

Individual or group. (20 Responses)
Name (12 Responses)
Organization (12 Responses)
Group Name (8 Responses)
Lead Contact (8 Responses)
Question 1 (20 Responses)
Question 1 Comments (20 Responses)
Question 2 (20 Responses)
Question 2 Comments (20 Responses)
Question 3 (18 Responses)
Question 3 Comments (20 Responses)
Question 4 (1 Responses)
Question 4 Comments (20 Responses)
Question 5 (0 Responses)
Question 5 Comments (20 Responses)

-	-
	Group
	Northeast Power Coordinating Council
	Guy Zito
	Yes
	
	Yes
	The SDT should not assume that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergencies, whereas EOP-002 and EOP-003 deal with the actions needed in real-time to mitigate generation deficiency. EOP-001 is unique when compared with EOP-002, and EOP-003. Merging EOP-001 with the other two EOP standards will not result in gain in efficiency. The SDT should not assume that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergencies, whereas EOP-002 and EOP-003 deal with the actions needed in real-time to mitigate generation deficiency. EOP-001 is unique when compared with EOP-002, and EOP-003. Merging EOP-001 with the other two EOP standards will not result in a gain in efficiency.
	Yes
	
	
	
	Group
	Bonneville Power Administration
	Denise Koehn
	Yes
	
	Yes
	a. Agree with the idea of merging EOP-001-0, EOP-002-2, and EOP-003-1 into a single Standard. b. Requirement 8 from IRO-001-1 should be included in a new single EOP standard and removed from IRO-001-1. This would allow IRO-001-1 to apply only to Reliability Coordinators and Regional Reliability Organizations. c. BPA supports improving clarity and removing redundant and non essential requirements (those that don't support bulk power system reliability).
	Yes
	
	
	a. In the paragraph under Industry Need, page SAR-2, suggest that the first sentence be rewritten to state as follows: "The industry needs standards that are technically accurate, clearly written so as to leave no confusion as to what a requirement means, and support the overall goal of ensuring bulk power system reliability". One concern with the EOP standards - and others - is the lack of use of the defined terms - with appropriate capitalization - from the NERC Glossary of Terms Used in Reliability Standards. The use of these terms without appropriate capitalization leads to confusion as to whether the words in the requirement mean something different than the defined term. b. On page SAR-10 The EOP-002-2 the comment from FERC about not using the TLR procedure to mitigate IROL violations doesn't seem right. IS FERC saving to allow an IROL to be VIOLATED (TOP-004 R1) by not changing phase shifters

	<p>or ATC corrections or etc, so that a deficient entity won't be forced to shed load under a EEA? EOP-001 R2 says to have load reduction available to mitigate IROL. Or do they mean re-evaluate the IROL limits first which is already in the standard? In Attachment 2, page SAR-12, paragraph 3, suggest rewording 2nd sentence to say "Additionally, each standard must be clearly written, so that bulk power system users, owners, and operators are informed of the expected behavior (or have knowledge of the expected behavior, rather than "put on notice").</p>
	Individual
	Jonathan Appelbaum
	Long Island Power Authority
	Yes
	
	Yes
	
	Yes
	
	
	<p>These comments are for the SDT. Reference is to existing standards: 1)EOP-001 R2.3 requires plans for load shedding and so does EOP-003 2) EOP-001 R2 and R3 can be merged. 3) EOP-001 R6 - Uses the term "coordinate with other...as appropriate". How is "appropriate"determined. Suggest tie it in with existin R3.3. 4) EOP-001 R6.3 - Consider eliminating because its literal meaning means in an emergency do one or the other, not both, and nothing else. 5) EOP-001 R6.4 - Transmission Operators do not arrange for fuel deliveries to Generators. What does aranging for electrical energy through normal operating channels mean? If its an emergency, can there be an Emergency communication protocol? 6)EOP-003 R2 and R3 - Eliminate. The under frequency load shed program is developed by the Regional Entity in PRC-006. 7) EOP-003 R5 - Poorly written. By using the word "further" it implies that either uncontrolled separation, loss of generation, or system shutdown has occurred. 8) EOP-003 R6 - Redundant to R5 because after seapration, if frequency is not restored, there is a risk of further loss of generation and system shutdown. 9)EOP-003 R8 - The second requirement to be capable of implementing load shedding ina timeframe adequate for responding to the emergency can not be met in all circumstances. The problem is with the use of "the emergency". This captures all emergencies, not just the planning scenarios where manual load shedding can be deployed. 10) Consider Adding to the Glossary definitions for Load Shed, and Load Reduction 1) Consider not using the term emergency plan. The proper term is a Plan for Emergencies.</p>
	Individual
	Michael Gammon
	Kansas City Power & Light
	Yes
	
	Yes
	
	No
	<p>This should not include Transmission Service Provider, Purchase-Selling Entity. These functions provide for the normal and routine transactions for energy and transmission capacity and do not prohibit or add any reliability related actions taken by Operators.</p>
	Not aware of any regional variances or business practices.
	<p>Do not support the notion of development of specific load shedding capability that should be provided and the maximum amount of delay before load shedding can be implemented. Each region is developing their own regional standard for load shedding and it should be left at that.</p>
	Individual
	James H. Sorrels, Jr.
	American Electric Power
	Yes
	
	Yes
	
	<p>Assessing the appropriate applicability of functional entities is part of the scope of the SAR. We believe that this is an appropriate and worthwhile effort.</p>

	None known at this time.
	No additional comments at this time.
	Individual
	Kasia Mihalchuk
	Manitoba Hydro
	Yes
	EOP-001-0 should have the Attachment 1-EOP-001-0 and its 15 elements "assigned" to more appropriate entities. As now they are all directly assigned to TOP and BA. The consistent theme (as per FMPA) is the delegating or clarifying of various requirement responsibilities to the appropriate entities (eg: generation issues to TOP, transmission issues to BA)
	Yes
	From Brief Description: Modify requirements to improve clarity and remove ambiguity; EOP-001 Clarify or justify requirements responsibilities as assigned to TOP and BA. (Example: In PRC-007-0 Introduction describes how each entity is responsible for the Standard or Requirement, TO has to own a UFLS, TOP has to operate UFLS, DP owns or operates UFLS, LSE operate UFLS) The above methodology removes the vagueness of why an entity is assigned an requirement. From Brief Description: Move or eliminate requirements or start new SAR process; EOP-001-0 Attachment 1 and its 15 elements require some work. These elements appear "rough" as they may have been translated from Operating Policies on the Version 0 process. Create a SAR for these items?
	No
	Just examining EOP-001-0 (along with its attachment) involves the following processes: Development Maintain Implement Coordination Load shedding System restoration Fuel and inventory Environmental constraints Customer appeals etc. which are all placed directly on TOP and BA. For instance, Attachment 1, Element 2, Fuel Switching. Does this mean fuel energy for Diesel Backups for black start plants, or the actual supply for a Thermal Unit. Does this include coal? These elements belong directly to a GO.
	Individual
	Greg Rowland
	Duke Energy
	Yes
	Yes
	Only RC responsibilities from IRO-001-1 that relate to emergency plans and operations should be included in the SAR scope. Other RC responsibilities in IRO-001-1 should remain in IRO-001-1.
	Yes
	Business Practice
	Regional Variance: The reliability gap issue with retail power marketers is only applicable to regions with RTOs/ISOs. Business Practice: EOP-002-2 deals with transmission reservations, but does not currently address Conditional Firm Service. We believe that requirements associated with the adjustment of transmission service priorities should be moved to NAESB Business Practices.
	None
	Individual
	Kirit Shah
	Ameren
	Yes
	The current standards are too vague to support reliability and too detailed in other areas where no BES benefit is accrued.
	Yes
	Yes
	Although as the team works through the process it might find additions or deletions need to be made to support reliability. We would offer that the drafting effort recognize this option and not force the standard based on these early assessments.

	We hope that this effort is on a fast-track schedule. Additionally, this may be a group of standards that would be a good fit for treatment as suggested by Gerry Cauley and the "ad-hoc" team
	Individual
	Martin Bauer
	Bureau of Reclamation
	No
	Reclamation does not agree with the SAR as it is written. In order to properly assess the need for this project which proposes to combine three complicated set of requirements into one, the SAR must provide the specifics. The SAR has only general references to inconsistencies with the functional model, phrases such as "various words or elemetns that need clarification"and IRO-001 " applicability issues that must be addressed". The SAR does not be adequately explained why the need the combine the standards. It would be preferable to make revisions to the three standards seperately under one project. Since IRO is being revised, Reclamation believes the SAR should be evaluated after the IRO-001 is revised.
	No
	See previous comment
	Yes
	Individual
	Jason Shaver
	American Transmission Company
	Yes
	Yes
	Yes
	Group
	IRC Standards Review Committee
	Ben Li
	Yes
	Yes
	We generally agree with the scope of the proposed actions. However, we urge the SDT not to presume or pre-determine that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergency, whereas EOP-002 and EOP-003 deal with actions needed in real-time to mitigate generation deficiency. EOP-001 clearly has a place of its own. We do not believe that merging this together with the other two EOP standards will result in any efficiency gain.
	Yes
	Group
	FirstEnergy
	Sam Ciccone

	Yes
	Yes
	Although we agree with the scope, the team should use EOP-001-1 instead of EOP-001-0. EOP-001-1 has been NERC Board approved since October 2008 as part of the "Pre-2006" project on IROLs.
	No
	We are not sure how the Distribution Provider (DP) is involved in the requirements of these standards. They are checked as an applicable entity but no explanation is given as to why they are being added to these standards which currently place no responsibilities on the DP. (Note: UFLS and UVLS schemes can be and are sometimes installed on DP and LSE facilities. This would require applicability to them.)
	FE has the following additional comments: 1. Interpretations which have been approved should be incorporated into these standards to provide clarity. Two examples are the interpretation of EOP-001-0 per Project 2008-09 and the interpretation of EOP-002-2 per project 2008-07. 2. The SAR does not detail modifications directed by FERC Order 693 for standard IRO-001-1. The SAR should add these directives which include: (a) Remove Regional Reliability Organization as an applicable entity (Order 693 pp. 896); (b) Add Measures and Levels of Non-Compliance as requested by APPA (Order 693 pp. 897). Also, although not directives, FERC indicated that NERC should consider FirstEnergy Corp.'s and California Cogeneration's suggestions for improvement. These include: (a) FirstEnergy suggests that NERC clarify whether Requirement R8, which requires entities to comply with a reliability coordinator directive "unless such actions would violate safety, equipment or regulatory or statutory requirements," refers to personnel safety, equipment safety or both. In addition, it suggests the establishment of a chain of command so that, for example, if a generator receives conflicting instructions from a balancing authority and a transmission operator, it can determine which instruction governs (Order 693 pp. 893); (b) California Cogeneration comments that the Reliability Standard fails to address the operational limitations of QFs because they have contractual obligations to provide thermal energy to their industrial hosts. It contends that a QF can be directed to change operations only in the case of a system emergency, pursuant to 18 CFR § 292.307 (Order 693 pp. 895) 3. With regard to EOP-001-1 R2.1, plans to mitigate operating emergencies for insufficient generating capacity are not made in a vacuum. They must consider deliverability of the power and since the BA typically does not have sufficient information about the transmission system to ensure deliverability, the TOP has to assist in this determination. 4. With regard to EOP-001-1 R2.2, plans to mitigate operating emergencies on the transmission system are not made in a vacuum. The Balancing Authority controls the tools used by the Transmission Operator for re-dispatching generation in order to eliminate overloads on the transmission system in instances where the overloaded facility is needed to maintain reliability. Since the TOP typically does not have sufficient information about the generation facilities outside his area of responsibility, the BA has to assist in this determination. 5. With regard to EOP-001-0 R2 load shedding aspects, when load is shed due to insufficient voltage, the TOP is the one who has the tools to recognize the need for this load shed. However, shedding load for an under voltage condition via UFLS impacts the BA. Since this is an automatic operation, the BA needs to know where these facilities are located and how much load can be affected so they know how to react when this load shedding occurs. 6. With regard to EOP-001-1 R4, the current requirement does specify "applicable elements in Attachment 1-EOP-001-0" which removes the items specified in the SAR as problematic and not applicable to the TOP from the list. The solution appears to be two separate lists, one for TOPs and one for BAs. 7. With regard to Requirement R2 of EOP-003-1, the SAR table cites EOP-001-0 rather than EOP-003-1. 8. With regard to the Real-time Best Practices Standards Study Group comment to "Establish document plans and procedures for conservative operations" it is not clear from the SAR what is expected of the drafting team for addressing this comment. Is this something that is missing from the standard? More information is needed with regard to this comment. 9. With regard to FERC's December 20, 2007 and April 4, 2008 Orders, more information is needed with regard to what is expected of the drafting team for addressing these items. It would be more useful to the drafting team if only the excerpts from the order that they are expected to address are included in the SAR. 10. With regard to the Real-time Best Practices Standards Study Group comment to "Provide the location, Real-time status, and MWs of Load available to be shed," it is not clear from the SAR what is expected of the drafting team for addressing this comment. Is this something that is missing from the standard? More information is needed with regard to this comment. 11. The SAR suggests separating the requirements relating to the TOP and BA; one for the BA and one for the TOP. However, this is not reflected in the Standard review forms. Also, this seems contrary to the industry comments contained in the review forms. The SAR should be reconciled to provide a consistent and clear message to the drafting team of what is offered for consideration and what must be included in the new standard. 12. The Standard Review Form for EOP-002-2 makes reference to R10. Version EOP-002-2.1 included in the current version of the reliability standards does not contain an R10. The reference to this requirement should be revised to be correct or removed from the SAR. 13. The Standard Review Form for EOP-003-1 contains a version 0 comment that states "Move to Policy 5 & 9." The reference to these policies should be revised to reflect the applicable standard or removed from the SAR.
	Individual
	Dave Allen
	Operations
	Yes
	The TO's will have plans to mitigate transmission related emergencies and the BA/GO's will follow Directives to support reliability, and the TO will support capacity emergencies without compromising transmission reliability or safety. The BA's will have plans to mitigate capacity emergencies and will receive support from TO's short of compromising system reliability or safety. Your reference should point to R2.2 not R3.2

	Yes
	Yes
	Not enough information to support making a decision on this point
	Group
	Southern Company Transmission
	JT Wood
	Yes
	Combining these three standards would improve documentation of applicable requirements. It would also be consistent with the work done with the System Restoration from Blackstart Resources standards. (I would not say these proposed changes are critical to improve reliability but they do present some advantages).
	Yes
	Yes
	Under Applicable Reliability Principles on SAR-5 I believe the following principle should be included: The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand. The goal of the actions taken during Capacity and Energy Emergencies is to return (or at attempt to return) the balance between supply and demand and eventually bring the system back to operate within its reliable operating frequency and voltage limits.
	Group
	Electric Market Policy
	Jalal Babik
	Yes
	Yes
	No
	Nothing in the SAR itself seems to justify addition of the following entities; Transmission Service Provider, Purchasing-Selling Entity, or Load-Serving Entity. Given that, in most cases, these entities do not own physical assets (and if they do, they are probably also registered as either TO, GO or DP), do not see where including them promotes reliability. We did note that they were added in efforts related to Project 2006-06 as well as Project 2007-02. Do not agree with inclusion in Project 2007-02 and noted that many commenters also disagree with inclusion in Project 2006-06.
	None
	None
	Individual
	Derek Bleyle
	SCE&G
	Yes
	Yes
	Yes
	None known.

	SCE&G looks at consolidation of redundant requirements and standards as having a positive impact on reliability. We support this objective and feel it is necessary to improve clarity of both requirements and standards.
	Individual
	Dan Rochester
	Independent Electricity System Operator
	Yes
	Yes
	We generally agree with the scope of the proposed actions. However, we urge the SDT not to presume or pre-determine that the three EOP standards will be merged. EOP-001 deals with operational plans for both resource and transmission emergency, whereas EOP-002 and EOP-003 deal with actions needed in real-time to mitigate generation deficiency. EOP-001 clearly has a place of its own. We do not believe that merging this together with the other two EOP standards will result in any efficiency gain.
	Yes
	We believe the checked entities will largely cover the responsible entities that will be assigned at least a requirement. However, we do not think that the list needs to be exhaustive. The SDT should have the leverage to add entities as needed as it begins drafting the standards.
	The Performance-based Reliability Standard Task Force has presented an assessment of the existing standards, a method to develop standards that support reliability performance and risk management, and is working on an overall plan to transition existing standards to a new set of standards. We view the proposed scope of this SAR is largely in line with the Performance-based Reliability Standard Task Force's general direction, and may well be an element of the TF's transition plan. To avoid duplicated work and to support prioritization of needed projects balancing scarce resource, we suggest the SAR proponent to liaison with Dave Taylor of NERC to identify the best way forward including whether or not this project should proceed alone and if so, the timing to start drafting the standards.
	Group
	Midwest ISO Standards Collaborators
	Jason L. Marshall
	Yes
	Yes
	Yes
	Individual
	Scott Barfield
	Georgia System Operations Corporation
	No
	It is assumed that the word "either" in question 1 was not intended since there was only one statement to agree or disagree with. There is not a reliability-related need for modifications to these standards. There is a need for clarity. Lack of clarity could possibly affect reliability if it leads to misunderstandings that may lead to wrong actions by entities. There is also a need for measurability and reasonableness of the requirements. There is a need to eliminate requirements that do not impact the BES and eliminate redundant requirements. These needs are compliance-monitoring/enforcement-related needs and not reliability-related needs. Combining these 3 standards is not necessary but would be an improvement and is supported. It is agreed that the 3 bullets of options, under the "Brief Description" section for proposed changes, are desired goals.
	No
	The scope may be good but it may also help improve the standards and compliance monitoring or enforcement if EOP-005 would be merged together with these 3 standards included in the SAR. EOP-005 is interrelated with the 3 standards. If merging EOP-005 with the other 3 would make the resulting merged standard too long, then EOP-005 could still stand alone.
	At least one requirement in the 3 existing standards applies to each of the entities listed except to a DP. As long as an existing requirement is not extended to entities not now included. If EOP-005 is merged in, it is agreed that a DP should be covered because they are involved in system restoration. It is possible that they also should be covered

	because they may be involved in load shedding.
	No known variances
	Declaring/communicating when an entity is in an alert level should remain in the appropriate EOP/IRO standards and not moved to a COM standard. The requirements relating to emergencies in all other groups of standards (mainly BAL, COM, IRO, and TOP) should be moved to EOP standards. The BAL, IRO, and TOP standards should cover non-emergency requirements. An exception should be requirements relating to training, drills, and tests which should be moved to the PER standards and removed from EOP and other standards. Some requirements for load shedding (e.g., automatic load shed) should be moved to PRC standards and not included in the EOP standards.
	Group
	NERC Standards Review Subcommittee
	Carol Gerou
	Yes
	
	Yes
	
	Yes
	
	N/A
	N/A