

## Meeting Notes

### Project 2013-01 Cold Weather Preparedness SAR Standard Drafting Team

January 24-25, 2012

Atlanta, GA

#### Administrative

##### 1. Introductions

The meeting was brought to order by JC Culberson, chair, at 8:00 a.m. ET on Thursday, January 24, 2013. The team meeting was hosted by the North American Electric Reliability Corporation. Meeting safety and logistic information was provided by Barb Nutter. The chair noted that Mr. Henery with the Federal Energy Regulatory Commission staff would be joining the meeting in-person on Friday. Introductions were made and those in attendance were:

Name	Company	Member/ Observer (M/O)	In-person (IP) or Remote (R)	
			01/24	01/25
JC Culberson (Chair)	ERCOT	M	IP	IP
Matt Averett	Southern Company	M	IP	IP
Clinton Carter	Luminant	O	IP	IP
Clem Cassmeyer	Western Farmers Electric Cooperative	O	R	R
Jason Fisher	Minnesota Power	M	IP	IP
Mike Gentry	Salt River Project	M	R	R
Nick Henery	Federal Energy Regulatory Commission	O	-	IP
Kevin Lynch	PSEG Power Fossil LLC	M	IP	IP
Ed Schnell	American Electric Power	M	IP	-
Scott Barfield	North American Electric Reliability Corporation	O	IP	IP

Name	Company	Member/ Observer (M/O)	In-person (IP) or Remote (R)	
			01/24	01/25
Roman Carter	North American Electric Reliability Corporation	O	R	R
Barb Nutter (Standard Developer)	North American Electric Reliability Corporation	O	IP	IP

**2. Determination of quorum**

The rule for NERC Standard Drafting Teams (SDTs) states that a quorum requires two-thirds of the voting members of the SDT to be present. Quorum was achieved as all members were present January 24<sup>th</sup> and five of the six members were present January 25<sup>th</sup>.

**3. NERC Antitrust Compliance Guidelines and Public Announcement**

NERC Antitrust Compliance Guidelines and public announcement were reviewed by Ms. Nutter. There were no questions. The participants were reminded each day they are working under the NERC Antitrust Guidelines.

**4. Review team roster**

Ms. Nutter informed the team of the additions of Scott Barfield, NERC observer and Nick Henery and Kumar Agarwal as FERC observers to the drafting team roster. Version 4 has been posted to website.

**Agenda**

**1. Approval of Meeting Notes from Previous Meetings**

The team approved the meeting notes from the December 7, 2012, January 10 and January 14, 2013 meetings.

**2. Discussion**

Team members discussed if cold weather preparedness should be considered under normal or emergency plans. The bright line between normal and emergency application was still unclear to one team member. The chair suggested not focusing on normal operation standards (e.g., TOP-001 and TOP-002). For example, TOP-002-3 has been approved by industry and the NERC Board of Trustees on May 9, 2012 and is pending regulatory filing. The chair’s reasoning was that this standard only includes the Transmission Operator and relates more to operating limits.

Questions were raised about including references to documents such as the Operating Committee (OC) document. NERC staff provided insight that outside documents should not be referenced within requirements or attachments that are incorporated within the requirements. Outside documents are not within the control of the standards process and may become contradictory to remaining compliant with the requirement. It is acceptable to reference third party documents within the standard's Guideline and Technical Basis document. A technical document provides basis on how the drafting team arrived at certain criteria in the requirements. The technical document may also provide the "how" as guidance in the things a functional entity should consider or achieve the requirements; however, the technical document does not provide details on how to be compliant.

The team is concerned about the cost impact to small power producers that may not be capable of achieving a certain level of winterization. A suggestion was made to craft the requirement to account for these entities without exclusion.

Another concern was raised about how a Generator Operator that would have an extreme winterization plan would require the Generator Owner to implement items to meet the plan.

The team returned to EOP-001-2.1b that is pending regulatory approval and considered an approach to removing item #10 from Attachment 1 and more clearly identifying the item to a Generator Owner. The suggestion was to remove the last sentence of item #10 and add the new proposed Requirement.

After much discussion on the use of "Emergency" in the requirement, the team decided to use the term 'extreme winter preparation plans' and to explain what is meant by extreme in the rationale box in the redlined EOP-001-2.1b.

### **3. Response to comments**

The team considered issues about the SAR potentially requiring a regional variance based on the initial version of the posted SAR. During discussions, the team struggled with the level of detail needed to provide each comment. NERC staff sought senior staff opinion to determine the best approach and decided that general responses would be sufficient. The purpose of the SAR is to help the team understand what options or alternatives could be considered in developing or changing a standard that would result in a reliability benefit that industry could embrace and achieve consensus.

### **4. Revising the SAR**

FERC staff attendee was also one of the investigators on the "cold snap event" (February 2011) investigation team. FERC staff attendee also shared personal experiences concerning generator plants from various regions and the differences in weather related preparations. One item noted was that generator plants do have plans; however, it appears that not all have consistent

execution. The FERC staff attendee also noted that having a plan or certifying the plan is not necessarily sufficient. The entity must execute the plan while, at the same time, the team in crafting requirements do not need to prescribe criteria in such a way that entities do not have the flexibility in addresses their specific circumstances.

The team considered the use of the defined NERC glossary term “Emergency” and how it applies to the weather event. Initially, the team connected the term with “winter weather” to replace the word “extreme;” however, weather is not an “abnormal system event.” To address this misapplication, the team referred to “Emergency” as the result of the extreme winter weather.

## 5. Action Item Review

- a. Ms. Nutter (send the following for discussion at the January 31<sup>st</sup> meeting):
  - i. EOP-001 new requirement wording
  - ii. Talking points document
  - iii. Consideration of Comments
- b. Entire SAR DT (due for January 31<sup>st</sup> meeting):
  - i. Review new requirement wording for EOP-001
  - ii. Review and add to talking points
  - iii. Consideration of Comments
- c. Mr. Culberson:
  - i. Review revised SAR and make appropriate changes in accordance with change from the use of “Emergency” to “extreme”
- d. Develop webinar straw man
- e. Develop communication and outreach plan
- f. Discuss with NERC staff about aligning the scope with FERC, NERC, OC, PC, RISC, etc. Consider using two members from the various interests to reach a common consensus

## 6. Next steps

- a. Finish Consideration of Comments
- b. Develop and hold industry webinar
- c. Meeting in Atlanta, GA February 26-28, 2013

## 7. Review of the Schedule

The team reviewed the meeting dates document. It was decided to hold the industry webinar in March 2013 instead of February 2013. This will provide sufficient time to complete the Consideration of Comments, redlined version of EOP-001, implementation plan and webinar along with outreach prior to the webinar.

A tentative date was sent for an April or May, 2013 meeting to review and respond to comments from the revised SAR.

The advisor informed the group that per the current process, the drafting team does not have to take the revised SAR back to the Standard Committee for approval prior to posting. The team will keep the chair of the SC informed of its progress.

## 8. Future meeting(s)

- a. January 31, 2013 | Conference Call
- b. February 26-28, 2013 | NERC Headquarters in Atlanta, GA
- c. March 19-21, 2013 | NERC Headquarters in Atlanta, GA

## 9. Adjourn

The meeting adjourned at 12:30 p.m. ET on January 25, 2013.