Unofficial Comment Form

Project 2015-08 Emergency Operations

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://sbs.nerc.net/) to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by **8:00 p.m. Eastern, Wednesday, August 19, 2015**.

If you have questions please contact Laura Anderson via email or by telephone at (404) 446-9671.

## Background Information

This posting is soliciting informal comment.

On February 3, 2015, the Standards Committee appointed the Project 2015-02 Emergency Operations Periodic Review Team (EOP PRT) and tasked them to review the following standards:

* EOP-004-2 — Event Reporting;
* EOP-005-2 — System Restoration from Blackstart Resources;
* EOP-006-2 — System Restoration Coordination; and
* EOP-008-1 — Loss of Control Center Functionality.

Based on this review, the EOP PRT developed a set of recommendations for EOP-004-2, EOP-005-2, EOP-006-2, and EOP-008-1. The EOP PRT recommendations were posted for a 45-day comment period from March 27, 2015 through May 11, 2015.

The EOP PRT carefully reviewed and considered the comments received during the posting period and, based on stakeholder comments, made revisions to the initial recommendations. To support consideration and implementation of these recommendations, the EOP PRT developed a new Standards Authorization Request (SAR). Many improvements suggested by stakeholders during the comment period were incorporated into the final recommendations.

The recommendations of the EOP PRT are attached to the SAR (Periodic Review Templates). The recommendations of the EOP PRT are as follows:

* EOP-004-2 – (1) Revise the standard and attachement and (2) retire Requirement R3;
* EOP-005-2 – Revise the standard;
* EOP-006-2 – (1) Revise the standard and (2) retire Requirements Parts R1.2, R1.3, and R1.4; and
* EOP-008-1 – Revise the standard.

Additional documents developed to support the Project 2015-02 team’s recommendations have been posted to the [2015-02 EOP PRT project page](http://www.nerc.com/pa/Stand/Pages/Project-2015-02-Emergency-Operations-Periodic-Review.aspx), including: 1) the EOP PRT’s consideration of comments on the draft recommendations; 2) Department of Energy OE-417 Comparison of Reporting; 3) and Standards Independent Experts Review Project.

The EOP PRT has reviewed and developed a recommendation based upon the language of Federal Energy Regulatory Commission (Commission) Order no. 749[[1]](#footnote-1), as follows:

 *“[N]ERC, in its comments about the term, states that it “could promote the development of a guideline to aid registered entities in complying with Requirement R11.” The Commission notes that this Reliability Standard will not become effective for at least 24 months, during which time ambiguities in language or differences of opinion among affected entities may be resolved in practical ways. Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations.”[[2]](#footnote-2)*

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. The scope of this project includes:
* Implement the recommendations of the periodic review team related to the following standards:
	+ EOP-004-2
	+ EOP-005-2
	+ EOP-006-2
	+ EOP-00801
* Improve quality, relevance and clarity of the standards
* Bring standards into Results-Based format
* Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel

Do you agree with this scope? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

 Comments:

1. *System Restoration Reliability Standards*, 134 FERC ¶61,215 (2011) (Order No. 749).

 *Id.* at P24. [↑](#footnote-ref-1)
2. [↑](#footnote-ref-2)