



Request for Participation in Reliability Assessment

Commission staff, in collaboration with NERC and the Regional Entities, is initiating a voluntary review of recovery and restoration plans for selected registered entities. The purpose of this joint staff review is to assess and verify the electric utility industry's bulk power system recovery and restoration planning, and to test the efficacy of the relevant Reliability Standards in achieving or maintaining reliability. The joint staff review is focused on supporting entities in ensuring reliable restoration from reliability events and reviewing the adequacy of the Reliability Standards; it is not a compliance and enforcement initiative.

Recent reliability events, including weather-driven events (e.g., Superstorm Sandy, February 2011 Southwest cold weather rolling blackouts), bulk power system disturbances (e.g., September 2011 Arizona-Southern California Blackout, 2008 Florida Blackout, 2003 Northeast Blackout) and possible cyber/physical attacks have highlighted the potential to cause widespread adverse effects on the bulk power system. Effective system recovery and restoration plans are essential to facilitate a quick and orderly recovery in the aftermath of such events.

The primary objective of this joint staff review is to assess entities' plans for restoration and recovery, and verify how the Reliability Standards support them. To accomplish this objective, the joint staff review will:

- Gather information via outreach with a representative sample of selected entities with significant bulk power system responsibilities.
- Understand the overall state of restoration plans by comparing and contrasting their content, scope and interrelationships.
- Assess the clarity of the Reliability Standards in supporting the adequacy and efficacy of restoration and recovery plans.
- Identify good industry practices or make recommendations to ensure that effective restoration and recovery plans are in place to support reliability.

As an entity with bulk power system significance and broad interrelationships that may impact restoration planning, we are requesting [ENTITY]'s participation in this

review. Additionally, other registered entities with interrelated reliability functions that impact, or are impacted by, [ENTITY]'s restoration plan may also be asked to participate in order to achieve comprehensive review of the wider area restoration capabilities.

The focus on the recovery and restoration plan review will be based on the reliability intent of three Reliability Standards:

EOP-005-2 System Restoration Plans from Blackstart Resources¹
CIP-008-3 Cyber Security — Incident Reporting and Response Planning
CIP-009-3 Cyber Security — Recovery Plans for Critical Cyber Assets

Specifically, documents and information to be requested during the entity outreach, depending on their applicable functions, will include:

- Reliability Coordinator approved restoration plan
- Procedures for deploying blackstart resources
- Selected results of the most recent analysis of actual events, steady state and dynamic simulations, and testing that the restoration plan accomplishes its intended function, including any restoration strategies used to facilitate restoration for recent disturbances or the deployment of blackstart resources
- Existing notes or recommendations recorded as a result of the most recent annual exercise or from an actual incident. Also, any Reliability Coordinator feedback or analysis of last year's system restoration drills, exercises or simulations, as dictated by the particular scope of the drills, exercises, or simulations that were conducted²
- Cyber Security Incident Response Plan
- Recovery Plan(s) for Critical Cyber Assets

¹ The assessment of EOP-005 will also consider the NERC report "Standards Independent Experts Review Project; An Independent Review by Industry Experts." Located at and accessed April 1, 2014:
http://www.nerc.com/pa/Stand/Standards%20Development%20Plan%20Library/Standards_Independent_Experts_Review_Project_Report.pdf

² The provided documents may be informative on how other activities required by the above or related Reliability Standards are accomplished (e.g. EOP-006-2 – System Restoration Coordination). In some cases, other information as it relates to the above or other Standards may be requested later, as needed, in order to have a complete understanding of the applicable entity's restoration and recovery processes.

The joint review will also assess entities' reports or recommendations from major events to understand the effectiveness of their recovery and restoration plans following an actual implementation. Reports developed after actual events like Hurricane Sandy, the September 2011 Arizona-Southern California Blackout, the Derecho storms in the Midwest and Mid Atlantic in 2012, and the 2014 Polar Vortex are also requested in order to better put response, recovery and restoration plans into the context of overall reliability efforts. The joint staff review will also use any public or private reports that have already been produced in these areas.

In addition to the information specified above, entities are encouraged to provide any further information or documents that may be helpful in explaining their recovery and restoration planning.

This collaborative assessment by the Commission, NERC and the Regional Entities is an important step in protecting reliability by gauging the electric utility industry's level of preparation for a major event and the ability to recover quickly and efficiently. In anticipation of [ENTITY]'s participation, we thank you and will work closely with you to ensure this project is conducted as a partnership with minimal disruption to your organization. I or my staff will call you at your earliest convenience to provide greater detail and answer any questions or concerns that you may have about this joint staff review.