FRCC Disturbance Reporting Processes and Procedures

FRCC–RE–OP–001-3.3

Effective Date: 11/29/2018

Version: 3.3
The original signatures are maintained on file.

<table>
<thead>
<tr>
<th>TITLE</th>
<th>NAME</th>
<th>DATE</th>
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<tbody>
<tr>
<td>Version Author</td>
<td>Hassan Hamdar</td>
<td>09/17/2018</td>
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<tr>
<td>Document Review Authority</td>
<td>Regional Entity Committee and Compliance Forum</td>
<td>11/29/2018</td>
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<tr>
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<td>Regional Entity Committee and Compliance Forum</td>
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</tbody>
</table>

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1.0 Purpose

To document disturbance reporting processes and procedures for Impacted Entities within the FRCC Region.

2.0 Terms and Definitions

Refer to NERC Glossary of Terms for definitions of Capitalized Terms.

Disturbance

Refers to disturbances, events and incidents as defined by the respective reporting requirements.

Impacted Entity

Refers to the registered entity(ies) that experienced a Disturbance.

3.0 Background

The FRCC Disturbance Reporting Procedure was developed to communicate the requirements of EOP-004. It was later expanded to include all local reporting opportunities (required or voluntary) for FRCC Impacted Entities. The document was originally drafted under the Regional Entity FRCC Operating Committee but since the reorganization of the FRCC committee structure the document will be reviewed and approved by the Regional Entity Committee and Compliance Forum (RECCF).

4.0 Applicability

Each Reporting Process or Procedure referenced in this document has its respective applicability. The applicability of this document is all FRCC Impacted Entities.

5.0 Responsibilities

Approval by Regional Entity Committee and Compliance Forum (RECCF)

6.0 Reporting Processes

FPSC Rule:

6.1.1 The Florida Public Service Commission (FPSC) requires disturbance reporting in Rule 25-6.018. The FPSC requests to be notified as soon as practicable of certain event listed in the rule. A copy of this rule and the associated reporting requirements
6.1.2 Entities are requested to copy EA@FRCC.COM on filings to the FPSC.

**NERC EOP-004:**

6.1.3 EOP-004 requires each Responsible Entity (as defined in the applicability section of EOP-004) to have an event reporting Operating Plan (NERC defined term). EOP-004 includes protocols, event types, and thresholds for reporting events to the Electric Reliability Organization (ERO) and other organizations (refer to EOP-004 or the FRCC Event Reporting webpage).

6.1.3.1 An EOP-004 Event Reporting Form is provided as an attachment to the NERC Reliability Standard (refer to EOP-004 or the FRCC Event Reporting webpage).

6.1.3.2 Entities are requested to copy EA@FRCC.COM on EOP-004 reports to the ERO.

**ERO Event Analysis Process:**

The voluntary ERO Event Analysis Process (ERO EAP) can be found at http://WWW.NERC.COM> “Program Areas & Departments” > “Reliability Risk Management” > “EA Program” > “ERO Event Analysis Process – Version 3”. Participation in the ERO EAP does not supersede the requirements of EOP-004, DOE 417 or any other reporting requirements. The FRCC has developed a flowchart titled “FRCC RE Event Analysis Process Flow” (Attachment C) to aid Impacted Entity(ies) in following the ERO EAP.

The FRCC Operating Committee (OC) has in place a stakeholder FRCC Event Analysis Working Group (EAWG) to review event information with the Impacted Entity(ies) and ensure consistency in event reporting and analysis.

Refer to Attachment B for a table listing target timeframes. The “Event Categories” document contains a listing of qualifying events by Category (Cat.). These Categories are associated with a level of analysis as described in the ERO EAP. The list may be found in the ERO EAP or on the FRCC Event Reporting webpage.

6.1.4 Brief Report

6.1.4.1 A Brief Report template should be completed and sent to the FRCC (EA@FRCC.COM) within 10 business days. The FRCC will work with the Impacted Entity(ies) over the next 10 business days to ensure the report is accurate and complete. Then the report will be forwarded to NERC. Any lessons learned identified should be sent to the FRCC (EA@FRCC.COM).

6.1.4.2 During the 10 business days the FRCC is working with the Impacted Entity(ies) a planning meeting will be held with the FRCC EAWG to assign the category to
the event, review the draft Brief Report, discuss any data retention and agree on future due dates.

6.1.4.3 Final Brief Reports will be forwarded to NERC Reliability Risk Management and FRCC Compliance.

6.1.5 The following are requested for events qualifying as Cat. 3 and above. Special requests will be made by FRCC for specific Cat. 1 or Cat. 2 events where necessary.

Due dates vary based on the event category; refer to the ERO Event Analysis Process for timeframes and deadlines (refer to Attachment B).

6.1.5.1 Data Hold:

6.1.5.1.1 A Data Retention Hold Notice will be issued by the FRCC for all Cat. 3 and above events. There will not be an automatic data hold for Cat. 1 or 2 events.

6.1.5.2 Event Analysis Report:

6.1.5.2.1 An Event Analysis Report should follow the Brief Report. This report should be sent to EA@FRCC.COM. A template for an Event Analysis Report may be found attached to the ERO EAP (“NERC Event Analysis Report Template”) and on the FRCC Event Reporting webpage (“FRCC Format for Final Disturbance Report or Event Analysis Report Template”).

6.1.5.2.2 FRCC (including the EAWG) will review the report and work with the Impacted Entity(ies) to finalize.

6.1.5.2.3 The Event Analysis Report will be forwarded to NERC Reliability Risk Management and FRCC Compliance.

6.1.5.3 Event Closure:

6.1.5.3.1 The FRCC will notify the Impacted Entity(ies) through email when the event has been deemed closed by FRCC and NERC.

6.1.6 The following are only requested in the NERC Compliance Monitoring and Enforcement Plan for events qualifying as Cat. 2 and above.

6.1.6.1 Voluntary Compliance Assessment:

6.1.6.1.1 It is expected that impacted entity(ies) review their events to ensure compliance. Impacted Entity(ies) compliance staff should be engaged in the event analysis at the beginning so that they are well informed. The voluntary Compliance Assessment should be
preceded by a preliminary plan of what will be assessed based on
the type of event.

6.1.6.1.2 Voluntarily submitting a Compliance Assessment demonstrates an
Impacted Entity’s focus on a good culture of compliance.
Impacted Entities should:

- Establish Reliability Standards liaisons.

- Send a list (or plan) of standards and requirements to be
reviewed to COMPLIANCEMANAGER@FRCC.COM for
FRCC Compliance review.

6.1.6.1.2.1 The completed Reliability Standards Assessment
should be sent to FRCC Compliance.
Communications with FRCC Compliance should be
handled through
COMPLIANCEMANAGER@FRCC.COM.

DOE OE-417:

The Department of Energy (DOE) Electric Emergency Incident and Disturbance Report (Form OE-417)
collects information on electric incidents and emergencies. The DOE uses the information to fulfill its
overall national security, energy emergency management responsibilities, and for analytical purposes. Form
OE-417 may be found on the FRCC Event Reporting webpage.

The DOE online filing system for the OE-417 has a separate instruction manual and is posted on the FRCC
Event Reporting webpage and the DOE website (see links below).

Manual Filing:

- A detail instruction sheet to aid in completing the OE-417 can be found at
HTTP://WWW.OE.NETL.DOE.GOV/OE417.ASPX.

- Impacted Entity(ies) shall submit OE-417 reports to OE417@OE.NETL.DOE.GOV and copy the FRCC
at EA@FRCC.COM on any OE-417 reports and updates. Online OE-417 form:
HTTPS://WWW.OE.NETL.DOE.GOV/OE417/

Online Filing:

- A detail instruction sheet to aid in completing the OE-417 can be found at
HTTP://WWW.OE.NETL.DOE.GOV/OE417.ASPX.

- If online filing is utilized Impacted Entities are requested to forward a copy of the completed OE-417 form
to FRCC at EA@FRCC.com. Impacted Entities should check the two checkboxes to notify NERC and E-ISAC (refer to screenshot (Attachment D)).
6.1.7 OE-417 reports shall be filed if Impacted Entity(ies) experience any of the incidents listed in Schedule 1 under Criteria for Filing.

6.1.7.1 Incidents described in items one through eight require a report within one hour (check Emergency Alert for the Alert Status).

6.1.7.2 Incidents described in items nine through 12 require a report within six hours (check Normal Alert for the Alert Status).

6.1.7.3 If significant changes have occurred after filing the initial report, Impacted Entity(ies) shall re-file the form with the changes (check Update for the Alert Status).

6.1.7.4 A final report is required within 48 hours (check Final for the Alert Status).

7.0 Document Distribution/Notification Requirements

7.1.1 Posted to FRCC website under Event Reporting

https://www.frcc.com/disturbance/EventReporting/SitePages/Home.aspx

8.0 References

Florida Public Service Commission (FPSC) Rule 25-6.018 – (http://www.psc.state.fl.us/)

NERC Standard EOP-004 – (www.NERC.com > Program Areas & Departments > Standards > Reliability Standards)


9.0 Attachments

Attachment A: FPSC Rule - Records of Interruptions and Commission Notification of Threats to Bulk Power Supply Integrity or Major Interruptions of Service

Attachment B: Table 1 — Target Timeframes for Completion of Brief Reports, Event Analysis Report and Lessons Learned

Attachment C: FRCC RE Event Analysis Process Flow

Attachment D: OE-417 Webpage Screenshot
10.0 Review and Modification History

<table>
<thead>
<tr>
<th>Date</th>
<th>Version Number</th>
<th>Description of Review or Modification</th>
<th>Sections Affected</th>
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<tbody>
<tr>
<td>09/29/2016</td>
<td>3.3</td>
<td>Updated based on revised OE-417</td>
<td>Pages 4, 7, 8 Attachment C, D</td>
</tr>
<tr>
<td>01/21/16</td>
<td>3.1</td>
<td>Updated the due date for NERC Brief Reports</td>
<td>Pages 5, 8, 11, 12</td>
</tr>
<tr>
<td>03/24/15</td>
<td>3.2</td>
<td>Removed version number from EOP-004 and validated Attachment D. Updated the disclaimer to the most current FRCC template.</td>
<td>Pages 4, 5, 9, 13</td>
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<tr>
<td>01/01/14</td>
<td>3.1</td>
<td>Updated with EOP-004-2 changes. Removed unneeded attachments.</td>
<td>All</td>
</tr>
<tr>
<td>10/03/13</td>
<td>3.1</td>
<td>Updated document with change in ERO EAP and DOE-417 online filing.</td>
<td>All</td>
</tr>
<tr>
<td>02/10/12</td>
<td>3.1</td>
<td>Update of document to include the ERO EAP and new reporting address.</td>
<td></td>
</tr>
<tr>
<td>09/02/09</td>
<td>3.1</td>
<td>Conversion of RRO Legacy document – FRCC Disturbance Reporting Procedure, to new format.</td>
<td></td>
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<tr>
<td>05/2008</td>
<td>N/A</td>
<td>RRO Legacy document – FRCC Disturbance Reporting Procedures</td>
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11.0 Disclaimer

The information, analysis, requirements and/or procedures described herein are not intended to be fully inclusive of all activities that may support compliance to a specific NERC Reliability Standard referenced or implied within the document. Nevertheless, it is the FRCC entities’ and other users’ responsibility to ensure the most recent version of this document is being used in conjunction with other applicable procedures, including, but not limited to, the applicable NERC Reliability Standards as they may be revised from time to time.

The use of this information in any manner constitutes an agreement to hold harmless and indemnify FRCC and FRCC Member Systems, and FRCC Staff, FRCC Committees and FRCC Member Employees from all claims of any damages. In no event shall FRCC and FRCC Member Systems, and FRCC Staff and FRCC Member Employees be liable for actual, indirect, special or consequential damages in connection with the use of this information.
Attachment A: 25-6.018 Records of Interruptions and Commission Notification of Threats to Bulk Power Supply Integrity or Major Interruptions of Service

(1) Each utility shall keep a record of all major and/or prolonged interruptions to services affecting an entire community or a substantial portion of a community. Such record shall show cause for interruption, date, time duration, remedy, and steps taken to prevent recurrence, where applicable.

(2) The Commission shall be notified as soon as practicable of:

   (a) Any action to maintain bulk power supply integrity by:
      1. Requests to the public to reduce the consumption of electricity for emergency firm customer load reduction purposes.
      2. Reducing voltage which affects firm customer load.
      3. Reducing firm customer loads by manual switching, operation of automatic load-shredding devices, or any other means except under direct load management programs as approved by the Commission.

   (b) Any loss in service for 15 minutes or more of bulk electric power supply to aggregate firm customer loads exceeding 200 megawatts.

   (c) Any bulk power supply malfunction or accident which constitutes an unusual threat to bulk power supply integrity. The utility shall file a complete report with the Commission of steps taken to resume normal operation or restore service and prevent recurrence, where applicable, within 30 days of return to normal operation unless impracticable, in which event the commission may authorize an extension of time.

(3) Each utility with interruptible or curtailable rate schedules shall provide a report to the Commission of customer interruptions and curtailments for each applicable rate schedule. The report shall include the reason for interruption or curtailment, the date, time, and duration of the interruption or curtailment, and amount of load shed. For utilities with optional billing provisions which provide for the utility to purchase power from another utility and supply it directly to the interrupted or curtailed customer, the report to the Commission shall include the source, date, time, and amount of purchase, in megawatt hours, and cost per megawatt hour for those months when purchases are made under the optional billing provision. Beginning on July 1, 2004, the report shall be filed quarterly and no later than 30 days after the end of the reported quarter. If there were no interruptions, curtailments, or optional billing events in the quarter, the report shall so state. Reports of customer interruptions or curtailments are not required when done under direct load management programs as approved by the Commission.

Specific Authority 366.05(1) FS. Law Implemented 366.03, 366.04(2)(c), (f), (5), 366.055 FS. History—Amended 7-29-69, 4-13-80, Formerly 25-6.18, Amended 4-27-04.
## Attachment B: Target Timeframes for Completion of Brief Reports, Event Analysis Reports and Lessons Learned

<table>
<thead>
<tr>
<th>Event Category</th>
<th>Brief Report</th>
<th>Event Analysis Report</th>
<th>Lessons Learned</th>
<th>Close Event Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Draft sent to FRCC RE (<a href="mailto:EA@frcc.com">EA@frcc.com</a>) within 10 business days for review. Final report sent to FRCC RE (<a href="mailto:EA@frcc.com">EA@frcc.com</a>) within 20 days.</td>
<td>If requested ² Within 30 business days of the event</td>
<td>Within 30 business days of the event (if applicable)</td>
<td>10 business days following receipt of Brief Report</td>
</tr>
<tr>
<td>2</td>
<td>Same as Cat. 1</td>
<td>Same as Cat. 1</td>
<td>Same as Cat. 1</td>
<td>10 business days following receipt of Brief Report or, 30 business days following receipt of EAR (If requested)</td>
</tr>
<tr>
<td>3</td>
<td>Same as Cat. 1</td>
<td>Within 60 business days of the event</td>
<td>Within 60 business days of the event (if applicable)</td>
<td>30 business days following receipt of EAR</td>
</tr>
<tr>
<td>4</td>
<td>Same as Cat. 1</td>
<td>Within 180 business days of the event</td>
<td>Within 180 business days of the event (if applicable)</td>
<td>60 business days following receipt of EAR</td>
</tr>
<tr>
<td>5</td>
<td>Same as Cat. 1</td>
<td>Same as Cat. 4</td>
<td>Same as Cat. 4</td>
<td>Same as Cat. 4</td>
</tr>
</tbody>
</table>

³ All timeframes are subject to extension to ensure accurate and complete information with agreement from FRCC RE. If the timeline for the completion of the EAR exceeds 30 days from the date of the event, updates need to be provided to the Regional Entity every 30 days. ² The need for an EAR should be determined within 15 business days of receiving the Brief Report.

Classification: Public
Attachment C: FRCC RE Event Analysis Process Flow

FRCC RE Event Analysis Process Flow – Rev 2018:
FRCC Registered Entity Participation in the NERC Event Analysis Process for Category 1, 2 & 3 Events

Start

Fill out and submit Brief Report (BR) to EAC within 5 Business days. EA@FRCC.COM

Provide additional information upon request from FRCC. Submit to EA@frcc.com


FRCC EA Review

Request Add’l Info (if necessary)

Y

Request Event Analysis Report (EAR)

N

Review EAR

Y

Request Add’l Info (if necessary)

N

Gather and review event details & prepare Event Analysis Report (EAR) if required.

Develop Lessons Learned or Best Practices

Performing a Voluntary Compliance Assessment
- Initiate standards review
- Create a list (plan) of standards and requirements to be reviewed.

Voluntary submitting a Compliance Assessment demonstrates a registered entity’s focus on a good culture of compliance. Entities should:
- Establish a Reliability Standards liaisons.
- Send list (or plan) to FRCC Compliance
- Complete Compliance Assessment and send to FRCC Compliance. Communications with FRCC Compliance should be handled through ComplianceManager@frcc.com

Stop

Retaining data is crucial to performing an event analysis however, the FRCC will only require an automatic data hold be issued for all Cat. 3 and above events.

Developed based on the ERO Event Analysis Process Rev2018

Gold highlighting indicates: Automatic Request for all Cat. 3

Classification: Public
Attachment D: Screenshot of DOE Website (OE-417)

The screenshot above demonstrates how to copy NERC and E-ISAC when submitting an online OE-417. Validated on 09/17/2018