

Supporting Statement for
**FERC-725S (Mandatory Reliability Standards: Emergency Preparedness
and Operations (EOP) Reliability Standards)**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve modifications to the FERC-725S (Mandatory Reliability Standards: Emergency Preparedness and Operations (EOP) Reliability Standards) under OMB Control No. 1902-0270. The FERC-725S collection was modified in Docket No. RD24-5-000 (Order Approving Extreme Cold Weather Reliability Standards EOP-011-4 and EOP-012-2).

EOP-012-1 is being replaced with version EOP-012-2 that will supersede requirements in EOP-012-1. The Commission has deferred decision on whether to approve or modify NERC's proposed implementation plan for proposed Reliability Standard EOP-012-2 which was previously superseded by EOP-011-3) until NERC submits the revised applicability section for Reliability Standard EOP-012-1. The Reliability Standard EOP-012-1 when revised, will ensure all bulk electric system generating units are required to maintain cold weather preparedness plans and associated trainings.

**1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION
NECESSARY**

Background. On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005¹ (EPAAct 2005), was enacted into law. EPAAct 2005 added a new section 215 to the Federal Power Act (FPA),² which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. Once approved by the Commission, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.

In 2006, the Commission certified North American Electric Reliability Corporation (NERC) as the ERO pursuant to section 215 of the FPA.

Pursuant to section 215 of the Federal Power Act (FPA),³ the Commission has approved Emergency Preparedness and Operations (EOP) Reliability Standards EOP-004-4 (Event Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3

¹ 16 U.S.C. § 824d(a).

² 16 U.S.C. § 824o. The approved Reliability Standards are available on the NERC website, www.nerc.com.

³ 16 U.S.C. § 824o.

(System Restoration Coordination), EOP-008-2 (Loss of Control Center Functionality), EOP-010-1 (Geomagnetic Disturbance Operations), and EOP-011-2 (Emergency Operations) submitted by the North American Electric Reliability Corporation (NERC), the Commission-certified Electric Reliability Organization (ERO). The Commission also approved the associated violation risk factors, violation severity levels, implementation plans, and effective dates of the Reliability Standards EOP-004-4, EOP-005-3, EOP-006-3 and EOP-008-2, EOP-010-1, and EOP-011-1.

In the order RD24-1-000, the Commission is approving the EOP-011-4 to replace previous iterations of the standard.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

FERC-725S consists of Emergency Preparedness and Operations (EOP) Reliability Standards, EOP-004-4 (Event Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3 (System Restoration Coordination), and EOP-008-2 (Loss of Control Center Functionality), EOP-010-1 (Geomagnetic Disturbance Operations), EOP-011-4 (Emergency Operations), and EOP-012-2 (Extreme Cold Weather Preparedness and Operations). These Reliability Standards enhance reliability by:

- (1) develop and submit modifications to proposed Reliability Standard EOP-012-2 to address concerns related to the ambiguity of the newly defined term Generator Cold Weather Constraint to ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Standard are objective and sufficiently detailed so that applicable entities understand what is required of them and to remove all references to “reasonable cost,” “unreasonable cost,” “cost,” and “good business practices” and replace them with objective, unambiguous, and auditable terms;
- (2) develop and submit modifications to proposed Reliability Standard EOP-012-2 for NERC to receive, review, evaluate, and confirm the validity of each Generator Cold Weather Constraint invoked by a generator owner, in a timely fashion, to ensure that such declaration cannot be used to avoid mandatory compliance with the proposed Reliability Standard or obligations in a corrective action plan;
- (3) develop and submit modifications to proposed Reliability Standard EOP-012-2 to shorten and clarify the corrective action plan implementation timelines and deadlines in Requirement R7, as further directed below;
- (4) develop and submit modifications to Requirement R7 of proposed Reliability Standard EOP-012-2 to ensure that any extension of a corrective action plan

implementation deadline beyond the maximum implementation timeframe required by the Standard is pre-approved by NERC and to ensure that the generator owner informs relevant registered entities of operating limitations in extreme cold weather during the period of the extension; and

(5) develop and submit modifications to Requirement R8, part 8.1 of proposed Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations to verify that the constraint declaration remains valid.

EOP-004-4 Requirements and Measures

R1. Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-4 Attachment 1 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).

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).

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-004-4 Evidence Retention

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the

Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- Each Responsible Entity shall retain the current Operating Plan plus each version issued since the last audit for Requirement R1, and Measure M1.
- Each Responsible Entity shall retain evidence of compliance since the last audit for Requirement R2 and Measure M2.

If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the duration specified above, whichever is longer.

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

EOP-005-3 Requirements and Measures

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.

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.

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.

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.

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.

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.

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.

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:

- 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 (reenergized 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.

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.

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.

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.

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.

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.

M14. Each Generator Operator with a Blackstart Resource shall maintain dated documentation of its Blackstart Resource test results and shall have evidence such as e-mails 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.

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.

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-005-3 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Transmission Operator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Approved restoration plan and any restoration plans in effect since the last compliance audit for Requirement R1, Measure M1.
- 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 for the current calendar year and three prior calendar years for Requirement R2, Measure M2.
- Submission of the Transmission Operator's annually-reviewed restoration plan to its Reliability Coordinator for the current calendar year and three prior calendar years for Requirement R3, Measure M3.
- Submission of a revised restoration plan to its Reliability Coordinator for all versions for the current calendar year and the prior three calendar years for Requirement R4, Measure M4.
- The current restoration plan approved by its Reliability Coordinator and any restoration plans for the last three calendar years that was made available in its control rooms for Requirement R5, Measure M5.
- The verification results for the current, approved restoration plan and the previous approved restoration plan for Requirement R6, Measure M6.
- The verification process and results for the current Blackstart Resource testing requirements and the last previous Blackstart Resource testing requirements for Requirement R7, Measure M7.

- Training program materials or descriptions for three calendar years for Requirement R8, Measure M8.
- Records of participation in all requested Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit, as well as one previous compliance audit period for Requirement R10, Measure M10.

If a Transmission Operator is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer. The Transmission Operator, applicable Transmission Owner, and applicable Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Training program materials or descriptions and training records for three calendar years for Requirement R9, Measure M9.

If a Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

The Transmission Operator and Generator Operator with a Blackstart Resource shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Current Blackstart Resource Agreements and any Blackstart Resource Agreements or mutually agreed upon procedures or protocols in effect since its last compliance audit for Requirement R11, Measure M11.

The Generator Operator with a Blackstart Resource shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Current documentation and any documentation in effect since its last compliance audit on procedures to start each Blackstart Resource and for energizing a bus for Requirement R12, Measure M12.
- Notification to its Transmission Operator of any known changes to its Blackstart Resource capabilities over the last three calendar years for Requirement R13, Measure M13.
- The verification test results for the current set of requirements and one previous set for its Blackstart Resources for Requirement R14, Measure M14.
- Training program materials and training records for three calendar years for Requirement R15, Measure M15.

If a Generation Operator with a Blackstart Resource is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

The Generator Operator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- Records of participation in all requested Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit for Requirement R16, Measure M1

If a Generation Operator is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last compliance audit records and all requested and submitted subsequent compliance audit records.

EOP-006-3 Requirements and Measures

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:

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.

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.

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.

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.

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.

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:

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.

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.

EOP-006-3 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the

Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The current restoration plan and any restoration plans in effect since the last compliance audit for Requirement R1, Measure M1.
- Distribution of its most recent restoration plan and any restoration plans in effect for the current calendar year and three prior calendar years for Requirement R2, Measure M2.
- Its reviewed restoration plan for the current review period and the last three prior review periods for Requirement R3, Measure M3.
- Reviewed copies of neighboring Reliability Coordinator restoration plans for the current calendar year and the three prior calendar years for Requirement R4, Measure M4.
- The reviewed restoration plans for the current calendar year and the last three prior calendar years for Requirement R5, Measure M5.
- The current, approved restoration plan and any restoration plans in effect for the last three calendar years was made available in its control rooms for Requirement R6, Measure M6.
- Actual training program materials or descriptions for three calendar years for Requirements R7, Measure M7.
- Records of all Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit, as well as one previous compliance audit period for Requirement R8, Measure M8.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

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

EOP-008-2 Requirements and Measures

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:

- 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.

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:

- 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:

- 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.

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.

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:

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.

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 re-establish primary or backup functionality in accordance with Requirement R8.

EOP-008-2 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in effect Operating Plan for backup functionality plus all issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain a dated, current, in effect copy of its Operating Plan for backup functionality, with evidence of its last issue, available at its primary control center and at the location providing backup functionality, for the current year, in accordance with Measurement M2.
- Each Reliability Coordinator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated 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) in accordance with Requirement R3 that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Measurement M3.
- Each Balancing Authority and Transmission Operator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated 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) in accordance with Requirement R4 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 in accordance with Measurement M4.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the time period since its last compliance audit, that its dated, current,

in effect Operating Plan for backup functionality, 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 Measurement M5.

- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain dated evidence for the current year and for any Operating Plan for backup functionality in effect since its last compliance audit, 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 Measurement M6.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the current calendar year and the previous calendar years, such as dated records, that it has tested its Operating Plan for backup functionality, in accordance with Measurement M7.
- 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 would last for more than six calendar months shall retain evidence for the current in effect document and any such documents in effect since its last compliance audit 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 re-establish primary or backup functionality in accordance with Measurement M8

EOP-010-1 Requirements and Measures

R1. Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include:

- 1.1 A description of activities designed to mitigate the effects of GMD events on the reliable operation of the interconnected transmission system within the Reliability Coordinator Area.
- 1.2 A process for the Reliability Coordinator to review the GMD Operating Procedures or Operating Processes of Transmission Operators within its Reliability Coordinator Area

M1. Each Reliability Coordinator shall have a current GMD Operating Plan meeting all the provisions of Requirement R1; evidence such as a review or revision history to indicate that the GMD Operating Plan has been maintained; and evidence to show that the plan was implemented as called for in its GMD Operating Plan, such as dated operator logs, voice recordings, or voice transcripts.

R2. Each Reliability Coordinator shall disseminate forecasted and current space weather information to functional entities identified as recipients in the Reliability Coordinator's GMD Operating Plan.

M2. Each Reliability Coordinator shall have evidence such as dated operator logs, voice recordings, transcripts, or electronic communications to indicate that forecasted and current space weather information was disseminated as stated in its GMD Operating Plan.

R3. Each Transmission Operator shall develop, maintain, and implement a GMD Operating Procedure or Operating Process to mitigate the effects of GMD events on the reliable operation of its respective system. At a minimum, the Operating Procedure or Operating Process shall include:

- 3.1. Steps or tasks to receive space weather information.
- 3.2. System Operator actions to be initiated based on predetermined conditions.
- 3.3. The conditions for terminating the Operating Procedure or Operating Process.

M3. Each Transmission Operator shall have a GMD Operating Procedure or Operating Process meeting all the provisions of Requirement R3; evidence such as a review or revision history to indicate that the GMD Operating Procedure or Operating Process has been maintained; and evidence to show that the Operating Procedure or Operating Process was implemented as called for in its GMD Operating Procedure or Operating Process, such as dated operator logs, voice recordings, or voice transcripts.

EOP-010-1 Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. 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 Reliability Coordinator and Transmission Operator shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

The responsible entities shall retain documentation as evidence for three years.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

EOP-011-4 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.

- 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;
- 1.2.5. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and
 - 1.2.5.1. Provisions for manual Load shedding capable of being implemented in a timeframe adequate for mitigating the Emergency;
 - 1.2.5.2. Provisions to minimize the overlap of circuits that are designated for manual Load shed, UVLS, or UFLS and circuits that serve designated critical loads which are essential to the reliability of the BES;
 - 1.2.5.3. Provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that are utilized for UFLS or UVLS;
 - 1.2.5.4. Provisions for limiting the utilization of UFLS or UVLS circuits for manual Load shed to situations where warranted by system conditions;
 - 1.2.5.5. Provisions for the identification and prioritization of designated critical natural gas infrastructure loads which are essential to the reliability of the BES as defined by the Applicable Entity; and
- 1.2.6. Reliability impacts of extreme weather conditions.
 - 1.2.6.1 Cold weather conditions
 - 1.2.6.2 Extreme weather conditions

M1. Each Transmission Operator will have a dated Operating Plan(s) developed in accordance with Requirement R1 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 R1.

R2. Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable:

- 2.1. Roles and responsibilities for activating the Operating Plan(s);
- 2.2. Processes to prepare for and mitigate Emergencies including:
 - 2.2.1. Notification to its Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency;
 - 2.2.2. Requesting an Energy Emergency Alert, per Attachment 1;

2.2.3. Managing generating resources in its Balancing Authority Area to address:

- 2.2.3.1. capability and availability;
- 2.2.3.2. fuel supply and inventory concerns;
- 2.2.3.3. fuel switching capabilities; and
- 2.2.3.4. environmental constraints.

- 2.2.4. Public appeals for voluntary Load reductions;
- 2.2.5. Requests to government agencies to implement their programs to achieve necessary energy reductions;
- 2.2.6. Reduction of internal utility energy use;
- 2.2.7. Use of Interruptible Load, curtailable Load and demand response;
- 2.2.8. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and
- 2.2.9. Reliability impacts of extreme weather conditions
- 2.2.10. Provisions to determine reliability impacts of:
 - 2.2.10.1. Cold weather conditions; and
 - 2.2.10.2. Extreme weather conditions.

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.

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 6 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.

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.

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.

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

R7 Each Transmission Operators shall annually identify and notify Distribution Providers, UFLS-Only Distribution Providers and Transmission Owners that are required to assist with the mitigation of operating Emergencies in its Transmission Operator Area through operator-controlled manual Load shedding, undervoltage Load shedding, or underfrequency Load shedding. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning, Long-term Planning]

M7. Each Transmission Operator will have documentation, such as dated emails or other correspondences that it identified and notified Distribution Providers, UFLS-Only Distribution Providers and Transmission Owners annually in accordance with Requirement R7.

R8. Each Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner notified by a Transmission Operator per R7 to assist with the mitigation of operating Emergencies in its Transmission Operator Area shall develop, maintain, and implement a Load shedding plan. The Load shedding plan shall include the following, as applicable: [Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning]

8.1. Operator-controlled manual Load shedding, undervoltage Load shedding, or underfrequency Load shedding during an Emergency that accounts for each of the following:

8.1.1. Provisions for manual Load shedding capable of being implemented in a timeframe adequate for mitigating the Emergency;

8.1.2. Provisions to minimize the overlap of circuits that are designated for manual, undervoltage, or underfrequency Load shed and circuits that serve designated critical loads which are essential to the reliability of the BES;

8.1.3. Provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that are utilized for UFLS or UVLS;

8.1.4. Provisions for limiting the utilization of UFLS or UVLS circuits for manual Load shed to situations where warranted by system conditions; and

8.1.5. Provisions for the identification and prioritization of designated critical natural gas infrastructure loads which are essential to the reliability of the BES as defined by the Applicable Entity.

8.2. Provisions to provide the Load shedding plan to the Transmission Operator for review

M8. Each Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner notified by a Transmission Operator per R7 to assist with the mitigation of operating Emergencies in its Transmission Operator Area will have a dated Load shedding plan(s) developed in accordance with Requirement R8 and evidence that the Load 9 shedding plan(s) was provided to its Transmission Operator; evidence such as a review or revision history to indicate that the Load shedding 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 Load shedding plan(s) was implemented f

EOP-011-4 Evidence Retention

Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. 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 applicable entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation

- 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.
- 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.
- The Reliability Coordinator shall maintain evidence of compliance since the last audit for Requirements R3, R5, and R6. • The Transmission Operator shall maintain evidence of compliance since the last audit for Requirement R7.
- The Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner shall retain the current Load shedding plan, evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R8.

EOP-12-2 (effective date [upon regulatory approval])

EOP-12-2 Requirements and Measures

R1. At least once every five calendar years, each Generator Owner shall, for each of its applicable generating unit(s):

1.1. Calculate the Extreme Cold Weather Temperature for each of its applicable unit(s) and identify the calculation date and source of temperature data; and

1.1.1. If the re-calculated Extreme Cold Weather Temperature is lower than the previous Extreme Cold Weather Temperature, the entity shall review and update its cold weather preparedness plan(s) under Requirement R4 within six (6) months of the recalculation. If new corrective actions are needed to provide the required operational capability under Requirement R2 or R3, the entity shall develop a Corrective Action Plan within 6 months of the recalculation.

1.2. Identify generating unit(s) cold weather data, to include:

1.2.1. Generating unit(s) operating limitations in cold weather to include:

1.2.1.1. Capability and availability;

1.2.1.2. Fuel supply and inventory concerns;

1.2.1.3. Start-up issues;

1.2.1.4. Fuel switching capabilities; and

1.2.1.5. Environmental constraints.

1.2.2. Generating unit(s) minimum:

- Design temperature, and if available, the concurrent wind speed and precipitation;
- Historical operating temperature at least one hour in duration, and if available, the concurrent wind speed and precipitation; or
- Current cold weather performance temperature determined by an engineering analysis, which includes the concurrent wind speed and precipitation.

M1. Each Generator Owner will have evidence documenting its Extreme Cold Weather Temperature calculation and design information, operating data, or engineering analysis that supports its generating unit minimum temperature.

R2. Applicable to generating units with a commercial operation date on or after October 1, 2027: Each Generator Owner, for each generating unit that has a calculated Extreme Cold Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius) as determined in Requirement R1, and the self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),¹ shall:

- Implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature with sustained concurrent twenty (20)

mph wind speed for (i) a period of not less than twelve (12) continuous hours, or (ii) the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours; or

- Develop a Corrective Action Plan(s) to add new or modify existing or previously planned freeze protection measures to provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature with a sustained concurrent twenty (20) mph wind speed for (i) a period of not less than

1 Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit

(zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity

Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),

are exempt from this requirement.

twelve (12) continuous hours, or (ii) the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours.

M2. Each Generator Owner will have dated evidence that demonstrates it has freeze protection measures for its unit(s) in accordance with R2, or it has developed a Corrective Action Plan for the identified issues. Acceptable evidence may include the following (electronic or hardcopy format): Identification of generating unit(s) minimum temperature under Requirement R1 Part 1.2.2 which is equal to or less than the unit's Extreme Cold Weather Temperature, documentation of freeze protection measures, and Corrective Action Plan(s).

R3. Applicable to generating unit(s) in commercial operation prior to October 1, 2027:

Each Generator Owner, for each generating unit that has a calculated Extreme Cold

Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius) as determined in Requirement R1, and that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),² shall:

- Implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature; or
- Develop a Corrective Action Plan to add new or modify existing freeze protection measures to provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature.

M3. Each Generator Owner will have dated evidence that demonstrates it has freeze protection measures for its unit(s) in accordance with R3, or it has developed a Corrective Action Plan for the identified issues. Acceptable evidence may include, but is not limited to, the following (electronic or hardcopy format): Identification of generating unit(s) minimum temperature per Part 1.2.2 which is equal to or less than the unit's Extreme Cold Weather Temperature, documentation of freeze protection measures, and Corrective Action Plan(s).

R4. Each Generator Owner shall implement and maintain one or more cold weather preparedness plan(s) for its generating units. The cold weather preparedness plan(s) shall include the following, at a minimum: [Violation Risk Factor: High] [Time Horizon: Operations Planning and Real-time Operations]

² Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit

(zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity

Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),
are exempt from this requirement.

- 4.1. The lowest calculated Extreme Cold Weather Temperature for each unit, as determined in Requirement R1;3
- 4.2. The generating unit cold weather data, as determined in Requirement R1.2;
- 4.3. Documentation identifying Generator Cold Weather Critical Components;
- 4.4. Documentation of freeze protection measures implemented on Generator Cold Weather Critical Components which includes measures used to reduce the cooling effects of wind determined necessary by the Generator Owner to protect against heat loss, and where applicable, the effects of freezing precipitation (e.g., sleet, snow, ice, and freezing rain); and
- 4.5. Annual inspection and maintenance of generating unit(s) freeze protection measures.

M4. Each Generator Owner will have evidence documenting that its cold weather preparedness plan(s) was implemented and maintained in accordance with Requirement R4. Examples of documentation to demonstrate a cold weather preparedness plan may include existing operating procedures, plans, checklists, or processes. Examples of documentation to demonstrate inspections and maintenance have been completed may include, but are not limited to, completed work order(s) from the Generator Owner's work management system and/or freeze protection checklists identifying the measures inspected and maintained.

R5. Each Generator Owner in conjunction with its Generator Operator shall identify the entity responsible for providing the generating unit-specific training, and that

identified entity shall provide annual training to its maintenance or operations personnel responsible for implementing the cold weather preparedness plan(s) developed pursuant to Requirement R4. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]

M5. Each Generator Operator or Generator Owner will have documented evidence that the applicable personnel completed annual training of the Generator Owner's cold weather preparedness plan(s). This evidence may include, but is not limited to, documents such as personnel training records, training materials, date of training, agendas or learning objectives, attendance at pre-work briefings, review of work order tasks, tailboards, attendance logs for classroom training, and completion records for computer-based training in fulfillment of Requirement R5.

R6. Each Generator Owner shall, for each generating unit that has a calculated Extreme Cold Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius) as determined in Requirement R1 and that self-commits or is required to operate at 3 Generator Owners shall include the lowest calculated Extreme Cold Weather Temperature for the unit, even where

subsequent periodic re-calculations under Requirement R1 Part 1.1 cause an increase in the Extreme Cold Weather Temperature or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),⁴ develop a Corrective Action Plan when the generating unit experiences a Generator Cold Weather Reliability Event. The Corrective Action Plan shall be developed within 150

days or by July 1;

6.1. A summary of the identified cause(s) for the Generator Cold Weather Reliability Event, where applicable, and any relevant associated data;

6.2. A review of applicability to similar equipment at generating units owned by the

Generator Owner; and

6.3. An identification of operating limitations or impacts to the cold weather preparedness plan that would apply until execution of the corrective action(s) identified in the Corrective Action Plan.

M6. Each Generator Owner will have documented evidence that it developed a Corrective

Action Plan following a Cold Weather Reliability Event at an applicable unit in accordance with Requirement R6. Acceptable evidence may include, but is not limited to, the following dated documentation (electronic or hardcopy format): Corrective Action Plan(s) and updated cold weather preparedness plan(s) where indicated as needed by the Corrective Action Plan.

R7. Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, R3, or R6.

7.1. Include a timetable for implementing the selected corrective action(s) that shall:

7.1.1. List the action(s) which address(es) existing equipment or freeze protection measures, if any, to be completed within 24 calendar months of completing development of the Corrective Action Plan;

7.1.2. List the action(s) which require(s) new equipment or freeze protection measures, if any, to be completed within 48 calendar months of completing development of the Corrective Action Plan; and

7.1.3. List the updates to the cold weather preparedness plan required under Requirement R4 to identify the updates or additions to the Generator Cold Weather Critical Components and their freeze protection measures;

7.2. Implement the Corrective Action Plan in accordance with the specified

timetables in Requirement R7 Part 7.1;

4 Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit

(zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity

Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),

are exempt from this requirement.

7.3. Update the Corrective Action Plan action(s) and timetable(s), with justification, if corrective action(s) change or timetable(s) exceed the timelines in Requirement R7 Part 7.1; and

7.4. Document in a declaration, with justification, any Generator Cold Weather Constraint that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan.

M7. Each Generator Owner shall have dated evidence that demonstrates it implemented each Corrective Action Plan, including updating actions or timetables, or has explained in a declaration why corrective actions are not being implemented in accordance with Requirement R8. Acceptable evidence may include, but is not limited to, the following dated documentation (electronic or hardcopy format): records that document the implementation of each Corrective Action Plan and the completion of actions for each Corrective Action Plan including revision history of each Corrective Action Plan and, if applicable, justification to support any changes to corrective action(s) identified in the Corrective Action Plan or timetables exceeding the timelines in Requirement R7 Part 7.1. For each Corrective Action Plan applying to multiple generating units, the timetable shall reflect implementation at each unit addressed in the Corrective Action

Plan. Evidence may also include work management program records, work orders, and maintenance records. Any declaration shall contain dated documentation to support constraints identified by the Generator Owner.

R8. Each Generator Owner that creates a Generator Cold Weather Constraint declaration shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

8.1. Review the Generator Cold Weather Constraint declaration at least every five calendar years or as needed when a change of status to the Generator Cold Weather Constraint occurs; and

8.2. Update the operating limitations associated with capability and availability under Requirement R1 Part R1.2 if applicable.

M8. Each Generator Owner shall have dated evidence that demonstrates it performed the review and updated operating limitations as needed. Acceptable evidence may include, but is not limited to the following dated documentation (electronic or hardcopy format): records that document the performance of the review and update to the operating limitations, as needed.

EOP-012-2 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. 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 applicable entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a

longer period of time as part of an investigation.

- The Generator Owner shall retain data or evidence to support its current Extreme Cold Weather Temperature calculation and generating unit cold weather data, plus each calculation or revision since the last audit, for Requirement R1 and Measure M1.
- The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan under Requirement R2 or R3 is complete, whichever timeframe is greater, for Requirements R2 and R3 and Measures M2 and M3.
- The Generator Owner shall retain the current cold weather preparedness plan(s), as evidence of review or revision history, plus each version issued since the last audit and evidence of compliance since the last audit for Requirement R4 and Measure M4.
- The Generator Owner or Generator Operator shall keep data or evidence to show compliance for three years for Requirement R5 and Measure M5.
- The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan under Requirement R6 is complete, whichever timeframe is greater, for Requirement R6 and Measure M6.
- The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan is complete, whichever time frame is greater, for Requirement R7 and Measure M7.

- The Generator Owner shall maintain data or evidence to support its current Generator Cold Weather Constraint declaration, plus each revision since the last audit, for Requirement R8 and Measure M8.

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED TECHNOLOGY TO REDUCE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

The use of current or improved technology and the medium are not covered in Reliability Standards and are therefore left to the discretion of each respondent. We think that nearly all the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password-protected user interface.

These collections do not require industry to file the information with the Commission. However, they do contain information collection and record retention requirements for which using current technology is an option.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. EOP Reliability Standards do not duplicate any filing requirements.

5. METHODS USED TO MINIMIZE THE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden.

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

If the requirements of these standards were performed less frequently, NERC would not be provided any information to allow assessment of the compliance. Adequate planning for operating emergencies and responding to those emergencies is critical for the reliable operation of the bulk power system. The frequency of reporting is conducted once per year for all entities.

- Reliability Standard EOP-004-4 requires reporting of events by responsible entities. The reportable events under the proposed Reliability Standard are collected and used to examine the underlying causes of events, track subsequent corrective action to prevent recurrence of such events, and develop lessons learned for industry.
- Reliability Standard EOP-005-3 ensures plans, facilities, and personnel are prepared to enable system restoration from blackstart (the ability to restart generation following a blackout) resources to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection. Failure to follow this Reliability Standard could result in delays in restoration efforts.
- Reliability Standard EOP-006-3 establishes how personnel should prepare, execute, and coordinate system restoration processes to maintain reliability and to restore the Interconnection. Failure to follow this Reliability Standard could result in delay in restoration efforts.
- Reliability Standard EOP-008-2 ensures continued reliable operations of the bulk electric system if a control center becomes inoperable. Failure to follow this Reliability Standard could result in a control center not being able to perform operations of the BES in an effective manner.
- Reliability Standard EOP-010-1 mitigates the effects of geomagnetic disturbance (GMD) events by implementing Operating Plans, Processes, and Procedures. Failure to follow this Reliability Standard may result in an entity not being able to respond to a GMD Event.
- Reliability Standard EOP-011-4 addresses 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. Failure to follow this Reliability Standard may result in an entity not being able to effectively mitigate operating Emergencies to preserve the BES.
- Reliability Standard EOP-012-2 addresses the effects of operating in extreme cold weather by ensuring each Generator Owner has developed and implemented plan(s) to mitigate the reliability impacts of extreme cold weather on its generating units. Failure to follow the EOP-012-2 may result in Generator Owner not being able to provide power to customers during extreme cold weather events as the generating units have been adversely affected.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

The Emergency Preparedness and Operation (EOP) family of Reliability Standards represent Requirements that may need to occur in near real-time operations which if not done could place the operations of the electric system into an unknown state or lead to possible cascading, voltage instability, or uncontrolled separation. For the 30-day timeframes, those were set by industry to assign responsibility to entities to communicate with others that need to plan and operate the BES in a reliable manner.

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS

The FERC Order on Reliability Standards was published in the Federal Register thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collections of data.

The modifications to FERC 725S in RD24-5-000 are a result of the ongoing effort by the Commission to enhance the reliability of the bulk-power system. Specifically, RD24-5-000 approves additional standards (than what is included in the current FERC 725S) for extreme cold weather events. The Commission solicited comments for 60 days upon the approval of the reliability standards which were published in the Federal Register on July 3, 2024 (89 FR 55239). The Commission received no comments.

FERC also published a 30-day public notice and invited public comment to OMB on December 19, 2024 (89 FR 103811).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts have been made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rules of Procedure, "...a Receiving Entity shall keep in confidence and not copy, disclose, or distribute any Confidential Information or any part thereof without the permission of the Submitting Entity, except as otherwise legally required." This serves to protect confidential information submitted to NERC or Regional Entities.

Responding entities do not submit the information collected due to the Reliability Standards to FERC. Rather, they submit the information to NERC, the regional entities, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE

These collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Table 1 details Reliability Standards EOP-004-4, EOP-005-3, EOP-006-3, EOP-008-2, EOP-010-1, EOP-11-4 and EOP-012-2 in FERC-725S (OMB Control No. 1902-0270). Table 2 describes the burden related to RD24-5-000 which updated EOP-012-1 to EOP-012-2, which are part of the FERC 725S.

The EOP Standards are currently located in the FERC-725S (OMB Control No. 1902-0270) collection.⁴ In Docket No. RD24-5-000, the Commission proposes to replace the current OMB approved Reliability Standard EOP-012-1 with proposed Reliability Standard EOP-012-2 (Table 1). Proposed Reliability Standard EOP-012-2 has eight requirements, seven of which have been carried over and modified from the already approved Reliability Standard EOP-012-1 (Requirements R1-R7) and one of which is new (Requirement R8).

The estimates in the tables below are based, in combination, on one-time (years 1 and 2) and ongoing execution (year 3) obligations to follow the revised Reliability Standard EOP-012-2.

The number of respondents below are based on an estimate of the NERC compliance registry for generator owners and generator operators. Proposed Reliability Standard EOP-012-2 applies to generator owners and generator operators. The Commission based its paperwork burden estimates on the NERC compliance registry as of April 16, 2024. According to the registry for US unique entities, there are 1,210 generator owners. The estimates in the tables below are based on the change in burden from the Reliability Standards approved in this order.⁵ The Commission based the burden estimates in the tables below on staff experience, knowledge, and expertise.

⁴ The FERC-725S collection includes the EOP family of Reliability Standards: EOP-004-4, EOP 005-3, EOP-006-3, EOP-008-2, EOP-010-1, EOP-011-4, and EOP-012-2.

⁵ The overall burden associated with Reliability Standard EOP-012 will be the sum of the burden (responses) from Reliability Standard EOP-012-1 (under RD23-1-000) and Reliability Standard EOP-012-2 (under RD24-5-000).

Table 1: Standards not affected by RD24-1-000 that are included in FERC-725S (1902-0270)						
Reliability Standard and Associated Requirement	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response (4)	Total Annual Burden & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
EOP-010-1						
(No Change)	181	1	181	20 hrs.; \$1,297.80	3,620 hrs.; \$234,901.80	\$1,297.80
EOP-004-4, EOP-005-3, EOP-006-3, EOP-008-2						
(No Change)	280	1	280	250hrs.; \$16,222.50	70,162 hrs.; \$4,552,812.18	\$16,260.04
EOP-012-1	Former One-Time Burden and Ongoing					
One-Time (GO)	369	1	369	150hrs; \$9,733.50	55,350hrs; \$3,591,661.50	
One-Time (GOP)	327	1	327	10hrs; \$648.90	3,270hrs; \$212,190.30	
Ongoing (GO + GOP)	696	1	696	24.18hrs; \$1,569.040	16,830hrs; \$1,092,098.70	

Total EOP not affected by RD24-1-000						
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Table 2: Proposed Changes to FERC 725S Due to Modifications in Docket No. RD24-1-000

Reliability Standard & Requirement	Type⁶ and Number of Entity (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1)*(2)=(3)	Average Number of Burden Hours per Response⁷ (4)	Total Burden Hours (3)*(4)=(5)
FERC-725S – Proposed estimates due to RD24-1 for EOP-011-4					
One Time Estimate - Years 1 and 2 in EOP-011-4					
EOP-011-4	165 (TOP)	1	165	40 hrs. \$ 3,031.60	6,600 hrs. \$500,214.00
EOP-011-4	98 (BA)	1	98	20 hrs. \$1,515.80	1,960 hrs. \$148,548.40
EOP-011-4	12 (RC)	1	12	20 hrs. \$1,515.80	240 hrs. \$18,189.60
EOP-011-4	72	1	72	40 hrs.	2,880 hrs.

⁶ TOP = Transmission Operator, BA = Balancing Authority, RC = Reliability Coordinator, UFLS-Only DP = Underfrequency Load Shed-Only Distribution Provider, DP = Distribution Provider, and TO = Transmission Owner.

⁷ The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2023, for 75% of the average of an Electrical Engineer (17-2071) - \$77.29, mechanical engineers (17-2141) - \$87.38. $\$77.29 + \$87.38/2 = 82.335 \times .75 = 54.303$ (**\$61.75 rounded**) (**\$61.75/hour**) and 25% of an Information and Record Clerk (43-4199) $\$56.14 \times .25\% = 14.035$ (**\$14.04 rounded**) (**\$14.04/hour**), for a total ($\$61.75 + \$14.04 =$ **\$75.79/hour**).

	(UFLS- Only DP)			\$3,031.60	\$218,275.20
EOP-011-4	300 (DP)	1	300	40 hrs. \$3,031.60	12,000 hrs. \$909,480.00
EOP-011-4	324 (TO)	1	324	40 hrs. \$3,031.60	12,960 hrs. \$982,238.40
Sub-total of EOP-011-4 (One time)			971		36,640 hrs. \$2,776,945.60
Annualized One-Time Costs (average cost per year is calculated by the sub- total divided by 3)			323.67 (rounded)		12,213 hrs. (rounded) \$925,623.27
Ongoing Estimate – Year 3 ongoing EOP-011-4					
EOP-011-4	165(TOP)	1	165	20 hrs. \$1,515.80	3,300 hrs. \$250,107.00
EOP-011-4	98 (BA)	1	98	4 hrs. \$303.16	392 hrs. \$29,709.68
EOP-011-4	12 (RC)	1	12	4 hrs. \$303.16	48 hrs. \$3,637.92

EOP-011-4	72 (UFLS- Only DP)	1	72	10 hrs. \$757.90	720 hrs. \$54,568.80
EOP-011-4	300 (DP)	1	300	10 hrs. \$757.90	3,000 hrs. \$227,370.00
EOP-011-4	324 (TO)	1	324	10 hrs. \$757.90	3,240 hrs. \$245,559.60
Sub-Total of EOP-011-4 (ongoing)			971		10,700 \$810,953.00
Sub-Total of ongoing burden averaged over three years			323.67 (rounded)		3,566.67 hrs. (rounded) \$270,317.92
Proposed Total Annual Burden Estimate of EOP-011-4 (one-time plus ongoing)			647.34		15,779.67 hrs. \$1,195,941.19 (rounded)

Table 3: Proposed Changes Due to Final Rule in Docket No. RD24-5-000 for EOP-012-2

Reliability Standard & Requirement	Type and Number of Entity	Number of Annual Responses	Total Number of Responses	Average Number of Burden	Total Burden Hours
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	(1)	Per Entity (2)	(1)*(2)=(3)	Hours per Response ⁸ (4)	(3)*(4)=(5)
FERC-725S					
One Time Estimate - Years 1 and 2 EOP-012-2					
EOP-012-2	1,210 (GO)	1	1,210	5 hrs. \$373.15	6,050 hrs. \$451,511.5
Sub-Total for EOP-012-2 (one-time)			1,210	5 hrs. \$373.15	6,050 hrs. \$451,511.5
Ongoing Estimate – Year 3 ongoing EOP-012-2					
EOP-012-2	1,210 (GO)	1	1,210	2 hrs. ⁹ \$ 149.26	2,420 hrs. \$ 180,604.6
Sub-Total for EOP-012-2 (ongoing)			1,210	2 hrs. \$ 149.26	2,420 hrs. \$ 180,604.6
Sub-Total of ongoing burden averaged over three years			404		807 hrs. \$60,226.41
Proposed			1,614		6,857 hrs.

8 The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for seventy five percent of the average of an Electrical Engineer (17-2071) - \$79.31 and mechanical engineers (17-2141) - \$89.86. $(\$79.31 + \$89.86)/2 = 84.585 \times .75 = 63.439$ (**\$63.44**-rounded) (**\$63.44/hour**) and twenty-five percent of an Information and Record Clerk (43-4199) $\$44.74 \times .25\% = 11.185$ (**\$11.19** rounded) (**\$11.19/hour**), for a total $(\$63.44 + \$11.19 = \mathbf{\$74.63/hour})$.

9 A fraction of generator owners would be required to perform the task on an ongoing basis, and the hours represent the whole body of generator owners.

Total Burden Estimate of EOP-012-2					\$511,737.91
Changes to FERC 725S by RD24-5-000					
FERC-725S Modification	Current Inventory (hours)	Current Inventory (responses)	Total Change Due to RD24-5-000		
Addition of EOP-012-2	-	-	+6,857 hrs. +1,614 responses		

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up or other non-labor costs.

Total Capital and Start-up cost: \$0

Total Operation, Maintenance, and Purchase of Services: \$0

All of the costs in the RD24-1-000 are associated with burden hours (labor) and described in Questions #12 and #15 in this supporting statement.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0255).

The Commission does incur the costs associated with obtaining OMB clearance for the collections under the Paperwork Reduction Act (PRA). The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. FERC estimates the annual cost for this effort to be **\$8,396** for each of the collections.

FERC-725S	Number of Employees (FTEs)	Estimated Annual Federal Cost
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Analysis and Processing of filings	0	\$0
Paperwork Reduction Act Administrative Cost ¹⁰		\$8,396
TOTAL		\$8,396

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

The following table details the total burden for Reliability Standards EOP-010-1, EOP-004-4, EOP-005-3, EOP-006-3, EOP-008-2, EOP-011-4, and EOP-012-2 in FERC-725S (OMB Control No. 1902-0270).¹¹ As shown in question #12 above, in RD24-5-000, only EOP-012-1 is being updated to be EOP-012-2, which will increase the total burden of the FERC 725S information collection.

From Table 3:

In Docket No. RD24-5-000, NERC petitioned the Commission for approval of revisions to the EOP standards from EOP-012-1 to EOP-012-2. Due to the revision, the Commission is removing its estimates for EOP-012-1 and replacing them with our estimates for EOP-012-2. Thus, the removal includes all of the one-time costs associated with EOP-012-1 which includes the estimate for the Generator Operator (GOP). This results in a total reduction of -327 responses and -3,270 hours which were the onetime GOP costs. Further, the onetime costs associated with GO were increased by 841 responses and decreased by -49300 hours. This totals +222 responses and -68,592 hours.

The update resulted in an increase in responses and reduction in burden hours as shown in the table below:

FERC-725S	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,723	2,501	0	+222
Annual Time Burden	96,420	165,012	0	-68,592

¹⁰ The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection.

¹¹ The table reflects the ROCIS entry, which includes rounding adjustments from the totals reflected in question 12.

Annual Cost Burden (\$)	\$0	\$0	\$0	\$0
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16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

There is no publication of data associated with FERC-725S collections of information.

17. DISPLAY OF THE EXPIRATION DATE

The expiration dates are posted on ferc.gov at <https://www.ferc.gov/media/information-collections>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions for FERC-725S.