

Unofficial Comment Form for Project 2009-03 Emergency Operations SAR

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the proposed Emergency Operations SAR. Comments must be submitted by **January 15, 2010**. If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803.530.1963

http://www.nerc.com/filez/standards/Project2009-03_Emergency_Operations.html

Background Information:

The SAR for Project 2009-03 Emergency Operations Project proposes modifications to the following standards:

- EOP-001-0 — Emergency Operations Planning
- EOP-002-2 — Capacity and Energy Emergencies
- EOP-003-1 — Load Shedding Plans
- IRO-001-1 — Reliability Coordination — Responsibilities and Authorities

Many of the requirements in this set of standards were translated from Operating Policies as part of the Version 0 process; suggestions for improvement have been submitted by stakeholders, other drafting teams, and FERC staff. The drafting team will consider these comments throughout its review of the standards. Options for the proposed changes include:

- Modify the requirement to improve its clarity and measurability while removing ambiguity,
- Move the requirement (into another SAR or Standard or to the certification process)
- Eliminate the requirement (either because it is redundant or because it doesn't support bulk power system reliability).

The standards do not meet some of NERC's quality objectives for reliability standards, and do not meet some of the factors FERC uses to determine whether to approve a standard as identified in FERC Order 672. The SAR proposes making modifications to bring the standards into conformance with these objectives and criteria.

The SAR proposes that the drafting team review the applicability of these standards and recommend modifications to align the applicability with the Functional Model. For example, in EOP-001, there Requirement R3.2 assigns both the Transmission Operator and the Balancing Authority the responsibility for having plans to mitigate operating emergencies on the transmission system – however the Balancing Authority isn't required to have the capability of monitoring and controlling the transmission system.

The SAR proposes adding clarity to the requirements where needed. For example, EOP-001, Requirement R1 includes a reference to "remote Balancing Authorities" – and some entities have indicated that the expectation for performance is not clear enough.

NERC has an obligation to address FERC's directives. It is the intent to identify all the applicable FERC directives in the SAR. There are several directives associated with load shedding – involving setting minimum load shedding criteria, requiring drills of simulated load shedding. Other stakeholders also indicated that more details are needed in requirements associated with load shedding.

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The Real-time Best Practices team suggested that additional requirements should be added to require entities to have documented plans for conservative operations.

These are just some of the proposed modifications. Please review the SAR in its entirety and then answer the following questions by using the electronic comment form.

1. Do you agree that either there is a reliability-related need for the proposed standards action?

Yes

No

Comments:

2. Do you agree with the scope of the proposed standards action?

Yes

No

Comments:

3. Do you agree with the list of entities includes all those functional entities that may have one or more requirements assigned to them as part of this project? If not, please state specific reasons why not.

Yes

No

Comments:

4. If you are aware of the need for a regional variance or business practice that we should consider with this SAR, please identify it here.

Regional Variance: N/A

Business Practice: N/A

Comments: N/A

5. If you have any other comments on this SAR that you have not already provided in response to the prior questions, please provide them here. Note that any comments recommending specific changes to the standards will be forwarded to the standard drafting team and will not be addressed by the SAR drafting team.

Comments: N/A