# Review of EOP-006-2—System Restoration Coordination (Deferred/Filing 2)

http://www.nerc.com/files/EOP-006-2.pdf

### VRFs for Requirements R6 and R9:

Standard, Requirement	Requirement Language	VRF Assignment	Original Guideline-	Comments
			Based Explanation for	
			Assignment ( <u>from P.</u>	
			29 of December 31,	
			<u>2009 filing</u> )	
EOP-006-2, R6	Each Reliability Coordinator	<del>Lower</del> Medium	A lower VRF was given	FERC cited a possible
	shall have a copy of its latest		to Requirements R2	inconsistency with
	restoration plan and copies		and R6 because these	Guideline 4, stating that the
	of the latest approved		requirements are	requirement is arguably not
	restoration plan of each		primarily	purely administrative.
	Transmission Operator in its		administrative in	
	Reliability Coordinator Area		nature.	While NERC staff does
	within its primary and			believe the requirement
	backup control rooms so			addresses a task that is, in
	that it is available to all of			and of itself, administrative,
	its System Operators prior			it recognizes that the
	to the implementation date.			implications could be more
				than administrative.
				Accordingly, NERC staff
				proposes changing the VRF
				to Medium.
EOP-006-2, R9	Each Reliability Coordinator	Medium	A medium VRF was	FERC cited a Guideline 1
	shall include within its		assigned to	issue, stating that the
	operations training		Requirements R3, R4,	requirement might need a
	program, annual System		R5, R9 and R10 on the	higher VRF because it deals
	restoration training for its		basis that these items	with topics cited in the Final
	System Operators to assure		were not considered as	Blackout Report and, thus,
	the proper execution of its		directly leading to BPS	could directly contribute to

restoration plan. This	instabilit	ry. BPS instability.
training program shall		
address the following:		NERC staff continues to
		support the drafting team's
<b>R9.1.</b> The coordination re	ole	Medium VRF assignment.
of the Reliability		Failure to provide training,
Coordinator.		while important, would not
		directly lead to instability,
<b>R9.2.</b> Reestablishing the		etc. NERC staff believes the
Interconnection.		VRF assignment should
		remain a Medium.

## VSLs for Requirements R6:

Standard,	Requirement	Lower	Moderate	High	Severe	Comments
Requirement	Language					
EOP-006-2, R6	Each Reliability	The Reliability	The Reliability	The Reliability	The Reliability	Citing a Guideline
	Coordinator shall	Coordinator did	Coordinator did	Coordinator did	Coordinator did	2 concern, FERC
	have a copy of its	not make its latest	not make its latest	not make its latest	not	pointed out that
	latest restoration	restoration plan	restoration plan	restoration plan	make its latest	EOP-006-2, R6 is
	plan and copies of	and the latest	and	and the latest	restoration plan	similar to EOP-
	the latest	approved	the latest	approved	and	005-2, R5, which
	approved	restoration plan	<del>approved</del>	restoration plan	the latest	has a binary VSL.
	restoration plan	<del>of each</del>	restoration plan	<del>of each</del>	<del>approved</del>	They encouraged
	of each	<b>Transmission</b>	<del>of each</del>	<b>Transmission</b>	restoration plan	staff to consider a
	Transmission	Operator in its	<del>Transmission</del>	Operator in its	<del>of each</del>	similar binary set-
	Operator in its	Reliability	Operator in its	Reliability	<del>Transmission</del>	up.
	Reliability	Coordinator Area	Reliability	Coordinator Area	Operator in its	
	Coordinator Area	available to all of	Coordinator Area	available to all of	Reliability	NERC staff agreed
	within its primary	<del>its System</del>	available to all of	<del>its System</del>	Coordinator Area	with FERC that the
	and backup	Operators in its	<del>its System</del>	Operators in its	available to all of	intervals in the
	control rooms so	primary and	Operators in its	<del>primary and</del>	<del>its System</del>	VSLs were not
	that it is available	<del>backup control</del>	<del>primary and</del>	<del>backup control</del>	Operators in its	appropriate, but

to all of its Sy	rstem rooms prior to the	<del>backup control</del>	rooms within 25	<del>primary and</del>	believes that
Operators pri	ior to implementation	rooms within 20	<del>calendar days of</del>	<del>backup control</del>	there still is some
the	date within 15	calendar days of	the	rooms for more	opportunity for
implementat	ion <del>calendar days of</del>	the	implementation	than 25	gradation and has
date.	the	implementation	<del>date.</del>	<del>calendar days</del>	redlined the VSLs
	implementation	<del>date.</del>		<del>after its</del>	accordingly.
	<del>date.</del>		The Reliability	implementation	
			Coordinator did	<del>date.</del>	
			not have a copy of		
			the latest	The Reliability	
			approved	Coordinator did	
			restoration plan	not have a copy of	
			of all Transmission	its latest	
			Operators in its	restoration plan	
			<u>Reliability</u>	within its primary	
			Coordinator Area	and backup	
			within its primary	control rooms	
			and backup	prior to the	
			control rooms	implementation	
			prior to the	date.	
			implementation		
			<u>date.</u>		

#### Original Guideline Explanation for R6 VSLs in <a href="December 1">December 1</a>, <a href="2010 VSL Filing 2">2010 VSL Filing 2</a>:

No changes in VSLs from the previously filed version of the standard.

- Guideline 1: P. 881-882 of Guideline 1 Analysis in March 5, 2012 VSL Filing 1
- Guideline 2: N/A (was blank in filing need to look into this)
- Guideline 3: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.

• Guideline 4: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time

### **VSLs for Requirements R7:**

Standard,	Requirement	Lower	Moderate	High	Severe	Comments
Requirement	Language					
EOP-006-2, R7	Each Reliability	N/A	N/A	N/A	The Reliability	FERC asked what
	Coordinator shall				Coordinator did	would happen if
	work with its				not	the RC did not
	affected				work with its	utilize its
	Generator				affected	restoration plan
	Operators, and				Generator	strategy as
	Transmission				Operators and	described at the
	Operators as well				Transmission	end of R7. In
	as neighboring				Operators as well	other words, the
	Reliability				as neighboring	last sentence of
	Coordinators to				Reliability	the requirement is
	monitor				Coordinators to	not accounted for
	restoration				monitor	in the VSLs.
	progress,				restoration	
	coordinate				progress,	NERC staff agreed
	restoration, and				coordinate	with FERC staff
	take actions to				restoration, and	and incorporated
	restore the BES				take actions to	the last sentence
	frequency within				restore the BES	of the
	acceptable				frequency within	requirement into
	operating limits. If				acceptable	the VSLs.
	the restoration				operating limits.	
	plan cannot be					
	completed as				<u>OR</u>	
	expected the					
	Reliability				When the	
	Coordinator shall				restoration plan	

utilize its		cannot be
restoration plan		completed as
strategies to		expected, the
facilitate System		Reliability
restoration.		Coordinator did
		not utilize its
		restoration plan
		strategies to
		facilitate System
		restoration.

#### Original Guideline Explanation for R7 VSLs in <a href="December 1">December 1</a>, <a href="2010 VSL Filing 2">2010 VSL Filing 2</a>:

No changes in VSLs from the previously filed version of the standard.

- Guideline 1: P. 881-882 of Guideline 1 Analysis in March 5, 2012 VSL Filing 1
- Guideline 2: The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as written, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- Guideline 3: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- Guideline 4: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

## VSLs for Requirements R8:

Standard,	Requirement	Lower	Moderate	High	Severe	Comments
Requirement	Language					
EOP-006-2, R8	The Reliability	N/A	N/A	N/A	The Reliability	As in R7, FERC
	Coordinator shall				Coordinator did	staff pointed out
	coordinate or				not coordinate or	that the second
	authorize				authorize	sentence of the
	resynchronizing				resynchronizing	VSL is not
	islanded areas				islanded areas	accounted for in
	that bridge				that bridge	the VSL
	boundaries				boundaries	assignments.
	between				between	
	Transmission				Transmission	NERC staff agreed
	Operators or				Operators or	with FERC staff
	Reliability				Reliability	and incorporated
	Coordinators. If				Coordinators.	the last sentence
	the					of the
	resynchronization				<u>OR</u>	requirement into
	cannot be					the VSLs.
	completed as				<u>If the</u>	
	expected the				resynchronization	
	Reliability				could not be	
	Coordinator shall				completed as	
	utilize its				expected, the	
	restoration plan				<u>Reliability</u>	
	strategies to				Coordinator did	
	facilitate				not utilize its	
	resynchronization.				restoration plan	
					strategies to	
					<u>facilitate</u>	
					resynchronization.	

#### Original Guideline Explanation for R8 VSLs in <a href="December 1">December 1</a>, <a href="2010 VSL Filing 2">2010 VSL Filing 2</a>:

The VSLs were modified from the previously filed version 2 of the standard to be consistent with Guideline 2.

- Guideline 1: P. 881-882 of Guideline 1 Analysis in March 5, 2012 VSL Filing 1
- Guideline 2: The VSLs were modified to be consistent with FERC Guideline 2b. Additionally, NERC has reviewed the VSL text and has determined that, as originally written, the VSL could have been misinterpreted to require the Reliability Coordinator to authorize resynchronizing, while the intent of the requirement is to require the Reliability Coordinator to determine when resynchronizing should occur. The VSL was modified to correct this potential misinterpretation. As modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- Guideline 3: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- Guideline 4: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

#### **VSLs for Requirements R9:**

Standard,	Requirement	Lower	Moderate	High	Severe	Comments
Requirement	Language					
EOP-006-2, R9	Each Reliability	N/A	N/A	The Reliability	The Reliability	Citing a Guideline
	Coordinator shall			Coordinator	Coordinator	1 issue, FERC staff
	include within its			included the	supplied annual	was concerned
	operations			annual System	System	that a two-year
	training program,			restoration	restoration	timeline was not
	annual System			-training within its	training but did	appropriate
	restoration			<u>operations</u>	not address both	because the
	training for its			training program,	of the sub-	requirement talks
	System Operators			but did not	requirements.	about an annual
	to assure the			address both of		plan.

proper exe	ecution	the sub-	<del>OR</del>	
of its resto	oration	requirements.		NERC staff agreed
plan. This	training	<del>N/A</del>	The Reliability	that the VSLs
program s	hall		Coordinator	should be focused
address th	e		supplied did not	on the "annual"
following:			include the	aspect, and
			requiredannual	modified them to
<b>R9.1.</b> The			System	better match the
coordinati	on role		restoration	requirement
of the Reli	ability		training within its	language.
Coordinate	or.		<u>operations</u>	
R9.2.			training program.	
Reestablis	hing the		<del>but it was over</del>	
Interconne	ection.		<del>two calendar</del>	
			years from the	
			last training	
			offered.	

#### Original Guideline Explanation for R9 VSLs in <a href="December 1">December 1</a>, <a href="2010 VSL Filing 2">2010 VSL Filing 2</a>:

In accordance with Guidelines 2 and 3, the VSLs were modified from the previously filed version 2 of the standard for clarity and consistency with other standards and VSLs and the language in the requirement.

- Guideline 1: P. 881-882 of Guideline 1 Analysis in March 5, 2012 VSL Filing 1
- Guideline 2: NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or
  format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying
  Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed
  to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement
  Authority.
- Guideline 3: The VSLs were modified to be consistent with FERC Guideline 3. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.

• Guideline 4: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.