

## Comment Report

**Project Name:** 2025-01 Canadian-Specific Revisions to EOP-012-3 | Standard Authorization Request  
**Comment Period Start Date:** 5/28/2025  
**Comment Period End Date:** 6/26/2025  
**Associated Ballots:**

There were 6 sets of responses, including comments from approximately 42 different people from approximately 29 companies representing 8 of the Industry Segments as shown in the table on the following pages.

## Questions

1. Do you agree that a Canadian-specific variance would be the best way to address the project scope? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation or explanation.
2. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to incorporate Canadian-specific language regarding applicable governmental authorities and their applicable processes when it comes to development, approval, implementation, and extension requests for Corrective Action Plans and Generator Cold Weather Constraint declarations?
3. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to allow Canadian entities to account for the geographical and winter climate characteristics of the Canadian provinces, including allowing additional flexibility in the definition of Extreme Cold Weather Temperature (ECWT) and Generator Cold Weather Reliability Event (GCWRE)?
4. Do you agree that the EOP-012 Reliability Standard should be updated, or a variance should be developed, to address the difference between freezing risk and cold temperature operating risk where the operating temperature is far below the freezing point, as it is in many of the Canadian provinces?
5. Do you agree that the EOP-012 Reliability Standard requires further revision or a variance to avoid imposing retroactive compliance obligations on jurisdictions with standard effective dates later than those established in the United States?
6. Do you agree that the EOP-012-3 Reliability Standard should modify or remove requirement language that may potentially conflict with Canadian law or regulatory processes?
7. Please provide any additional comments for the 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
BC Hydro and Power Authority	Adrian Andreoiu	1,3,5	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Northeast Power Coordinating Council	Ruida Shu	10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Silvia Mitchell	NextEra Energy -	1	NPCC

						Florida Power and Light Co.		
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
					Joel Charlebois	AESI	7	NPCC
					John Hastings	National Grid	1	NPCC
					Erin Wilson	NB Power	1	NPCC
					James Grant	NYISO	2	NPCC
					Michael Couchesne	ISO-NE	2	NPCC
					Kurtis Chong	IESO	2	NPCC
					Michele Pagano	Con Edison	4	NPCC
					Bendong Sun	Bruce Power	4	NPCC
					Carvers Powers	Utility Services	5	NPCC
					Wes Yeomans	NYSRC	7	NPCC
					Emma Halilovic	Hydro One	1,3	NPCC
					Philip Nichols	National Grid	1	NPCC
					Emma Halilovic	Hydro One	1,3	NPCC
					Caver Powers	Utility Services	5	NPCC

**1. Do you agree that a Canadian-specific variance would be the best way to address the project scope? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation or explanation.**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer** No

**Document Name**

**Comment**

Appendix 3A, Section 9.0 of the NERC Rules of Procedure describes the process for developing a Variance. It outlines two types of Variances – those that apply on an Interconnection-wide basis, and those that apply to one of more entities on less than an Interconnection-wide basis. Neither condition is fulfilled with the proposed SAR. There are no other reliability standards with a Canadian-specific variance. Several provinces have regulatory frameworks in place which allow province-specific variances to accommodate the types of concerns outlined in the proposed SAR. However, it is noted that some provinces, such as Ontario, do not have this mechanism available.

I do not support a Canadian specific version of the standard, though I do support further revisions to EOP-012 to address some of the concerns noted by the SAR requesters. For example, the use of Generator Cold Weather Constraints could be expanded for existing Canadian generating units. There are already acceptable situations outlined in Attachment 1 of filed for approval EOP-012-3, including #4 “A determination, through an analysis, that the freeze protection measure would not be effective for the generating unit,” and #7 “The implementation of a specific freeze protection measure would introduce the risk of noncompliance with other statutory, regulatory, or health and safety requirements or standards”. Additional Canadian specific situations could be added as deemed appropriate by the standard drafting team.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC**

**Answer** Yes

**Document Name**

Comment	
Likes 0	
Dislikes 0	
Response	
Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

**2. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to incorporate Canadian-specific language regarding applicable governmental authorities and their applicable processes when it comes to development, approval, implementation, and extension requests for Corrective Action Plans and Generator Cold Weather Constraint declarations?**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer** No

**Document Name**

**Comment**

Given the vast diversity of provincial authorities and their respective roles in reliability standards, it will likely be difficult to find language which will be acceptable to entities in all Canadian provinces. Furthermore, other reliability standards such as PRC-002, PRC-004, PRC-012, PRC-026, PRC-028, and TPL-007 have similar requirements for Corrective Action Plans – these standards do not have a Canadian-specific variance.

Likes 0

Dislikes 0

**Response**

**Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	



**3. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to allow Canadian entities to account for the geographical and winter climate characteristics of the Canadian provinces, including allowing additional flexibility in the definition of Extreme Cold Weather Temperature (ECWT) and Generator Cold Weather Reliability Event (GCWRE)?**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer** No

**Document Name**

**Comment**

Regarding ECWT, the draft SAR does not appear to give clear rationale for having a separate defined term just for Canada. It may be beneficial for the SAR requesters to provide specific use cases citing generating units in different Canadian geographical locations in order to better highlight the concern. Regarding CWRE, item 3 of the Detailed Description of the proposed SAR refers to an “implicit requirement to investigate all outages and derates to rule out freezing equipment and freezing precipitation as causes”. I agree this could be one interpretation, though stress it is only implicit and not explicitly required in the filed for approval version of EOP-012-3. This concern could possibly be addressed by requesting an Interpretation as per Appendix 3A of the NERC Rules of Procedure.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

Response	
Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. Do you agree that the EOP-012 Reliability Standard should be updated, or a variance should be developed, to address the difference between freezing risk and cold temperature operating risk where the operating temperature is far below the freezing point, as it is in many of the Canadian provinces?

Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF

Answer Yes

Document Name

Comment

EOP-012 should be updated to account for both freezing risk and cold temperature operating risk. A Canadian-specific variance is not required to do so, however.

Likes 0

Dislikes 0

Response

Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

**5. Do you agree that the EOP-012 Reliability Standard requires further revision or a variance to avoid imposing retroactive compliance obligations on jurisdictions with standard effective dates later than those established in the United States?**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer** Yes

**Document Name**

**Comment**

EOP-012 should be updated to address this. A Canadian-specific variance is not required to do so, however.

Likes 0

Dislikes 0

**Response**

**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

**6. Do you agree that the EOP-012-3 Reliability Standard should modify or remove requirement language that may potentially conflict with Canadian law or regulatory processes?**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer** Yes

**Document Name**

**Comment**

EOP-012 should be updated to address this. A Canadian-specific variance not required to do so, however. Consider the approach taken for PRC-029 exemptions in the filed for approval version of PRC-029-1, specifically footnote 10 "The exemption requests for a non-US Registered Entity should be implemented in a manner that is consistent with, or under the direction of, the applicable governmental authority or its agency in the non-US jurisdiction."

Likes 0

Dislikes 0

**Response**

**Edvard Lauman - Capital Power Corporation - 5 - MRO,WECC,Texas RE,SERC,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	



**7. Please provide any additional comments for the Drafting Team to consider, if desired.**

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5 - WECC, Group Name BC Hydro**

**Answer**

**Document Name**

**Comment**

BC Hydro appreciates the opportunity to comment. Additional flexibility in the ECWT calculation may better reflect Northern generators winter operating conditions. In Canada the cold weather period lasts longer than in southern regions of North-America; this makes construction season shorter with more logistical challenges. Flexibility in CAP timelines and mitigation practices may also allow better long term reliability solutions.

Likes 0

Dislikes 0

**Response**

**Adam Burlock - TransAlta Corporation - 5 - MRO,WECC,NPCC,RF**

**Answer**

**Document Name**

**Comment**

The closing statement on page 1 of the proposed SAR, "Consequently, due to current practices and mitigation efforts, extreme cold weather has not jeopardized the reliable operation to the power system in Canada." is not accurate for all of Canada. In Alberta for example, there was a significant supply shortfall event on January 13, 2024 during an extreme cold weather event; refer to the report from Alberta's Market Surveillance Administrator - <https://www.albertamsa.ca/assets/Documents/January-and-April-2024-Event-Report.pdf>.

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC**

**Answer**

**Document Name**

**Comment**

The NPCC RSC endorses the SAR

Likes 0

Dislikes 0	
Response	
Chantal Mazza - Hydro-Quebec (HQ) - 1,5 - NPCC	
Answer	
Document Name	
Comment	
HQ supports this SAR.	
Likes 0	
Dislikes 0	
Response	