Unofficial Comment Form

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

**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** by **8 p.m. Eastern, September 1, 2022.   
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](mailto:alison.oswald@nerc.net) (via email), or at 404-446-9668.

## Background Information

From February 8 through February 20, 2021, extreme cold weather and precipitation caused large numbers of generating units to experience 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 from February 15 through February 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

1. The SDT is proposing three new definitions from the initial posting of EOP-012. Does adding definitions of Extreme Cold Weather Temperature, Generator Cold Weather Critical Component, and Generator Cold Weather Reliability Event provide additional clarity to the requirements of EOP-012? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Do you agree with the proposed definitions of Extreme Cold Weather Temperature, Generator Cold Weather Critical Component, and Generator Cold Weather Reliability Event? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Is the revised Applicability Section language clear? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Do you support the SDT proposed 12-hour timeframe to require new Generation units to be capable of performing at or below the Extreme Cold Weather Temperature? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Do you support the SDT proposed 1-hour timeframe to allow existing Generation units to demonstrate their performance at or below the Extreme Cold Weather Temperature? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Do you support the addition of a 20 megawatt minimum (corresponding to the definition of a BES impacting generating unit) for requiring CAPS for derates? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. The SDT believes that with the proposed modifications to EOP-012-1, the initial proposed implementation plan is appropriate with one change. The 18-month implementation time frame is for all revised and new requirements in EOP-012-1, except Requirements R1 and R2 which have a 60-month implementation time frame, and R4 which has a 78-month implementation time frame. Do you agree with this implementation time frame? 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. The SDT proposes that the modifications in the proposed EOP-012-1 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. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments: