

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# EOP-008-1 – Loss of Control Center Functionality

***This section must be completed by the Compliance Enforcement Authority.***

**Registered Entity:**

**NCR Number:**

**Applicable Function(s):** BA, RC, TOP

**Compliance Assessment Date:**

**Compliance Monitoring Method:**

**Names of Auditors:**

# **Subject Matter Experts**

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

**Registered Entity Response (Required):**

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| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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# **R1 Supporting Evidence and Documentation**

**R1.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include the following, at a minimum:

1. The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality.
2. A summary description of the elements required to support the backup functionality. These elements shall include, at a minimum:
   1. Tools and applications to ensure that System Operators have situational awareness of the BES.
   2. Data communications.
   3. Voice communications.
   4. Power source(s).
   5. Physical and cyber security.
3. An Operating Process for keeping the backup functionality consistent with the primary control center.
4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.
5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.
6. An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include at a minimum:
7. A list of all entities to notify when there is a change in operating locations.
8. Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary or backup functionality.
9. Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R1**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify that the Operating Plans for backup functionality specifically address each one of the following elements at a minimum: |
|  | The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality. |
|  | A summary description of the elements required to support the backup functionality. These elements shall include, at a minimum: |
|  | Tools and applications to ensure that System Operators have situational awareness of the BES. |
|  | Data communications. |
|  | Voice communications. |
|  | Power source(s). |
|  | Physical and cyber security. |
|  | Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality. |
|  | Verify the transition period between the loss of primary control center functionality and the time to fully implement the backup functionality is less than or equal to two hours. |
|  | An Operating Process that includes at a minimum: |
|  | Keeping the backup functionality consistent with the primary control center. |
|  | Describes the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. |
|  | A list of all entities to notify when there is a change in operating locations. |
|  | Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary or backup functionality. |
|  | Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality. |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **R2 Supporting Evidence and Documentation**

**R2.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have acopy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R2**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify that a current set of the entities backup functionality Operating Plan is available at both the primary control center and the backup facility location. |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **R3 Supporting Evidence and Documentation**

**R3.** Each Reliability Coordinator shall have a backup control center facility (provided through itsown dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:

* Planned outages of the primary or backup facilities of two weeks or less
* Unplanned outages of the primary or backup facilities

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R3**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify that the entity has a backup control center (of its own, or at another entity’s control center). |
|  | Verify the backup control center is staffed by Reliability Coordinator certified operators when control has been transferred to the backup center. |
|  | Verify the backup facility provides the same functionality to maintain compliance with the Reliability Standards as the primary control center. |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **R4 Supporting Evidence and Documentation**

**R4.** Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator’s primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during

* Planned outages of the primary or backup functionality of two weeks or less
* Unplanned outages of the primary or backup functionality

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R4**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify the entity’s backup control center contains the functionality as listed below sufficient for maintaining compliance with all Reliability Standards that depend on primary control center functionality for reliability of the BES: |
|  | Monitoring. |
|  | Control. |
|  | Logging. |
|  | Alarming. |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **R5 Supporting Evidence and Documentation**

**R5.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annuallyreview and approve its Operating Plan for backup functionality.

**5.1.** An update and approval of the Operating Plan for backup functionality shall takeplace within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R5**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify the entity provided evidence that it reviewed, updated, and approved its backup functionality Operating Plan on an annual basis. |
|  | Verify that any updates and approvals of the Operating Plan took place within sixty days of any changes to the Plan as described in R1. |
| **Note to Auditor:** Requirement for an annual review of the Operating Plan includes the calendar year 2013. | |

**Auditor Notes:**

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# **R6 Supporting Evidence and Documentation**

**R6.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall haveprimary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R6**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify that the primary and backup control center do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **R7 Supporting Evidence and Documentation**

**R7.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conductand document results of an annual test of its Operating Plan that demonstrates:

1. The transition time between the simulated loss of primary control center functionality and the time to fully implement the backup functionality.
2. The backup functionality for a minimum of two continuous hours.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R7**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Verify the entity conducted an annual test of its Operating Plan and documented the results. |
|  | Verify the transition time was documented to identify the time from loss of functionality of the primary system and the time that the backup was fully functional. |
|  | Verify the backup facility was operated for a minimum of two continuous hours during the test. |
| **Note to Auditor:** Initially, entities will have until December 31, 2014 to conduct this test. | |

**Auditor Notes:**

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# **R8 Supporting Evidence and Documentation**

**R8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.

**Question:** Has the Registered Entity experienced a loss of primary or backup control center functionality and anticipated this loss will last for more than six calendar months? If yes, provide evidence of compliance.

**Registered Entity Response** **(Required):**

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-008-1, R8**

**(This section must be completed by the Compliance Enforcement Authority)**

Review the evidence to verify the Registered Entity has:

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|  | Responded to the applicability Question and provided evidence of compliance if the response was yes. |
|  | Verify the entity provided evidence to the Regional Entity of a plan detailing how it will re-establish primary or backup functionality within six calendar months of the date functionality is lost, for a loss of functionality anticipated to be six months or more. |
| **Note to Auditor:** | |

**Auditor Notes:**

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# **Compliance Finding Summary**

**(This section must be completed by the Compliance Enforcement Authority)**

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
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# **Additional Information:**

**Reliability Standard**

1. Introduction
2. **Title: Loss of Control Center Functionality**
3. **Number: EOP-008-1**
4. **Purpose:** Ensure continued reliable operations of the Bulk Electric System (BES) in the event that a control center becomes inoperable.
5. **Applicability:**
   1. **Functional Entity** 
      1. Reliability Coordinator.
      2. Transmission Operator.
      3. Balancing Authority.
6. **Effective Date:** The first day of the first calendar quarter twenty-four months after applicable regulatory approval. In those jurisdictions where no regulatory approval is required, the standard shall become effective on the first day of the first calendar quarter twenty-four months after Board of Trustees adoption.
7. Requirements
8. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include the following, at a minimum: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]* 
   1. The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality.
   2. A summary description of the elements required to support the backup functionality. These elements shall include, at a minimum:
      1. Tools and applications to ensure that System Operators have situational awareness of the BES.
      2. Data communications.
      3. Voice communications.
      4. Power source(s).
      5. Physical and cyber security.
   3. An Operating Process for keeping the backup functionality consistent with the primary control center.
   4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.
   5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.
   6. An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include at a minimum:
      1. A list of all entities to notify when there is a change in operating locations.
      2. Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary or backup functionality.
      3. Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality.
9. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality. *[Violation Risk Factor = Lower] [Time Horizon = Operations Planning]*
10. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

* Planned outages of the primary or backup facilities of two weeks or less
* Unplanned outages of the primary or backup facilities

1. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator’s primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

* Planned outages of the primary or backup functionality of two weeks or less
* Unplanned outages of the primary or backup functionality

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annually review and approve its Operating Plan for backup functionality. *[Violation Risk Factor = Lower] [Time Horizon = Operations Planning]*
   1. An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1.
2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
3. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conduct and document results of an annual test of its Operating Plan that demonstrates: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
   1. The transition time between the simulated loss of primary control center functionality and the time to fully implement the backup functionality.
   2. The backup functionality for a minimum of two continuous hours.
4. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
5. Measures

**M1**. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format.

**M2.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, available at its primary control center and at the location providing backup functionality.

**M3.** Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality in accordance with Requirement R3.

**M4.** Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority or Transmission Operator’s primary control center functionality respectively in accordance with Requirement R4.

**M5.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall have evidence that its dated, current, in force Operating Plan for backup functionality, in electronic or hardcopy format, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Requirement R5.

**M6.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Requirement R6.

**M7.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual test of its Operating Plan for backup functionality, in accordance with Requirement R7.

**M8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide evidence that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Requirement R8.

1. Compliance
2. **Compliance Monitoring Process** 
   1. **Compliance Enforcement Authority**

Regional Entity.

* 1. **Compliance Monitoring and Enforcement Processes:**

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints

* 1. **Data Retention**

The Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain data or evidence to show compliance as identified unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

* Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in force Operating Plan for backup functionality plus all issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.
* Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain a dated, current, in force copy of its Operating Plan for backup functionality, with evidence of its last issue, available at its primary control center and at the location providing backup functionality, for the current year, in accordance with Measurement M2.
* Each Reliability Coordinator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) in accordance with Requirement R3 that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality in accordance with Measurement M3.
* Each Balancing Authority and Transmission Operator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it’s backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) in accordance with Requirement R4 includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator’s primary control center functionality respectively in accordance with Measurement M4.
* Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall retain evidence for the time period since its last compliance audit, that its dated, current, in force Operating Plan for backup functionality, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Measurement M5.
* Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain dated evidence for the current year and for any Operating Plan for backup functionality in force since its last compliance audit, that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Measurement M6.
* Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the current year and one previous year, such as dated records, that it has tested its Operating Plan for backup functionality, in accordance with Measurement M7.
* Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality would last for more than six calendar months shall retain evidence for the current in force document and any such documents in force since its last compliance audit that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Measurement M8.
  1. **Additional Compliance Information**

None.

**Regulatory Language**

*North American Electric Reliability Corporation*, 135 FERC ¶ 61,040 (2011) (“Order Approving EOP-008-1”).

At P. 11-15

11. The Commission approves Reliability Standard EOP-008-1as just, reasonable, not unduly discriminatory or preferential and in the public interest. By providing detailed requirements for what must be included in a plan to meet functional obligations in the event a primary control center is lost, by now requiring formal, annual approval of such plans, and by specifically requiring reliability coordinators to have backup facilities and transmission operators and balancing authorities to have backup functionality, EOP-008-1represents a significant improvement to the currently effective Reliability Standard. The revised Standard addresses the relevant directives in Order No. 693 and specifically requires, among other things, independent backup capabilities, capable of operating for a prolonged period, and providing functionality sufficient to maintain compliance with all Reliability Standards that depend on primary control functionality.

12. Reliability Standard requires that all applicable entities have backup functionality. Reliability coordinators in particular must have full backup control centers while balancing authorities and transmission operators may elect to attain backup functionality either by a dedicated facility or by contracted service. This distinction recognizes the comparative difference in the scope of responsibility for a reliability coordinator versus a balancing authority or transmission operator, and the Standard satisfies the Commission directives in this regard.

13. Additionally, we note that Requirement R1 (section 1.5) permits a transition time between the loss of the primary control center and full implementation of backup functionality of up to two hours. NERC states that, in the standards development process, some stakeholders commented that the two hour transition period was too long, others considered it too short, and some argued that the timeframe seemed to weaken the current requirement. According to NERC, the standards drafting team “attempted to develop a reasonable number that would allow for a backup control center to be placed sufficiently far away so that the chances of a single catastrophe affecting both sites were minimal, versus having it so far away that there may be a serious gap in reliability during the intervening time before the backup is operational.”

14. The Commission is concerned that the two hour transition period may expose the grid to increased reliability risk without control functionality. For this reason it is imperative that full backup functionality occur as soon as possible after the loss of primary control functionality. Nonetheless, until data from drills, exercises and tests can support a specific time period, the Commission approves the Reliability Standard but notes it may revisit this transition timeframe once the applicable entities have developed experience operating under this new Standard.

15. Accordingly, the Commission approves Reliability Standard EOP-008-1, effective the first day of the first calendar quarter twenty-four months after Commission approval. Further, as requested by NERC, we approve the retirement of currently effective Reliability Standard EOP-008-0 concurrent with the implementation date of EOP-008-1.

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 08/02/2012 | RSAW Working Group | New Document |
| 1.1 | 10/05/2012 | NERC Legal | Regulatory Language Update |
| 1.2 | 06/28/2013 | RSAW Working Group | Edits to timing of periodic requirements in R5 and R7 |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website at <http://www.nerc.com/page.php?cid=2|20>. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)