

Meeting Notes

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

April 12 - 14, 2022 | 1:00 – 3:00 p.m. Eastern

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.

Chair Remarks

Leadership put together draft for discussion today to help facilitate discussion and make progress towards completing the initial draft this week. The document was re-organized to flow better.

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The team discussed Requirement R1 and added “where applicable” to 1.2 and 1.3 in recognition that some components would not be impacted by wind or precipitation. In part R1.1, the team discussed that 50 years is the target amount of temperature data, but if it is not available then use what reliable data is available. A comment was made asking what the definition of “reliable data” would be. The team discussed removing “reliable” from R1.1, but decided to leave as-is. Participants are welcome to bring back suggestions to the next meeting if different wording would work better. Additionally, the team discussed the 50-year look back period and moved to a firm date (consider temperatures back to 1975) so that years do not fall off on the back end and all generation units are subject to the same temperatures regardless of build date. A concern was raised about a “level playing field” regarding weatherization requirements for wind/renewables versus conventional generation in Part 1.3. Technology/costs for weatherization is not currently feasible for wind turbines but this may be possible in the future. It was asked if additional language was needed to create an ongoing expectation of reviewing feasibility. The team concluded that the ongoing obligation to review freeze protection measures is addressed in R2 while R1 is intended to be a one-time effort. The R2 language is an ongoing obligation to review constraint/exception every five years, if applicable.

A question was asked if an external review mechanism is needed in the standard, such as submit data to BA. The team concluded that data is subject to review by RE at any time, so a separate submittal to the BA is not required. Requirement R2 was modified to add an expectation that the generating unit would

communicate the constraint to the BA. Acceptable documentation of this communication will need to be addressed in the Measures. In addition for requirement R2, the team shifted timing out to every five years instead of an annual review. The team concluded that an annual review is not necessary and would be burdensome. Five years aligns with the cold weather plans in R3.

The standard drafting team discussed methods of demonstrating compliance. This will be addressed in the accompanying Measures that have not been drafted yet.

The team continued discussion on R1 and removing timing on when new and existing units will do freeze protection measures. The team discussed the intent would be to have at least 20% of applicable unit gross capability (MW) per year implemented for the new requirement. A comment was made regarding entities with a single unit. Would these entities have the whole period to become compliant or just the first year to winterize. It may be difficult to, according to industry, be in compliant with this because of the depth of the engineering analysis/inspection. Additionally, units were not designed for the lowest temperature day in 50 years, therefore the implementation of necessary changes are likely to be widespread and significant.

A suggestion was made to add “cannot practically implement” to the R2 language. It was noted that the intent of the requirement was not to cause plants to shut down because it is more economical than winterizing them. The team discussed the CAP and if it would allow a unit to simply file a CAP continuously and not meet the intent of the NERC report which was to have plants winterize and be able to operate reliably.

The team discussed moving the weather data sources in R3 into the technical rationale. The standard should not limit where weather data can be found. Additionally, the team reviewed the requirement language for the freeze protection and temperature to be reviewed every five years, and if a lower temperature is found then re-evaluate freeze protection measures. A question was raised about why this is driven based on temperature instead of snowfall rate. The team believes this project is not fixing icing on wind turbine blades or snowfall with this standard. The Report targets temperature. Proposed change to R3.1.1.3 to state “operate at the criteria established pursuant to R1”. Team discussed two options for this language, option 1 – review freeze protection measure against temp only, or option 2, zero review freeze protection measures against, temp, wind and precipitation. The team voted and decided language in R3.1.1.3 for CAPs to be used for freeze events only. Details on the vote are found in Attachment 1.

The team discussed R5 and added “develop a CAP in accordance with R6”. Additionally, the language was clarified if the apparent cause of the event is due to freezing of the generator owner’s equipment within the Generator Owner’s control. Clarity was requested around “expected capability”. The team discussed referring to language earlier in the standard so no ambiguity remains such as “Are within the conditions documented in R3.4.2” which are the generating unit minimums. It was intended that no CAP would be required if a winter storm comes along and temperature is lower than during URI. However, in the next five-year review cycle, units would have to account for that new lower temperature.

Slight language edits were made, prior to the meeting, in R6 which the team reviewed. Language in R6.2 raises a concern with how it interacts with phased implementation plan. The concern is that if generators have a problem with a specific piece of equipment that is present across the entire fleet, that it has to be addressed in all other locations immediately. The team intended that language in R6.2 is not intended to conflict with any measures stated in implementation plan. The team will attempt to come up with language that states R6.1 and R6.2 applies to R5 only before the next meeting.

April 14:

Chair opened the meeting by walking the standard drafting team through the discussion held with the leadership team which resulted in the decision to handle remediation for a startup failure in a CAP.

Introduction Section

Applicability of the new EOP-012 standard was discussed. It was decided that it should be applicable to GO and GOP. It is not necessary to include BA in the applicability section at this time.

There was discussion of using the term “operates” vs “capacity” in the purpose section. Team chose to go with “operates” to avoid any confusion in markets that do not utilize capacity and are energy only. The purpose was crafted to clearly tie back to mitigating reliability impacts of extreme cold weather.

Units will use the winter season that is defined by their BA per the facilities section when applying the requirements of the new standard. There was discussion on a possible need for a requirement to have the BA define winter season. The team decided to exclude this requirement and potentially include an accompanying question when the standard goes out to industry.

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The team discussed and moved the applicable CAP bullets up into R1 simplicity and to avoid cross-references. The team also discussed and confirmed that the 50-year/1975 requirement is applicable to both new and existing units.

The team discussed and decided to consolidated R5 and R6 into one requirement. Substantial additional discussion on how to handle the declaration requirements and which steps must be completed even if a declaration is utilized. A team member was assigned to review the language based on the discussion for the next meeting.

Implementation Plan

The team discussed the timeframe for implementation of UFLS/UVLS requirement and annual training requirement should be 18 months. The timeframe for establishing initial CAPs was discussed and two options presented, 5 or 10 years. The team voted and 5 years was unanimous with some opinions that 5 years may be too long since this is the timeline to put together plans, not complete them.

Attachment 1

Name	Organization	4/12	4/13	Vote	4/14	5 vs 10 years
Kenneth Luebbert	Evergy, Inc.	Y	Y	1	Y	5
Matthew Harward	Southwest Power Pool, Inc.	Y	Y	2	Y	abstain
Venona Greaff	Oxy	N	Y	1	Y	5
Derek Kassimer	ReliabilityFirst	Y	Y	1	Y	5
Jonathan Davidson	City Utilities of Springfield	Y	Y	1	Y	-
David McRee	Duke Energy	Y	Y	1	Y	-
Thor Angle	Puget Sound Energy	Y	Y	1	Y	5
Keith Smith	Orsted Onshore North American	Y	Y	1	Y	5
Chad Wiseman	Newfoundland & Labrador Hydro	N	N	1	Y	5
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	Y	1	Y	5
Collin Martin	Oncor Electric Delivery, LLC	Y	Y	2	Y	5
Jill Loewer	Utility Services	Y	Y	1	Y	5
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y	N	1	Y	5
Ryan Salisbury	Oklahoma Gas & Electric	Y	Y	2	N	-
David Deerman	Southern Company Services	Y	Y	1	Y	5