

Meeting Notes

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination SAR Drafting Team

January 31, 2022 | 1:00 – 3:00 p.m.

February 1 and 3, 2022 | 1:00 – 3:00 p.m.

Review NERC Antitrust Compliance Guidelines and Public Announcement

Alison Oswald, NERC staff, called attention to the NERC Antitrust Compliance Guidelines and the public meeting notice.

Roll Call and Determination of Quorum

A team roll call was performed and quorum was determined. The member attendance sheet is attached as attachment 1.

Opening Remarks

Howard Gugel, vice president, engineering and standards, NERC, joined the team call and addressed the team. He thanked the members of the team and observers on the call for participating in the project. He reviewed the background on the project stating that during the November meeting, the NERC Board of Trustees passed a resolution for the recommendations to be completed by two different time frames that align with the FERC report. He thanked the team for having conversations to understand the recommendations and the continued dialogue between the team, NERC staff, and FERC staff.

Kenny Luebbert, chair, thanked Howard for his remarks. Kenny noted that some comments and suggestions about language in the recommendations was received from SAR drafting team (SAR DT) members since the last meeting. The team will review those today, however, the language of the recommendations needs to remain the same from the FERC report. The team will discuss the suggestions and capture those for the standard drafting team (SDT) to review when drafting the standard language. The previous cold weather project SDT had many discussions during SAR drafting that were repeated as the SDT. That team had the liberty of time that this team doesn't have this time, so we will capture some suggestions and continue moving forward on the SAR.

Review of the SAR

Recommendation 1c: This recommendation contains language referencing EOP-011. FERC staff explained that the intent of the recommendation is to build off the language in EOP-011 that the previous drafting team wrote. This team is not required to keep any future revisions to meet this recommendation in EOP-011.

Recommendation 1h: A team member asked for clarifying information on if BA's are aware of what facilities are bid into demand response. ERCOT's view was explained by a SAR DT member and an observer explained how NPCC operates.

Recommendation 1a: It was noted that this recommendation mirrors the existing NERC guidance. The team had no additional discussion.

Recommendation 1b: In the preliminary report, recommendation 1a and 1b were combined into one recommendation. In the final report they were split into two recommendations and the team added 1b to be consistent with the final report. The team had no additional discussion.

Recommendation 1f: It was noted that there is concern in industry around the "retrofit" language included in this recommendation and this will be a large discussion during the drafting phase of the project. It was stated by an observer that some generation is not designed for winter operation and there is a concern that generators will be chasing a continuing lower temperature. FERC staff stated the intent of the recommendation was to make sure capacity is counted on during winter peak days. Units that were not going to be committed during the winter season were not targeted in this recommendation because that information has been passed on to reliability entities and the capacity from those units is not going to be relied on during winter operations. The intent behind the recommendation was to make sure that capacity that is included in winter peaking days can be relied on.

In reference to this recommendation, the team had written a footnote to include in this recommendation and many others where the team had discussed concerns and potential solutions and drafting team language. NERC staff suggested instead of having the same footnote repeated multiple times, the footnote language could be added to the end section of the detailed description with a list of all recommendations it applies to.

Recommendation 1i: It was noted that the language "protect" in the recommendation causes concern with industry and the word prioritize would be more appropriate. The concern includes that if everything is critical than nothing is critical and cannot be protected, so prioritizing would be more practical. The team made a note to pass along to the SDT to discuss when drafting language.

Recommendation 1j: SAR DT members are concerned on how this recommendation was written from a technical perspective, that entities should never use UFLS unless it was a last resort, and the recommendation seems to conflict with recommendation 10. FERC staff provided clarification on the two recommendations which can be found in the description in recommendation 10 in the FERC report.

The team concluded the review of the recommendations. Concerns will be noted and pass to the SDT for discussions during the standard drafting phase.

The team began discussions on which standards were suggested in the SAR comments from industry for the SDT to review for revisions. A list of suggestions from the SAR comments were created by the team after a review of the SAR comments. The team discussed the inclusion of EOP-004 in the list. The team

stated that cold weather issues are included in EOP-004 currently, so the team debated if including EOP-004 in the SAR was necessary. The team concluded to keep EOP-004 on the list. NERC staff reminded the team that the list that is included in the SAR for the team to consider revising does not force the team to make revisions in those standards, but does allow the team to consider and discuss revising those standards. If a standard is not included in this list, the team will not be able to consider it as a possible place to revise the standard language during the SDT phase. The team reviewed the remainder of the list which included suggestions to include BAL-502 and CIP-002. The team discussed CIP-002 and agreed that winter prep is an O&P function and not a CIP function. An industry suggestion was also to include BAL-502. The team discussed that this is a regional standard and would not be appropriate to review when the recommendations are not targeted to only certain regions. The team might consider leveraging some of the language in that standard for use in other areas. The team declines to include these standards in the list. A SAR DT member suggested including BAL-002 on the list because it could be potentially an appropriate place for the prohibition of gas loads participating in demand response to be addressed. The team agreed and it was placed on the list. The team also included the suggestion from industry to create a new cold weather standard.

The team reorganized the recommendations based on the timeframes listed in the FERC final report. Five of the recommendations timeframes were adjusted between the preliminary report to the final report.

The team concluded the SAR discussion with making some final edits to the SAR. The edits included, updating the reference to the final report in the Industry Need section of the SAR and organizing the list of standards in alphabetical order.

The team moved on to a discussion of the response to comments. The SAR was posted for formal comment period, so the team is required by the Standard Processes Manual to respond to the industry comments in writing. NERC staff recommended the team respond with a summary response to comments, given the similar nature of many of the comments received. The team agreed that this course of action was most appropriate to address the comments and keep consistency in responses. The team created a list of high level themes to address. The list included the following themes:

- Standards to be revised
- Write a new cold weather standard
- Purview/jurisdiction of NERC to draft these recommendations
- Expand project beyond cold weather to other extreme events
- Grouping recommendations by topics
- Concern with specific language in the recommendations
- Implementation period of 2019-06 drafted standards

The team began drafting responses to these themes and the final responses can be found in the summary response of comments posted on the project page.

Attachment 1

| Name | Organization | 1/31 | 2/1 | 2/3 |
|-------------------|---|------|-----|-----|
| Kenneth Luebbert | Evergy, Inc. | Y | Y | Y |
| Matthew Harward | Southwest Power Pool, Inc. | Y | Y | Y |
| Venona Greaff | Oxy | Y | Y | Y |
| Derek Kassimer | ReliabilityFirst | Y | Y | N |
| Jonathan Davidson | City Utilities of Springfield | Y | Y | Y |
| David McRee | Duke Energy | Y | Y | Y |
| Thor Angle | Puget Sound Energy | Y | Y | Y |
| Keith Smith | Orsted Onshore North American | Y | Y | Y |
| Chad Wiseman | Newfoundland & Labrador Hydro | Y | Y | Y |
| Bradley Pabian | Louisville Gas & Electric and Kentucky Utilities | Y | Y | N |
| Collin Martin | Oncor Electric Delivery, LLC | Y | Y | Y |
| Jill Loewer | Utility Services | Y | Y | Y |
| David Kezell | Electric Reliability Council of Texas, Inc. (ERCOT) | N | Y | Y |
| Ryan Salisbury | Oklahoma Gas & Electric | Y | Y | Y |
| David Deerman | Southern Company Services | Y | Y | Y |
| Michael Brytowski | Great River Energy | Y | Y | Y |
| Kirk Rosener | CPS Energy | Y | Y | Y |