

Meeting Notes

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

January 4 and 5, 2024 | 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 by Alison, and quorum was determined. The member attendance sheet is attached as attachment 1.

January 4, 2024

Chair Remarks

The chair, Kenny Leubbert, welcomed everyone for the new year and stated these are exciting times, as we are close to finalizing this version of EOP-012 and looking forward to getting it out for a vote.

Discussion on Generator Cold Weather Constraints

The team reviewed the agenda for the next two days and Kenny L. started off with a discussion related to the cost concern in the proposed definition of a Generator Cold Weather Constraint. There was an additional sentence proposed to be added to the last bullet of the definition. Kenny expressed the desire to not make any major changes, but to only add clarity to the intent of the definition. This wording addition would also address some comments that were voiced from the June 2023 EOP-012 posting.

The proposed additional language considered was, “A cost may be deemed “unreasonable” when implementation of selected freeze protection measure(s) are uneconomical to the extent that they would require unreasonably expensive modifications or significant expenditures on equipment with minimal remaining life or significant expenditures to change the equipment’s original design to meet the requirements”. After some discussion with several members of the SDT commenting and making suggestions, the SDT agreed to the following wording as an addition to the Generator Cold Weather Constraint: “A cost may be deemed “unreasonable” when implementation of selected freeze protection measure(s) are uneconomical to the extent that they would require prohibitively expensive modifications or significant expenditures on equipment with minimal remaining life.”

In addition to the previous wording addition concerning constraints, the topic of communication of these constraints was mentioned by David Huff of FERC. The concern was if a constraint is taken, how will the limitation be communicated. The reply to this concern was that via TOP-003 and IRO-010, the BA's/RCs/TOPs have the ability to request updated information at any time and most likely would do so in advance of each winter season. Kenny L. expressed that what is most important is not the constraint, but the unit's capability and the previously mentioned NERC standards would cover this concern. This addressed the concern by David H. of the removal of the requirement to make any declaration available to the BA. David H. stated he was concerned about the optics of fully addressing the FERC directive. Lauren Perotti of NERC mentioned that as part of the FERC directive, NERC will be gathering data on constraints and the rationale used for them. Hopefully, this will allow us to drill down a bit on the constraints being declared if it looks like specific areas are more affected than others.

Amir Najafzadeh of FERC also expressed concern of communication and the FERC directive mentioning the "appropriate entity" to ask for them and make a judgement. Lauren P. mentioned that the compliance authority would be the entity. Kenny L. also mentioned that the BA's were very adamant they did not want a compliance role in reviewing declarations and determining compliance. Lauren P. mentioned that some clarification and documentation may be needed to supplement the rationale if it is not clear to FERC. Kenny L. suggested that maybe we could add some additional language to the TR for clarification.

There was also a question from industry about having multiple constraints across a fleet of generators with the same technologies and would one constraint be allowed for all. Kenny L. suggested considering some language in TR and not in the standard concerning this question.

The discussion was then turned back to terms like "prohibitively expensive" and "reasonable", but at this point, it was felt that the proposed definition was adequate to move forward with. Kenny thanked everyone for the conversation and discussion concerning Generator Cold Weather Constraints and suggested we move to the next item on the agenda. Lauren raised the point about the phrase "not broadly implemented" in the proposed definition and offered "not broadly studied" for the team to consider. The concern was that it would be difficult to make a judgement call on implementation of new technologies and whether this should be after sufficient studies or pilot projects or truly "implementation". The team spent several minutes discussing the benefits and concerns of changing the language previously agreed to and at the conclusion, a suggestion was made to add some language to the TR to address this item.

Extreme Cold Weather Temperature (ECWT)

A concern was raised about how ECWT could play into the constraint declarations. Kenny L. reminded everyone that ECWT does not correlate with the constraint declarations. He believes in most cases that GO's will meet their ECWTs and the exceptions warranting a constrain declaration will be extreme events where egregiously low temps, snow fall, and or icing, combine to produce a condition where it is impractical to prepare for. Kenny L. believes it is these one-off situations that will warrant a declaration and not meeting the ECWT. Kenny L. gave the example of hurricanes in Florida and utilities cannot reasonably prepare for that level of extremes as it would be egregiously expensive.

Corrective Action Plans (CAPs)

The next point of discussion was concerning whether there were several corrective actions in a CAP, but only one was cost prohibitive, should you be expected to do the others. Kenny L. emphasized that a constraint doesn't excuse you from everything, it just excuses you from the things that meet the definition of a constraint.

Staggered Implementation

The topic of staggered implementation was then reviewed, and Lauren P. wanted it to be clear how to handle different timetables for multi-unit CAPs and if completion dates could be different. After a discussion on this, Lauren's proposed addition, "For each Corrective Action Plan applying to multiple generating units, the timetable shall reflect implementation at each unit addressed in the Corrective Action Plan." was added to M7.

Constraint Review

Next, the SDT moved to a discussion on R8 and the interval to review constraints. Based on comments from industry, there was a clarification suggested to replace the word "annual" to "at least every five calendar years or as needed when a change of status occurs". It was felt that this was improved language that conveys the intent of the SDT, and this change was adopted.

Technical Rationale (TR)

The TR section on Generator Cold Weather Constraints was updated to reflect the latest definition for constraints. The sentence, "The SDT encourages additional studying of freeze protection measures to remove constraints as appropriate over time" was added to emphasize the intent is for GOs to implement freeze protection measures as soon as possible and completing CAPS and removing constraints as timely as possible.

Misc

The last discussion of the meeting was a concern raised by David H. concerning existing units and the time they should be required to operate ECWT. Kenny explained that the standard does not mention time, and as events happen, above ECWT, the GO will be required to create a CAP and address these items.

January 5, 2024

Generator Cold Weather Critical Component

It was suggested by Brad Pabian to add "and/or system" in generator cold weather critical component definition second sentence, as it seems this was just a miss by the drafting team; no objections.

Comment Form

Kenny asked about the purpose of comment form if NERC has already expressed that they will exercise the 321 action at the end of the month if the standard does not draft. Alison responded that it would still be helpful to know where the issue is. David McRee asked, if NERC implements the 321 action, wouldn't the team be disbanded, and who would respond to comments? Alison stated she believes that comments will still be responded to, but is not sure how the process will work. Kenny suggested a brief comment

form only on the items that the drafting team has addressed since last comment period. The team will keep the generator cold weather constraint question for new posting. A question about staggering implementation of units was revised to explain new implementation plan would be sooner than a staggered approach. The team reviewed Requirement 7.4 language, and change of “action” to “selected action” was agreed; no question needed. Question 3 on R8 was revised to show the standard was revised to five years, or when there is a change. Question 4 was suggested to be removed, however, Alison O. noted it should likely stay, so the team added “this timeframe has not changed from previous posting” to the question used in the last comment period. The team kept the catchall question for more information the SDT should consider.

The team did a quick review of all the questions and asked if anything else should be addressed during webinar or questions. Nothing further was suggested by the drafting team members.

Webinar Assignments

Outlined webinar speaking points and assigned slides/speaking assignments.

Response to Comments

The team reviewed Q1 response to comments completed by Kenny and David Deerman. Team was happy with the responses, no further edits.

The team reviewed Q2 response to comments completed by David McRee and Collin Martin. A few edits on the wind speed and time stipulation response were made. The team had a discussion on the Hydro Quebec comment on ECWT having to be calculated after a unit is built/in operation, which resulted in minor edits made to the response to comment. The team added “as industry and FERC approved” to comment on continuous operating hours. The team had a discussion on Texas RE comment, no further comments added to the response.

The team reviewed Q3 response to comments completed by Brad Pabian and Thor Angle. Most responses to this question were the same.

The team reviewed Q4 response to comments by Matt Harward and Jon Davidson. The team edited a response to TVA wanting to combine R7 and R8. Drafted comment to Talen Generation, LLC about whether or not ECWT is a good gauge.

The team reviewed Q5 response to comments by Jill Loewer and David Kezell and discussed constraint definition and cost. The team edited response to North California Power Energy Agency on this and entered the defined term. This response was copied from the new drafted response and pasted to several other response to comments. The team edited a response to SRC comment on 24- and 48-month timeframe for existing or new freeze protection; referred to the TR.

The team reviewed Q6 response to comments by Alison Oswald. Much discussion was had on comments made by ACES Power Marketing on “includes” vs “may include” effects of wind and freezing precipitation to which the team edited. The team will complete the response to comments on Monday.

Attachment 1

Name	Organization	1/4	1/5
Kenneth Luebbert	Evergy, Inc.	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	Y	Y
Venona Greaff	Oxy	Y	Y
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	Y
Keith Smith	Orsted Onshore North American	Y	Y
Chad Wiseman	Newfoundland & Labrador Hydro	Y	N
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	Y
Collin Martin	Oncor Electric Delivery, LLC	Y	N
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