

Comments Received

Project Name: 2015-02 EOP Periodic Review | EOP-006-2

Comment Period Start Date: 3/27/2015

Comment Period End Date: 5/11/2015

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Segment(s)
Ben Engelby	ACES Power Marketing	6		ACES Standards Collaborators - EOP Project	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
					John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
					Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	3,5
					Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5

					Kevin Lyons	Central Iowa Power Cooperative	MRO	1
					Ginger Mercier	Prairie Power, Inc.	SERC	3
					Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
					Bill Hutchison	Southern Illinois Power Cooperative	SERC	1,5
					Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Kaleb Brimhall	Colorado Springs Utilities	5		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	WECC	1
					Charlie Morgan			3
					Shannon Fair			6
					Kaleb Brimhall			5
Connie Lowe	Dominion - Dominion Resources, Inc.	3		Dominion Collective Group	Randi Heise	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Louis Slade	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Connie Lowe	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Chip Humphrey	Power Generation Compliance	SERC	5
					Nancy Ashberry	Power Generation Compliance	RFC	5

					Dan Goyne	Power Generation Compliance	SERC	5
					Jarad L Morton	Power Generation Compliance	NPCC	5
					Larry Nash	Electric Transmission Compliance	SERC	1,3
					Angela Park	Electric Transmission Compliance	SERC	1,3
					Candace L Marshall	Electric Transmission Compliance	SERC	1,3
					Larry Bateman	Electric Transmission Compliance	SERC	1,3
					Jeffrey N Bailey	Nuclear Compliance	SERC	5
					Tom Huber	Nuclear Compliance	NPCC	5
Ben Li	Independent Electricity System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
					Greg Campoli	NYISO	NPCC	2
					Ali Miremadi	CAISO	WECC	2
					Ben Li	IESO	NPCC	2
					Kathleen Goodman	ISO-NE	NPCC	2
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6

				Review Forum (NSRF)	Amy Casucelli	Xcel Energy	1,3,5,6
					Chuck Lawrence	American Transmission Company	1
					Chuck Wicklund	Otter Tail Power Company	1,3,5
					Dan Inman	Minnkota Power Cooperative, Inc	1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6
					Jodi Jenson	Western Area Power Administration	1,6
					Larry Heckert	Alliant Energy	4
					Mahmood Safi	Omaha Public Utility District	1,3,5,6
					Marie Knox	Midwest ISO Inc.	2
					Mike Brytowski	Great River Energy	1,3,5,6
					Randi Nyholm	Minnesota Power	1,5
					Scott Nickels	Rochester Public Utilities	4
					Terry Harbour	MidAmerican Energy Company	1,3,5,6
				Tom Breene	Wisconsin Public Service Corporation	3,4,5,6	

					Tony Eddleman	Nebraska Public Power District		1,3,5
Lee Pedowicz	NPCC	10	NPCC	NPCC Proj 2015-02 EOP-006-2	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland Utilities Inc.		3
					Greg Campoli	New York Independent System Operator		2
					Sylvain Clermont	Hydro-Quebec TransEnergie		1
					Kelly Dash	Consolidated Edison Co. of New York, Inc.		1
					Gerry Dunbar	Northeast Power Coordinating Council		10
					Kathleen Goodman	ISO - New England		2
					Mark Kenny	Northeast Utilities		1
					Helen Lainis	Independent Electricity System Operator		2
					Alan MacNaughton	New Brunswick Power Corporation		9

					Paul Malozewski	Hydro One Networks Inc.		1
					Bruce Metruck	New York Power Authority		6
					Lee Pedowicz	Northeast Power Coordinating Council		10
					Robert Pellegrini	The United Illuminating Company		1
					Si Truc Phan	Hydro-Quebec TransEnergie		1
					David Ramkalawan	Ontario Power Generation, Inc.		5
					Brian Robinson	Utility Services		8
					Wayne Sipperly	New York Power Authority		5
					Edward Bedder	Orange and Rockland Utilities Inc.		1
					Peter Yost	Consolidated Edison Co. of New York, Inc.		3
					Michael Jones	National Grid		1
					Brian Shanahan	National Grid		1
					Silvia Parada Mitchell	NextEra Energy, LLC		5
					Michael Forte	Consolidated Edison Co. of New York, Inc.		1

					Glen Smith	Entergy Services, Inc.		5
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.		8
					Connie Lowe	Dominion Resources Services, Inc.		5
					RuiDa Shu	Northeast Power Coordinating Council		10
Jason Smith	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool	SPP	2
					James Nail	City of Independence, Missouri	SPP	3,5
					Gary Cox	Southwest Power Administration	SPP	1
					Mike Kidwell	Empire District Electric Company	SPP	1,3,5
					Brandon Levander	Nebraska Public Power District	MRO	1,3,5
					Mahmood Safi	Omaha Public Power District	MRO	1,3,5
					Sing Tay	Oklahoma Gas and Electric Company	SPP	1,3,5,6

1. The EOP PRT's initial recommendation outlines three (3) clarifying revisions to EOP-006-2. Do you agree with the EOP PRT's recommended revisions? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT agrees the language provided for R1.5 creates a more precise expectation for the criteria and conditions in the Reliability Coordinators restoration plan and supports forwarding the recommendation to the future SDT for consideration.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT agrees the language provided for R10.1 creates a more precise expectation and supports forwarding the recommendation to the future SDT for consideration; any GOP identified in the plan should be included in drills.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The EOP PRT agrees a more precise expectation for the criteria and conditions in the Reliability Coordinators restoration plan, and supports forwarding a recommendation to the future SDT for consistency of “adjacent” and “neighboring.”

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

Response:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:**Response:**

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - NPCC - 10 - NPCC

Selected Answer:

No

Answer Comment:

Regarding Item a. on page 4--Suggest revising Part R1.5 to read:

R1.5 Criteria and conditions for reestablishing interconnections between Transmission Operators within its Reliability Coordinator Area, with adjacent electrically interconnected Transmission Operators in other Reliability Coordinator Areas, and with electrically adjacent Reliability Coordinators.

Item b.--Agree.

Item c.--Agree.

Response:

The EOP PRT agrees the language provided for R1.5 creates a more precise expectation for the criteria and conditions in the Reliability Coordinators restoration plan and supports forwarding the recommendation to the future SDT for consideration.

Likes:

0

Dislikes:

0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

No

Answer Comment:

Regarding Item a.--Suggest revising Part R1.5 to read:

R1.5 Criteria and conditions for reestablishing interconnections between Transmission Operators within its Reliability Coordinator Area, with adjacent electrically interconnected Transmission Operators in other Reliability Coordinator Areas, and with electrically adjacent Reliability Coordinators.

Item b.--Agree.

Item c.--Agree.

Response:

The EOP PRT agrees the language provided for R1.5 creates a more precise expectation for the criteria and conditions in the Reliability Coordinators restoration plan and supports forwarding the recommendation to the future SDT for consideration.

Likes:

0

Dislikes:

0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

No

Answer Comment:

We disagree with the PRT's recommendation to modify the requirements by adding "develop, maintain, and implement" instead of retiring requirements that meet Paragraph 81 criteria. This additional language will only complicate registered entities' compliance programs, when the simple

solution is to retire the administrative requirements.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes:

0

Dislikes:

0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

No

Answer Comment:

We disagree with revising R8 to include other aspects of the RC implementing their plan. The RC's role in the plan is to simply coordinate and direct actions. So the language in R8 is appropriate in that it clearly specifies the RC's additional role which is to review and approve interconnections of TOP areas or islands as appropriate.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes:

0

Dislikes:

0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

No

Answer Comment:

R1.2, R1.3 and R1.4: Agree with the PRT comments to retire R1.2, R1.3 and R1.4 as they are covered (loosely) by R1.5.

R1.5: agree with adding the term "adjacent" to identify which TOPs and RCs the requirement refers to.

R7: We are hesitant to agree with the PRT on broadening the language of the requirement. What is the reason behind removing the phrase 'work with its affected GOPs and TOPs to monitor restoration progress, coordinate

restoration and take actions to restore the BE frequency within acceptable limits?

R7 and R8: It is unclear where the PRT expects the words ‘develop, maintain and implement’ to fit in the requirement.

R10.1: Add ‘blackstart’ before the term Generator Operator so that the RC only need to formally request blackstart GOPs during its restoration training drills.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT agrees the language provided for R10.1 creates a more precise expectation and supports forwarding the recommendation to the future SDT for consideration; any GOP identified in the plan should be included in drills.

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: No

Answer Comment:

Texas RE does not agree with the retirement of Requirement R9. See number three.

Texas RE recommends consistent use of the terms “adjacent” and “neighboring” (R1.5, R1.8, and R2). The terms “Adjacent” and “neighboring”

do not imply synchronous which has been a discussion point in the past with Entities that have DC Ties. In the Texas RE/ERCOT Interconnection, restoration could include use of DC Ties.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The EOP PRT agrees a more precise expectation for the criteria and conditions in the Reliability Coordinators restoration plan, and supports forwarding a recommendation to the future SDT for consistency of “adjacent” and “neighboring.”

Likes:

0

Dislikes:

0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:**Response:**

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer: No

Answer Comment:

Tri-State doesn't believe that R1.9 is an unnecessary action. TOPs have the authority to balance resources during a restoration event, and there should be some acknowledgement of how to accomplish the transfer of balancing back to the BA function

Response:

The EOP PRT identified keeping this requirement due to the corresponding requirement in EOP-005-2, Requirement R1.9.

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

2. The EOP PRT is proposing not to retire three (3) requirements in EOP-006-2 per the Paragraph 81 criteria and has provided justification for not retiring the requirements that the IERP recommended retiring. Do you agree with the EOP PRT's recommendations? If not, please explain.

Summary:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which determines the necessity for personnel training under PER-005-1 Requirement R3.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for EOP-006, but will not suggest specific rewrites. The PRT believes all recommendations The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

CSU agrees with the recommendations of the IERP for retirement of these requirements. These requirements need to be retired

Response:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: No

Answer Comment:

I agree with IERP recommendations and reasons. Revise for consistency by using the already-approved industry terminology, "Develop, maintain and implement"

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

ERCOT agrees with the review team that Requirement R10 should not be retired. Please refer to ERCOT's comments in response to the review of EOP-005-2 as well as its response to Question 3 below for additional details. For the same reasons, ERCOT does not support the review team's recommendation to retire Requirement R9.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: No

Answer Comment:

ATC believes EOP-006-2 R10 should be retired as recommended by the IERP. Requirement R10 is not about testing the plan but drilling the

personnel on execution of the plan, therefore, is a training item as the IERP identified and should be captured in PER-005-1

Response:

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which determines the necessity for personnel training under PER-005-1 Requirement R3.

Likes:

0

Dislikes:

0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Lee Pedowicz - NPCC - 10 - NPCC

Selected Answer:

No

Answer Comment:

Requirement R8 can be retired. Resynchronization is inherent in any restoration plan.

Agree that Requirement R10 should not be retired.

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. The already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan."

- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): "Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to restore the BES frequency within acceptable limits."

- The EOP PRT recommended a modest revision to Part R1.5 (adding the work “adjacent”). While we agree with the concept of the suggested change to Part R1.5, suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement

R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in adjacent Reliability Coordinator Areas."

- A new part should be added to R1 (best to be placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part R1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement ("drill, exercise, or simulation"), which determines the necessity for personnel training under PER-005-1 Requirement R3.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for EOP-006, but will not suggest specific rewrites. The PRT believes all recommendations The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

Likes:

0

Dislikes:

0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

No

Answer Comment:

Requirement R8 can be retired. Resynchronization is inherent in any restoration plan.

Agree that Requirement R10 should not be retired.

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. The already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan."
- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): "Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and

take actions to restore the BES frequency within acceptable limits."

- The EOP PRT recommended a modest revision to Part 1.5 (adding the work "adjacent"). While we agree with the concept of the suggested change to Part R1.5, suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in other adjacent Reliability Coordinator Areas."
- A new part should be added to R1 (best to be placed as Part 1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for EOP-006, but will not suggest specific rewrites. The PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

Likes:

0

Dislikes:

0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

No

Answer Comment:

(1) We disagree with the PRT's recommendation to modify the requirements that have already been identified as meeting Paragraph 81 criteria. These requirements should be retired, not modified.

(2) We disagree with the review team's interpretation that R10 is a testing requirement. The requirement is focused on training. Ensuring staff capabilities for carrying out the restoration plan is duplicative with PER-005-2 R3.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement ("drill, exercise, or simulation"), which determines the necessity for personnel training under PER-005-1 Requirement R3.

Likes:

0

Dislikes:

0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: No

Answer Comment:

We disagree with the PRT's recommendation that R10's intent is for testing. The very definition of drill seems to indicate a training intent. We recommend that if the PRT and future SDT perceive that R10 is related to testing that the wording of the requirement be changed to reflect that and be clear. Also, if the intent is testing, the requirement should clearly dictate what is to be tested and what results of testing are intended to be maintained.

Response:

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement ("drill, exercise, or simulation"), which determines the necessity for personnel training under PER-005-1 Requirement R3.

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer: Yes

Answer Comment:

We agree that Requirement R10 should not be retired.

We recommend that Requirements R7 and R8 be incorporated into Requirement R1. We agree that the already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, we recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: “Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan.”**
- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): “Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well**

as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to restore the BES frequency within acceptable limits."

· The EOP PRT recommended a modest revision to Part 1.5 (adding the work "adjacent"). While we agree with the concept of the suggested change to Part R1.5, we suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in adjacent Reliability Coordinator Areas."

A new part should be added to R1 (best placed as Part 1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for EOP-006, but will not suggest specific rewrites. The PRT believes all recommendation have merit and need a thorough review by the future SDT when formed for this standard. have merit and need a thorough review by the future SDT when formed for this standard.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer: No

Answer Comment:

Tri-State believes the recommendations for requirements R7 and R8 would make them duplicative requirements. We support the PRT recommendation for keeping R10.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion

into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

BPA disagrees with the PRT recommendation for changing R8 language; R8 language is measureable as is.

Response: The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

3. The EOP PRT does propose retiring one (1) requirement and four (4) Requirement Parts in EOP-006-2. Do you agree with the EOP PRT's recommendations? If not, please explain.

Summary:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The IERP determined Requirement R10 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-006-2 Requirement R10. Requirement R10 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which determines the necessity for personnel training under PER-005-1 Requirement R3.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for EOP-006, but will not suggest specific rewrites. The PRT believes all recommendations The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

Answer Comment:

We agree with the proposed retirement of Parts R1.2, R1.3 and R1.4, but do not agree with retiring Requirement R9 (which mirrors R10 in EOP-005-2) as we do not believe this requirement is duplicative of any requirements in PER-005-2.

Similar to our comments on the proposed retirement of R10 in EOP-005-2, we assess that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on its assessment that this requirement was duplicative of R3 in PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission

Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

The recommendation to retire R9 of EOP-006-2 appeared to be

appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training to RC operating personnel no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-1, and R9 in EOP-006-2

If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. We therefore suggest that this requirement be retained.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes:

0

Dislikes:

0

Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: Yes

Answer Comment:

Yes this should be retired.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT

recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

ERCOT agrees with the proposed retirement of Parts R1.3 and R1.4, but does not agree with retiring part 1.2 or Requirement R9 (which mirrors R10 in EOP-005-2) as it does not believe this requirement is duplicative. Similar to ERCOT's comments on the proposed retirement of R10 in EOP-005-2, ERCOT assesses that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on reliability standard PER-005-1, which has been revised. The successor standard, PER-005-2, removed the requirement to provide system restoration training to RC operating personnel. If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. ERCOT, therefore, suggests that this requirement be retained.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The EOP PRT recommended retiring Requirement R1.2. The EOP SDT discussed and concluded that Requirement R1.5 encompasses the entire criteria and conditions for re-establishing interconnections and Requirement R1.2 is redundant with Requirement R1.5.

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - NPCC - 10 - NPCC

Selected Answer:

No

Answer Comment:

Agree with the retirement of the requirement and the THREE requirement Parts listed on page 3. Agree with the retirement of requirement R9, however, as posted on the NERC website, PER-005-2 has yet to be filed with the regulatory authorities.

Agree that Requirement R9, as well as Requirement 1, Parts R1.3 and R1.4 should be retired. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, suggest that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired). Additionally, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recommended retiring Requirement R1.2. The EOP SDT discussed and concluded that Requirement R1.5 encompasses the entire criteria and conditions for re-establishing interconnections and Requirement R1.2 is redundant with Requirement R1.5.

Likes:

0

Dislikes:

0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: No

Answer Comment:

Agree that Requirement R9, as well as Requirement 1, Parts R1.3 and R1.4 should be retired. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, suggests that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired). Additionally, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recommended retiring Requirement R1.2. The EOP SDT discussed and concluded that Requirement R1.5 encompasses the entire criteria and conditions for re-establishing interconnections and Requirement R1.2 is redundant with Requirement R1.5.

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

Yes

Answer Comment:

We agree that requirements which meet Paragraph 81 criteria should be retired. As stated in an earlier question, we feel that there are several requirements, not just one requirement, that meet Paragraph 81 and all of these requirements should be retired.

Response:

The EOP PRT thanks you for your comment.

Likes:

0

Dislikes:

0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Yes

Answer Comment:

Correction to question #3 wording-The EOP PRT does not propose retiring one (1) requirement and Three (3) requirement parts in EOP-006-2.

Response:

Thank you for your comment.

Likes:

0

Dislikes:

0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: No

Answer Comment:

We disagree with the removal of R1.9 as we do not agree that it is an unnecessary action. During a restoration, depending on configuration, the BA may be “whole” but neighbors may not be fully interconnected with other entities. Therefore the interchange between those areas may need to be coordinated with the RC. In essence the BA’s role and authority is suspended and is overlapped with the RC’s role during restoration. When the event has reached the criteria as outlined in the RC plan where authority can be transferred back to the BA, then the BA can take balancing actions without coordinating those with the RC. This also leads us to disagree with the proposed changes to R7. The RC will be helping balance frequency through coordination with TOPs and GOPs during restoration. This role is not described in any other requirement and will be lost if the proposed changes are made.

Response:

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Answer Comment:

R9: We absolutely disagree with the PRT on retiring R9. It is not uniquely covered under proposed PER-005-2. System restoration is a very low probability high risk scenario with tremendous implications to the BES. As such, specific training is necessary to be identified. There is no requirement within proposed PER-005-2 to annually train on restoration.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Texas RE does not agree with the retirement of R1.2, R1.3, and

R1.4. “Criteria and conditions...” in R1.5 is not the same as “A description of the high level strategy to be employed during restoration events for restoring the Interconnection” in R1.1 nor is it the same as “Operating Processes for restoring the Interconnection” in R1.2.

Texas RE does not agree with retiring Requirement R9. Requirement R9 specifically requires training for Blackstart and other system-restoration processes. The EOP PRT suggests that these duties are covered by the upcoming PER-005-2 Standard. While the PER-005-2 standard does require that personnel be trained for normal/emergency operations of the BES, PER-005-2 does not require any specific type of training in regards to Blackstart/system-restoration. This is problematic because the PER-005-2 standard does not directly replace EOP-006-2 R9, and leaves potential gaps when determining compliance. Registered Entities could be allowed to forgo Blackstart training, while still being compliant with PER-005-2. The requirement to perform Blackstart training will be lost if EOP-006-2, R9 is retired.

Texas RE is concerned that gaps in training could occur since entities would not have to specifically comply with the sub requirements of R9, which are necessary to understand if system restoration is needed. If a company does not consider the R9 items as “BES company-specific Real-time reliability-related tasks” per PER-005-2, compliance may be met but reliability would suffer.

Response:

The EOP PRT recommended retiring Requirement R1.2, R1.3, and R1.4. The EOP SDT discussed and concluded that Requirement R1.5 encompasses the entire criteria and conditions for re-establishing interconnections and Requirement R1.2, R1.3 and R1.4 are redundant with Requirement R1.5.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer: No

Answer Comment:

We agree with the proposed retirement of Parts R1.2, R1.3 and R1.4. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, we suggest that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired).

In addition, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.

Wrt other requirements, we do not agree with retiring Requirement R9 (which mirrors R10 in EOP-005-2) as we do not believe this requirement is duplicative of any requirements in PER-005-2.

Similar to our comments on the proposed retirement of R10 in EOP-005-2, we assess that the Independent Expert Panel's recommendation

to retire R9 in EOP-006-2 was based on its assessment that this requirement was duplicative of R3 in PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission

Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

The recommendation to retire R9 of EOP-006-2 appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training to RC operating personnel no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-1, and R9 in EOP-006-2

If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. We therefore suggest that this requirement be retained.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT

recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer: No

Answer Comment:

SRP does not see R1.2, R1.3 and R1.4 as being duplicative of R1.5. For instance, specific Operating Processes are required under R1.2 whereas, that is not specifically addressed in R1.5 and may be omitted if R1.2 is retired.

Response:

The EOP PRT recommended retiring Requirement R1.2, R1.3 and R1.4. The EOP SDT discussed and concluded that Requirement R1.5 encompasses the entire criteria and conditions for re-establishing interconnections and Requirement R1.2, R1.3, and R1.4 are redundant with Requirement R1.5.

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-006-2? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recognizes that strategies are system and company specific and should be left up to the RC when developing their restoration plan.

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

We generally agree with the proposed revisions except the proposed retirement of Requirement R9 as noted under Q2, above.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

Answer Comment:

The NSRF is recommending the follow change: Page 3, second bulleted item, *IERP: Requirement R8* states “Develop, maintain and implement” (similar to the proposed EOP-011-1) so that all pertinent aspects of the plan are implemented...”. The NSRF would like to state that an established plan may not fit all real-time situations. The EOP PRT should make this clear, even though the terms “pertinent aspects” is used.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recognizes that strategies are system and company specific and should be left up to the RC when developing their restoration plan.

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

Response: The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

ERCOT reiterates its comments as set forth above. It also provides additional observations and comments below.

ERCOT disagrees with the review team's recommendation to retire Requirement R1.9 in the future. The transfer of operations and authority must be a coordinated, well-understood, well-established process. Without documentation of such process, there is a potential for error that could endanger the completion of restoration efforts and the resumption of normal

operations.

Response: The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:**Likes:** 0**Dislikes:** 0**Lee Pedowicz - NPCC - 10 - NPCC****Selected Answer:** No**Answer Comment:**

Once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0**Dislikes:** 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: No

Answer Comment:

Once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:

We agree that EOP-006-2 should be revised and requirements should be retired that meet Paragraph 81 criteria.

Response: The EOP PRT thanks you for your comment.

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: No

Answer Comment:
See other comments.

Response:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: No

Answer Comment:

Texas RE does not agree with the retirement of Requirement R9.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

Likes:

0

Dislikes:

0

Ben Li - Independent Electricity System Operator - 2 - NPCC**Selected Answer:**

Yes

Answer Comment:

We generally agree with the proposed revisions except the proposed retirement of Requirement R9 as noted under Q2, above.

Also, once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R9 into the PER family of standards; and if unable, Requirement R9 will be maintained in EOP-006.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Please change to wording of the question to clearly indicate the framework of the question is the initial recommendation **decision** regarding reaffirm/revise/retire of a Standard

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

5. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-006-2.

Summary:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

The EOP PRT recognizes that strategies are system and company specific and should be left up to the RC when developing their restoration plan. EOP-006, Requirement R1 states, “Resources are utilized to re-energize a shut down area of the Bulk Electric System (BES), or separation has occurred between neighboring Reliability Coordinators, or an energized island has been formed on the BES within the Reliability Coordinator Area.” No distinction is made between functional entity designation.

The EOP PRT will recommend that the future SDT consider a guideline and technical basis section be developed in EOP-006.

The EOP PRT agrees that the addition of a timeframe adds clarity to Requirement R4 and supports forwarding the recommendation to the SDT.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Québec TransEnergie - 1 - NPCC

Selected Answer:

Answer Comment:

R1: The phrase “or an energized island has been formed on the BES within the Reliability Coordinator Area” needs to be clarified. None of the sub-bullets elaborate on this particular point.

The spirit of this standard applies most notably to coordination between Reliability Coordinators and between the Reliability Coordinators and their Transmission Operators. Does the “energized island” refer to an island formed between two TOPs or an island formed within one TOP in the Reliability Area? Is the formation of the island in the context of a partial outage? In the Québec Reliability Area, islands are formed regularly albeit with neighbouring Reliability Areas.

Furthermore, R8 relates to resynchronizing islanded areas that bridge boundaries between TOPs or Reliability Coordinators (RC).

R1, R7 and R8 of EOP-005-2 make no reference to the formation of an island in the context of the TOP restoration plan.

R3 and R5: Hydro-Quebec TransEnergie assumes the role of both RC and TOP for the Quebec Interconnection. It would be helpful to consider this situation.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT decided to keep Requirement R1.9 in EOP-006 so that Requirement R1.9 in EOP-005 could be met.

The EOP PRT recognizes that strategies are system and company specific and should be left up to the RC when developing their restoration plan. EOP-006, Requirement R1 states, “Resources are utilized to re-energize a shut down area of the Bulk Electric System (BES), or separation has occurred between neighboring Reliability Coordinators, or an energized island has been formed on the BES within the Reliability Coordinator Area.” No distinction is made between functional entity designation.

Requirements R3 and R5 do not apply to the TOP.

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

No Comments

Response:

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - NPCC - 10 - NPCC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

Answer Comment:

(1) There are many Regional Entities that have not audited EOP-006-2 because it was not listed on the AML in previous years. There is not yet industry consensus on what evidence will meet compliance with EOP-006-2. A guideline and technical basis section in the standard should be developed to provide this guidance to industry.

(2) We disagree with the recommendations to use the phrase “develop, maintain and implement,” because both R7 and R8 are implementation requirements. Development and maintenance requirements are contained in R1. Further, the recommended modifications to R7 do not include this phrase, which leads to confusion what exactly the review team is recommending.

(3) Thank you for the opportunity to comment.

Response:

The EOP PRT will recommend that the future SDT consider a guideline and technical basis section be developed in EOP-006.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes:

0

Dislikes:

0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

We would suggest to the review team to add a time frame for Requirement R4 pertaining to the Reliability Coordinator reviewing the neighboring Reliability Coordinator(s) restoration plan as done in Requirement R3. In our opinion, this would promote consistency on the reviewing of both sets of documentation.

Response:

The EOP PRT agrees that the addition of a timeframe adds clarity to Requirement R4 and supports forwarding the recommendation to the SDT.

Likes:

0

Dislikes:

0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Texas RE recommends the future Standards Drafting Team review “Data Retention” section as it relates to the forward looking aspects of risk-based compliance activities. It appears that the Data Retention parameters for R3 (assume worse case of 39 months) go beyond the data retention requirements for R1 (assume “normal” 36 month review but if this is a risk identified to be monitored an RC could be audited on a more frequent basis than every three years). Similar statements could be made about several of the Data Retention items. The Data Retention for R10 could stretch to 6 years. Texas RE recommends the “Compliance Monitoring Process” section be consistent with other Standards being reviewed.

Response:

The EOP PRT included the data retention review in the initial recommendation and will carry it through to the final recommendation of the EOP PRT.

Likes:

0

Dislikes:

0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

None.

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

LADWP requests clarification on what a “unique task” will be defined as in the RSAW, maybe even add it to a future version of the NERC Glossary of Terms.

Response: Please see response to EOP-005 pertaining to unique tasks.

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0