

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# EOP-001-2.1b – Emergency Operations Planning

***This section must be completed by the Compliance Enforcement Authority.***

**NERC BOT Approval Date: 11/4/2010**

**FERC Approval Date: 9/13/2012**

**Reliability Standard Enforcement Date in the United States: 7/1/2013**

**Registered Entity:**

**NCR Number:**

**Applicable Function(s):** BA, TOP

**Compliance Assessment Date:**

**Compliance Monitoring Method:**

**Names of Auditors:**

# 

# **Subject Matter Experts**

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

**Registered Entity Response (Required):**

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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# **R1 Supporting Evidence and Documentation**

1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2.1b, R1**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | Verify that operating agreements with adjacent Balancing Authorities, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities. |

**Auditor Notes:**

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# **R2 Supporting Evidence and Documentation**

1. Each Transmission Operator and Balancing Authority shall:
   1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
   2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
   3. Develop, maintain, and implement a set of plans for load shedding.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2.1b, R2**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | Verify that plans are: |
|  | Developed. |
|  | Maintained. |
|  | Implemented. |
|  | For the following: |
|  | Mitigation of operating emergencies for insufficient generating capacity. |
|  | Mitigation of operating emergencies on the transmission system. |
|  | Load shedding. |

**Auditor Notes:**

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# **R3 Supporting Evidence and Documentation**

1. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
   1. Communications protocols to be used during emergencies.
   2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
   3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
   4. Staffing levels for the emergency.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2.1b, R3**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | Verified that plans are in place to address the following: |
|  | Emergency communications protocols. |
|  | Controlling actions to resolve the emergency, including: |
|  | Load reduction within NERC established timelines. |
|  | Coordinated tasks with adjacent Transmission Operators and Balancing Authorities. |
|  | Appropriate emergency staffing levels. |

**Auditor Notes:**

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# **R4 Supporting Evidence and Documentation**

1. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001 when developing an emergency plan.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2.1b, R4**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | Verify the applicable elements in Attachment 1-EOP-001 were contained in the emergency plan when it was developed, to include: |
|  | Fuel supply and inventory. |
|  | Fuel switching. |
|  | Environmental constraints. |
|  | System energy use. |
|  | Public Appeals. |
|  | Load management. |
|  | Optimization of fuel supply. |
|  | Appeals to customers to utilize alternate fuels. |
|  | Interruptible and curtailable loads to reduce capacity or to conserve fuel supplies. |
|  | Maximization of generator output. |
|  | Notifications to cogeneration and independent power producers to maximize output and availability. |
|  | Governmental requests and notification to appropriate government agencies. |
|  | Load curtailment as it affects the health, safety and welfare of the community served. |
|  | Notification to other operating entities as emergency plans are implemented. |

**Auditor Notes:**

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# **R5 Supporting Evidence and Documentation**

1. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2b, R5**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | Verified that each emergency plan is reviewed and updated annually. |
|  | Verified that a copy of the emergency plan has been provided to: |
|  | The Reliability Coordinator. |
|  | Neighboring Transmission Operators. |
|  | Neighboring Balancing Authorities. |

**Auditor Notes:**

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# **R6 Supporting Evidence and Documentation**

1. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:
   1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.
   2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.
   3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)
   4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

**Registered Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-001-2.1b, R6**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | The Transmission Operator and Balancing Authority shall coordinate emergency plans with other Transmission Operators and Balancing Authorities to include the following: |
|  | Reliable communications between interconnected systems. |
|  | Interchange agreements to provide for emergency capacity or energy transfers. |
|  | Transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. |
|  | deliveries of electrical energy or fuel from remote systems through normal operating channels. |

**Auditor Notes:**

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# **Compliance Finding Summary**

***This section must be completed by the Compliance Enforcement Authority***

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
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# **Additional Information:**

**Reliability Standard**

1. Introduction
2. **Title: Emergency Operations Planning**
3. **Number:** EOP-001-2.1b
4. **Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
5. **Applicability**
   1. Balancing Authorities.
   2. Transmission Operators.
6. **Proposed Effective Date:** Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.
7. Requirements
8. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
9. Each Transmission Operator and Balancing Authority shall:
   1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
   2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
   3. Develop, maintain, and implement a set of plans for load shedding.
10. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
    1. Communications protocols to be used during emergencies.
    2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
    3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
    4. Staffing levels for the emergency.
11. Each Transmission Operator and Balancing Authority shall include the applicable elements in 1-EOP-001 when developing an emergency plan.
12. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.
13. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:
    1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.
    2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.
    3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)
    4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.
14. Measures
15. The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.
16. The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.
17. Compliance
18. **Compliance Monitoring Process**
    1. **Compliance Monitoring Responsibility**

Regional Reliability Organization.

* 1. **Compliance Monitoring Period and Reset Time Frame**

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

* 1. **Data Retention**

Current plan available at all times.

* 1. **Additional Compliance Information**

Not specified.

**Attachment 1-EOP-001**

**Elements for Consideration in Development of Emergency Plans**

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system’s own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer‑owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

**Appendix 1 to EOP-001**

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| **Requirement Number and Text of Requirement** |
| R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities. |
| **Questions:** |
| 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition? 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance? 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement? 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-2, Requirement 1? |
| **Responses:** |
| 1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority. 2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections. 3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities. 4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-2. |

**Appendix 2 to EOP-001**

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| **Requirement Number and Text of Requirement** |
| R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system. |
| **Questions:** |
| Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP? |
| **Questions:** |
| The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 – EOP-001.” |

**Regulatory Language**

**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through October 5, 2011**

**EOP-001-2b**

**Order 693**

P 541. The Emergency Preparedness and Operations (EOP) group of proposed Reliability Standards consists of nine Reliability Standards that address preparation for emergencies, necessary actions during emergencies and system restoration and reporting following disturbances.

P 547. In the NOPR, we stated that the proposed Reliability Standard applies to transmission operators and balancing authorities, that the applicability portion of the Reliability Standard is sufficiently clear as to who must comply with the filed version of the Reliability Standard and that the Reliability Standard can be enforced against these entities … Given the importance NERC attributes to the reliability coordinator in connection with matters covered by EOP-001-0, the Commission is persuaded that specific responsibilities for the reliability coordinator in the development and coordination of emergency plans must be included as part of this Reliability Standard. While balancing authorities and transmission operators are capable of developing, maintaining and implementing plans to mitigate operating emergencies for their specific areas of responsibility, unlike reliability coordinators, they do not have wide-area views.

P 553. In response to the concerns of commenters, the Commission clarifies that the proposed modification does not require that SCADA or its equivalent be installed for all loads. Rather, SCADA would be required only for those loads necessary to mitigate IROL violations and to maintain reliable operations. As we stated in the NOPR, the Commission understands that it is not the intent of the Reliability Standard to require the shedding of all available load within 30 minutes, but rather only the amount necessary to correct system emergencies.Thus the Commission agrees … that not all load reduction schemes should be required to be operable within 30 minutes but only those used for emergency operations.

P 556. …the Commission accepts the 30 minute requirement as a reasonable period within which operators should return the system to a reliable operating state. However in order to satisfy this Requirement, when load shedding is the only viable option, the Commission believes that operators must have the capability through SCADA or other equivalent means to shed appropriate amounts of load in the desired locations as soon as possible to mitigate IROL violations but in no case in more than 30 minutes.

P 566. Accordingly, the Commission concludes that Reliability Standard EOP-001-0 is just, reasonable, not unduly discriminatory or preferential and in the public interest and approves it as mandatory and enforceable. …

P 564. With regard to ISO-NE’s concern that certain activities outlined in Requirement R7.4 are not functions normally performed by independent transmission operators and balancing authorities, the Commission understands that this Requirement covers either delivery of fuel or delivery of electrical energy from remote systems. While arranging for fuel deliveries may be outside of the functions that ISOs and RTOs perform, the requirement to arrange deliveries of electrical energy from remote systems is a function they normally perform. Because an ISO or RTO may choose to either deliver fuel or electrical energy from remote systems, Requirement R7.4 will not burden ISOs and RTOs with functions they do not normally perform.

P 565. The Commission agrees with ISO-NE that the Reliability Standard should be clarified to indicate that the actual emergency plan elements, and not the “for consideration” elements of Attachment 1, should be the basis for compliance. However, all of the elements should be considered when the emergency plan is put together.

P 566. Accordingly, the Commission concludes that Reliability Standard EOP-001-0 is just, reasonable, not unduly discriminatory or preferential and in the public interest and approves it as mandatory and enforceable….

**Order 748**

P 21. The Commission hereby adopts its NOPR proposals and approves new Reliability Standards IRO-008-1, IRO-009-1, and IRO-010-1a; revised Reliability Standards EOP- 001-1, IRO-002-2, IRO-004-2, IRO-005-3, TOP-003-1, TOP-005-2, and TOP-006-2; and the two new NERC Glossary terms: “Operational Planning Analysis” and “Real-time Assessment.” In approving these Reliability Standards, the Commission concludes that they are just, reasonable, not unduly discriminatory or preferential, and in the public interest. These Reliability Standards serve an important reliability purpose in seeking to prevent instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the interconnection by ensuring that the reliability coordinator has the data necessary to assess its reliability coordinator area during the operations horizon and that it takes prompt action to prevent or mitigate instances of exceeding IROLs. Moreover, they clearly identify the entities to which they apply and contain clear and enforceable requirements.

…

P 74. The Commission approves new Reliability Standards IRO-008-1, IRO-009-1, and IRO-010-1a; revised Reliability Standards EOP-001-1, IRO-002-2, IRO-004-2, IRO-005-3, TOP-003-1, TOP-005-2, and TOP-006-2; and the two new NERC Glossary terms: “Operational Planning Analysis” and “Real-time Assessment.” The three new Reliability Standards (IRO-008-1, IRO-009-1 and IRO-010-1a, governing reliability coordinator analyses, operational actions and data collection) replace parts of the currently-effective Reliability Standards EOP-001-0, IRO-002-1, IRO-004-1, IRO-005-2, TOP-003-0, TOP-005-1 and TOP-006-1 approved by the Commission in Order No. 693.

P 75. Thus, this final rule does not impose entirely new burdens on the affected entities. With the exception of the addition of Interchange Authority as an applicable entity in IRO-010-1a, the currently-effective standards EOP-001-0, IRO-002-1, IRO-004-1, IRO-005-2, TOP-003-0, TOP-005-1 and TOP-006-1 require actions by the same applicable group of entities.

…

**Order 749**

P 12. Proposed Reliability Standard EOP-001-1 contains seven requirements for the stated purpose of requiring each transmission operator and balancing authority to develop, maintain, and implement a set of plans to mitigate operating emergencies and to coordinate these plans with other transmission operators, balancing authorities, and the reliability coordinator. [Footnote omitted.] It modifies EOP-001-0 by deleting Requirement R3.4, which requires transmission operators and balancing authorities to develop, maintain and implement restoration plans, because proposed Reliability Standards EOP-005-2 and EOP-006-2 incorporate and expand upon this Requirement.

P 17. In the NOPR, the Commission proposed to approve the three EOP Reliability Standards and the glossary term filed by NERC in this proceeding. None of the nine interested parties filing comments to the NOPR objects to such an approval. For the reasons described below, the Commission adopts the NOPR proposal and approves Reliability Standards EOP-001-1, EOP-005-2, and EOP-006-2 as well as the proposed glossary term “Blackstart Resource” as just, reasonable, not unduly discriminatory or preferential, and in the public interest. [Footnote omitted.] EOP-005-2 and EOP-006-2 clarify the responsibilities of the reliability coordinator and transmission operator in the restoration process and restoration planning and address the Commission’s directives in Order No. 693 related to the EOP Standards. By enhancing the rigor of the restoration planning process, the Reliability Standards represent an improvement from the current Standards and will improve the reliability of the Bulk-Power System. The Commission is not directing any modifications to the three new Reliability Standards. Nevertheless, as discussed below, commenters raised several issues for consideration, at the time these standards are next revisited, which we believe could improve these new Reliability Standards. The Commission also approves NERC retiring the four currently effective Reliability Standards, EOP-001-0, EOP-005-1, EOP-006-1, and EOP-009-0 as well as the definition of “Blackstart Capability Plan” and withdrawing pending Reliability Standard EOP-007-0 concurrent with the effectiveness of the EOP-001-1, EOP-005-2, and EOP-006-2 and the definition of the term “Blackstart Resource.”

P 57. These regulations are effective [insert date 60 days from publication in FEDERAL REGISTER]. The Commission notes that although the determinations made in this Final Rule are effective [insert date that is 60 days from publication in the FEDERAL REGISTER], in those jurisdictions where regulatory approval is required, Reliability Standard EOP-001-1 will not become effective until the first day of the first calendar quarter three months after regulatory approval is obtained,…

**Orders 748-A and 749-A**

P6. Second, NERC requests clarification regarding the Commission’s approval of Reliability Standard EOP-001-1. NERC notes that at the same time NERC submitted a Petition in RM10-15-000, NERC filed a petition in Docket No. RM10-16-000 seeking approval of certain EOP Reliability Standards. Each Petition contained specific proposed changes to Reliability Standard EOP-001-0. NERC states in both Petitions that it requested that the Commission approve revised Reliability Standard EOP-001-1 only if the concurrent petition is not previously (or concurrently) approved by the Commission and otherwise to approve Reliability Standard EOP-001-2, which reflected the changes in both Petitions, rather than EOP-001-1. NERC requests clarification that EOP-001-2 is the approved Reliability Standard given the concurrent issuance of the Final Rules.

P 7. Finally, NERC requests clarification regarding the effective date of Reliability Standard EOP-001-2. NERC states that it requested Reliability Standard EOP-001-1 to become effective “the first day of the first calendar quarter, three months after applicable regulatory approval.” However, NERC states that it also requested that if the Commission previously or concurrently approved Reliability Standard EOP-001-2, it should be made effective “twenty-four months after the first day of the first calendar quarter following applicable regulatory approval.” NERC seeks clarification that Reliability Standard EOP-001-2 be made effective in accordance with the implementation schedule in the EOP-001-2 Reliability Standard given the concurrent issuance of the Final Rules.

P 9. The Commission also clarifies that it approved Reliability Standard EOP-001-2. Each NERC Petition in Docket Nos. RM10-15-000 and RM10-16-000 proposed unique changes to EOP-001-0 not reflected in the other petition presenting a logistical problem with cross-references. Given the issuance of Order Nos. 748 and 749, both on March 17, 2011, Reliability Standard EOP-001-2 is the currently-operative version. Moreover, we clarify that Reliability Standard EOP-001-2 shall become effective according to the implementation schedule in that standard.

**N. Am. Elec. Reliability Corp., 137 F.E.R.C. ¶ 61,196  (December 15, 2011)**

16. The interpretation of Requirement R1 supports the stated purpose of the Reliability Standard, i.e., that each transmission operator and balancing authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies and that such plans need to be coordinated with other transmission operators and balancing authorities, and the reliability coordinator. The interpretation also clarifies the meaning of emergency assistance in the context of Reliability Standard EOP-001-0. Further, the interpretation clarifies the meaning of the terms adjacent and remote with regard to neighboring balancing authorities, and clarifies the relationship between Reserve Sharing Groups and Reliability Standard EOP-001-0. Finally, the language of the interpretation is consistent with the language of the requirement. Accordingly, the Commission approves the ERO's interpretation of Requirement R1 of Reliability Standard EOP-001-0.  
  
**B. Requirement R3.2**  
   
17. The Commission finds that the interpretation of Requirement R3.2 supports the stated purpose of the Reliability Standard, i.e., that each transmission operator and balancing authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies and that such plans need to be coordinated with other transmission operators and balancing authorities, and the reliability coordinator. In addition, the interpretation reinforces the need for communication and coordination between the transmission operator and balancing authority both in planning to mitigate operating emergencies on the transmission system through the development of operating agreements and in carrying out such operating agreements during an actual system emergency. n14   
  
18. Accordingly, the Commission approves Reliability Standard EOP-001-0b, effective as of the date of this order. In addition, the Commission approves the retirement of Reliability Standard EOP-001-0b effective as of June 30, 2013, n15 and an effective date of July 1, 2013 for Reliability Standard EOP-001-2b, consistent with the Commission's approval of Reliability Standard EOP-001-2 in Order Nos. 748 and 749. n16

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 08/02/2012 | RSAW Working Group | Deleted Requirement 2.4 and revised audit approaches. |
| 1.1 | 10/05/2012 | NERC Legal | Regulatory Language Update |
| 1.2 | 08/09/2013 | NERC Compliance | Update RSAW for errata changes to standard. Administrative edits only – changed title and references to Attachment 1 to omit inclusion of version numbers and corrected standard references in Appendix 1 Question 4. Made grammatical changes. |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)