

Summary of Proposed Reliability Standards: EOP-011-4 and TOP-002-5

Details of Standard Development

Reliability Standards Authority: NERC

Standard(s)	EOP-011-4 – Emergency Operations TOP-002-5 – Operations Planning
Purpose	<p>The purpose of NERC Reliability Standard EOP-011-4 ensures that each Transmission Operator and Balancing Authority has developed and implement plan(s) to mitigate operating Emergencies.</p> <p>Reliability Standard TOP-002-5 ensure that Transmission Operators and Balancing Authorities have plans for operating within specified limits.</p>
Change Type:	FERC Directive
Affected Functional Entities:	<ul style="list-style-type: none">• Balancing Authority (BA)• Transmission Operator (TOP)• Reliability Coordinator (RC)• Transmission Owner (TO)
Ballot Results:	<p>EOP-011-4 - 73.29 % approval / 92.5% quorum</p> <p>TOP-002-5 - 79.56% approval / 92.11% quorum</p>
Ontario Participant Support:	<ul style="list-style-type: none">• There were 250 votes cast by NERC registered entities.• 2 OEB rate-regulated entities voted (2/250) affirmative.
Impact Within Ontario	Not assessed.

Standard Development Milestones

Date	Action
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October 23, 2023	Adopted by NERC Board of Trustees
October 30, 2023	NERC Petition for Approval
November 15, 2023	IESO Posting Date
March 19, 2024	End of OEB Preliminary Review Period
TBD	FERC Order Issued
TBD	US Mandatory Enforcement Date
TBD	Ontario Enforcement Date (Milestones in Reliability Standard Development and Lifecycle)

Summary

Proposed revisions to EOP-011-4 and TOP-002-5 are part of the second phase of work to address the extreme cold weather recommendations (from the FERC, NERC, and Regional Entity Staff Report on the causes of the February 2021 cold weather event affecting Texas and the south central United States).

Proposed Reliability Standard EOP-011-4 will require Balancing Authorities, Transmission Operators, and load shedding entities identified by Transmission Operators to limit the participation of critical natural gas infrastructure loads in the demand response and emergency load shedding programs they oversee, particularly during cold weather conditions when natural gas supply issues for generation have proven to be the most challenging.

Proposed Reliability Standard TOP-002-5 adds a new requirement addressing how the Balancing Authority will prepare for operations during extreme cold weather conditions.

Other Salient Information

Stakeholder Consultation

NERC Reliability Standards Development Procedure

- NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual;
- NERC's rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards;
- The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk Power System. NERC considers the comments of all stakeholders;
- Stakeholders must approve, and the NERC Board of Trustees must adopt, a new or revised Reliability Standard before NERC submits the Reliability Standard to FERC for approval;

- NERC provided public notices for comments and balloting as follows:
 - Standard Authorization Request: November 22 – December 21, 2021
 - Draft 1 of Proposed Changes: February 28, – April 12, 2023
 - Draft 2 of Proposed Changes: August 24, – September 12, 2023
 - Final Draft of Proposed Changes: September 24 – October 6, 2023

IESO Reliability Standards Standing Committee

- The purpose of the Reliability Standards Standing Committee (RSSC) is to assist market participants to develop a more comprehensive understanding of their reliability obligations by:
 - Notifying participants of reliability-related information on new and developing reliability standards;
 - Providing a forum to discuss and develop consensus comments on new and developing reliability standards; and
 - Engaging participants in the standard development process of NERC and NPCC.
- The majority of stakeholder engagement takes place by email communications and is open to any stakeholder wishing to join
- The IESO presented the proposed changes at the following RSSC meetings:
 - March 8, 2023
 - June 15, 2023
 - September 14, 2023