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NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Project 2015-02

Periodic Review of Emergency Operations Standards

Laura Anderson, NERC Standard Developer
Industry Webinar
April 24, 2015

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Administrative items

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Participants are reminded that this meeting is public. The access number was widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders. (SPM, Section 1.4)

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Periodic Review Team

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Member	Entity
David McRee (Chair)	Duke Energy
Connie Lowe (Vice Chair)	Dominion Resources Services, Inc.
Mark Atkins	VELCO
Matthew Beilfuss	We Energies
Richard Cobb	MISO
Bobby Crump	Luminant Generation Company
Charles Jen	CenterPoint Energy Houston Electric
David Mahlmann	New York ISO
Robert Staton	Xcel Energy

Member	Entity
Michael Gildea	FERC Representative
Nick Henery	FERC Representative
Kenneth Goldsmith	PMOS Representative
Laura Anderson	NERC Staff
Steve Crutchfield	NERC Staff
Sean Cavote	NERC, Manager of Standards Development
Valerie Agnew	NERC, Director of Standards
Sean Bodkin	NERC Counsel

- Project 2015-02 Periodic Review of Emergency Operations
 - Emergency Operations Periodic review was delayed on the following standards to allow the Electric Reliability Organization (ERO) and industry to gain compliance experience with revisions to the standards that became enforceable in 2013 and early 2014.
 - EOP-004-2
 - EOP-005-2
 - EOP-006-2
 - EOP-008-1

- February:
 - NERC SC accepted the recommendations of the Project 2015-02 Emergency Operations Periodic Review Team (EOP PRT)
 - February 11, 2015, First Meeting of the team via conference call for introductions of team members and introduction of the documents
 - February 17 – 18, 2015 Joint Technical Conference with FAC PRT in Salt Lake City
 - February 18 – 20, 2015 EOP PRT meeting in Salt Lake City
- March
 - March 11 – 13, 2015 EOP PRT meeting in St. Petersburg, Florida
 - Initial posting March 27, 2015 – May 11, 2015 for 45-day formal comment period

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FERC Staff Observer – Nick Henery

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FERC Order 749, Paragraph 18:

“Requirement R11 of EOP-005-2 requires that a minimum of two hours of system restoration training be provided every two years to field switching personnel performing “unique tasks” associated with the transmission operator’s restoration plan. In the NOPR, the Commission expressed concern that the applicable entities may not understand what the term “unique tasks” means. We requested comment on what is intended by that term and on whether guidance should be provided to the transmission operators, transmission owners, and distribution providers who are responsible for providing training. In addition, the NOPR sought comment as to whether the unique tasks should be identified in each transmission operator’s restoration plan.”

FERC Order 749, Paragraph 24:

Paragraph 24: “Both EEI and APPA recognize potential benefit in the development of further guidance as to the term “unique tasks,” and BPA is uncertain as to the meaning of the term and consequently unsure as to how to demonstrate compliance with its training obligation. NERC, 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.”²³ 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.”



Project 2015-02 – Periodic Review of Emergency Operations

**History of standards under review –
Nick Henery, FERC**

History of:

- **EOP-004-2**
- **EOP-005-2**
- **EOP-006-2**
- **EOP-008-1**

Nick Henery, FERC

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Preliminary Recommendations

David McRee, Chair, Duke Energy

Connie Lowe, Vice Chair, Dominion Resources Services, Inc.

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- Clarity revision recommendations for Attachment 1
 - Review for revision “Entity with Reporting Responsibility” for proper application of “Initiating Entity.”
 - Include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.
 - Generation loss/event type: The threshold of reporting is per Interconnection; and, therefore, the EOP PRT recommends that the GOP be removed from reporting responsibility, eliminating duplicative reporting by the GOP and BA.

Independent Expert Review Project (IERP) recommends retirement of Requirement R3 or, in the alternative, to combine Requirements R1 and R3.

- Requirement R3
 - The EOP PRT ***does not*** recommend retiring Requirement R3. Requirement R3, while administrative, does support Real-time operations as a function necessary to promote reliability.
 - Requirement R3 requires validation to ensure that the contact information, including phone numbers, is still accurate in the Operating Plan. During Emergency operations, operators should not be burdened with looking up contact information or having invalid phone numbers. Due to the nature of contact information changing, the EOP PRT recommends retaining Requirement R3 in EOP-004-2 to support up-to-date listings for use during emergency operations.

- Combining of Requirements R1 and R3
 - The EOP PRT ***does not*** support the recommendation contained in the IERP to combine Requirements R1 and R3.
 - The EOP PRT recommends that Requirements R1 and R3 remain as separate requirements due to differing VRF levels (Requirement R1 is a low VRF level, whereas Requirement R3 is a **high** medium VRF level).

- Recommended requirement retirements
 - Requirement R10
 - Duplicative of proposed PER-005-2
 - The four identified tasks identified in R10, reviewed every year, provides for elements of the training

- Requirements not being recommended for retirement
 - Requirement R7
 - R7 holds accountability to *implement* the plan
 - EOP PRT recommends revision by using already-approved industry terminology from standards: “Develop, maintain and implement”
 - Requirement R8
 - The TOP plan requires RC approval for resynchronizing
 - When event occurs, that portion of the plan to be adhered to
 - Requirement R12
 - R12 is not a training requirement, it is a testing requirement (drill, exercise, or simulation), which determines the necessity for personnel training (PER-005-1)

- Requirement R6 – addition of a Rationale Box to clarify “dynamic simulations.”
 - **Proposed Rationale Box:** Dynamic simulations should simulate your frequency and voltage response beyond the transient period of time. It is the intent of the (future) EOP SDT that the simulation provides for the feedback of the System performance as generation and Load are added.

- Recommended requirement retirements
 - Requirement Parts R1.2, R1.3, and R1.4
 - Redundant with Requirement Part R1.5
 - Requirement R9
 - Duplicative with Proposed PER-005-2 Requirement R1

- Recommended revision
 - Requirement Part R1.9
 - The EOP PRT recommends EOP-006-2 be revised to remove Requirement Part R1.9, as this is an unnecessary action

- Requirements not being recommended for retirement
 - Requirement R7
 - Accountability to *implement* the plan
 - EOP PRT recommends revision by using already-approved industry terminology from standards: “Develop, maintain and implement”
 - Requirement R8
 - R8 requires only implementing a very specific element of the restoration plan; i.e., resynchronizing islanded areas
 - EOP PRT recommends revision by using already-approved industry terminology from standards: “Develop, maintain and implement” so that all pertinent aspects of the plan be implemented as system conditions warrant
 - Requirement R10
 - Addresses exercises and drills, which is a method of testing and validating implementation of the plan
 - The GOP drill requirement in EOP-005-2 is not captured in PER-005

- Requirement R1, subpart 1.1 – the EOP PRT recommends revision (and the associated Measure) for clarity to the intended timeframe to restore primary control center functionality
 - **1.1** The location and method of implementation for providing backup functionality ~~for the time it takes to restore the primary control center functionality.~~

- Please contact the NERC Standards Developer for more information, to schedule an outreach session, or to be added to a project's email distribution list:
 - Laura Anderson: laura.anderson@nerc.net
 - Stephen Crutchfield: stephen.crutchfield@nerc.net

- May 11, 2015 – 45-day formal comment period closes
 - Please submit comments by May 11, these are valuable to the EOP PRT!
- May 18 – 20, 2015 meeting in Denver, CO
- Post Final Recommendations, red-lined standards, and SARs first week of June 2015
- Present the final recommendations, red-lined standards, and SARs to the Standards Committee July 2015
- Present Project 2015-02 to NERC Board August 2015



Questions and Answers