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, Tuesday, September 12, 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 Manager of Standards Development, [Alison Oswald](mailto:alison.oswald@nerc.net) (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.

## Questions

**EOP-011-4 (Questions 1-3)**

1. Do you agree with the new R7 for identification and notification?

Yes

No

Comments:

1. Is the 30-month time frame in R8 adequate time for the physical changes that may be required to comply with these requirements?

Yes

No

Comments:

1. The SDT has elected to add clarifying language in the applicable requirements in lieu of making “critical natural gas infrastructure load” a defined term, providing flexibility for individual entities to apply this term in a manner that is appropriate for their situation. A definition may have necessarily been overly broad and would not provide substantial additional clarity given the diversity of these types of facilities and their relative impact on the BES. Do you agree with this approach?

Yes

No

Comments:

**TOP-002-5 (Question 4)**

1. The SDT modified the proposed Requirement R8 to remove the link between the required Operating Process and the Operating Plan required under Requirement R4. Do you agree with this modification?

Yes

No

Comments:

**General (Questions 5-7)**

1. The SDT proposes that the modifications in EOP-011-4 and TOP-002-5 meet the key recommendations in The Report 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. Do you agree with the implementation plan proposed by the SDT? 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.

Yes

No

Comments:

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

Comments: