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Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted: October 15, 2009	
Date accepted: November 30, 2009	
Contact information for person requesting the interpretation:	
Name:	Thomas E Washburn
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Identify the standard that needs clarification:	
Standard Number (include version number):	EOP-001-1 and EOP-001-2
Standard Title:	Emergency Operations Planning
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement: R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system. **Clarification needed:** According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans. Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?	
Identify the material impact associated with this interpretation:	
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.	

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Project 2009-28: Response to Request for an Interpretation of EOP-001-1 and EOP-001-2, Requirement R2.2, for Florida Municipal Power Pool
The following interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, was developed by the Project 2006-03 (System Restoration and Blackstart) drafting team.
Requirement Number and Text of Requirement
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
Question
Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?
Response[1]
The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and agreements with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in "Attachment 1 –EOP-001-0."

[1] At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the Unites States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.