

A. Introduction

1. **Title:** Emergency Operations
2. **Number:** EOP-011-1
3. **Purpose:** To address the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed Operating Plan(s) to mitigate operating Emergencies, and that those plans are coordinated within a Reliability Coordinator Area.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1 Balancing Authority
 - 4.1.2 Reliability Coordinator
 - 4.1.3 Transmission Operator
5. **Effective Date:**

See *Implementation Plan for EOP-011-1*
6. **Background:**

EOP-011-1 consolidates requirements from three standards: EOP-001-2.1b, EOP-002-3.1, and EOP-003-2.

The standard streamlines the requirements for Emergency operations for the Bulk Electric System into a clear and concise standard that is organized by Functional Entity. In addition, the revisions clarify the critical requirements for Emergency Operations, while ensuring strong communication and coordination across the Functional Entities.

B. Requirements and Measures

- R1. Each Transmission Operator shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include the following, as applicable: *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning]*
 - 1.1. Roles and responsibilities for activating the Operating Plan(s);
 - 1.2. Processes to prepare for and mitigate Emergencies including:
 - 1.2.1. Notification to its Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency;
 - 1.2.2. Cancellation or recall of Transmission and generation outages;
 - 1.2.3. Transmission system reconfiguration;
 - 1.2.4. Redispatch of generation request;

- M2.** Each Balancing Authority will have a dated Operating Plan(s) developed in accordance with Requirement R2 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R2.
- R3.** The Reliability Coordinator shall review the Operating Plan(s) to mitigate operating Emergencies submitted by a Transmission Operator or a Balancing Authority regarding any reliability risks that are identified between Operating Plans. *[Violation Risk Factor: High] [Time Horizon: Operations Planning]*
- 3.1.** Within 30 calendar days of receipt, the Reliability Coordinator shall:
- 3.1.1.** Review each submitted Operating Plan(s) on the basis of compatibility and inter-dependency with other Balancing Authorities' and Transmission Operators' Operating Plans;
 - 3.1.2.** Review each submitted Operating Plan(s) for coordination to avoid risk to Wide Area reliability; and
 - 3.1.3.** Notify each Balancing Authority and Transmission Operator of the results of its review, specifying any time frame for resubmittal of its Operating Plan(s) if revisions are identified.
- M3.** The Reliability Coordinator will have documentation, such as dated e-mails or other correspondences that it reviewed Transmission Operator and Balancing Authority Operating Plans within 30 calendar days of submittal in accordance with Requirement R3.
- R4.** Each Transmission Operator and Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R3 and resubmit its Operating Plan(s) to its Reliability Coordinator within a time period specified by its Reliability Coordinator. *[Violation Risk Factor: High] [Time Horizon: Operation Planning]*
- M4.** The Transmission Operator and Balancing Authority will have documentation, such as dated emails or other correspondence, with an Operating Plan(s) version history showing that it responded and updated the Operating Plan(s) within the timeframe identified by its Reliability Coordinator in accordance with Requirement R4.
- R5.** Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority within its Reliability Coordinator Area shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators. *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*

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- M5.** Each Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator within its Reliability Coordinator Area will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that will be used to determine if the Reliability Coordinator communicated, in accordance with Requirement R5, with other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators .
- R6.** Each Reliability Coordinator that has a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area shall declare an Energy Emergency Alert, as detailed in Attachment 1. [*Violation Risk Factor: High*]
[*Time Horizon: Real-Time Operations*]
- M6.** Each Reliability Coordinator, with a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that it declared an Energy Emergency Alert, as detailed in Attachment 1, in accordance with Requirement R6.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Evidence Retention

The Balancing Authority, Reliability Coordinator, and Transmission Operator shall keep data or evidence to show compliance, as identified below, unless directed by its Compliance Enforcement Authority (CEA) to retain specific evidence for a longer period of time as part of an investigation. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- The Transmission Operator shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R1 and R4 and Measures M1 and M4.
- The Balancing Authority shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R2 and R4, and Measures M2 and M4.
- The Reliability Coordinator shall maintain evidence of compliance since the last audit for Requirements R3, R5, and R6 and Measures M3, M5, and M6.

If a Balancing Authority, Reliability Coordinator or Transmission Operator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Assessment Processes:

As defined in the NERC Rules of Procedure; “Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.

1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real-time Operations, Operations Planning, Long-term Planning	High		The Transmission Operator developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to maintain it.	The Transmission Operator developed an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to have it reviewed by its Reliability Coordinator.	The Transmission Operator failed to develop an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. OR The Transmission Operator developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to implement it.

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R2	Real-time Operations, Operations Planning, Long-term Planning	High	N/A	The Balancing Authority developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to maintain it.	The Balancing Authority developed an Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to have it reviewed by its Reliability Coordinator.	The Balancing Authority failed to develop an Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area. OR The Balancing Authority developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to implement it.

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R3	Operations Planning	High	N/A	N/A	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator within 30 calendar days.	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator.
R4	Operations Planning	High	N/A	N/A	The Transmission Operator or Balancing Authority failed to update and resubmit its Operating Plan(s) to its Reliability Coordinator within the timeframe specified by its Reliability Coordinator.	The Transmission Operator or Balancing Authority failed to update and resubmit its Operating Plan(s) to its Reliability Coordinator.
R5	Real-time Operations	High	N/A	N/A	The Reliability Coordinator that received an Emergency	The Reliability Coordinator that received an Emergency

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
					notification from a Transmission Operator or Balancing Authority did notify neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators but failed to notify within 30 minutes from the time of receiving notification.	notification from a Transmission Operator or Balancing Authority failed to notify neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators.
R6	Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area failed to declare an Energy Emergency Alert.

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	November 13, 2014	Adopted by Board of Trustees	Merged EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.
1	November 19, 2015	FERC approved EOP-011-1. Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000. Order No. 818	

Attachment 1-EOP-011-1 Energy Emergency Alerts

Introduction

This Attachment provides the process and descriptions of the levels used by the Reliability Coordinator in which it communicates the condition of a Balancing Authority which is experiencing an Energy Emergency.

A. General Responsibilities

- 1. Initiation by Reliability Coordinator.** An Energy Emergency Alert (EEA) may be initiated only by a Reliability Coordinator at 1) the Reliability Coordinator's own request, or 2) upon the request of an energy deficient Balancing Authority.
- 2. Notification.** A Reliability Coordinator who declares an EEA shall notify all Balancing Authorities and Transmission Operators in its Reliability Coordinator Area. The Reliability Coordinator shall also notify all neighboring Reliability Coordinators.

B. EEA Levels

Introduction

To ensure that all Reliability Coordinators clearly understand potential and actual Energy Emergencies in the Interconnection, NERC has established three levels of EEAs. The Reliability Coordinators will use these terms when communicating Energy Emergencies to each other. An EEA is an Emergency procedure, not a daily operating practice, and is not intended as an alternative to compliance with NERC Reliability Standards.

The Reliability Coordinator may declare whatever alert level is necessary, and need not proceed through the alerts sequentially.

1. EEA 1 — All available generation resources in use.

Circumstances:

- The Balancing Authority is experiencing conditions where all available generation resources are committed to meet firm Load, firm transactions, and reserve commitments, and is concerned about sustaining its required Contingency Reserves.
- Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.

2. EEA 2 — Load management procedures in effect.

Circumstances:

- The Balancing Authority is no longer able to provide its expected energy requirements and is an energy deficient Balancing Authority.
- An energy deficient Balancing Authority has implemented its Operating Plan(s) to mitigate Emergencies.

- An energy deficient Balancing Authority is still able to maintain minimum Contingency Reserve requirements.

During EEA 2, Reliability Coordinators and energy deficient Balancing Authorities have the following responsibilities:

2.1 Notifying other Balancing Authorities and market participants. The energy deficient Balancing Authority shall communicate its needs to other Balancing Authorities and market participants. Upon request from the energy deficient Balancing Authority, the respective Reliability Coordinator shall post the declaration of the alert level, along with the name of the energy deficient Balancing Authority on the RCIS website.

2.2 Declaration period. The energy deficient Balancing Authority shall update its Reliability Coordinator of the situation at a minimum of every hour until the EEA 2 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the RCIS website as changes occur and pass this information on to the neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators.

2.3 Sharing information on resource availability. Other Reliability Coordinators of Balancing Authorities with available resources shall coordinate, as appropriate, with the Reliability Coordinator that has an energy deficient Balancing Authority.

2.4 Evaluating and mitigating Transmission limitations. The Reliability Coordinator shall review Transmission outages and work with the Transmission Operator(s) to see if it's possible to return to service any Transmission Elements that may relieve the loading on System Operating Limits (SOLs) or Interconnection Reliability Operating Limits (IROLs).

2.5 Requesting Balancing Authority actions. Before requesting an EEA 3, the energy deficient Balancing Authority must make use of all available resources; this includes, but is not limited to:

2.5.1 All available generation units are on line. All generation capable of being on line in the time frame of the Emergency is on line.

2.5.2 Demand-Side Management. Activate Demand-Side Management within provisions of any applicable agreements.

3. EEA 3 — Firm Load interruption is imminent or in progress.

Circumstances:

- The energy deficient Balancing Authority is unable to meet minimum Contingency Reserve requirements.

During EEA 3, Reliability Coordinators and Balancing Authorities have the following responsibilities:

3.1 Continue actions from EEA 2. The Reliability Coordinators and the energy deficient Balancing Authority shall continue to take all actions initiated during EEA 2.

3.2 Declaration Period. The energy deficient Balancing Authority shall update its Reliability Coordinator of the situation at a minimum of every hour until the EEA 3 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the RCIS website as changes occur and pass this information on to the neighboring Reliability Coordinators, Balancing Authorities, and Transmission Operators.

3.3 Reevaluating and revising SOLs and IROLs. The Reliability Coordinator shall evaluate the risks of revising SOLs and IROLs for the possibility of delivery of energy to the energy deficient Balancing Authority. Reevaluation of SOLs and IROLs shall be coordinated with other Reliability Coordinators and only with the agreement of the Transmission Operator whose Transmission Owner (TO) equipment would be affected. SOLs and IROLs shall only be revised as long as an EEA 3 condition exists, or as allowed by the Transmission Owner whose equipment is at risk. The following are minimum requirements that must be met before SOLs or IROLs are revised:

3.3.1 Energy deficient Balancing Authority obligations. The energy deficient Balancing Authority, upon notification from its Reliability Coordinator of the situation, it will immediately take whatever actions are necessary to mitigate any undue risk to the Interconnection. These actions may include Load shedding.

3.4 Returning to pre-Emergency conditions. Whenever energy is made available to an energy deficient Balancing Authority such that the Systems can be returned to its pre-Emergency SOLs or IROLs condition, the energy deficient Balancing Authority shall request the Reliability Coordinator to downgrade the alert level.

3.4.1 Notification of other parties. Upon notification from the energy deficient Balancing Authority that an alert has been downgraded, the Reliability Coordinator shall notify the neighboring Reliability Coordinators (via the RCIS), Balancing Authorities and Transmission Operators that its Systems can be returned to its normal limits.

Alert 0 - Termination. When the energy deficient Balancing Authority is able to meet its Load and Operating Reserve requirements, it shall request its Reliability Coordinator to terminate the EEA.

0.1 Notification. The Reliability Coordinator shall notify all other Reliability Coordinators via the RCIS of the termination. The Reliability Coordinator shall also notify the neighboring Balancing Authorities and Transmission Operators.

Guidelines and Technical Basis

Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

Rationale for R1:

The EOP SDT examined the recommendation of the EOP Five-Year Review Team (FYRT) and FERC directive to provide guidance on applicable entity responsibility that was included in EOP-001-2.1b. The EOP SDT removed EOP-001-2.1b, Attachment 1, and incorporated it into this standard under the applicable requirements. This also establishes a separate requirement for the Transmission Operator to create an Operating Plan(s) for mitigating operating Emergencies in its Transmission Operator Area.

The Operating Plan(s) can be one plan, or it can be multiple plans.

“Notification to its Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency” was retained. This is a process in the plan(s) that determines when the Transmission Operator must notify its Reliability Coordinator.

To meet the associated measure, an entity would likely provide evidence that such an evaluation was conducted along with an explanation of why any overlap of Loads between manual and automatic load shedding was unavoidable or reasonable.

An Operating Plan(s) is implemented by carrying out its stated actions.

If any Parts of Requirement R1 are not applicable, the Transmission Operator should note “not applicable” in the Operating Plan(s). The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).

With respect to automatic Load shedding schemes that include both UVLS and UFLS, the EOP SDT’s intent is to keep manual and automatic Load shed schemes as separate as possible, but realizes that sometimes, due to system design, there will be overlap. The intent in Requirement R1 Part 1.2.5. is to minimize, as much as possible, the use of manual Load shedding which is already armed for automatic Load shedding. The automatic Load shedding schemes are the important backstops against Cascading outages or System collapse. If any entity manually sheds a Load which was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. Each entity should review their automatic Load shedding schemes and coordinate their manual processes so that any overlapping use of Loads is avoided to the extent reasonably possible.

Application Guidelines

Rationale for R2:

To address the recommendation of the FYRT and the FERC directive to provide guidance on applicable entity responsibility in EOP-001-2.1b, Attachment 1, the EOP SDT removed EOP-001-2.1b, Attachment 1, and incorporated it into this standard under the applicable requirements. EOP-011-1 also establishes a separate requirement for the Balancing Authority to create its Operating Plan(s) to address Capacity and Energy Emergencies.

The Operating Plan(s) can be one plan, or it can be multiple plans.

An Operating Plan(s) is implemented by carrying out its stated actions.

If any Parts of Requirement R2 are not applicable, the Balancing Authority should note “not applicable” in the Operating Plan(s). The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).

The EOP SDT retained the statement “Operator-controlled manual Load shedding,” as it was in the current EOP-003-2 and is consistent with the intent of the EOP SDT.

With respect to automatic Load shedding schemes that include both UVLS and UFLS, the EOP SDT’s intent is to keep manual and automatic Load shedding schemes as separate as possible, but realizes that sometimes, due to system design, there will be overlap. The intent in Requirement R2 Part 2.2.8. is to minimize as much as possible the use manual Load shedding which is already armed for automatic Load shedding. The automatic Load shedding schemes are the important backstops against Cascading outages or System collapse. If an entity manually sheds a Load that was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. Each entity should review its automatic Load shedding schemes and coordinate its manual processes so that any overlapping use of Loads is avoided to the extent possible.

The EOP SDT retained Requirement R8 from EOP-002-3.1 and added it to the Parts in Requirement R2.

Rationale for R3:

The SDT agreed with industry comments that the Reliability Coordinator does not need to approve BA and TOP plan(s). The SDT has changed this requirement to remove the approval but still require the RC to review each entity’s plan(s), looking specifically for reliability risks. This is consistent with the Reliability Coordinator’s role within the Functional Model and meets the FERC directive regarding the RC’s involvement in Operating Plan(s) for mitigating Emergencies.

Rationale for Requirement R4:

Requirement R4 supports the coordination of Operating Plans within a Reliability Coordinator Area in order to identify and correct any Wide Area reliability risks. The EOP SDT expects the Reliability Coordinator to make a reasonable request for response time. The time period requested by the Reliability Coordinator to the Transmission Operator and Balancing Authority to update the Operating Plan(s) will depend on the scope and urgency of the requested change.

Application Guidelines

Rationale for R5

The EOP SDT used the existing requirement in EOP-002-3.1 for the Balancing Authority and added the words “within 30 minutes from the time of receiving notification” to the requirement to communicate the intent that timeliness is important, while balancing the concern that in an Emergency there may be a need to alleviate excessive notifications on Balancing Authorities and Transmission Operators. By adding this time limitation, a measurable standard is set for when the Reliability Coordinator must complete these notifications.

Rationale for Introduction

LSEs were removed from Attachment 1, as an LSE has no Real-time reliability functionality with respect to EEAs.

EOP-002-3.1 Requirement R9 was in place to allow for a Transmission Service Provider to change the priority of a service request, as permitted in its transmission tariff, informing the Reliability Coordinator so that the service would not be curtailed by a TLR; and since the Tagging Specs did not allow profiles to be changed, this was the only method to accomplish it. Under NAESB WEQ E-tag Specification v1811 R3.6.1.3, this has been modified and now the TSP has the ability to change the Transmission priority which, in turn, is reflected in the IDC. This technology change allows for the deletion of Requirement R9 in its entirety. Requirement R9 meets with Criterion A of Paragraph 81 and should be retired.

Rationale for (2) Notification

The EOP SDT deleted the language, “*The Reliability Coordinator shall also notify all other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS). Additionally, conference calls between RCs shall be held as necessary to communicate system conditions. The RC shall also notify the other RCs when the alert has ended*” as duplicative to proposed IRO-014-3 Requirement R1:

- R1. Each Reliability Coordinator shall have and implement Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. These Operating Procedures, Operating Processes, or Operating Plans shall include, but are not limited to, the following:
- 1.1 Communications and notifications, and the process to follow in making those notifications.
 - 1.2 Energy and capacity shortages.
 - 1.3 Control of voltage, including the coordination of reactive resources.
Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments.
 - 1.5 Authority to act to prevent and mitigate system conditions which could adversely impact other Reliability Coordinator Areas.
 - 1.6 Provisions for weekly conference calls.

Application Guidelines

Rationale for EEA 2:

The EOP SDT modified the “Circumstances” for EEA 2 to show that an entity will be in this level when it has implemented its Operating Plan(s) to mitigate Emergencies but is still able to maintain Contingency Reserves.

Rationale for EEA 3:

This rationale was added at the request of stakeholders asking for justification for moving a lack of Contingency Reserves into the EEA3 category.

The previous language in EOP-002-3.1, EEA 2 used “Operating Reserve,” which is an all-inclusive term, including all reserves (including Contingency Reserves). Many Operating Reserves are used continuously, every hour of every day. Total Operating Reserve requirements are kind of nebulous since they do not have a specific hard minimum value. Contingency Reserves are used far less frequently. Because of the confusion over this issue, evidenced by the comments received, the drafting team thought that using minimum Contingency Reserve in the language would eliminate some of the confusion. This is a different approach but the drafting team believes this is a good approach and was supported by several commenters.

Using Contingency Reserves (which is a subset of Operating Reserves) puts a BA closer to the operating edge. The drafting team felt that the point where a BA can no longer maintain this important Contingency Reserves margin is a most serious condition and puts the BA into a position where they are very close to shedding Load (“imminent or in progress”). The drafting team felt that this warrants categorization at the highest level of EEA.