Requirements and Measures Attachment

EOP-004-4:

R1. Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-4 that includes the protocol(s) for reporting to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or governmental authority). [Violation Risk Factor: Lower] [Time Horizon: Operations Planning] M1. Each Responsible Entity will have a dated event reporting Operating Plan that includes protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-4 Attachment 1 and in accordance with the entity responsible for reporting.

R2. Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day). [Violation Risk Factor: Medium] [Time Horizon: Operations Assessment]

M2. Each Responsible Entity will have as evidence of reporting an event to the entities specified per their event reporting Operating Plan either a copy of the completed EOP-004-4 Attachment 2 form or a DOE-OE-417 form; and some evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating that the event report was submitted by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).

EOP-005-3:

R1. Each Transmission Operator shall develop and implement a restoration plan approved

by its Reliability Coordinator. The restoration plan shall be implemented to restore the Transmission Operator's System following a Disturbance in which one or more areas of the Bulk Electric System (BES) shuts down and the use of Blackstart Resources is required to restore the shutdown area to a state whereby the choice of the next Load to be restored is not driven by the need to control frequency or voltage regardless of whether the Blackstart Resource is located within the Transmission Operator's System. The restoration plan shall include: [Violation Risk Factor = High] [Time Horizon = Operations Planning, Real-time Operations]

1.1. Strategies for System restoration that are coordinated with its Reliability Coordinator's high level strategy for restoring the Interconnection.

1.2. A description of how all Agreements or mutually-agreed upon procedures or protocols for off-site power requirements of nuclear power plants, including priority of restoration, will be fulfilled during System restoration.

1.3. Procedures for restoring interconnections with other Transmission Operators under the direction of its Reliability Coordinator.

1.4. Identification of each Blackstart Resource and its characteristics including but not limited to the following: the name of the Blackstart Resource, location, megawatt and megavar capacity, and type of unit.

1.5. Identification of Cranking Paths and initial switching requirements between each Blackstart Resource and the unit(s) to be started.

1.6. Identification of acceptable operating voltage and frequency limits during restoration.

1.7. Operating Processes to reestablish connections within the Transmission Operator's System for areas that have been restored and are prepared for reconnection.

1.8. Operating Processes to restore Loads required to restore the System, such as station service for substations, units to be restarted or stabilized, the Load needed to stabilize generation and frequency, and provide voltage control.

1.9. Operating Processes for transferring operations back to the Balancing Authority in accordance with its Reliability Coordinator's criteria.

M1. Each Transmission Operator shall have a dated, documented System restoration plan developed in accordance with Requirement R1 that has been approved by its Reliability Coordinator as shown with the documented approval from its Reliability Coordinator and will have evidence, such as operator logs, voice recordings or other operating documentation, voice recordings or other communication documentation to show that its restoration plan was implemented for times when a Disturbance has occurred, in accordance with Requirement R1.

R2. Each Transmission Operator shall provide the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M2. Each Transmission Operator shall have evidence such as dated electronic receipts or registered mail receipts that it provided the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan in accordance with Requirement R2.

R3. Each Transmission Operator shall review its restoration plan and submit it to its Reliability Coordinator annually on a mutually-agreed, predetermined schedule.

[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]

M3. Each Transmission Operator shall have documentation such as a dated review signature sheet, revision histories, dated electronic receipts, or registered mail receipts, that it has annually reviewed and submitted the Transmission Operator's restoration plan to its Reliability Coordinator in accordance with Requirement R3.

R4. Each Transmission Operator shall submit its revised restoration plan to its Reliability

Coordinator for approval, when the revision would change its ability to implement its restoration plan, as follows: [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]

4.1. Within 90 calendar days after identifying any unplanned permanent BES modifications.

4.2. Prior to implementing a planned permanent BES modification subject to its Reliability Coordinator approval requirements per EOP-006.

M4. Each Transmission Operator shall have documentation such as dated review signature

sheets, revision histories, dated electronic receipts, or registered mail receipts, that it has submitted the revised restoration plan to its Reliability Coordinator in accordance with Requirement R4.

R5. Each Transmission Operator shall have a copy of its latest Reliability Coordinator approved restoration plan within its primary and backup control rooms so that it is available to all of its System Operators prior to its effective date. [*Violation Risk Factor* = *Lower*] [*Time Horizon* = *Operations Planning*]

M5. Each Transmission Operator shall have documentation that it has made the latest Reliability Coordinator approved copy of its restoration plan, in electronic or hardcopy format, in its primary and backup control rooms and available to its System Operators prior to its effective date in accordance with Requirement R5.

R6. Each Transmission Operator shall verify through analysis of actual events, a combination of steady state and dynamic simulations, or testing that its restoration plan accomplishes its intended function. This shall be completed at least once every five years. Such analysis, simulations or testing shall verify: [*Violation Risk Factor = Medium*] [*Time Horizon = Long-term Planning*]

6.1. The capability of Blackstart Resources to meet the Real and Reactive Power requirements of the Cranking Paths and the dynamic capability to supply initial Loads.6.2. The location and magnitude of Loads required to control voltages and frequency within acceptable operating limits.

6.3. The capability of generating resources required to control voltages and frequency within acceptable operating limits.

M6. Each Transmission Operator shall have documentation, such as power flow outputs, that it has verified that its latest restoration plan will accomplish its intended function in accordance with Requirement R6.

R7. Each Transmission Operator shall have Blackstart Resource testing requirements to verify that each Blackstart Resource is capable of meeting the requirements of its restoration plan. These Blackstart Resource testing requirements shall include:

[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]

7.1. The frequency of testing such that each Blackstart Resource is tested at least once every three calendar years.

7.2. A list of required tests including:

7.2.1. The ability to start the unit when isolated with no support from the BES or when designed to remain energized without connection to the remainder of the System.

7.2.2. The ability to energize a bus. If it is not possible to energize a bus during the test, the testing entity must affirm that the unit has the capability to energize a bus such as verifying that the breaker close coil relay can be energized with the voltage and frequency monitor controls disconnected from the synchronizing circuits.

7.3. The minimum duration of each of the required tests.

M7. Each Transmission Operator shall have documented Blackstart Resource testing requirements in accordance with Requirement R7.

R8. Each Transmission Operator shall include within its operations training program, annual System restoration training for its System Operators. This training program shall include training on the following: [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

8.1. System restoration plan including coordination with its Reliability Coordinator and Generator Operators included in the restoration plan.

8.2. Restoration priorities.

8.3. Building of cranking paths.

8.4. Synchronizing (re-energized sections of the System).

8.5. Transition of Demand and resource balance within its area to the Balancing Authority.

M8. Each Transmission Operator shall have an electronic or hard copy of the training program material provided for its System Operators for System restoration training in accordance with Requirement R8.

R9. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator's restoration plan that are outside of their normal tasks. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

M9. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall have an electronic or hard copy of the training program material provided to their field switching personnel for System restoration training and the corresponding training records including training dates and duration in accordance with Requirement R9.

R10. Each Transmission Operator shall participate in its Reliability Coordinator's restoration

drills, exercises, or simulations as requested by its Reliability Coordinator. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M10. Each Transmission Operator shall have evidence that it participated in its Reliability

Coordinator's restoration drills, exercises, or simulations as requested in accordance with Requirement R10.

R11. Each Transmission Operator and each Generator Operator with a Blackstart Resource

shall have written Blackstart Resource Agreements or mutually agreed upon procedures or protocols, specifying the terms and conditions of their arrangement. Such Agreements shall include references to the Blackstart Resource testing requirements. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

M11. Each Transmission Operator and Generator Operator with a Blackstart Resource shall

have the dated Blackstart Resource Agreements or mutually agreed upon procedures or protocols in accordance with Requirement R11.

R12. Each Generator Operator with a Blackstart Resource shall have documented procedures for starting each Blackstart Resource and energizing a bus. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M12. Each Generator Operator with a Blackstart Resource shall have dated documented procedures on file for starting each unit and energizing a bus in accordance with Requirement R12.

R13. Each Generator Operator with a Blackstart Resource shall notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator's restoration plan within 24 hours following such change. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M13. Each Generator Operator with a Blackstart Resource shall provide evidence, such as

dated electronic receipts or registered mail receipts, showing that it notified its Transmission Operator of any known changes to its Blackstart Resource capabilities within 24 hours of such changes in accordance with Requirement R13.

R14. Each Generator Operator with a Blackstart Resource shall perform Blackstart Resource tests, and maintain records of such testing, in accordance with the testing requirements set by the Transmission Operator to verify that the Blackstart Resource can perform as specified in the restoration plan. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

14.1. Testing records shall include at a minimum: name of the Blackstart Resource, unit tested, date of the test, duration of the test, time required to start the unit, an indication of any testing requirements not met under Requirement R7.

14.2. Each Generator Operator shall provide the blackstart test results within 30 calendar days following a request from its Reliability Coordinator or Transmission Operator.

M14. Each Generator Operator with a Blackstart Resource shall maintain dated documentation of its Blackstart Resource test results and shall have evidence such as emails with receipts or registered mail receipts, that it provided these records to its Reliability Coordinator and Transmission Operator when requested in accordance with Requirement R14.

R15. Each Generator Operator with a Blackstart Resource shall provide a minimum of two

hours of training every two calendar years to each of its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. The training program shall include training on the following: [Violation Risk Factor = *Medium*] [Time Horizon = Operations Planning]

15.1. System restoration plan including coordination with the Transmission Operator **15.2.** The procedures documented in Requirement R12

M15. Each Generator Operator with a Blackstart Resource shall have an electronic or hard

copy of the training program material provided to its operating personnel responsible for the startup, energizing a bus and synchronization of its Blackstart Resource generation units and a copy of its dated training records including training dates and durations showing that it has provided training in accordance with Requirement R15.

R16. Each Generator Operator shall participate in its Reliability Coordinator's restoration drills, exercises, or simulations as requested by its Reliability Coordinator. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M16. Each Generator Operator shall have evidence that it participated in its Reliability Coordinator's restoration drills, exercises, or simulations if requested to do so in accordance with Requirement R16.

EOP-006-3:

R1. Each Reliability Coordinator shall develop and implement a Reliability Coordinator Area restoration plan. The scope of the Reliability Coordinator's restoration plan starts when Blackstart Resources are utilized to re-energize a shutdown area of the Bulk Electric System (BES), or separation has occurred between neighboring Reliability Coordinators, or an energized island has been formed on the BES within the Reliability Coordinator Area. The scope of the Reliability Coordinator's restoration plan ends when all of its Transmission Operators are interconnected and its Reliability Coordinator Area is connected to all of its neighboring Reliability Coordinator Areas. The restoration plan shall include: *[Violation Risk Factor = High] [Time Horizon = Operations Planning, Real-time Operations]*

1.1. A description of the high-level strategy to be employed during restoration events for restoring the Interconnection, including minimum criteria for meeting the objectives of the Reliability Coordinator's restoration plan.

1.2. Criteria and conditions for re-establishing interconnections with other Transmission Operators within its Reliability Coordinator Area, with Transmission Operators in other Reliability Coordinator Areas, and with other Reliability Coordinators.

1.3. Reporting requirements for the entities within the Reliability Coordinator Area during a restoration event.

1.4. Criteria for sharing information regarding restoration with neighboring Reliability Coordinators and with Transmission Operators and Balancing Authorities within its Reliability Coordinator Area.

1.5. Identification of the Reliability Coordinator as the primary contact for disseminating information regarding restoration to neighboring Reliability Coordinators, and to

Transmission Operators, and Balancing Authorities within its Reliability Coordinator Area.

1.6. Criteria for transferring operations and authority back to the Balancing Authority.

M1. Each Reliability Coordinator shall have available a dated copy of its restoration plan and will have evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its restoration plan was implemented in accordance with Requirement R1.

R2. The Reliability Coordinator shall distribute its most recent Reliability Coordinator Area

restoration plan to each of its Transmission Operators and neighboring Reliability Coordinators within 30 calendar days of creation or revision. [Violation Risk Factor = Lower] [Time Horizon = Operations Planning]

M2. Each Reliability Coordinator shall provide evidence such as electronic receipts, posting

to a secure website with notification to affected entities, or registered mail receipts, that its most recent restoration plan has been distributed in accordance with Requirement R2.

R3. Each Reliability Coordinator shall review its restoration plan within 13 calendar months of the last review. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

M3. Each Reliability Coordinator shall provide evidence such as a review signature sheet,

or revision histories, that it has reviewed its restoration plan within 13 calendar months of the last review in accordance with Requirement R3.

R4. Each Reliability Coordinator shall review its neighboring Reliability Coordinator's restoration plans and provide written notification of any conflicts discovered during that review within 60 calendar days of receipt. [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]

4.1. If a Reliability Coordinator finds conflicts between its restoration plans and any of its neighbors, the conflicts shall be resolved within 30 calendar days of receipt of written notification.

M4. Each Reliability Coordinator shall provide evidence such as dated review signature sheets or electronic receipt that it has reviewed its neighboring Reliability Coordinator's restoration plans and resolved any conflicts within the timing requirements of Requirement R4 and Requirement R4, Part 4.1.

R5. Each Reliability Coordinator shall review the restoration plans required by EOP-005 of

the Transmission Operators within its Reliability Coordinator Area. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

5.1. The Reliability Coordinator shall determine whether the Transmission Operator's restoration plan is coordinated and compatible with the Reliability Coordinator's restoration plan and other Transmission Operators' restoration plans within its Reliability Coordinator Area. The Reliability Coordinator shall provide notification to the

Transmission Operator of approval or disapproval, with stated reasons, of the Transmission Operator's submitted restoration plan within 30 calendar days following the receipt of the restoration plan from the Transmission Operator.

M5. Each Reliability Coordinator shall provide evidence such as a dated review signature sheet or electronic receipt that it has reviewed, approved or disapproved, and notified its Transmission Operators within 30 calendar days following the receipt of the restoration plan from the Transmission Operator in accordance with Requirement R5.

R6. Each Reliability Coordinator shall have a copy of its latest restoration plan and copies

of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area within its primary and backup control rooms so that it is available to all of its System Operators prior to the effective date. [Violation Risk Factor = Lower] [Time Horizon = Operations Planning]

M6. Each Reliability Coordinator shall have documentation such as electronic receipts that

it has made the latest copy of its restoration plan and copies of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area available in its primary and backup control rooms and to each of its System Operators prior to the effective date in accordance with Requirement R6.

R7. Each Reliability Coordinator shall include within its operations training program, annual System restoration training for its System Operators. This training program shall address the following: [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

7.1. The coordination role of the Reliability Coordinator; and

7.2. Re-establishing the Interconnection.

M7. Each Reliability Coordinator shall have an electronic copy or hard copy of its training

records available showing that it has provided training in accordance with Requirement R7.

R8. Each Reliability Coordinator shall conduct two System restoration drills, exercises, or

simulations per calendar year, which shall include the Transmission Operators and Generator Operators as dictated by the particular scope of the drill, exercise, or simulation that is being conducted. [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]

8.1. Each Reliability Coordinator shall request each Transmission Operator identified in its restoration plan and each Generator Operator identified in the Transmission Operators' restoration plans to participate in a drill, exercise, or simulation at least once every two calendar years.

M8. Each Reliability Coordinator shall have evidence, such as dated electronic documents,

that it conducted two System restoration drills, exercises, or simulations per calendar year in accordance with Requirement R8. And each Reliability Coordinator shall have

evidence that the Reliability Coordinator requested each applicable Transmission Operator and Generator Operator to participate per Requirement R8 and Requirement R8, Part 8.1.

EOP-008-2:

R1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include: [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

1.1. The location and method of implementation for providing backup functionality.

1.2. A summary description of the elements required to support the backup functionality. These elements shall include:

1.2.1. Tools and applications to ensure that System Operators have situational awareness of the BES.

1.2.2. Data exchange capabilities.

1.2.3. Interpersonal Communications.

1.2.4. Power source(s).

1.2.5. Physical and cyber security.

1.3. An Operating Process for keeping the backup functionality consistent with the primary control center.

1.4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.

1.5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.

1.6. An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include:

1.6.1. A list of all entities to notify when there is a change in operating locations. **1.6.2.** Actions to manage the risk to the BES during the transition from primary to backup functionality, as well as during outages of the primary or backup functionality.

1.6.3. Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality.

M1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format.

R2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality. *[Violation*

Risk Factor = Lower] [*Time Horizon = Operations Planning*]

M2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, available at its primary control center and at the location providing backup functionality.

R3. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards are applicable to the primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during: [*Violation Risk Factor = High*] [*Time Horizon = Operations Planning*]

• Planned outages of the primary or backup facilities of two weeks or less

• Unplanned outages of the primary or backup facilities

M3. Each Reliability Coordinator shall provide dated evidence that it has a backup control

center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Requirement R3.

R4. Each Balancing Authority and Transmission Operator shall have backup functionality

(provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's primary control center functionality. To avoid requiring tertiary functionality, backup functionality is not required during: [Violation Risk Factor = High] [Time Horizon = Operations Planning]

• Planned outages of the primary or backup functionality of two weeks or less

• Unplanned outages of the primary or backup functionality

M4. Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's or Transmission Operator's primary control center functionality in accordance with Requirement R4.

R5. Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annually review and approve its Operating Plan for backup functionality. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

5.1. An update and approval of the Operating Plan for backup functionality shall take

place within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1.

M5. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have evidence that its dated, current, and in effect Operating Plan for backup functionality, in electronic or hardcopy format, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Requirement R5.

R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability

Standards. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]* **M6.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Requirement R6.

R7. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conduct and document results of an annual test of its Operating Plan that demonstrates: [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

7.1. The transition time between the simulated loss of primary control center functionality and the time to fully implement the backup functionality. **7.2.** The backup functionality for a minimum of two continuous hours.

M7. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual test of its Operating Plan for backup functionality, in accordance with Requirement R7. **R8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has

experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.

[*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*] **M8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has

experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide evidence that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will reestablish primary or backup functionality in accordance with Requirement R8.