

# Meeting Notes

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

April 26 and 28, 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

Kenny Luebbert thanked all the team members and observers for their comments and participation thus far in creating the draft standards.

### Technical Rationale

Alison Oswald reviewed the Technical Rationale (TR) document with the layout of the requirements and sections. The team discussed having two TR documents or combining the draft EOP-011 and EOP-012 into the same document and determined having two documents would be the ideal choice.

The team reviewed the TR that was drafted for EOP-012.

A comment was made that if BA is expecting units to be available, the BA will make the request. The TR wording does not line up with that. Kenny stated that the wording is to keep summer units out of requirement. If a unit is expected to run in the winter, it needs to be reliable. The discussion continued to ask what reason the BA has to expect a unit to run if there's no prior communication, but the Facilities language doesn't match this. The team discussed and decided to remove the BA language.

An observer asked how a BA would know which assets are used for resource adequacy purposes without communication. The team noted that this communication already happens and any communication requirements will have to be dealt with in phase 2. The intent of this language is to exclude summer units, not define how BAs and GOs communicate. The team is trying to ensure "not winter" units are excluded from this requirement.

An additional concern was raised asking if terminology to include outages should be added as units in outage are not being relied upon. The team stated that if there is an outage over the entire winter season,

then yes the unit would be exempt, and meet the intent of this wording. Additional concerns were raised because units can be called to come on for other reasons. This wording should also be limited to exclude units that can't get fuel. This will create a reason for entities to just opt-out of winter operation, which is contrary to winter reliability. The team decided to not change the language at this point due to the schedule the team has to meet.

The discussion on outages continued. Industry would like clarity on "plan to operate" and additional language to make that clearer. The team stated that a unit would need to take an outage for the entire winter to qualify, and have a unit that takes outages every winter. There is not the desire for a loophole for a unit to take an outage to avoid the standard. Observers were asked to submit language alternatives in the comment period. An additional question was asked regarding plants that take winter outages and how they are applicable to this requirement. The team reiterated that a legitimate planned outage during winter season is acceptable if warranted. There is no language in the standard that says a unit can't take an outage if needed. The standard just says if a unit is planning to run, they need to be ready for winter weather to be reliable.

Under the "General Considerations" under section included in R1 and R2, the team discussed the wording "participate in winter market" and if the word market is necessary. The conclusion was to change market to season to clarify. Additionally, the team decided to change participate to operate.

The team discussed the language "lowest recorded ambient temp" as a concern was raised asking if the team believes this language meets the recommendation from the report as it is currently drafted. The team believes that it is meeting the intent of the report as the recommendation states that drafting team should determine the appropriate temperature to be used in the standard.

The team discussed adding wording to address recommendation 2. The team concluded that we can recognize the recommendation, but the team is not addressing it in standards language.

Requirement R2 was kept short, depending on the comments received from industry, if they would prefer to integrate this requirement into others.

In Requirement R6 the team discussed the language "regardless of duration". Immediately after using that language, the team created an exception, which a team member asked for clarity on. The chair stated that the team is trying to prevent derates of short duration from triggering the CAP requirement. Another concern was raised that a Generator Owner can't control a freezing event. The team reworded to ensure the language is clear that it must be GO owned equipment that is impacted.

The team discussed the Technical Rationale for EOP-011-3. The team added more explanatory wording into this document in addition to the language in the Implementation Guidance.

### **Implementation Guide**

The team decided to put the Implementation Guidance into two documents for each standard which is in line with the Technical Rationale. The team discussed the Load Shed Example 2 contained in the

document. An observer suggested that this should be a reference instead of an example. The team believes it is a discrete example that's worth keeping in the document.

## **Quality Review Comments**

### ***EOP-012-1***

The team discussed comments received on the Purpose Statement of the standard. Looking at other purpose statements in standards, functional registration like GO are not usually specified. It was recommended to strike that wording and making purpose statement more general. A team member noted that in the original EOP-011, there are references to applicable entity. The purpose of this standard is to develop plans to mitigate. A suggestion was made to change the wording to say GO mitigates reliability impacts. NERC staff stated that could be too specific for purpose statement and recommend not using that language. The team discussed and determined to use the language "develops and implements plans".

The team discussed the Applicability section next. Comments were received on the "plan to" language being too vague. A concern was raised about removing the word plan and if it could create a gap. Some team members believed that removing plan is more inclusive to all situations. However, a different team member stated that on a mild winter day when gas is available, certain units that would not normally run would be available to. The team concluded to keep "plan to" in the language as removing it changes the intent.

Next, the team moved onto the Quality Review comments on the Requirements and Measures. The team discussed Requirement R1 and the team intent is that freeze protection is installed. A comment received asked if "utilize" equates to "install". A team member noted that the report says "implement" and the team changed the language. An observer asked if they do not implement freeze protection in July, would this be a violation since there is no date that says when the freeze protection has to be implemented. The team discussed adding language "as appropriate" but ultimately decided it was unnecessary.

The team discussed Requirement R1.1. An observer stated that NOAA has repository of 1-hour data for most locations and recommend the team standardize where the data comes from. The team discussed the definition of minimum temperature. A suggestion was made to use minimum hourly temperature. The team identified that the preparedness plan would document the temperature, however the team feels that having this language in R1.1 causes potential to violate two requirements in the standard at the same time. Therefore, the team deleted this language in R1.1 and made sure R3 contains documentation of temperature.

The team reordered R1.4.1 – 1.4.4 per comments received.

The team discussed Requirement R2 and if this requirement is needed. The comments form has a question for industry to provide feedback and the team will address this further after the first posting.

Requirement R3 was updated to have the same working as Requirement R1. Additionally, the team changed “maximum” to “a lesser period” to account for the possibility that reliable data is not available to 1975 in Requirement R3 as well as Requirement R1.1.

A team member noted that the language for the CAP contained in Requirement R6 does not need the word “implement” as the definition of CAP includes “to implement” and the language was updated to reflect this.

The team will continue reviewing comments from Quality Review at the meetings next week.

# Attachment 1

Name	Organization	4/26	4/28
Kenneth Luebbert	Evergy, Inc.	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	Y	Y
Venona Greaff	Oxy	Y	N
Derek Kassimer	ReliabilityFirst	Y	Y
Jonathan Davidson	City Utilities of Springfield	Y	Y
David McRee	Duke Energy	Y	Y
Thor Angle	Puget Sound Energy	Y	N
Keith Smith	Orsted Onshore North American	Y	Y
Chad Wiseman	Newfoundland & Labrador Hydro	N	Y
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	N
Collin Martin	Oncor Electric Delivery, LLC	Y	Y
Jill Loewer	Utility Services	Y	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y	Y
Ryan Salisbury	Oklahoma Gas & Electric	Y	Y
David Deerman	Southern Company Services	Y	Y