Unofficial Comment Form

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination | Phase 2

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination | Phase 2** by **8 p.m. Eastern, Thursday, July 20, 2023.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2021-07-ExtremeColdWeather.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

Extreme cold weather and precipitation affected the south central United States February 8-20, 2021. Many generating units experienced outages, derates, or failures to start, resulting in energy and transmission emergencies (referred to as “the Event"). The total Event firm Load shed was the largest controlled firm Load shed event in U.S. history and was the third largest in quantity of outaged megawatts (MW) of Load after the August 2003 northeast blackout and the August 1996 west coast blackout. The Event was most severe February 15-18, 2021, and it contributed to power outages affecting millions of electricity customers throughout the regions of ERCOT, SPP, and MISO South. Additionally, the February 2021 event is the fourth cold weather event in the past 10 years, which jeopardized bulk-power system reliability. A joint inquiry was conducted to discover reliability-related findings and recommendations from FERC, NERC, and Regional Entity staff. The FERC, NERC, and Regional Entity staff Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations (“Joint Inquiry Report”) was published on November 16, 2021.

The scope of the proposed project is to address the ten recommendations for new or enhanced NERC Reliability Standards proposed by the Joint Inquiry Report. In November 2021, the NERC Board of Trustees (Board) approved a Board Resolution directing that new or revised Reliability Standards addressing these recommendations be completed in accordance with the timelines recommended by the joint inquiry team, as follows:

* New and revised Reliability Standards to be submitted for regulatory approval before Winter 2022/2023: development completed by September 30, 2022, for the Board’s consideration in October 2022 to address Key Recommendations 1d, 1e, 1f, and 1j;
* New and revised Reliability Standards to be submitted for regulatory approval before Winter 2023/2024: development completed by September 30, 2023, for the Board’s consideration in October 2023 to address Key Recommendations 1a, 1b, 1c, 1g, 1h, and 1i.

On February 16, 2023, the Commission issued an order approving proposed Reliability Standards EOP‐011‐3 and EOP‐012‐1. The order directed changes in five areas of the standard. Reliability Standard EOP-012-2 was revised to address Recommendations 1a, 1b, and 1c as well as the Federal Energy Regulatory Commission (“FERC”) directives in the February 2023 order approving the Phase 1 standards EOP-011-3 and EOP-012-2.[[1]](#footnote-1)

## Questions

*In Paragraph 6 of the FERC order, the Commission directed NERC to include in the Standard objective criteria on permissible technical, commercial, and operational constraints.*

1. Do you agree that the proposed definition of Generator Cold Weather Constraint provides additional clarity to the requirements on EOP-012-2, is auditable and meets the directive in the FERC Order in the most effective way? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

*Key Recommendation 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.*

1. Do you agree that the proposed Requirement R1 language accounts for the effects of precipitation and the accelerated cooling effect of wind when providing temperature data per Key Recommendation 1c? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed date of October 1, 2027 is an appropriate time frame for units that enter commercial operation after this date to implement the enhanced cold weather requirements that are contained within Requirement R2? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT structured R2.1 and R2.2 in the vein of an if/then statement.  The intent being, if a GO implements R2.1, then they would be compliant with Requirement R2.  If a GO does not implement R2.1 but implements R2.2, then they would be compliant with Requirement R2.  Stated differently, a GO would only risk non-compliance with Requirement R2 if they did neither R2.1 nor R2.2.  Does the proposed language, as drafted by the SDT, provide that clarity and reflect the SDT’s intent as stated above?  If not, please provide suggested clarifying language.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes two timeframes, 24 months for addressing existing equipment or freeze protection and 48 months for implementing new equipment or freeze protection, for Corrective Action Plans in Requirement R7. Do you agree that the timeframes proposed are appropriate? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

*In P 64 of the FERC order, the Commission expressed concern that a generator owner may make a constraint declaration without informing planning and operational entities (e.g., the balancing authority) that are expecting the reliable operation of the generating unit to its Extreme Cold Weather Temperature. To address this concern, the SDT has developed R8 to require the GO to provide the constraint declaration to the Balancing Authority and update the generating unit’s data specification regarding operational limitations to the generator unit’s capability and availability under R1.*

1. Do you agree that Requirement R8 is sufficient to inform the Balancing Authority of the potential impacts a constraint declaration may have on the generating unit’s performance to its Extreme Cold Weather Temperature? If you do not agree, or if you do agree but have an alternative approach that will more effectively address the concern, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Per the FERC directive to shorten the timeframe to implement freeze protection measures on existing units, the SDT proposes an implementation plan where all requirements of EOP-012-2 go into effect on the effective date of the standard except Requirement R3 which has a 12-month implementation time frame. The chart below is included to compare the EOP-012-1 and EOP-012-2 IPs for this requirement which requires GOs to have the capability to operate at the ECWT or a CAP written by the effective date of the requirement. If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

|  |  |  |
| --- | --- | --- |
|  | **EOP-012-1** | **EOP-012-2** |
| **Effective Date** | 10/1/2024 | 10/1/2024 |
| **Have Capability to Operate at ECWT or CAP Developed** | 4/1/2028 | 10/1/2025 |
| **CAP Completed** | no end date specified | 10/1/2027 (R7.1.1) or 10/1/2029 (R7.1.2) |

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modifications in EOP-012-2 meet the key recommendations in The Report as well as the directives in the FERC order in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments:

1. [Order](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230216-3062&optimized=false). [↑](#footnote-ref-1)