

Meeting Notes

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

January 31, 2023 | 1:00 – 3:30 p.m. Eastern

February 2, 7, and 9, 2023 | 1:00 – 3:30 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 taken and quorum was determined on both days. The member attendance sheet is attached as attachment 1.

Response to Comments

The team started the meeting reviewing the comments received from EEI. The team discussed the inclusions from the BES definition in the Facilities section. Sean Bodkin noted that there is a possible future project to revise the BES definition. The team noted that if we remove these inclusion numbers, dispersed power resource would need to be added because it is different than generator resources. The team voted to keep the inclusion references or remove them. The details of the vote are included in the attachment below. The result was to keep the inclusion references.

Technical Rationale

The team reviewed the Technical Rationale (TR) write up from Matt Harward for TOP-002 Requirement R8. The team revised some wording for clarity and approved the write up for inclusion in the TR.

Comment Form

The team reviewed the comment form where all questions are grouped by Standard. All FERC report Recommendations are also listed right before the question for easy reference. The group agreed that this is a good format. The team reviewed the individual questions.

For TOP-002-5/Recommendation 1g, Sean Bodkin asked whether the questions should read “As a BA...”, and asked if this mean only BAs should answer those questions. Matt Harward stated yes, and that there are also some GO/GOP specific questions for this topic.

Kenny Luebbert asked about question 13 and the ‘preventing surprises’ phrase. He stated unplanned outages are always a surprise and Matt Harward stated that language is directly from the FERC report.

David Kezell suggested rewording question 13 and removing ‘preventing surprises’....change to ‘minimizing the reliability impact when the GO/GOP experienced unplanned outages.’ David Lemmons suggested another edit, removing GO/GOP experience unplanned outages. Sean Bodkin asked why “extreme” has been dropped from the questions. Kenny agreed this should be added back in and that edit was made. Venona Greaff asked if this is about a data request or about better communication. Matt suggested “ensuring increase awareness of the potential of unplanned outages”.

David Deerman asked if we should reference the Requirement that the question matches up to. Kenny stated for this particular line of questioning the team has not written specific language at this point. The team is simply asking if TOP-003, as written, covers this Recommendation.

Sean Bodkin again suggested just pointing to the Recommendation and not being that specific with the question. Kenny Luebbert asked can it just be that one question and not multiple, questions 11 – 14, as we have now. Alison Oswald stated she thinks there should be more questions because the whole industry has not been part of the debate about 1g. Matt Harward suggested going with question 12 and just make it more of a general question. Team agreed and the comment form was updated.

Matt Harward also discussed question about TOP-002 R8 language and an extreme cold weather Operating Process within its Operating Plan. The team agreed with the wording of the question. David Deerman asked that the entire recommendation be included in the Comment Form and Alison Oswald said she would add that offline.

Matt Harward also discussed question about EOP-012 applicability section. Team agreed with question as written.

Brad Pabian discussed question regarding Recommendation 1c and the effects of precipitation and the accelerated cooling effect of wind. Team agreed with question as written.

The team next discussed Question 3 regarding modifying the Fixed Fuel Supply definition. Alison Oswald suggested adding the language of the definition on the Comment Form. Additionally, the question should also mention that the change was based on Phase 1 comments.

The team discussed a question regarding Generator Cold Weather Critical Components definition. Alison Oswald asked if this question is needed. Team agreed to strike this question.

Next, the questions regarding Requirement R1 and COD after the effective date were discussed. Alison suggested adding text about 1a and 1b recommendation language for clarity. Brad Pabian agreed with the question as written. Some slight re-wording of the question was made based on team discussion.

Question regarding Requirement R2, prior to the effective date, was discussed next. Kenny L. suggested striking the question, but Alison pointed out that we now have R2.1 and R2.2 which is a change from Phase 1 language. The team will leave the question on the comment form.

Alison asked if the team would like to ask a question about the addition of R6.4 to EOP-012, Identification of needed updates. Kenny stated he did not believe we need a question for this.

Collin Martin covered a question regarding Recommendation 1h and change to EOP-011-4 R2. Team agreed with the question. Collin suggests striking the phrase “should other Functional Registrations be added’ in the question regarding Recommendation 1i. Team agreed to strike that part.

Jill Loewer had a general suggestion that the comment form should say ‘any part of the requirements’ instead of any part of the rule. Alison agreed and made this change. Sean B. also suggested the change, “as currently drafted that are unclear”. Team agreed and made this change.

The team discussed the Implementation Plan question and decided a general question would be fine. However, they decided to also ask a specific question about the implementation plan with the Recommendation 1h and 1i section, because that deals with the addition of DP/DPU/TO to the applicability section of EOP-011-4.

The final Comment Form has 15 questions. Alison states we should expect a lot of comments back that the team will have to address.

Quality Review

EOP-012

The team started a review of the comments received during Quality Review. First was a discussion of the complexity of the measures and Requirement Parts R3.5.2 and R3.5.3. The team added language to the end of the phrase “Historical operating temperature at least one hour in duration”. Additionally, the team decided to strike R3.5.3 and add “and if available, concurrent wind speed and precipitation” phrase to all three 3.5.2 bulleted items. David Lemmons brought up a point about wind direction and how it can be a factor in being able to operate during extreme cold weather. Kenny stated the team did not have to provide for all scenarios in the Standard.

Additional redline edits in the Evidence Retention section were suggested, but team decided to not accept them.

EOP-011

The team discussed the comments received for this standard. Specifically, a comment on Requirement R1 Part 1.2.6.1 asking if ‘Cold’, and the other words that are lower case in the other parts, should be capitalized because it is the beginning of the Requirement. Team decided to make this change so it is consistent with other Standards.

In requirement R4, the team discussed if the language should be time period or timeframe. Kenny L. suggested leaving it as time period to which the team agreed. In Requirement R7 the team changed Transmission Operator to Transmission Operator’s. In Measure M7 the team added language to demonstrate ‘maintaining’ Operating Plan. Matt H. brought up that providing the Operating Plan to the TOP is no longer in the Measure and the Team agreed that should be.

Additional redline edits in the Evidence Retention section were suggested, but team decided to not accept them.

Finally, the team reviewed the redlines in the VSL's. The VSL for R7 should be 'or TO' not 'and TO' to which the team agreed. Additionally, Alison O. asked if the reference to 'maintain' the plan is clear. Team agreed it is fine as written. The Attachment 1 redlines were not accepted.

TOP-002

The team began by discussion Requirement R2 language 'because of' vs. 'as a result of'. Kenny L. suggested not accepting these edits and the team agreed. A comment on Requirement R8 was discussed and the team stated they may need to clarify in the TR the role of this process in next day operating plans for cold weather events. Additionally, a discussion occurred if the BA should be required to use the operation process. Kenny L. suggested not making that update at this time, and if it is a legitimate concern the team should wait for industry comments. The team discussed Requirement R8.3 and what does the five-day hourly forecast include. It doesn't necessarily mean all 8.3 sub requirements; 8.3.4 is the main one "capacity and energy reserve requirements". Matt H. pointed out the language is copied from Requirement R4 for a 'next day plan'. The team believes it is clear as written. In the VSL it was noted that Operating Plan was capitalized. For Requirement R8, the question was asked what if the BA failed to use the Operating Process. Matt H. noted it is not currently in Requirement language that the plan be used, so then the team can't list it in the VSL.

Implementation Plan

Lauren Perotti stated the IP may need to be modified based on the timing of approval of the Phase 1 Standards.

Technical Rationale for EOP-012

Alison noted that all Requirement language in the TR will be updated to what goes out in the initial ballot. The team added in language about what to do if weather data is not available at a generation site's location. The team also decided to strike the sentence with an example – i.e., using the mean of three locations. Additionally, the team removed language about Fixed Fuel Supply Component because it is duplicated in the definition section of the TR. A question rose about the use of the word "untimely" in the consideration of wind and precipitation section. Kenny L. suggested it should be unwieldy not untimely. After discussion, the team decided on unreliable.

The team discussed a comment about "state point" in the consideration of wind and precipitation section. Team decided to delete state point and change it to conditions.

The team identified there was no explanation about Part 6.4 in the TR and asked if some language should be added about this added requirement. Kenny L. suggested "the SDT intends that the Cold Weather Preparedness Plan is a living document that accurately reflects the current state of the generating units. As such, R6.4 was included to identify any needed updates to the CWCC listing."

Technical Rationale for EOP-011

No comments were made by the QR team and the drafting team made mostly minor grammatical edits.

Technical Rationale for TOP-002

The team reviewed one comment regarding the IERP acronym that was included in the Guidelines and Technical Basis. The team determined the acronym stood for “Independent Experts Review Project and/or Panel” and this change was made.

The files are now complete and will be submitted to the Standards Committee for approval for initial ballot.

Attachment 1

Name	Organization	1/31	Vote	2/2	2/7	2/9
Kenneth Luebbert	Evergy, Inc.	X	Remove	X	X	X
Matthew Harward	Southwest Power Pool, Inc.	X	Keep	X	X	X
Venona Greaff	Oxy	X	Keep	X	X	X
Derek Kassimer	ReliabilityFirst	X	Remove	X	X	X
Jonathan Davidson	City Utilities of Springfield	X	Keep	X	X	X
David McRee	Duke Energy	X	Remove	X	X	X
Thor Angle	Puget Sound Energy	X	Keep	N	N	X
Keith Smith	Orsted Onshore North American	N	-	X	N	X
Chad Wiseman	Newfoundland & Labrador Hydro	X	Keep	X	X	X
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	N	-	X	X	X
Collin Martin	Oncor Electric Delivery, LLC	X	Remove	X	N	N
Jill Loewer	Utility Services	X	Keep	X	X	X
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	X	Keep	X	X	X
Ryan Salisbury	Oklahoma Gas & Electric	X	remove	X	X	N
David Deerman	Southern Company Services	X	Remove	X	X	N