

Meeting Notes

Project 2023-01 EOP-004 IBR Event Reporting Drafting Team Meeting

June 30, 2025 | 2:00 – 4:00 p.m. Eastern

WebEx

Administrative

1. Introductions

The meeting was brought to order by the Chair, Charlie Cook at 2:02 p.m. Eastern on June 30, 2025. The Chair provided the Drafting Team (DT) with opening remarks and welcomed members and guests.

2. Determination of Quorum

The rule for NERC DT states that a quorum requires two-thirds of the voting members of the DT. Quorum was not achieved as 6 of the 11 members were present for the meeting. See Attachment 1 for those in attendance.

3. NERC Antitrust Compliance Guidelines and Public Announcement

NERC Antitrust Compliance Guidelines and public announcement were reviewed by Michael Gabor. There were no questions raised.

4. Review Meeting Agenda and Objectives

Developer reviewed agenda items and objectives. There were no questions raised.

5. Review of Parking Lot Items

Developer reviewed the remaining Parking Lot items. NERC staff have engaged with BPA staff regarding their comment submitted during the informal comment period and will report back to the DT. Other items remain ongoing.

Agenda Items

1. Discuss NAGF's Questions and Informal Comments

- a. Is this 500 MW threshold based on the aggregate of a single GO/GOP IBR?
- b. What is the aggregate collection point for the IBR MW Totals?
 - i. NAGF representative joined the meeting to discuss their questions with DT members and observers. DT confirmed that for both questions, the reporting threshold applies to the aggregate of all the IBRs within a Balancing Authority Area and that only the BA needs to report. DT also flagged the word "aggregated" from Attachment A, IBR loss event type for future discussion to consider whether a new term is needed to increase clarity.
- c. Comment submitted in response to Question 2 regarding coordination of Implementation Plans between Projects 2021-04 (PRC-028) and 2023-02 (PRC-030), and 2023-01 (EOP-004).
 - i. DT clarified that this standard was not meant to coordinate with the other standards cited in the comment and that only BAs are required to report on IBR loss events. In addition, this Project does not propose GOs and GOPs add new telemetry. As proposed, BAs are to use Telemetry data for which they have availability (i.e. within its Balancing Authority Area) when reporting on IBR generation.

2. Informal Comment Period

- a. Review themes from Question 4
 - i. DT discussed various comments requesting it to coordinate the EOP-004 update with changes to the DOE-417 form. DT acknowledged its intent to have updates to EOP-004-5 finalized by end of 2026, so they may feed into the DOE / OMB update process, which begins January 1, 2027, to accommodate the form's expiration date of May 31, 2027.
 - ii. DT discussed a comment submitted by the Nuclear Energy Institute (NEI) that summarized duplication of reporting of physical event notifications by commercial nuclear power plants and that the DOE has exempted such reporting under DOE-417. NEI requests that the DT coordinate the changes with what is proposed in EOP-004-5 Attachment 1. DT discussed that GO / GOP commercial nuclear power plants may be subject to report the "Damage or destruction of its Facility" and "Physical threats to its Facility" event types listed under EOP-004, Attachment 1. However, DT concluded that the requested changes may be beyond the scope of the SAR, as written. Developer to conduct additional follow up and report back to the DT.
 - iii. DT discussed a comment submitted by SPP suggesting removal of "GO-IBR" from the last proposed Technical Rationale (TR). DT to consider and address during the next TR update.
 - iv. DT discussed a comment submitted by EEI on the "Loss of DC Line" reporting event type listed under Attachment 1. The commentor suggested additional TR background to explain and justify the addition of this event type, and if sufficient justification is not available, suggested removal from EOP-004. DT hesitated to remove this reportable event type, as

the SAR directed its addition to align with Category 1j events from the NERC Event Analysis Process. Developer to conduct additional follow up and report back to the DT.

- v. DT discussed several submitted comments regarding VSLs. Hydro-Quebec suggested that Requirement R1 VSLs address failure to notify one of the required organizations and after discussing, DT concluded that Requirement R2 VSLs addresses this concern. DT discussed other comments submitted by AEP and MRO, including suggested language for Requirement R2 VSLs. After discussing, DT recommend Developer review with NERC Compliance staff and report back.
- vi. DT discussed a comment submitted by WECC suggesting that the DT specify “BES-connected” and “BPS-connected” IBRs, as at the time of the comment submittal, Project 2020-06 and the IBR definition were still pending. DT proposed to leave reference to IBRs as is and not specify BES- or BPA-connected. DT also considered whether there is a need to include Cat 1 and Cat 2 GOs and GOPs under Applicability and concluded not to, as these are Registration terms and that this standard will most likely be effective after May 15, 2026 (new Registration cutoff period). All generation would apply here, so it is unnecessary to list all the various kinds. DT also noted that GO / GOP applicable reportable events deal with physical damage and physical threats, while IBR-related events are handled by the BA.

3. Begin Drafting the Technical Rational (TR)

- a. Overview of TR requirements
 - i. Item was tabled for a future DT meeting.
- b. TR individual drafting assignments
 - i. Item was tabled for a future DT meeting.

4. Next Step(s) – Michael Gabor

- a. Discuss future webinar approach and how to respond to informal comments
 - i. The DT settled on providing a summary response that identifies how it used comments submitted by stakeholders during the informal comment period during the expected webinar to take place after posting Draft 2 for a 45-day formal comment and additional ballot.
- b. DT will continue Question 4 themes discussion and begin Technical Rationale revisions and assignments at the next DT meeting.
- c. Project is tentatively scheduled to post for 45-day formal comment and additional ballot in late-September 2025

5. Adjourn

- a. The meeting adjourned at 3:57 p.m. Eastern by consent.

Parking Lot

Topic	Due Date
Revisit Attachment 1 and discuss suggested language of "within a Balancing Authority Area" and consider need for a new term for "aggregated" to increase clarity.	July 10, 2025
Revisit Attachment 2 and discuss need to still reference "BPS".	July 10, 2025
Developer to reach out to BPA to get clarification on their comment and then follow up with NERC EA staff for their input on reporting expectations on event reporting for Category 1.j.	In Progress
Follow up on commercial nuclear power plant concern on EOP-004 duplicate reporting of physical damage or threats, as commenter's requested changes may be outside of the SAR's scope.	In Progress
Follow up with NERC Event Analysis and Legal staff regarding need to include Category 1j reportable events, as listed in the SAR.	In Progress
Follow up on Requirement R2 VSLs with NERC Compliance and Legal staff on proposed language and report back to the DT.	In Progress
Add graphs, etc. to the Implementation Guidance to support the IBR generation loss event reporting category and illustrate the 30 second or less period.	July 31, 2025
Select webinar date to coincide with after posting Draft 2 for a 45-day formal comment and additional ballot. Prepare slides and include a summary response to the informal comment period.	Late-September 2025
Developer to include a question for the next comment form asking whether what the DT proposed clarifies which telemetry data (BES vs. BPS) are to be included in the calculation.	Late-September 2025

Attachment 1

Name	Company	Member/ Observer	Attendance (Y/N)
Charlie Cook	Duke Energy	Member	Y
Ali Miremadi	California ISO	Member	Y
Patrick Gravois	ERCOT	Member	Y
Michael Ropp	Sandia National Laboratories	Member	Y
Filippo Benigni	Florida Power & Light	Member	N
Todd Bennett	AECI	Member	Y
Kellie Macpherson	Radian Generation (consulting)	Member	N
Cindy Robert	Hydro-Quebec	Member	N
Rebecca Skalko	MISO	Member	N
Mario L. Kiresich	SCE	Member	N
Rob Robertson	Leeward Renewable Energy	Member	Y
Dominique Love	NERC	Developer	Y
Michael Gabor	NERC	Developer	Y
Ruida Shu	NPCC	Observer	N
Terri Pyle	Oklahoma Gas & Electric	Observer	N