

## Consideration of Issues and Directives

### Project 2015-08 Emergency Operations

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Issue or Directive	Source	Consideration of Issue or Directive
<p>Order no. 749:</p> <p><i>"[N]ERC, in its comments about the term [unique tasks], states that it 'could promote the development of a guideline to aid registered entities in complying with Requirement R11.' The Commission notes that this Reliability Standard will not become effective for at least 24 months, during which time ambiguities in language or differences of opinion among affected entities may be resolved in practical ways. Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations."</i></p>	<p>FERC Order Number 749</p>	<p>The Project 2015-02 Emergency Operations Periodic Review Team (EOP PRT), as well as the Project 2015-08 Emergency Operations Standards Drafting Team (EOP SDT) determined (through conducted outreach and comment questions/responses during postings of periodic review templates, the project SAR, and project postings) that industry does not find ambiguity with the term "unique tasks." The industry understands "unique tasks" to be those tasks that are defined by the Transmission Operator (TOP), Transmission Owner (TO), and the Distribution Provider (DP).</p> <p>A rationale box was added to EOP-005-3, Requirement R9 to clarify "unique tasks."</p> <p><b>Rationale:</b> The intent of "unique tasks" are those tasks that are defined by the Transmission Operator, the Transmission Owner, and the Distribution Provider.</p>
<p><b>Clarify when system changes will trigger a requirement to update restoration plans.</b></p> <p>The joint staff review team recommends that measures be taken (including considering changes to the Reliability Standards) to address the need for updating restoration</p>	<p>FERC-NERC-Regional Entity Joint Review of Restoration</p>	<p>The Project 2015-08 EOP SDT revised EOP-005-3, Requirement R4 and the requirement parts. The references to unplanned permanent and planned permanent BES modifications that will change the ability to implement the Reliability Coordinator (RC)-approved restoration plan are intended to require a TOP to</p>

Project 2015-08 Emergency Operations

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<p>plans for all system modifications that would change the implementation of an entity’s restoration plan for an extended period of time, not just permanent or planned system modifications. In considering these measures, the kinds of events that may warrant an update to the system restoration plan should be identified, taking into account the length of time the system is affected, as well as the overall objective of ensuring that restoration plans are generally flexible enough so that system modifications can be addressed without continuous updates.</p>	<p>and Recovery Plans. <b>Section IV.E</b></p>	<p>update and submit a restoration plan to the RC when the modification would substantively change the TOP’s ability to implement the restoration plan or impact the RC’s ability to monitor and direct restoration efforts. The intent is not to require a TOP to update and submit changes that do not substantively change the restoration plan, the TOP’s ability to implement the plan, or the RC’s ability to monitor and direct the restoration efforts.</p> <p>Examples of instances that do not require update and submission of a restoration plan include element number changes or device changes that have no significance to the implementation of the plan.</p>
<p><b>Verification/testing of modified restoration plan.</b> The joint staff review team recommends that measures be taken (including considering changes to the Reliability Standards) to address the need for re-verification of a system restoration plan when a system change precipitates the need to determine whether the plan’s restoration processes and procedures, when implemented, will operate reliably, i.e., when needed to ensure that the restoration plan, when implemented, allows for restoration of the system within acceptable operating voltage and frequency limits.<sup>6</sup> In considering such measures, the types of system changes that could impact reliable implementation of the restoration plan should be taken into account (e.g., identification of a new</p>	<p>FERC-NERC-Regional Entity Joint Review of Restoration and Recovery Plans. <b>Section IV.G</b></p>	<p>The EOP SDT discussed the recommendation to address the “...need for re-verification of a system restoration plan when a system change precipitates the need to determine whether the plan’s restoration processes and procedures, when implemented, will operate reliably...”</p> <p>The TOP performs detailed testing at least every five years to ensure that its restoration plan accomplishes its intended function (EOP-005, Requirement R6). In addition, the TOP 1) has to annually review its restoration plan and submit it to its RC for approval, 2) when there are revisions that would change the TOP’s ability to implement its restoration plan, these also have to be submitted to the RC for review, 3) include within its operations training program annual System restoration training</p>

Project 2015-08 Emergency Operations

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<p>blackstart generator location or on redefinition of a cranking path).</p>		<p>for its System Operators, and 4) participate in RC restoration drills, exercises or simulations (EOP-005, Requirements R3, R4, R8, and R10).</p> <p>The RC 1) has to review its restoration plan within 13 calendar months of the last review, 2) has to review its neighboring RC’s restoration plans and provide notice of any conflicts discovered, 3) has to review and approve/disapprove its TOP’s restoration plans, 4) provide annual System Restoration training for its System Operators, and 5) conduct two System Restoration drills, exercises or simulations per calendar year (EOP-006, Requirements R3, R4, R5, R7, and R8).</p> <p>The recommendation pointed to system changes that could impact the viability of the plan. When the RC reviews the TOP restoration plan for annual approval/disapproval, the RC is the only entity that has the wide-area view of the entire System, and the RC is the only entity that can effectively complete this approval. The EOP SDT believes that since the TOP and RC have to meet multiple requirements, that both entities are continually reviewing and testing the viability of their restoration plans; and, therefore, no changes were made in EOP-005 based on the recommendation.</p>
<p><b>Operator training: Exercises on transferring control back to the balancing authority.</b> The joint staff review team recommends that measures be taken (including considering changes to the Reliability Standards) to</p>	<p>FERC-NERC-Regional Entity Joint Review of</p>	<p>Since the Balancing Authority does not relinquish any BA authority to the TOP, language was revised in EOP-005-3, Requirement R1, Part 1.9 to the standard: “Processes for</p>

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address system restoration training and drilling for transitioning from transmission operator island control to balancing authority ACE/AGC7 control.	Restoration and Recovery Plans. <b>Section IV.H.</b>	transferring <u>operations authority</u> back to the Balancing Authority in accordance with the Reliability Coordinator's criteria."