Unofficial Comment Form

Project 2019-06 Cold Weather

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **2019-06 Cold Weather** project by **8 p.m. Eastern, Friday, March 12, 2021**.

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project%202016-02%20Modifications%20to%20CIP%20Standards.aspx). If you have questions, contact Senior Standards Developer, [Jordan Mallory](mailto:jordan.mallory@nerc.net?subject=CIP-002-6%20Posting) (via email) or at 404-446-2589.

**Background**  
In July 2019, the FERC and NERC staff report titled The South Central United States Cold Weather Bulk Electronic System Event of January 17, 2018 (Report) was released. Following the report, Southwest Power Pool, Inc. (SPP) submitted a Standards Authorization Request (SAR) proposing a new standard development project to review and address the recommendations in the Report. The industry need for this project is to enhance the reliability of the BES during cold weather events.

**Summary of Changes**

Many commenters expressed concern regarding the development of a new standard during the SAR phase of Project 2019-06 Cold Weather. Therefore, the initial draft standards reflects modifications to currently existing standards EOP-011, IRO-010, and TOP-003.

**EOP-011-2**

The standards drafting team (SDT) reviewed the NERC Reliability Standards concluding that EOP-011 was the best fit out of all the standards for cold weather preparedness, plans, procedures, and awareness training. The SDT developed a new Requirement R7 with respective parts as the minimum requirement for entities. As such, the below outlines the EOP-011 modifications at a high level:

* Updated title and purpose to allow for this new requirement.
* Generator Owner (GO) has been added to the Applicability Section. The team discussed the addition of Generator Operator, but determined GO would suffice respective requirement situation as the GO owns the generating site.
* “Cold weather conditions” added to Requirement R1 Part 1.2.6, and Requirement R2 Part 2.2.9.
* New Requirement R7 and its respective Parts.

**IRO-010-3**

The SDT made modifications to IRO-010-3 to address the Reliability Coordinators (RCs) incorporating data specifications communicated by the GO/GOP to their respective Operational Planning Analysis, develop its Operating Plans, or determine the expected availability of contingency reserves for the appropriate next day operating horizon.

**TOP-003-4**

The SDT made modifications to TOP-003-4 to address the Transmission Operator (TOPs) incorporating data specifications communicated by the GO/GOP to their respective Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

**Questions:**

1. The SDT placed the Generator Owner cold weather preparedness plan(s) requirements within EOP-011. Do you agree with this new requirement placement in the EOP-011 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments:

1. The SDT placed the Reliability Coordinator data specification requirements within IRO-010. Do you agree with this modified requirement placement in the IRO-010 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments:

1. The SDT placed the Transmission Operator data specification requirements within TOP-003. Do you agree with this modified requirement placement in the TOP-003 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments:

1. The SDT placed the Balancing Authority data specification requirements within EOP-011. Do you agree with this modified requirement placement in the EOP-011 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments:

1. EOP-011-2 (Requirement R7 Part 7.2): The SDT suggest maintenance and inspection be, at a minimum, an annual requirement. Does the requirement provide enough specificity for an industry wide standard?

Yes

No

Comments:

1. The SDT modified the Implementation Plan to allow twelve (12) months following the effective date to become compliant with EOP-011, IRO-010, and TOP-003. If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments:

1. Proposed TOP-003-5 Requirement R1 and IRO-010-4 Requirement R1 would require TOPs and Reliability Coordinator to maintain cold weather parameter. For consistency with the data specification requirements and to ensure the BA has the necessary information to perform its analysis during cold weather, do you believe that similar parameters should be required? Please provide your reasoning as to why it should be required or should not be required.

Yes

No

Comments:

1. Please provide any additional comments for the SDT to consider, if desired.

Comments: