

Comment Report

Project Name: 2019-06 Cold Weather | Standard Authorization Request
Comment Period Start Date: 10/4/2019
Comment Period End Date: 11/5/2019
Associated Ballots:

There were 42 sets of responses, including comments from approximately 95 different people from approximately 76 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Westar Energy	Douglas Webb	1,3,5,6	MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
Public Utility District No. 1 of Chelan County	Jeff Kimbell	1,3,5,6		CHPD	Davis Jelusich	Public Utility District No. 1 of Chelan County	6	WECC
					Meaghan Connell	Public Utility District No. 1 of Chelan County	5	WECC
					Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF

FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Adrienne Collins	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no NGrid	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC

David Burke	Orange & Rockland Utilities	3	NPCC
Michele Tondalo	UI	1	NPCC
Helen Lainis	IESO	2	NPCC
Sean Cavote	PSEG	4	NPCC
Kathleen Goodman	ISO-NE	2	NPCC
David Kiguel	Independent	NA - Not Applicable	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Mike Forte	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC

				Ashmeet Kaur	Con Ed - Consolidated Edison	5	NPCC
				Caroline Dupuis	Hydro Quebec	1	NPCC
				Chantal Mazza	Hydro Quebec	2	NPCC
				Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
				Laura McLeod	NB Power Corporation	5	NPCC
				Randy MacDonald	NB Power Corporation	2	NPCC
				Gregory Campoli	New York Independent System Operator	2	NPCC
				Quintin Lee	Eversource Energy	1	NPCC

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

This standard may be necessary for specific generation types in climates where sudden severe winter weather may be a threat, but for many generators in northern climates this standard will be a burden. NERC has put out guidance on winter weather preparedness, and this should be sufficient.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

AEP takes cold weather preparedness very seriously, and has developed and implemented procedures to ensure unit reliability for cold weather. In addition, NERC's own Reliability Guideline "Generating Unit Winter Weather Readiness", has been in effect for some time now. In its own words, this document provides a "framework for developing an effective winter weather readiness program for generating units throughout North America" and guidance "on maintaining individual unit reliability and preventing future cold weather related events." We believe entities need the flexibility of engineering judgement to design and implement their own procedures to prepare for cold weather outside of prescriptive obligations. Original unit types, design, age, and geographic locations all drive what unique preparatory steps should be taken, making prescriptive obligations undesirable and perhaps even inappropriate. As generation types continue to evolve, winter weather preparation is taken into account more than ever before.

In addition, it should be noted that RTOs often provide their own guidance such as PJM's as found in [PJM Manual 14D](#) attachment N: Cold Weather Preparation Guideline and Checklist. This is one of several guidance documents that is already available and emphasize reviewing lessons learned after each event and implementations of defenses to prevent recurrence. Once this is in place it creates a living effort that focuses improvements in areas of specific need that directly translates to continual improvement of the process that is in place. ERCOT already has a suitable mechanism in place, which has proven itself in practice. In addition, we are now seeing that REs are heading in a similar direction as well.

In addition, EOP-011 already addresses weather preparedness in an appropriate manner. Functional Entities, such as the TOP and BA, have checklists and attestations required for Generator weatherization. Improvements to weather preparedness have been significantly improved since 2011, with increased awareness and action plans driven by NERC recommendations.

In summary, NERC guidelines, RTO guidance and checklists, and existing NERC requirements, all collectively provide an effective framework for cold weather preparedness.

Likes 0

Dislikes 0

Response

Jim Nail - City of Independence, Power and Light Department - 1,3,5

Answer

No

Document Name

Comment

Requirements already exist to inform others concerning the status of Facilities. RC/BA/TOP have the authority to include any status/data they deem necessary in their Facility Data requests. Whether a GO/GOP maintains their Facilities ready for dispatch is properly a Market function rather than a Reliability function. Declaring a Facility as available and then failing to bring it on line could be dealt with using Market penalties rather than imposing a new continent wide Standard. For many entities, the documentation of cold weather preparations and maintenance would be an additional administrative burden without an appreciable increase in Reliability.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

No

Document Name

Comment

The information in the SAR does not suggest any exemptions or qualifiers are being considered. Reclamation recommends limiting the applicability of a future NERC standard on cold weather preparedness to entities located in geographic areas that don't normally see harsh winter conditions and excluding hydro generators from applicability. As the SAR is presently written, the future standard will result in an administrative burden that offers no increase in reliability for facilities that normally operate in a cold winter environment.

Reclamation agrees with the proposal for Generator Owners and Generator Operators to develop winterization plans and procedures. The SAR appears to propose winterization preparedness requirements that are not prescriptive, which will allow facilities that need certain cold weather preparedness methods to implement those methods while allowing other facilities to implement different appropriate methods. If the proposed standard does not include the above exemptions, it is important to allow different entities with different equipment to develop winterization procedures that are appropriate for their needs.

Likes 0

Dislikes 0

Response**Jeff Kimbell - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name CHPD****Answer**

No

Document Name**Comment**

The SPP SAR addresses issues experienced in the Southern portion of the Mid-Continent Regional Transmission Organization. The SAR therefore seeks to address a regional event on national basis, with implications for all of North America.

Many generators operate in areas of regular cold weather and have operated reliably for many years, based on their design for this environment, as well as existing operations planning and procedures. Events in the The South Central United States Cold Weather Bulk Electronic System Event of January 17, 2018 report show the potential unpreparedness of some utilities that do not operate in this environment. While the SAR addresses those that may not be prepared for winter weather, this is not the case for most utilities in North America. Any standard should focus on those not in cold climates, or limit any additional compliance obligations to those who do operate in cold weather to a simple response of preparedness rather than multiple documentation and training requirements specific to cold weather. Our maintenance and operating procedures, practices and the design of our plants are for reliable operation in cold environments. Practices to operate in cold conditions are embedded in existing documentation, rather than specific procedures or documents that would meet this very specific, prescriptive list. Our designs are for cold environments. Many of the problems identified in the report will not happen at northern facilities because the systems are designed around them.

Additionally, multiple past cold weather Events have included natural gas supply availability as an issue. This is not applicable to large hydro plants on a major river such as the Columbia.

The list of requirements to be included in the standard provide little to no additional value to those GOPs that operate in cold weather areas and would create a significant regulatory burden. A more appropriate solution would be to limit the applicability of the standard to specific geographic regions where cold weather is an anomaly and not include regions where this weather is in the normal and planned operating range.

Specific comments for the list contained in the SAR are provided below.

1. *Generator Owner/Generator Operator develops winterization plans, procedures, and winter-specific and plant-specific operator awareness training. Additional elements to consider may include:* These are unnecessary for GO and GOP that operate in regularly cold regions and simply create additional evidence burdens.
 - a. *Generating unit availability;* Normally reported, and not a significant cold weather dependent issue with hydro generation on a major river, such as the Columbia.
 - b. *Parameters around operating temperatures;* Parameters don't change, as we are designed and operate for cold weather as a matter of course.
 - c. *Implementing freeze protection measures and technologies;* These are in place in cold regions, but not specifically identified. Identification and implementation would be an additional burden.
 - d. *Performing periodic adequate maintenance and inspection of freeze protection measures and technologies;* This is part of normal processes and maintenance: What is adequate for a plant that operates in a cold region is minimal and in place, or it would routinely not be operable. Evidence documentation would be an unnecessary burden with no improvement to reliability.
 - e. *Ensuring gas-fueled generating units' Reliability Coordinator and Balancing Authority are provided notification of firm transportation capacity for natural gas supply.* Our generation is 100% hydro and this is not applicable.

2. *Generator Owner/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators associated parameters for generating unit availability for extreme cold weather performance.* The capacity of our generation type (hydro) does not change based on cold weather conditions, unlike other generation types such as gas and wind that have been affected by cold weather.
3. *Generator Owners/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators when expected temperatures are forecasted within the determined generating unit availabilities, expected availability of the generating units for the appropriate next day operating horizon.* This is unnecessary, as availability is already reported to the BA. Cold weather does not change that for those who operate in cold climates.
4. *Balancing Authority use of the information provided by the Generator Owner/Generator Operator to perform Operational Planning Analysis, and determine the expected availability and contingency reserves for the appropriate next day operating horizon.* This is already performed as a matter of course for our system and would not benefit from additional mandatory requirements.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer

No

Document Name

Comment

City Utilities is not opposed to creating a new Reliability Standard or modifying an existing one to ensure resource availability or capability for the BES if necessary. However, we believe the scope of the SAR is too narrow and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during various ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a Standard to only address the cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the draft 2019 ERO Reliability Risk Priorities Report.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

No

Document Name

Comment

No. I don't feel this is a reliability issue. This is Market issue. If a Generator cannot start up and has been selected by BA to run; then there are financial penalties to encourage keeping the unit available to run when called on.

Likes 0

Dislikes 0

Response

Michael Brytowski - Great River Energy - 1,3,5,6 - MRO

Answer No

Document Name

Comment

GRE recommends that no new Standard be developed at this time, as the issue seems to affect southern U.S. entities and is not a continent-wide issue. GRE also recommends more technical information be posted on this topic before deciding on a course of action to take. For example, NERC should develop a white paper that clearly defines the true issues that need correction by the GOs/GOPs that have problems operating during extreme cold weather events.

While GRE is opposed to creating a new Reliability Standard; we would be willing to consider modification of existing standards to ensure resource availability or capability for the BES, if necessary. However, GRE believes the scope of the SAR is too narrowly drawn and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during diverse ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Reliability Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a new Reliability Standard that only addresses the extreme cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the draft 2019 ERO Reliability Risk Priorities Report.

Likes 0

Dislikes 0

Response

Jerry Horner - Basin Electric Power Cooperative - 1,3,5,6

Answer No

Document Name

Comment

Basin supports comments generated by MRO NSRF, as follows:

The NSRF recommends that no new Standard be developed at this time, as the issue seems to affect southern U.S. entities and is not a continent-wide issue. The NSRF also recommends more technical information be posted on this topic before deciding on a course of action to take. For example, NERC should develop a white paper that clearly defines the true issues that need correction by the GOs/GOPs that have problems operating during extreme cold weather events.

The NSRF is opposed to creating a new Reliability Standard; however, the group would be willing to consider modification of existing standards to ensure resource availability or capability for the BES, if necessary. However, the NSRF believes the scope of the SAR is too narrowly drawn and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during diverse ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Reliability Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a new Reliability Standard that only addresses

the extreme cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the [draft 2019 ERO Reliability Risk Priorities Report](#).

1. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments: If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

- FAC-008 and MOD-025 should ensure the GO and GOP know the capability and availability of their BES resources under diverse ambient conditions, including extreme cold weather. If they don't have this information or are providing false information, then that should be in scope today for the ERO.
- MOD-031 and MOD-032 should ensure the PC and BA request and receive information from each RP to know the capability and availability of BES resources within their area under diverse ambient conditions, including extreme cold weather. If they don't have this information or are provided false information, then that should be in scope today for the ERO.
- NERC Reliability Assessments and TPL-001 should ensure near-term/long-term planning studies only include BES resources that are known to have the capability and availability under the specified ambient conditions, including extreme cold weather/winter peak. If they are not studying these conditions or are including invalid resources, then that should be in scope today for the ERO.
- IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under diverse ambient conditions, including extreme cold weather. If they don't have this information or are provided false information, then that should be in scope today for the ERO.
- IRO-008, TOP-001 and TOP-002 should ensure the RC's and BA's Operational Planning Analysis and the RC's Real-time Assessment only includes BES resources that are known to have the capability and availability under the expected ambient conditions, including extreme cold weather/winter peak. If they are not assessing these conditions or are including invalid resources and/or Operating Plans, then that should be in scope today for the ERO.

If the ERO enforces these expectations, then it should either incent the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that impact resource capability and availability, which are becoming too frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as a GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are "non-utility" companies who are operating in RTO markets solely for revenue. The SAR proposal will most likely be very controversial with these entities and take years to develop and implement. Additionally, to secure industry approval, the result could be a Reliability Standard with weak requirements that does little to address the issue; and creates more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring of all 1000 of these entities, which may be inefficient and impractical.

A more effective and efficient method would be to ensure requirements for the PC, RC and BA (whose role and responsibility is to oversee resource adequacy within an area of the BES) are sufficient to address the emerging risk of grid transformation. This proactive approach would reduce the need to create projects continually to address the next event based on other factors.

Many northern GOs/GOPs do not have issues during extreme weather events (both hot and cold), and did not have an issue during the extreme cold weather event of January 17, 2018. A Standard developed for a GO/GOP to assure that a unit will always start is unrealistic and unsustainable. A generator owner could invest a large sum of money into winterizing their generator and it still may not start and perform as designed. The SAR should

clearly address the communication of when a generator cannot perform as requested (to start, to ramp, etc.). This communication could include (but not limited to):

- De-rates of output due to snow/dust/ cloud cover/sun set times etc. to PV systems;
- Icing of turbine blades/over speed due to excess wind/cut out due to extreme cold for wind Facilities;
- Frozen and wet coal piles/hot-cold ambient temps that impact Mw outputs/etc. for fossil fuel plants; and
- Lack of water due to frozen water/EPA restrictions/etc. for hydro plants.

As you can see, every type of generator has some type of natural and outside rules that can limit its output. This SAR should address the communication of such information and not just training or installing freeze protection measures.

Finally, this SAR seems to propose Resource Adequacy as a requirement, which does not need to be part of a Reliability Standard focused on reliability during ambient conditions. In other words, a GO/GOP should perform its obligations pursuant to contract or market rules without the influence of a Reliability Standard, and a Reliability Standard should not dictate that a generator must perform in a certain way. The maintenance items within the FERC and NERC report should be “common sense” items that a GO/GOP would perform, in order to operate as required. If there are a set of GOs/GOPs who do not perform due to some type of low (i.e., extreme cold weather) temperature parameters, then there could be a tariff or market process to reduce the credibility of the GO/GOP.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer

No

Document Name

Comment

This issue seems to affect southern U.S. entities and does not appear to be a continent-wide issue. Alliant Energy recommends more technical information be posted on this topic before deciding on a course of action to take such as a white paper that clearly defines the true issues that need correction by the GOs/GOPs during extreme cold weather events.

Rather than a new standard, Alliant Energy would support consideration of a modification of existing standards to ensure resource availability or capability for the BES. However, we believe the scope of the SAR is too narrowly drawn and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during diverse ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Reliability Standards adequately protect the BES under all ambient conditions, not just extreme cold. Development of a new Reliability Standard that only addresses the extreme cold weather issue will miss an opportunity to address the broader emerging risk of grid transformation as identified in the [draft 2019 ERO Reliability Risk Priorities Report](#).

Likes 0

Dislikes 0

Response	
Daniel Gacek - Exelon - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>The section labeled “project scope” is acceptable. However the following section “Detailed Description” is both too restrictive and too vague, see additional comments below.</p> <p>On Behalf of Exelon: Segments 1, 3, 5, 6</p>	
Likes	0
Dislikes	0

Response	
Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 3,4,5,6	
Answer	No
Document Name	
Comment	
<p>MGE recommends that no new Standard be developed at this time as this seems to be a southern US entity issue and not continent-wide issue.</p> <p>We are opposed to creating a new Reliability Standard but would be willing to modify an existing one to ensure resource availability or capability for the BES, if necessary. However, we believe the scope of the SAR is too narrow and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during various ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a Standard to only address the cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the draft 2019 ERO Reliability Risk Priorities Report.</p>	
Likes	0
Dislikes	0

Response	
Theresa Allard - Minnkota Power Cooperative Inc. - 1	
Answer	No
Document Name	

Comment

Minnkota believes that no new Standard needs to be developed at this time, as the issue seems to affect southern U.S. entities and is not a continent-wide issue. Minnkota also requests more technical information be posted on this topic before deciding on a course of action to take. For example, NERC should develop a white paper that clearly defines the specific issues that need correction by the GOs/GOPs that have problems operating during extreme cold weather events, including metrics based on geographic location and generator type.

Minnkota is opposed to creating a new Reliability Standard; however, Minnkota would be willing to consider modification of existing standards to ensure resource availability or capability for the BES, if necessary.

Likes 0

Dislikes 0

Response

Jamie Monette - Allele - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

For Generating Units that are designed for cold weather operation, this would create an unnecessary administrative burden. Minnesota Power supports Edison Electric Institute's comment, which supports the North American Generator Forum (NAGF)'s recommendations:

- The development of a quantifiable definition for "Extreme Cold Weather"
- The addition of language within the SAR that ensure regional differences will be considered when addressing this issue.

Likes 0

Dislikes 0

Response

Thomas Breene - WEC Energy Group, Inc. - 3,4,5,6

Answer

No

Document Name

Comment

WEC Energy Group does not agree with this SAR.

The GO/GOP topics covered in 1. a, b, c and d of this SAR are already included in existing reliability guidelines. The SAR materials and links refer to issues in climates typically not exposed to cold weather patterns. The need to focus on winterization procedures and freeze protection in these regions should be emphasized.

The SAR attempts to bring the market function into the reliability function during cold weather and this should not be supported with a standard.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 1,2,3,6 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

No

Document Name

Comment

The North America Generator Forum (NAGF) does not agree with the proposed scope of the SAR for Cold Weather Preparation as submitted by SPP. Generators as a whole take weather preparation, whether winter or summer, and reliability, very seriously. Under normal winter weather conditions, generators do not experience operating issues on a consistent basis. However, under extreme conditions, all BES elements, not just those associated with generation, could experience unpredictable operational issues. The NAGF believes that the proposed SAR does not address the core issue(s) and will create more administrative work and financial expense for GO/GOP registered entities with no reliability benefit. The NAGF supports ensuring that existing requirements for the PC, RC, and BA address communication of generator operational information, including when they cannot perform as requested, during all types of extreme weather events.

The NAGF membership believes the deliverables of the SAR are presently met through existing Tariffs, Operating Agreements, Interconnection Agreements, ISO market rules, BA Surveys, and other Standards such as TOP-003. Under the requirements of TOP-003-3, the TOP and BA must maintain a documented specification for the data necessary for it to perform its Operational Planning Analyses. The GO / GOP must satisfy the obligations of documented specifications to assist in Real-time monitoring and assessments. If the TOP and BA do not have the information needed to perform Planning Analyses for cold weather events, the data should be requested as part of TOP-003-3. There may be an opportunity to further refine the required data by revising TOP-003-3.

Although not representative of all NERC registered generators, many of the NAGF membership companies already have Cold Weather Preparation procedures in place and have invested in winterizing their facilities. They utilize and reference NERC's Reliability Guideline "Generating Unit Winter Weather Readiness" and ISO market rules, and believe that flexibility is needed based on design, geography and market requirements in order to determine appropriate weather preparation. Continent wide, prescriptive requirements are not appropriate because of the differences in technology and typical winter conditions across the ERO.

Organized markets provide financial incentives for GO/GOPs to invest in winterization improvements. However, such investments do not guarantee that a generation unit will start when required or will not be derated during an extreme cold weather event. Extreme cold weather-related outages typically involve previously unknown vulnerabilities, especially when plants experience unprecedented combinations of temperature, wind speed and precipitation. Transmission systems suffer unpredictable failures under such circumstances, and the same applies for generation plants.

Therefore, the focus of this SAR should be to:

- Enhance communication of generator operational capabilities for the planning and real-time time horizon so that the RC, BA, and TOPs can more accurately forecast BES generator capability and availability during extreme weather events.
- Support incentives for GO/GOPs to continually improve generation facilities for all types of extreme weather events.
- Support incentives for putting additional generation plants online in advance of extreme weather events (keeping units running is far more secure than starting-up in the middle of a major winter storm).

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Black Hills Corporation (BHC) agrees with most of the SAR, but does not agree with the proposed scope for “Operator Awareness Training”. Due to the fact that our Generation Resources/Facilities are all located in the central to Northern area of North America, our generation facilities are designed already for “cold weather” and as such, our generation facilities already have in place plans/procedures and as part of these annual reviews, each facility reviews prior items from past year(s) and proceed accordingly for their annual winter preparations. Our Generators Plant Operators already have an awareness of cold weather, including extreme cold, & its potential impacts to our facilities and the reliability of the BES, that another mandatory training placed upon them if not a productive or cost effective use of their time.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer No

Document Name

Comment

I don't feel this is a reliability issue. This is Market issue. If a Generator cannot start up and has been selected by BA to run; then there are financial penalties to encourage keeping the unit available to run when called on.

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

WAPA recommends that no new Standard be developed at this time, as the issue seems to affect southern U.S. entities and is not a continent-wide issue. WAPA also recommends more technical information be posted on this topic before deciding on a course of action to take. For example, NERC should develop a white paper that clearly defines the true issues that need correction by the GOs/GOPs that have problems operating during extreme cold weather events.

WAPA is opposed to creating a new Reliability Standard; however, the group would be willing to consider modification of existing standards to ensure resource availability or capability for the BES, if necessary. However, WAPA believes the scope of the SAR is too narrowly drawn and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during diverse ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Reliability Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a new Reliability Standard that only addresses the extreme cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the [draft 2019 ERO Reliability Risk Priorities Report](#).

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer

No

Document Name

Comment

Ameren does not support the proposed SAR for Cold Weather Preparation as submitted by SPP. The Midcontinent Independent System Operator (MISO) and the other ISOs serve as Balancing Authorities (BA) and Reliability Coordinators (RC) and have been leading several initiatives to address cold weather preparation. To avoid the duplication of efforts, Ameren would like to push for more of a regional approach, and allow the ISOs to continue leading extreme weather preparations.

The vast majority of generation outages and derates caused by cold weather happened in the southern region, where cold weather susceptible components are not adequately protected. As a matter of normal reliable operating procedure, generators in the mid and northern regions fully enclose their critical components and utilize heat tracing technologies.

Another issue was having precautions for wind barriers, measures Ameren is already doing. MISO has already created cold weather steps for wind in preparation for winter. Ameren would prefer that the RTOs and GO/GOPs work out winterization plans outside the formal standard process.

Likes 0

Dislikes 0

Response

Devon Tremont - Taunton Municipal Lighting Plant - 1,3,5 - NPCC**Answer** No**Document Name****Comment**

The Taunton Municipal Lighting Plant believes that the BAs and RCs are well-equipped to address winter preparedness on their own without the need to create a mandatory Reliability Standard. BAs and RCs in North America that regularly experience cold weather are well aware of the concerns and limitations of their GOPs, and part of this comes from the BAs and RCs creating their own operating procedures that require some level of winterization/winter preparedness. By creating a mandatory Reliability Standard for this scope, NERC will be placing additional burden on the GOPs who already have extensive reporting requirements, and the fear is that this requirement would only add an additional, cumbersome compliance task to GOPs without a significant increase in reliability.

Likes 0

Dislikes 0

Response**Tara Lightner - Sunflower Electric Power Corporation - 1 - MRO****Answer** No**Document Name****Comment**

The NSRF recommends that no new Standard be developed at this time, as the issue seems to affect southern U.S. entities and is not a continent-wide issue. The NSRF also recommends more technical information be posted on this topic before deciding on a course of action to take. For example, NERC should develop a white paper that clearly defines the true issues that need correction by the GOs/GOPs that have problems operating during extreme cold weather events.

The NSRF is opposed to creating a new Reliability Standard; however, the group would be willing to consider modification of existing standards to ensure resource availability or capability for the BES, if necessary. However, the NSRF believes the scope of the SAR is too narrowly drawn and shortsighted. The rapid transformation of the grid due to growing political and economic pressures is leading to more resource shortages during diverse ambient conditions, not just extreme cold. Therefore, the scope of the project should evaluate the larger issue and ensure existing Reliability Standards adequately protect the BES under all ambient conditions, not just extreme cold. If the industry develops a new Reliability Standard that only addresses the extreme cold weather issue, then it will miss an opportunity to address the broader emerging risk of grid transformation as identified in the [draft 2019 ERO Reliability Risk Priorities Report](#).

Likes 0

Dislikes 0

Response**Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6****Answer** No

Document Name	
Comment	
<p>LDWP does not agree with the scope of this SAR. Extreme cold weather has little to no impact on the reliability of LDWP's generating stations, including the Intermountain Power Plant (IPP) generating station in Utah. Historically, IPP encounters subzero temperatures regularly throughout the winter months, and no reliability issues have been encountered.</p> <p>The only issue that does occur during these extreme cold weather events is the potential to disrupt IPP's fuel supply. IPP personnel deal with frozen coal in the coal cars when they arrive on site for unloading. They also manage frozen coal moving up the conveyor belts into the generating unit. Both of these issues could cause a disruption to the generating units. The turbine generator and the transformers historically have not been adversely effected by these cold weather events.</p>	
Likes	0
Dislikes	0
Response	
Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>Entities located in the northern United States experience and prepare for cold weather conditions every year. These entities design their facilities to operate during cold weather (unlike entities in the south, which design facilities to manage heat during the summer). Moreover northern entities already have practices in place to prepare for winter conditions each year, and have had such practices for as much as 100 years. For northern entities, this Standard would appear to add a paperwork burden—formally documenting, tracking, monitoring, and evidencing implementation of policies and procedures that have functioned for decades—that offers no reliability benefit. Indeed the burden to prepare and manage the necessary documentation may even detract from cold weather reliability for northern entities. First because resources will need to be assigned to document compliance, potentially reducing the availability of resources to perform other work (including winterization). And second because to minimize the compliance risk and documentation challenge, northern entities may simplify, standardize, or eliminate some of the proven winterization activities they perform today.</p>	
Likes	0
Dislikes	0
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
None.	

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

ReliabilityFirst provides the following as points to be considered in the Cold Weather SAR.

1. Although the main focus of the Standard is extreme cold weather, this is a perfect opportunity for other extreme weather conditions to be addressed (hot, cold, draught, hurricane, etc.)
2. Addition or modification of Glossary terms may be necessary such as what is considered “extreme cold” or “extreme weather”.
3. Transmission Owners/Operators should be included in applicability to ensure extreme cold weather preparations for switchyards/substations.
4. Purpose should include preparing switchyards/substations for extreme cold weather performance (Ensuring operation of breaker compressors/heaters, weather proofing of breaker cabinets/electrical boxes against water infiltration, preventing icing of Kirk key interlocking system, preventing freezing of disconnect/ground switch operating mechanisms, etc.).

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4, Group Name FE Voter

Answer

Yes

Document Name

Comment

Nuclear units are subject to annual reviews from their On-Site NRC Inspectors for both winter and summer seasonal readiness per NRC Attachment 71111.01 “Adverse Weather Protection”. A cold-weather standard would represent dual regulation (i.e. both NRC and NERC would be auditing cold weather preparation plans). Consider exempting all units regulated by the NRC from this standard (removed from scope) similar to what is being done for the CIP Standards.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Bette White - AES - Indianapolis Power and Light Co. - 3

Answer Yes

Document Name

Comment

IPL agrees with the basic scope of the proposed scope of the Cold Weather SAR.

Likes 0

Dislikes 0

Response

Rodney Warner - PNM Resources - Public Service Company of New Mexico - 1 - WECC

Answer Yes

Document Name

Comment

Concern was expressed by the committee the "Ensuring gas-fueled generating units' Reliability Coordinator and Balancing Authority are provided notification of firm transportation capacity for natural gas supply." This information is publically available. Should not be a requirement for the GO/GOP to report to the RC and BA.

Recommend that GO/GOP provide changes to firm gas supply that would effect planned generation to BA and RC as soon as possible. BA and RC will use this information for real time Operational Planning assesments and Real Time Assesments.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl supports the SAR scope as proposed but suggests consideration be given to the following recommendations made by the NAGF:

- Flexibility based on design, geography, and other unique characteristics of each generator in order to determine appropriate weather preparations.
- Development of a quantifiable definition for “Extreme Cold Weather” that considers regional differences.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2 - MRO,SERC,RF

Answer Yes

Document Name

Comment

MISO supports the development of a NERC Reliability Standard to ensure preparedness for extreme cold weather conditions and believes that the proposed SAR does a good job capturing the spirit and intent of the findings and recommendations contained in the *2019 FERC and NERC Staff Report: The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018*. In addition, we offer the following items for consideration.

Currently the SAR is silent regarding accuracy of generating unit performance with respect to ambient temperature. As the FERC and NERC Staff Report mentions “accuracy” several times, how can accuracy be incorporated into the scope of the Standard? MISO recommends the Generator Owner/Generator Operator periodically review generating unit performance and update its plans, procedures and training for operating generating units based on changes (equipment modifications, operating experience, etc.) and share this information with their Balancing Authorities.

In addition to the standards outlined in the SAR (IRO-010-2 and TOP-003-3), MISO recommends EOP-011 be reviewed for impacts as a result of this proposed project. For example, EOP-011 requires some of these aspects already. This standard requires Balancing Authorities to develop, maintain and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area, including “Reliability impacts of extreme weather conditions.” In addition, Reliability Coordinators are required to review the Operating Plan(s) submitted by Balancing Authorities for compatibility, inter-dependency and coordination to avoid risk to Wide Area reliability.

Under Reliability Principles, we recommend that boxes 6 and 7 also be checked to:

Recognize the Generator Owner/Generator Operator training aspects proposed under the scope of this project; i.e. “Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.”

Recognize the Reliability Coordinator wide-area assessment and monitoring aspects associated with this project; i.e. "The security of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide area basis."

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no NGrid

Answer Yes

Document Name

Comment

Although we agree with the industry need for better preparation in extreme weather conditions and better situation awareness in both planning and operations, extreme cold is relative to where you are in North America. We suggest that the SAR should be modified to be more general, i.e extreme weather preparedness (removal of the word cold weather).

Likes 0

Dislikes 0

Response

Douglas Webb - Westar Energy - 1,3,5,6 - MRO, Group Name Westar-KCPL

Answer Yes

Document Name

Comment

Westar Energy and Kansas City Power & Light endorse Edison Electric Institute's (EEI) response to Question 1.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

While Southern Company support efforts to improve BES reliability during extreme cold weather, the scope of the SAR, as written, should be focused on actions that will improve generating unit availability and capability during all weather events; furthermore, the SAR should not introduce redundant requirements or revise existing standard requirements that already account for weather conditions, including extreme cold weather.

1. Consistent with the Cold Weather Event recommendations, the SAR should only be applicable to GO/GOP activities related to winterization efforts and associated communication to the RC and/or BA.
 - Design does not necessarily ensure generating unit capability, as each winter event is unique. Generating unit capability is ensured by proper maintenance, operation, and when necessary, preparation for inclement weather. “Parameters around operating temperatures” implies temperature design limits have been reviewed for each generating facility and that units will operate during extreme weather above a certain temperature. Actual operation is different than design, and each winter event will have unique characteristics, making it nearly impossible to guarantee operation above a certain pre-defined temperature. Additionally, the plant site dynamics will vary for each winter event, including whether adjacent units are running or offline prior to and during the winter event. The SAR, as written, could drive GOs/GOPs to declaring their units’ availability uncertain below 32 degrees in order to ensure compliance with this new standard. This would provide little value to BES reliability. Therefore, Southern recommends that the SAR Drafting Team abandon the concept of defining a design temperature for each generating facility, that may not be relevant from event to event, and instead include a requirement for Generator Owners to develop and implement winterization plans prior to the onset of winter weather.
 - Additionally, the SAR is not specific on the type of firm transportation (FT) for natural gas supply obtained and what details would be required to be communicated to the BA and/or RC. In the SAR, bullet 1.e. is unnecessary and should be factored into 1.a. in the assessment of generating unit availability by the GO/GOP. Where-as primary FT guarantees point to point delivery, examples such as released capacity may not be secure under peak winter demand situations, even though it is classified as FT. The SAR also fails to outline expectations around Delivered gas, where the supplier utilizes their FT for delivery. Finally, the SAR makes no mention of other fuel commodities such as fuel oil inventory levels for oil-fired CTs.

2. No new standard requirements should be placed on the RC and/or BA, or where there is already a requirement for the GO/GOP to provide availability and capability information. There are several existing NERC standards that address generating resource availability and capability that address all kinds of conditions, including cold weather events, and a new or revised standard addressing availability and capability during one specific type of weather event is duplicative and unnecessary.

- FAC-008 – Requires Generator Owner to consider ambient conditions in establishing Facility Ratings.
- IRO-008 – Requires Reliability Coordinators to perform Operational Planning Analyses (next-day) and Real-time Assessments (every 30 minutes) to determine potential SOL and IROL exceedances; RCs are authorized to request information from Generator Owners necessary for conducting these analyses and assessments by way of NERC Standard IRO-010.
- IRO-010 – Authorizes the Reliability Coordinator to request and collect information necessary for performing Operational Planning Analyses, Real-time monitoring and Real-time Assessments.
- MOD-025 – Requires the Generator Owner to verify real and reactive capability and allows for the Transmission Planner to request an adjustment for different conditions.
- TOP-002 – Requires the Balancing Authority to have an Operating Plan (next-day) that specifically addresses expected generation resource availability (commitment and dispatch), reserve requirements and deliverability capability.
- TOP-003 – Authorizes the Balancing Authority to request and collect information necessary for performing Operational Planning Analyses, Real-time monitoring and Real-time Assessments.

Likes 0

Dislikes 0

Response

Bruce Reimer - Manitoba Hydro - 1,3,5,6

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Line Dufour - Hydro-Quebec Production - 5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
<p>Texas RE has the following comments regarding the scope of the SAR:</p> <ul style="list-style-type: none"> • The SAR includes “Balancing Authority use of the information provided by the Generator Owner/Generator Operator to perform Operational Planning Analysis” as a deliverable in new or revised Reliability Standards. However, per TOP-002-4 Balancing Authorities are not required to perform an Operational Planning Analysis and are only required to create Operating Plan(s) for the next day. • The Purpose or Goal states “To ensure optimal reliability by preparing generation for extreme cold weather performance and ensure situational awareness in both planning and operations by applicable registered entities.” However, the SAR does not include provision of associated parameters for generating unit availability for extreme cold weather performance to Transmission Planners (TPs) and Planning Coordinators (PCs). In order to prepare for extreme cold weather events, the impact of the events should be studied in the in the planning horizon as well rather than just identifying issues in next-day studies when it may be too late to develop solutions for the issues. • The SAR discusses provision of “associated parameters for generating unit availability for extreme cold weather performance” to the RC, but does not address how the RC would use the data. The RC would need to Due to the vague language used in the definitions of OPA and RTA, it may be necessary to prescribe use of this data for the RCs OPA and RTA. • The SAR discusses provision of “associated parameters for generating unit availability for extreme cold weather performance” to the RC, but does not include provision of data to the TOP. Since the TOP is required to perform the same analysis (OPA, RTA) as the RC, this data should be provided to the TOP as well and the TOP should be required to consider the data in its analysis. • There are no parameters for what is considered “extreme” cold weather performance. Texas RE recommends the SAR provide guidance on simply cold weather performance. There is no mention of renewables fuel supply or protection measures. Certainly the BA, RC, and TOP should have information from the GO/GOPs that expect icing on blades or feathering of turbines at wind speed X. For consistency the technical basis document should provide discreet examples for GO/GOPs to provide to allow for consistency in application of the Standard. 	

- Natural gas is the only fuel mentioned as a potential fuel availability issue in the SAR, and the GO/GOP may not have the information necessary to inform the RC and BA about fuel supply. Gas availability may very well be beyond the control of the generating entity. Evaluation of freezing coal would also need to be considered for completeness.

Likes 0

Dislikes 0

Response

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC

Answer

Document Name

Comment

Entities in northern North America should not be subject to the proposed Standard for the reasons discussed in question 1, above. We offer three options for achieving this.

1) One approach to design of a Reliability Standard with Regional Variance might be to identify, using historical data of the United States National Weather Service or a similar organization, regions where freezing temperatures may be expected at some time in each three to five years. A map that clearly marks such regions should be included as an Attachment to the Standard.

2) A second approach is to identify two regions as suggested above, but have different requirements in the Standard for each region. Entities of the southern region would be required to document, track, monitor, and evidence implementation of cold weather policies and procedures as envisioned in the SAR. Entities of the northern region would be required simply to have a document that states their winterization plans without having to meet specific sub-requirements as to content, implementation, tracking, or monitoring (they may be presumed already to do so by virtue of long experience in cold weather).

3) A third approach might be to include a 'trigger mechanism' within the Standard. Such a trigger mechanism would control when the Standard would apply to an entity, i.e., if the entity suffered loss of availability of BES generation or transmission due to cold weather, that entity then would be required to document, track, and evidence implement of cold weather policies and procedures. A sunset clause would be appropriate, to the effect that after successfully maintaining availability for the next two or three cold weather events, the need to document, track, and evidence implementation of winterization would no longer be required until a future loss of availability occurs. Such a mechanism provides appropriate carrot and stick incentives. If an entity winterizes successfully by whatever means, it would not be subject to compliance monitoring, audits, and risk. If an entity does not, it can remove the compliance risk by demonstrating successful winterization over the next two or three cold weather events (which might be 2-3 years for a northern entity and decades for a southern entity).

4) Both options could be combined.

Likes 0

Dislikes 0

Response

Tony Skourtas - Los Angeles Department of Water and Power - 1,3,5,6

Answer

Document Name

Comment

Perhaps this project could use a geographic approach in restricting applicability to areas in which reliability could be impacted by extreme cold weather.

Likes 0

Dislikes 0

Response

Tara Lightner - Sunflower Electric Power Corporation - 1 - MRO

Answer

Document Name

Comment

If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

- FAC-008 and MOD-025 should ensure the GO and GOP know the capability and availability of their BES resources under diverse ambient conditions, including extreme cold weather. If they don't have this information or are providing false information, then that should be in scope today for the ERO.
- MOD-031 and MOD-032 should ensure the PC and BA request and receive information from each RP to know the capability and availability of BES resources within their area under diverse ambient conditions, including extreme cold weather. If they don't have this information or are provided false information, then that should be in scope today for the ERO.
- NERC Reliability Assessments and TPL-001 should ensure near-term/long-term planning studies only include BES resources that are known to have the capability and availability under the specified ambient conditions, including extreme cold weather/winter peak. If they are not studying these conditions or are including invalid resources, then that should be in scope today for the ERO.
- IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under diverse ambient conditions, including extreme cold weather. If they don't have this information or are provided false information, then that should be in scope today for the ERO.
- IRO-008, TOP-001 and TOP-002 should ensure the RC's and BA's Operational Planning Analysis and the RC's Real-time Assessment only includes BES resources that are known to have the capability and availability under the expected ambient conditions, including extreme cold weather/winter peak. If they are not assessing these conditions or are including invalid resources and/or Operating Plans, then that should be in scope today for the ERO.

If the ERO enforces these expectations, then it should either incent the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that impact resource capability and availability, which are becoming too frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as a GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are "non-utility" companies who are operating in RTO markets solely for revenue. The SAR proposal will most likely be very controversial with these entities and take years to develop and implement. Additionally, to secure industry approval, the result could be a Reliability Standard with weak requirements that does little to address the issue; and creates more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring of all 1000 of these entities, which may be inefficient and impractical.

A more effective and efficient method would be to ensure requirements for the PC, RC and BA (whose role and responsibility is to oversee resource adequacy within an area of the BES) are sufficient to address the emerging risk of grid transformation. This proactive approach would reduce the need to create projects continually to address the next event based on other factors.

Many northern GOs/GOPs do not have issues during extreme weather events (both hot and cold) and did not have an issue during the extreme cold weather event of January 17, 2018. A Standard developed for a GO/GOP to assure that a unit will always start is unrealistic and unsustainable. A generator owner could invest a large sum of money into winterizing their generator and it still may not start and perform as designed. The SAR should clearly address the communication of when a generator cannot perform as requested (to start, to ramp, etc.). This communication could include (but not limited to):

- De-rates of output due to snow/dust/ cloud cover/sun set times etc. to PV systems;
- Icing of turbine blades/over speed due to excess wind/cut out due to extreme cold for wind Facilities;
- Frozen and wet coal piles/hot-cold ambient temps that impact Mw outputs/etc. for fossil fuel plants; and
- Lack of water due to frozen water/EPA restrictions/etc. for hydro plants.

As you can see, every type of generator has some type of natural and outside rules that can limit its output. This SAR should address the communication of such information and not just training or installing freeze protection measures.

Finally, this SAR seems to propose Resource Adequacy as a requirement, which does not need to be part of a Reliability Standard focused on reliability during ambient conditions. In other words, a GO/GOP should perform its obligations pursuant to contract or market rules without the influence of a Reliability Standard, and a Reliability Standard should not dictate that a generator must perform in a certain way. The maintenance items within the FERC and NERC report should be “common sense” items that a GO/GOP would perform, in order to operate as required. If there are a set of GOs/GOPs who do not perform due to some type of low (i.e., extreme cold weather) temperature parameters, then there could be a tariff or market process to reduce the credibility of the GO/GOP.

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

In addition, the North America Generator Forum (NAGF) does not support the proposed SAR for Cold Weather Authorization either. They too agree that most Generator Owners already have Cold Weather Preparation procedures and implementation in place. Cold weather-related outages typically involve previously unknown vulnerabilities.

With MISO already looking at what FERC is putting out and addressing it, Ameren would prefer not to recreate the wheel, which is also what NAGF enforces in their comments. For instance, revising existing standards to address gaps in planning for “Extreme Weather Events” and developing a measurable definition for “Extreme Cold Weather.”

Likes 0

Dislikes 0

Response

Douglas Webb - Westar Energy - 1,3,5,6 - MRO, Group Name Westar-KCPL

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations

Answer

Document Name

Comment

Thank you for the opportunity to comment. Cost Impacts are an important aspect to be studied. Company budget cycles are requested to be measured as a consideration in the time-extension decisions.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2 - MRO,SERC,RF

Answer

Document Name

Comment

Some suggested modifications to language in the SAR are provided below:

1. Generator Owner/Generator Operator develops, ***maintains and implements*** winterization plans, procedures, and winter-specific and plant-specific operator awareness training, ***including consideration of the following*** elements: a. Generating unit ***output and*** availability; b. ***Operating*** parameters around ***ambient*** temperatures; c. Implementing freeze protection measures and technologies; d. Performing periodic adequate

maintenance and inspection of freeze protection measures and technologies; and e. Ensuring gas-fueled generating units' Reliability Coordinator and Balancing Authority are provided notification of firm transportation capacity for natural gas supply.

2. Generator Owner/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators associated parameters for generating unit **output and** availability for extreme cold weather performance.

3. Generator Owners/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators when expected temperatures are forecasted within the determined generating unit availabilities, expected **output and** availability of the generating units for the appropriate next day operating horizon.

4. Balancing Authority use of the information provided by the Generator Owner/Generator Operator to perform Operational Planning Analysis, and determine the expected **output and** availability **of** contingency reserves for the appropriate next day operating horizon.

For bullet #4, MISO recommends the word "and" be replaced with the word "of" to indicate the requirement is to assess the forecasted sufficiency of reserves for the next day operating horizon as opposed to revisiting the annual determination of the Most Severe Single Contingency (MSSC).

Likes 0

Dislikes 0

Response

Jonathan Robbins - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer

Document Name

Comment

- The resulting standard could become onerous for GO's to comply with
 - Will evidence and communication regarding routine maintenance of plant heat trace system and components be required?
 - Would winter specific and plant specific awareness training create the need for a whole certification program to NERC?
- Could this be simplified by requiring the GO to provide their minimum operating temperature or by the standard only be applicable to locations that experience extreme cold weather?

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6

Answer

Document Name

Comment

If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

{C}- FAC-008 and MOD-025 should ensure the GO and GOP know the capability and availability of their BES resources under diverse ambient conditions, including extreme cold weather. If this information is unavailable or incorrect, then that should be in scope today for the ERO.

{C}- MOD-031 and MOD-032 should ensure the PC and BA request and receive information from each RP to know the capability and availability of BES resources within their area under diverse ambient conditions, including extreme cold weather. If this information is unavailable or incorrect, then that should be in scope today for the ERO.

{C}- NERC Reliability Assessments and TPL-001 should ensure near-term/long-term planning studies only include BES resources that are known to have the capability and availability under the specified ambient conditions, including extreme cold weather/winter peak. If they are not studying these conditions or are including invalid resources, then that should be in scope today for the ERO.

{C}- IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under diverse ambient conditions, including extreme cold weather. If this information is unavailable or incorrect, then that should be in scope today for the ERO.

{C}- IRO-008, TOP-001 and TOP-002 should ensure the RC's and BA's Operational Planning Analysis and the RC's Real-time Assessment only includes BES resources that are known to have the capability and availability under the expected ambient conditions, including extreme cold weather/winter peak. If they are not assessing these conditions or are including invalid resources and/or Operating Plans, then that should be in scope today for the ERO.

If the ERO enforces these expectations, then it should either incent the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that impact resource capability and availability, which are becoming too frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as a GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are "non-utility" companies who are operating in RTO markets solely for revenue. The SAR proposal will most likely be very controversial with these entities. Additionally, to secure industry approval, the result could be a Reliability Standard with weak requirements that does little to address the issue; and creates more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring of all 1000 of these entities, which may be inefficient and impractical.

A more effective and efficient method would be to ensure requirements for the PC, RC and BA (whose role and responsibility is to oversee resource adequacy within an area of the BES) are sufficient to address the emerging risk of grid transformation. This proactive approach would reduce the need to create projects continually to address the next event based on other factors.

Many northern GOs/GOPs do not have issues during extreme weather events (both hot and cold), and did not have an issue during the extreme cold weather event of January 17, 2018. A Standard developed for a GO/GOP to assure that a unit will always start is unrealistic and unsustainable. A generator owner could invest a large sum of money into winterizing their generator and it still may not start and perform as designed. The SAR should clearly address the communication of when a generator cannot perform as requested (to start, to ramp, etc.). This communication could include (but not limited to):

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- Lack of water due to frozen water/EPA restrictions/etc. for hydro plants.

As you can see, every type of generator has some type of natural and outside rules that can limit its output. This SAR should address the communication of such information and not just training or installing freeze protection measures.

Finally, this SAR seems to propose Resource Adequacy as a requirement, which does not need to be part of a Reliability Standard focused on reliability during ambient conditions. In other words, a GO/GOP should perform its obligations pursuant to contract or market rules without the influence of a Reliability Standard, and a Reliability Standard should not dictate that a generator must perform in a certain way. The maintenance items within the FERC and NERC report should be "common sense" items that a GO/GOP would perform, in order to operate as required. If there are a set of GOs/GOPs who do not perform due to some type of low (i.e., extreme cold weather) temperature parameters, then there could be a tariff or market process to reduce the credibility of the GO/GOP.

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Document Name

Comment

Xcel Energy believes that the SAR could be easility addressed by modifying already existing standards. For instance, weather conditions considered "extreme" and their effects likely have regional variability depending on historical events and might be best addressed by Regional data specifications. Regional data specifications are addressed in existing Standard IRO-010-2 R1-R3. Further, data specifications for Operational Planning assessments are addressed in existing Standard TOP-003-3. Fuel supply and relaiability impacts of extreme weather conditions are addressed by EOP-011 R2.2.3.2 and 2.2.9 respectively.

We suggest that variability between extreme weather conditions between regions and their effects on Generators, Generator Operators, Balancing Authorities and Reliability Coordinators an approach similar to EOP-010-1 should be considered. A Standard where the individual RCs develop, maintain and implement an Extreme Cold Weather Preparedness Operating Plan that coordinates Operating Procedures or Operating Processes within its Reliability Coordinator Area and each GOP, GO and BA and other affected entities develop, maintain and implement an Extreme Cold Weather Preparedness Plan Operating Procedure or Operating Process to mitigate the effects of Extreme Cold Weather events on the reliable operation of its respective system.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 1,2,3,6 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF recommends the following prior to implementing any new weather-related Reliability Standard for Generator Owner / Operators:

1. Prior to developing a new standard, revise existing standards to address gaps in planning for “Extreme Weather Events”
 - i. Reliability Assessments, TPL-001, IRO-010 and TOP-003 can all be strengthened to ensure the RC and BA request and receive information from GO / GOP to plan for various “Extreme Weather Events”.
2. Develop a measurable definition for “Extreme Cold Weather”. This likely would need to be based on regional assessments and account for changing weather patterns rather than just averages.
3. Develop cause codes for GADs that address outages, start-up failures and curtailments attributed directly to extreme cold weather. This would allow for meaningful data collection that could be useful in future mitigation.
4. Encourage BA / TOP / RC to develop criteria to dispatch units with extended start-up periods early to allow for pre-warming.
 - i. Instead of cycling natural gas Combined Cycle units, dispatch units at a lower load so that they are warm and available when needed.
5. Encourage TOP / TP / BA to schedule planned outage seasons with regard to changing weather patterns.
6. If a cold weather standard is eventually developed do not use ambiguous language (“Parameters around operating temperatures”), treat equipment failures as NERC violations (“adequate” measures), or expect GO/GOPs to communicate information they do not possess (“notification of firm transportation capacity for natural gas supply”).
7. Support research on the weaknesses of IEEE-515 and misapplication of this standard by heat tracing and insulation contractors, particularly as regards quantifying the effects of failing to properly account for uninsulated valve bonnets, actuators and pipe supports, and spiraling insulation instead of bunching it at valves, traps and other devices.
8. The NAGF is interested in working with the FERC and NERC to assist those entities identified in the *South Central United States Cold Weather Bulk Electronic System Event of January 17, 2018 Report* and industry to strengthen generation cold weather plans/processes where needed.

Likes 0

Dislikes 0

Response

Line Dufour - Hydro-Quebec Production - 5 - NPCC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE suggests including applicable planning entities as well as the TOP.

Likes 0

Dislikes 0

Response

Theresa Allard - Minnkota Power Cooperative Inc. - 1

Answer

Document Name

Comment

If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

- FAC-008 and MOD-025 should ensure the GO and GOP know the capability and availability of their BES resources under diverse ambient conditions, including extreme cold weather. If they do not have this information or are providing false information, then that should be in scope today for the ERO.

- MOD-031 and MOD-032 should ensure the PC and BA request and receive information from each RP to know the capability and availability of BES resources within their area under diverse ambient conditions, including extreme cold weather. If they do not have this information or are provided false information, then that should be in scope today for the ERO.
- NERC Reliability Assessments and TPL-001 should ensure near-term/long-term planning studies only include BES resources that are known to have the capability and availability under the specified ambient conditions, including extreme cold weather/winter peak. If they are not studying these conditions or are including invalid resources, then that should be in scope today for the ERO.
- IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under diverse ambient conditions, including extreme cold weather. If they do not have this information or are provided false information, then that should be in scope today for the ERO.
- IRO-008, TOP-001 and TOP-002 should ensure the RC's and BA's Operational Planning Analysis and the RC's Real-time Assessment only includes BES resources that are known to have the capability and availability under the expected ambient conditions, including extreme cold weather/winter peak. If they are not assessing these conditions or are including invalid resources and/or Operating Plans, then that should be in scope today for the ERO.

If the ERO enforces these expectations, then it should either incent the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that affect resource capability and availability, which are becoming more frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as a GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are "non-utility" companies who are operating in RTO markets solely for revenue. The SAR proposal will most likely be very controversial with these entities and take years to develop and implement. Additionally, to secure industry approval, the result could be a Reliability Standard with weak requirements that does little to address the issue; and creates more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring of all 1000 of these entities, which may be inefficient and impractical.

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FERC and NERC report should be “common sense” items that a GO/GOP would perform, in order to operate as required. If there are a set of GOs/GOPs who do not perform due to some type of low (i.e., extreme cold weather) temperature parameters, then there could be a tariff or market process to reduce the credibility of the GO/GOP.

Likes 0

Dislikes 0

Response

Joseph DePoorter - MGE Energy - Madison Gas and Electric Co. - 3,4,5,6

Answer

Document Name

Comment

If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

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If the ERO enforces these expectations, then it should either incentivize the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that impact resource capability and availability, which are becoming too frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are “non-utility” companies who are operating in RTO markets solely for revenue. This will most likely be very controversial with them and take years to develop and implement. To get industry approval the end result could be a Standard with weak requirements that does little to address the issue. This could

create more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring on all 1000 of these entities, which may be inefficient and impractical.

A more effective and efficient method would be to ensure requirements for the PC, RC and BA (whose role and responsibility is to oversee resource adequacy within an area of the BES) are sufficient to address the emerging risk of grid transformation. This proactive approach would reduce the need to continually create a project to address the next event based on other factors.

This SAR has its positive and negative aspects which is based on the FERC and NERC report. Many northern GOs do not and did not have an issue with the cold (or hot) weather event. A Standard developed for a GO to assure that a unit will always start will be a magical instrument. A generator owner could invest a large sum of money into winterizing their generator and it still may not start and perform as designed. The SAR should clearly address the communication of when a generator cannot perform as requested (to start, to ramp, etc.). This would include; derates of output due to snow/dust/ cloud cover/sun set times etc. to PV systems, icing of turbine blades/over speed due to excess wind/cut out due to extreme cold for wind Facilities, frozen and wet coal piles/hot-cold ambient temps that impact Mw outputs/etc. for fossil fuel plants, lack of water due to frozen water/EPA restrictions/etc. for hydro plants. As you can see, every type of generator has some type of natural and outside rules that can limit its output. This SAR should address the communication of such information not just training or installing freeze protection measures.

A Standard should not incent an entity to perform as the state they can as this is a market issue. This SAR is developing Resource Adequacy which does not need to a Reliability Standard. The maintenance items within the FERC and NERC report should be common sense items that a GO would perform, in order to perform as required. If there are a set of GOs who do not perform due to some type of (low) temperature parameters, then there could be a tariff or market process to reduce the credibility of the GO.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3,5,6

Answer

Document Name

Comment

The shortcoming of the proposed SAR scope is it tries to address a regional problem, i.e., failure of generation during cold weather in traditionally warm-weather locales, with an international solution. The Standard should be performance-based, describing the outcome desired, and not prescriptive of actions which may or may not result in the outcome desired. If the overall goal of the Standard is to ensure better winter generation performance, then the Requirements should apply more to those generators that have failed to perform in cold weather. Similar to other Standards, exemptions should apply for those generators that have not experienced operational interruptions due to cold weather, with increasing requirements for those that have had the worst operation and would benefit the most from increased oversight. As performance improves, the need for oversight lessens and this lessening is built into the Standard. The SAR should clearly communicate the intent is improvement in generation performance in areas that have been lacking.

The concept that there is a single "ambient temperature limit" that applies to a generator unit is not universally accurate. Different temperature limits may apply for HVAC systems, water systems, etc. however these limiting design temperatures are routinely extended by use of mitigating actions. Especially in regions that routinely experience cold weather, mitigating operations such as the application of heaters, re-routing of warmed condenser water, flushing/drainage of systems, alternate or standby operation of parallel components are taken during extreme conditions. In addition, these components are typically located in enclosed buildings protected from the weather making the determination of a single ambient design temperature moot. The laborious determination of each nominal minimum operating temperature for the tens of systems and thousands of components

within a generating station, when seasonal preparation actions and contemporary operator actions routinely mitigate the impact of both hot and cold weather operation, do nothing to prove the operational capability of the generating unit. The most reliable indication of low-temperature capability is the actual minimum temperature recorded at which the generating unit has successfully operated at not the application of an "ambient temperature limit".

The "Additional elements to consider may include" recommendations should be located in technical guidance and not included as auditable requirements. For example, if the general location of a motor control center in a building keeps the MCC warm enough without a heater, then specifying in a Standard that MCCs should have heaters adds nothing to the BES reliability. By including detailed requirements that must be considered and dispositioned for every component creates a situation in which large lists of components are maintained to prove to auditors that mitigating features have been considered, with attendant burdens in storage, retrieval, and maintenance, with no gain in operating capability. Again, the Standard should focus on the performance required, not the means to achieve it.

The "Detailed description" section includes, "Generator Owner/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators associated parameters for generating unit availability for extreme cold weather performance " What does "associated parameters for generating unit availability" mean?

The proposed Standard development/revisions should take maximum advantage of existing Standards and any new Standard should be general enough to reflect the wide variation in generator unit types, geographical and meteorological conditions, and historical generator experience in coping with cold weather.

Items such as "training" need not be a separate training module in already burdened training schedules (especially for nuclear generating units). That is, the technical basis or reference sections of winterizing procedures, "Just in Time" training and briefings as cold weather preparations begin, should be sufficient. The Standard should not conflict with or repeat requirements already embodied in ISO operating manuals with which GOs must comply.

For those generators which routinely operate in cold weather the Standard is not required. Any new requirements should be geared to improving the operation of generators which do not.

Likes 0

Dislikes 0

Response

Rodney Warner - PNM Resources - Public Service Company of New Mexico - 1 - WECC

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer

Document Name**Comment**

If FERC and NERC expect to have no adverse effects on the BES in the real-time operations horizon during extreme ambient conditions, then the same expectation should be placed on the planning horizons. There are numerous Reliability Standards already in place that should be assessing resource capability and availability for these extreme conditions to identify and mitigate shortages ahead of real-time. For example:

FAC-008 and MOD-025 should ensure the GO and GOP know the capability and availability of their BES resources under diverse ambient conditions, including extreme cold weather.

MOD-031 and MOD-032 should ensure the PC and BA request and receive information from each RP to know the capability and availability of BES resources within their area under diverse ambient conditions, including extreme cold weather.

NERC Reliability Assessments and TPL-001 should ensure near-term/long-term planning studies only include BES resources that are known to have the capability and availability under the specified ambient conditions, including extreme cold weather/winter peak.

IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under diverse ambient conditions, including extreme cold weather.

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Many northern GOs/GOPs do not have issues during extreme weather events (both hot and cold), and did not have an issue during the extreme cold weather event of January 17, 2018. A Standard developed for a GO/GOP to assure that a unit will always start, which could require the investment of a large sum of money for winterizing their generator, seems unrealistic.

The SAR should clearly address the communication of when a generator cannot perform as requested (to start, to ramp, etc.). This communication could include:

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Likes 0

Dislikes 0

Response

Michael Brytowski - Great River Energy - 1,3,5,6 - MRO

Answer

Document Name

Comment

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Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer

Document Name

Comment

NO.

Likes 0

Dislikes 0

Response

Bette White - AES - Indianapolis Power and Light Co. - 3

Answer

Document Name

Comment

IPL does not agree with all the Detailed Description provided in the SAR to support the scope. IPL takes exception to the following items for the stated reasons:

1. If generating unit availability is measured differently than it currently is, this could impose undue burden on utilities due to potential additional studies and reporting activities.
2. Documented operating temperature parameters pose a significant burden on established generating stations that did not likely have documented operating parameters defined when they were built. For older plants, would historical operational data be sufficient? Or would time consuming, expensive studies be required?
3. Weather conditions vary significantly throughout the US based on location and geography. If operating temperature parameters are specified, they need to include consideration of regional weather patterns, altitude, etc.
4. Adding the word “technologies” into the proposed verbiage introduces the potential for conscriptive, and potentially expensive, preparation/remediation measures. Simply stating “Implementing effective freeze protection measures.” would cover traditional means as well as any emerging technologies that might spring up as a result of this new standard.
5. Introducing the thought of “firm gas transportation” into the language implies utilities must have firm transport contracts. This infringes on a company’s decision on how to utilize the Market processes and will likely provide undo excessive costs. It also focuses solely on natural gas a fuel rather than being more generic and preparing for shortages or issues with all fuel supply. However, fuel supply concerns are already a part of EOP-011 and should remain in one standard only.
6. Communications for generating unit availability between the GO/GOPs and BAs/RCs already take place through normal and emergency operations. If these are included in a Cold Weather specific emergency, great care should be taken to ensure the requirements don’t conflict with or further restrict what is already in other standards.
7. There is the potential for significant cost impacts should additional studies or technologies be required of entities to meet the language of the new standard. Until the language is further defined, these costs are difficult to calculate, but the potential should be considered as verbiage is crafted.

Likes 0

Dislikes 0

Response

John Allen - City Utilities of Springfield, Missouri - 1,3,4

Answer

Document Name

Comment

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- IRO-010 and TOP-003 should ensure the RC and BA request and receive information from each GO and GOP to know the capability and availability of BES resources in their area under various ambient conditions, including extreme cold weather. If they don't have this information or are provided false information, then that should be in scope today for the ERO.
- IRO-008, TOP-001 and TOP-002 should ensure the RC's and BA's Operational Planning Analysis and the RC's Real-time Assessment only includes BES resources that are known to have the capability and availability under the expected ambient conditions, including extreme cold weather/winter peak. If they are not assessing these conditions or are including invalid resources and/or Operating Plans, then that should be in scope today for the ERO.

If the ERO enforces these expectations, then it should either incentivize the GO/GOP to invest in improvements to be eligible for resource planning and BA/market dispatch (revenue) or the entities planning and operating the BES should have to acquire and dispatch other resources to maintain reliability and prevent recurrence of an event like January 17, 2018. This approach should also work in protecting the BES against other factors that impact resource capability and availability, which are becoming too frequent.

The drafting team should also be mindful of the practicality in creating more Reliability Standards that apply to nearly 1000 entities registered as GO/GOP whose primary business is to sell power to the grid. With the proliferation of renewable resources, many of those GO/GOP entities are "non-utility" companies who are operating in RTO markets solely for revenue. This will most likely be very controversial with them and take years to develop and implement. To get industry approval the end result could be a Standard with weak requirements that does little to address the issue. This could create more administrative work for the registered entities (especially those who already routinely operate in cold weather conditions) with uncertain value. The ERO will also have to initiate monitoring on all 1000 of these entities, which may be inefficient and impractical.

A more effective and efficient method would be to ensure requirements for the PC, RC and BA (whose role and responsibility is to oversee resource adequacy within an area of the BES) are sufficient to address the emerging risk of grid transformation. This proactive approach would reduce the need to continually create a project to address the next event based on other factors.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Jeff Kimbell - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name CHPD

Answer

Document Name

Comment

This SAR addresses an important concern in some regions, but is so general that it will negatively impact the bulk of generators that already reliably operate in routinely cold weather regions and generation types that are not impacted fully in the same ways as the types concerned in the Events that have been analyzed over the last ten years. We design and operate our plants for cold weather. Additional regulatory requirements will divert resources from valuable work in maintaining these systems to compliance paperwork that will not improve plant or system reliability.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

BPA suggests that the Drafting Team include a good representation of cold weather GO/GOPs, specifically, generators that are experienced with cold weather preparation and who are in a better position to assess the new documentation burden that will come with a new standard.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

Reclamation recommends the SAR be reviewed by FERC or a FERC representative to ensure it encompasses the full scope of what FERC envisions for regulating cold weather preparedness. This will help to fully scope the project and avoid the churn of immediate modifications to newly approved or revised standards under this project.

Reclamation also recommends the drafting team for this project include representatives from Canadian and northern U.S. entities and hydro generators to ensure unreasonable burdens are not created while regulating a problem that only impacts a subset of entities and generators.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4, Group Name FE Voter

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Bruce Reimer - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

If the equipment's operational temperatures were properly specified during designs and procurements then most of issues discussed in the report should not have occurred. The cold weather related issues are more design and geographical related than of compliance.

Likes 0

Dislikes 0

Response

Anthony Jablonski - ReliabilityFirst - 10

Answer

Document Name

Comment

ReliabilityFirst notes that the "Recommendations" section (Appendix G) of the 2019 FERC and NERC Staff Report - The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018 has a number of Recommendations as well which should be included in the SAR (some of these may already be covered SAR). They include the following:

#6: Transmission Operators, Balancing Authorities, and Generator Owner/Operators should consider developing mechanisms to verify that units that have fuel switching capabilities can periodically demonstrate those capabilities. (I would think this should really be directed to the GO/GOPs)

#7: Balancing Authorities, Transmission Operators and Generator Owners/Operators should take the steps necessary to ensure that black start units can be utilized during adverse weather and emergency conditions. (Blackstart Resources should always get special attention).

#14: Generator Owner/Operators should ensure that adequate maintenance and inspection of freeze protection elements be conducted on a timely and repetitive basis.

#15: Each Generator Owner/Operator should inspect and maintain its generating units' heat tracing equipment.

#16: Each Generator Owner/Operator should inspect and maintain its units' thermal insulation.

#17: Each Generator Owner/Operator should plan on the erection of adequate wind breaks and enclosures, where needed.

#18: Each Generator Owner/Operator should develop and annually conduct winter-specific and plant-specific operator awareness and maintenance training.

#19: Each Generator Owner/Operator should take steps to ensure that winterization supplies and equipment are in place before the winter season, that adequate staffing is in place for cold weather events, and that preventative action in anticipation of such events is taken in a timely manner.

#20: Transmission Operators should ensure that transmission facilities are capable of performing during cold weather conditions.

Likes 0

Dislikes 0

Response

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer

Document Name

Comment

The proposed SAR needs to more clearly identify whether these reports and preparations are only mandatory for BES assets. If the document refers to the preparation of NG and Coal facilities to be encompassing of power generation, preparations then need to specify responsibilities related to BES renewables.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer

Document Name

Comment

We should target requirements for winter preparedness to those who are the problem. Creating additional administrative burdens for entities who are in northern climates and have generation that is designed to operate in severe winter weather is not in the best interest of the ratepayers.

Likes 0

Dislikes 0

Response