

Summary of Changes EOP-011-1

Project 2009-03 – Emergency Operations

Changes made to proposed EOP-011-1: After careful review, discussion and consideration of comments received by industry stakeholders, the standards drafting team responsible for this project (EOP SDT) made conforming changes to proposed EOP-011-1. The changes drafted in EOP-011-1, through agreement of the EOP SDT on stakeholder comments received, provide additional clarity, consistency and better alignment with the EOP SDT's intent of EOP-011-1.

Throughout the entire proposed standard, where "Operating Plan" was written, the EOP SDT revised "Plan" to read as: "Plan(s)" to indicate that there can be one or multiple Operating Plan(s).

Standard Requirement changes

Requirement R1: "Each Transmission Operator shall develop, maintain, and implement **a one or more** Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include the following, as applicable:"

Requirement R1, Part 1.2.1.: Notification to the Reliability Coordinator..." was changed to: "1.2.1. Notification to **its** Reliability Coordinator..."

Rationale for R1: The third paragraph in the rationale box for Requirement R1 was revised to read as: "Notification to **its** Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency" was retained. This is a process in the plan(s) that determines **when the Transmission Operator must notify its** Reliability Coordinator."

A fourth paragraph was added to the rationale box to maintain consistency with Requirement R2 rationale box and reads: "**An Operating Plan(s) is implemented by carrying out its stated actions.**"

The fifth paragraph was expanded to provide additional clarity: "If any Parts of Requirement R1 are not applicable, the Transmission Operator should note "not applicable" in the Operating Plan(s). **The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).**"

Requirement R2: "...within its Balancing Authority Area" was added to Requirement R2 and the revision reads as: "Each Balancing Authority shall develop, maintain, and implement **a one or more** Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies **within its Balancing Authority Area**. The Operating Plan(s) shall include the following, as applicable:"

Requirement R2, Part 2.2.1.: “Notification to the Reliability Coordinator...” was revised to read as: “Notification to **its** Reliability Coordinator...”

Rationale for R2: The fourth paragraph was expanded to provide additional clarity: “If any Parts of Requirement R1 are not applicable, the Balancing Authority should note “not applicable” in the Operating Plan(s). **The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).**”

Requirement R3: “...within 30 calendar days of receipt...” was removed from Requirement R3 and added to Requirement R3, Part 3.1.: “...**Within 30 calendar days of receipt**, the Reliability Coordinator shall:”

Requirement R3, Part 3.1.3.: Revision to Requirement R3, Part 3.1.3. reads as: “Notify each Balancing Authority and Transmission Operator of the results **of its review, specifying any time frame for resubmittal of its Operating Plan(s) if revisions are identified.**”

Rationale for R3: In the last line of the second sentence in the rationale box, the word “emergencies” was revised with capitalization of the word “**E**mergencies,” as this is NERC glossary defined term.

Requirement R5 and Measure M5: “...within in Reliability Coordinator Area...” was added to Requirement R5 to read as: “Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority **within its Reliability Coordinator Area...**”

Compliance Section 1.3, Compliance Monitoring and Assessment Processes: Compliance Section 1.3 was revised to read as: “**As defined in the NERC Rules of Procedure; “Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.**”

Table of Compliance Elements: The Table of Compliance Elements was updated to reflect changes made to the Requirements of EOP-011-1.

Attachment 1:

Introduction: In the Introduction section of Attachment 1, the Rationale Box title was added to read as: “**Rationale for Introduction.**” Additionally, in the first sentence in the Rationale for Introduction box, “...as permitted in its transmission tariff...” was added to read as: “...change the priority of a service request **as permitted in its transmission tariff...**”

2. Notification: The word “adjacent” was changed to “neighboring” to read as: “...shall also notify all neighboring Reliability Coordinators.

2.2 Declaration period: The word “impacted” was changed to “neighboring” to read as: “...and pass this information on to the neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators.”

2.3 Sharing information on resource availability: The word “other” was added to read as: “Other Reliability Coordinators of Balancing Authorities...”

2.4 Evaluating and mitigating Transmission limitations: The EOP SDT added “(s)” behind Transmission Operator and added the language “to service” to read as: “The Reliability Coordinator shall review Transmission outages and work with the Transmission Operator(s) to see if it’s possible to return to service any Transmission Elements...”

Rationale for EEA 2: A capitalization correction was made from: “Contingency reserves” to “Contingency Reserves.”

3.2 Declaration Period: The EOP SDT added the language “energy deficient” and changed the word “impacted” to “neighboring” to read as: “The energy deficient Balancing Authority...” and “...pass this information on to the neighboring Reliability Coordinators, Balancing Authorities, and Transmission Operators.”

3.3 Reevaluating and revising SOLs and IROLs: “Transmission Operator” was revised to “Transmission Owner” to read as: “...or as allowed by the Transmission Owner...”

3.4.1. Notification of other parties: The word “impacted” was revised to “neighboring” to read as: “...shall notify neighboring Reliability Coordinators...”

Rationale for EEA 3: A rationale box was added for EEA 3 to provide additional clarity of the EOP SDT’s intent of EEA 3 – Firm Load interruption is imminent or in progress. The language of the rationale box reads as:

“Rationale for EEA 3:

This rationale was added at the request of stakeholders asking for justification for moving a lack of Contingency Reserves into the EEA3 category.

The previous language in EOP-002-3.1, EEA 2 used “Operating Reserve,” which is an all-inclusive term, including all reserves (including Contingency Reserves). Many Operating Reserves are used continuously, every hour of every day. Total Operating Reserve requirements are kind of nebulous since they do not have a specific hard minimum value. Contingency Reserves are used far less frequently. Because of the confusion over this issue, evidenced by the comments received, the drafting

team thought that using minimum Contingency Reserve in the language would eliminate some of the confusion. This is a different approach but the drafting team believes this is a good approach and was supported by several commenters.

Using Contingency Reserves (which is a subset of Operating Reserves) puts a BA closer to the operating edge. The drafting team felt that the point where a BA can no longer maintain this important Contingency Reserves margin is a most serious condition and puts the BA into a position where they are very close to shedding Load (“imminent or in progress”). The drafting team felt that this warrants categorization at the highest level of EEA.”

Alert 0 – Termination:

0.1 Notification: The word “impacted” was changed to “neighboring” to read as: “...also notify the neighboring Balancing Authorities and Transmission Operators.”