

Meeting Notes

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

October 11 and 13, 2022 | 1:00 – 2:30 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 performed and quorum was determined. The member attendance sheet is attached as attachment 1.

Chair Remarks

Kenny Luebbert, chair, started the meeting by thanking the team for their hard work on the changes before the phase 1 final ballot. The changes contributed to higher approval rates during final ballot than the previous ballots.

Review Final Ballot Results

Alison Oswald reviewed the final ballot results and noted that both standards improved in approval rating. EOP-011-3 received 83.64% approval and EOP-012-1 received 79.04% approval.

Phase 2 Recommendations

The team reviewed the phase 2 recommendations. The team noted possible standards to revise as well as items to discuss during the future standard drafting. The chart the team created is attached as attachment 2.

Phase 1 Topics for Discussion

The team reviewed the comments from second ballot of phase 1 of the project for all comments the SDT noted would be discussed again in phase 2.

Question 1

Team discussed if the comments submitted about freezing not being relevant to wind, solar, and hydro generation are factual. The team believes if freezing is not relevant to a particular generation technology, then the entity states that in their plan, and is not sure what further definition/clarification is needed. The team will reach out to the commenter to get further clarification.

Next, the team discussed a comment to clarify forced outage wording, specifically should the forced outage be connected to any kind of time frame. Additionally, the team noted they would also have to discuss the CAP requirement and how it is connected when forced outage beyond control of GO.

The team discussed a comment regarding definitions in glossary of terms or leaving specific term definitions as standard only definitions. Terms defined within a standard or glossary of terms are equivalent as far as requiring compliance, and NERC legal noted that all defined terms should be in the glossary, so the team will not be making any changes based on this comment.

Question 2

The team reviewed multiple comments regarding the definition of Generator Cold Weather Reliability Event that were noted as needing future discussion. These included, how specific the standard needs to be in regards to the 10% or 20 MW threshold, that the phrase fixed fuel supply component was confusing, who would specify the startup time, or should the term be changed to “scheduled.” Additionally the term Generating Unit and how is it defined in other standards is another comment the team will discuss in the discussion on the definition. The team will also tackle comments about dispersed generation resources.

The team determined that an outreach effort in regards to component failure not caused by freezing during cold weather event was necessary instead of modifying the definition language.

The final comment the team reviewed regarding the definition of Generator Cold Weather Reliability Event was a request to remove “apparent” from the standard. The team discussed this comment, the response that was included in the response to comments and in the technical rationale, and determined that it was not something that would be discussed in the future.

A comment was received that EOP-012-1 sec. 4.2 was not clear. The team will review this during the discussion on recommendation 1g.

A comment stated that the use of the two phrases “freezing of equipment” and “susceptible to freezing issues” in the definitions of Generator Cold Weather Reliability Event vs Generator Cold Weather Critical Component is confusing. The team discussed that this is a difference between proactive approach to identify components and install freeze protection vs events where components did freeze. An observer to the project noted that removing the word “issue” would resolve this comment. The team will discuss this further.

The team discussed a comment that the use of the Extreme Cold Weather Temperature in the definition of Generator Cold Weather Reliability Event will cause a Generator Owner to do a CAP under R6. This issue has been discussed with SDT and industry previously and will not be discussed during this phase.

The team will continue this discussion with questions 3-9 at next week’s meetings.

Project Timeline

The team discussed an in-person meeting in January 2023. A poll was conducted for the team to indicate what dates they were available. The majority of responses were for January 17-19. The team discussed the MLK holiday and if they were willing to travel on that Monday, January 16 for the meeting. Most team members would prefer to not travel on the holiday. A. Oswald will check with the host utility in Tucson to move the meeting to January 18-20, 2023.

Attachment 1

Name	Organization	10/11	10/13
Kenneth Luebbert	Evergy, Inc.	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	Y	Y
Venona Greaff	Oxy	N	N
Derek Kassimer	ReliabilityFirst	Y	Y
Jonathan Davidson	City Utilities of Springfield	N	Y
David McRee	Duke Energy	Y	N
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	Y
Jill Loewer	Utility Services	Y	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y	N
Ryan Salisbury	Oklahoma Gas & Electric	N	N
David Deerman	Southern Company Services	Y	Y

Attachment 2

#	Recommendation	Standards	Notes
1a	To require Generator Owners to identify cold-weather-critical components and systems for each generating unit. Cold-weather-critical components and systems are those which are susceptible to freezing or otherwise failing due to cold weather, and which could cause the unit to trip, derate, or fail to start.	<ul style="list-style-type: none"> EOP-012-1 	<ul style="list-style-type: none"> Definition of Cold weather critical Component created (comments to refine definition) Met intent through Requirement R3 language
1b	To require Generator Owners to identify and implement freeze protection measures for the cold-weather-critical components and systems. The Generator Owner should consider previous freeze-related issues experienced by the generating unit, and any corrective or mitigation actions taken in response. At an interval of time to be determined by the Balancing Authority, the Generator Owner should analyze whether the list of identified cold-weather-critical components and systems remains accurate, and whether any additional freeze protection measures are necessary	<ul style="list-style-type: none"> EOP-012-1 	<ul style="list-style-type: none"> Definition of Cold weather critical Component created Requirement R3 language (might need to discuss stronger language to require implementation of freeze protection on GCCC) Suggestion from RTOs to include this in the R4 5-year review language instead of BAs picking different times in each area
1c	To revise EOP-011-2, R7.3.2, to require Generator Owners to account for the effects of precipitation and the accelerated cooling effect of wind when providing temperature data.	<ul style="list-style-type: none"> EOP-012-1 	<ul style="list-style-type: none"> Look at R3.3 and R3.5.2 as foundation Consider relationship with 1g
1g	<p>The Reliability Standards should be revised to provide greater specificity about the relative roles of the Generator Owners, Generator Operators and Balancing Authorities in determining the generating unit capacity that can be relied upon during “local forecasted cold weather,” in TOP-003-5:</p> <ul style="list-style-type: none"> Based on its understanding of the “full reliability risks related to the contracts and other arrangements [Generator Owners/Generator Operators] have made to obtain natural gas commodity and transportation for generating units,” each Generator Owner/Generator Operator should be required to provide the Balancing Authority with data on the percentage of 	<ul style="list-style-type: none"> TOP-003-6 TOP-002 IRO-010 EOP-012-1 	<ul style="list-style-type: none"> Planning data already being provided; this would be more real-time/event focused Look at ERCOT operating guides, etc. Targeted to natural gas and GOs understanding how to get fuel around events

	<p>the generating unit’s capacity that the Generator Owner/Generator Operator reasonably believes the Balancing Authority can rely upon during the “local forecasted cold weather”.</p> <ul style="list-style-type: none"> • Each Balancing Authority should be required to use the data provided by the Generator Owner/Generator Operator, combined with its evaluation, based on experience, to calculate the percentage of total generating capacity that it can rely upon during the “local forecasted cold weather,” and share its calculation with the Reliability Coordinator. • Each Balancing Authority should be required to use its calculation of the percentage of total generating capacity that it can rely upon to “prepare its analysis functions and Real-time monitoring,” and to “manag[e] generating resources in its Balancing Authority Area to address . . . fuel supply and inventory concerns” as part of its Capacity and Energy Emergency Operating Plans. 		
1h	<p>To require Balancing Authorities’ operating plans (for contingency reserves and to mitigate capacity and energy emergencies) to prohibit use for demand response of critical natural gas infrastructure loads.</p>	<ul style="list-style-type: none"> • EOP-011 (load shed unit TOP) • TOP-003 • BAL-002 	<ul style="list-style-type: none"> • Does BA have control over demand response? If they do not, it could be an administrative burden with no reliability benefit • Should be on that entity that have demand response, and will have to know where the infrastructure loads are • Relationship between TOP-003 and EOP-011
1i	<p>To protect critical natural gas infrastructure loads from manual and automatic load shedding (to avoid adversely affecting Bulk Electric System reliability):</p> <ul style="list-style-type: none"> • To require Balancing Authorities’ and Transmission Operators’ (TOPs) provisions for operator controlled manual load shedding to include processes for identifying and protecting critical natural gas infrastructure loads in their respective areas; • To require Balancing Authorities’, Transmission Operators’, Planning Coordinators’, and Transmission Planners’ respective 	<ul style="list-style-type: none"> • EOP-011 (applicability) 	<ul style="list-style-type: none"> • How do you identify the obligations? • How do you find the natural gas infrastructure entities?

	<p>provisions and programs for manual and automatic (e.g., underfrequency load shedding, undervoltage load shedding) load shedding to protect identified critical natural gas infrastructure loads from manual and automatic load shedding by manual and automatic load shed entities within their footprints;</p> <ul style="list-style-type: none"> • To require manual and automatic load shed entities to distribute criteria to natural gas infrastructure entities that they serve and request the natural gas infrastructure entities to identify their critical natural gas infrastructure loads; and • To require manual and automatic load shed entities to incorporate the identified critical natural gas infrastructure loads into their plans and procedures for protection against manual and automatic load shedding. 		
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