

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the <u>NERC Help Desk</u>. Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information					
			her Grid Operations, Preparedness, and Coordination		
/		10/6/2021			
SAR Requester				, , , , , , , , , , , , , , , , , , ,	
Name: Steven Noess & Kiel Lyons		s & Kiel Lyons			
Organization: NERC, as members of the 2021 F Weather Grid Operations			ERC, NERC, Regional Entity Joint Inquiry into 2021 Cold		
Telephone:	(404) 446-9691		Email:	Steven.Noess@nerc.net	
relephone.	(404) 446-96	665	Elliali.	Kiel.Lyons@nerc.net	
SAR Type (Check	k as many as a	apply)			
New Stand	dard		Imminent Action/ Confidential Issue (SPM		
Revision to	o Existing Star	ndard	Se	ection 10)	
🔲 🛮 Add, Mod	ify or Retire a	Glossary Term	Var	iance development or revision	
Withdraw	/retire an Exis	sting Standard	Oth	er (Please specify)	
Justification for	this propose	d standard developm	nent projec	t (Check all that apply to help NERC	
prioritize develo	pment)				
Regulatory Initiation Emerging Risk (Reliability Issues Steering Committee) Identified Reliability Standard Development Plan			Enh	RC Standing Committee Identified anced Periodic Review Initiated ustry Stakeholder Identified	
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):					
To enhance reliability of the BES through improved operations, preparedness, and coordination during extreme weather, as described by the Federal Energy Regulatory Commission (FERC), NERC, and Regional Entity Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations. See https://www.ferc.gov/media/february-2021-cold-weather-grid-operations-preliminary-findings-and-recommendations-full .					
From February 8 through 20, 2021, extreme cold weather and precipitation caused large numbers of generating units to experience outages, derates or failures to start, resulting in energy and transmission emergencies (referred to as "the Event"). The total Event firm load shed was the largest controlled firm load shed event in U.S. history and was the third largest in quantity of outaged megawatts (MW) of load after the August 2003 northeast blackout and the August 1996 west coast blackout. The Event was most					



severe from February 15 through February 18, 2021, and it contributed to power outages affecting millions of electricity customers throughout the regions of ERCOT, SPP and MISO South.

Extreme cold weather is a common occurrence, and it has jeopardized the reliable operation of the bulk-power system. The February 2021 event is the fourth in the past 10 years which jeopardized bulk-power system reliability. In February 2011, an arctic cold front impacted the southwest U.S. and resulted in numerous generation outages, natural gas facility outages and emergency power grid conditions with need for firm customer load shed. In January 2014, a polar vortex affected Texas, central and eastern U.S. This 2014 event also triggered many generation outages, natural gas availability issues and resulted in emergency conditions including voluntary load shed. And in January 2018, an arctic high-pressure system and below average temperatures in the south-central U.S. resulted in many generation outages and the need for voluntary load shed emergency measures.

Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):

The new or revised reliability standards are intended to address reliability-related findings from the 2021 joint inquiry, which in many cases are consistent with prior reports' recommendations.

Project Scope (Define the parameters of the proposed project):

The Project Scope will address nine recommendations for new or enhanced NERC Reliability Standards proposed by the Federal Energy Regulatory Commission (FERC), NERC, and Regional Entity Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations. The preliminary findings and recommendations of that joint inquiry were presented at the September 23, 2021, (FERC) Open Commission Meeting.

Considering the topic areas, the submitters contemplate that the Standards Committee may convene one or more standard drafting teams to address collectively the recommendations in the joint inquiry report.

The drafting team(s) should also consider the final report of the joint inquiry when it is released in late 2021, as it will contain additional context and analysis that will build upon the preliminary findings and recommendations. While the inquiry team does not anticipate material changes to the Reliability Standards Recommendations or basis for them provided in the preliminary presentation, the final SAR should reflect the final recommendations in the joint inquiry report.



Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification¹ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):

Technical justification is found within the work of the FERC, NERC, Regional Entity Joint Staff Inquiry. The proposed deliverable is new or revised Reliability Standards to enhance reliability during extreme cold weather.

The specific recommendations from the inquiry team have recommended "implementation timeframes," which means in this context that the new and/or revised Reliability Standards that address the recommendation have been completed through the NERC Reliability Standards Development Process and are proposed (filed) for approval within the timeframes listed within the recommendations. For these recommendations, "Implementation Timeframe" means that the proposed Reliability Standards are complete and filed by November 1, 2022, for the Winter 2022/2023 timeframes and by November 1, 2023 for the Winter 2023/2024 timeframes. Each Reliability Standards recommendation below is accompanied by one of those two implementation timeframes.

There are nine recommendations each of which is designed to support the reliable operation of the bulk power system during cold weather conditions and/or stressed system conditions, with associated timeframes as described above:

- 1. Generator Owners are to identify and protect cold-weather-critical components and systems for each generating unit. Cold-weather-critical components and systems are those which are susceptible to freezing or otherwise failing due to cold weather, and which could cause the unit to trip, derate, or fail to start. (Implementation Timeframe before Winter 2023/2024).
- Generator Owners are to design new or retrofit existing generating units to operate to a
 specified ambient temperature and weather conditions (e.g., wind, freezing precipitation). The
 specified ambient temperature and weather conditions should be based on available extreme
 temperature and weather data for the generating unit's location, and account for the effects of
 precipitation and accelerated cooling effect of wind. (Implementation Timeframe before Winter
 2023/2024).
- 3. Generator Owners and Generator Operators are to conduct annual unit-specific cold weather preparedness plan training. (Implementation Timeframe before Winter 2022/2023).
- 4. Generator Owners that experience outages, failures to start, or derates due to freezing are to review the generating unit's outage, failure to start, or derate and develop and implement a corrective action plan for the identified equipment, and evaluate whether the plan applies to

¹ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.



similar equipment for its other generating units. (Implementation Timeframe before Winter 2022/2023).

- 5. The Reliability Standards should be revised to provide greater specificity about the relative roles of the Generator Owners, Generator Operators and Balancing Authorities in determining the generating unit capacity that can be relied upon during "local forecasted cold weather," which is language from the revised Reliability Standard TOP-003-5, R2.3.
 - -Each Generator Owner/Generator Operator should be required to provide the Balancing Authority with the percentage of the total generating unit capacity that the Generator Owner/Generator Operator reasonably believes the Balancing Authority can rely upon during the "local forecasted cold weather," including reliability risks related to natural gas fuel contracts.
 - -Each Balancing Authority should be required to use the data provided by the Generator Owner/Generator Operator, combined with its evaluation, based on experience, to calculate the percentage of each individual generating unit's total capacity that it can rely upon during the "local forecasted cold weather," and share its calculation with the Reliability Coordinator. Each Balancing Authority should be required to use that calculation of the percentage of total generating capacity that it can rely upon to "prepare its analysis functions and Real-time monitoring," and to "manag[e] generating resources in its Balancing Authority Area to address . . . fuel supply and inventory concerns" as part of its Capacity and Energy Emergency Operating Plans.

(Implementation Timeframe before Winter 2022/2023).

- 6. In EOP-011-2, R7.3.2, Generator Owners are to account for the effects of precipitation and accelerated cooling effect of wind when providing temperature data. (Implementation Timeframe before Winter 2022/2023).
- 7. To protect critical natural gas infrastructure from manual and automatic load shedding in order to avoid adversely affecting bulk-power system reliability, Balancing Authorities' and Transmission Operators' (TOPs) provisions for operator-controlled manual load shedding are to include processes for identifying and protecting critical natural gas infrastructure loads in their respective areas from firm load shed. Critical natural gas infrastructure loads are natural gas production, processing and intrastate and interstate pipeline facility loads which, if de-energized, could adversely affect the provision of natural gas to bulk-power system natural gas-fired generation. (Implementation Timeframe before Winter 2023/2024).
- 8. Balancing Authorities' operating plans (for contingency reserves and to mitigate capacity and energy emergencies) are to prohibit use of critical natural gas infrastructure loads for demand response. (Implementation Timeframe before Winter 2022/2023).
- 9. In minimizing the overlap of manual and automatic load shed, the load shed procedures of Transmission Operators, Transmission Owners (TOs) and Distribution Providers (DPs) should separate the circuits that will be used for manual load shed from circuits used for underfrequency load shed (UFLS), undervoltage load shed (UVLS) or serving critical load. UFLS/UVLS circuits should only be used for manual load shed as a last resort and for UFLS



circuits, should start with the final stage (lowest frequency). (Implementation Timeframe before Winter 2023/2024).

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Unknown.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):

The BES facilities impacted by this proposed project will all have unique characteristics including fuel type, location, design, construction, etc. These unique characteristics need to be addressed during drafting to achieve the intended enhancements to reliability.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Owner, Distribution Provider, Generator Operator, and Generator Owner

Do you know of any consensus building activities² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

The FERC, NERC, Regional Entity Joint Staff Inquiry into the 2021 Cold Weather Grid Operations was publicly noticed by both FERC and NERC.

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

The proposed Reliability Standards are intended to build upon the requirements in EOP-011-2, IRO-010-4, and TOP-003-5 that were developed by Project 2019-06, and which for U.S. entities, were approved by FERC in August 2021. Additionally, several recommendations build on existing Standards related to load shedding and the development and implementation of UFLS and UVLS programs (e.g. EOP-011-2, PRC-006-5, and PRC-010-2). These Standards should be reviewed to ensure any conflicts or overlap with current requirements are mitigated.

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

There have been several recommendations and guidelines that have developed over the prior noted events, but the events since illustrate that they are not as widely adopted as necessary to prevent reoccurrence.

Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles (Reliability Interface Principles)? Please check all those that apply.



1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

² Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.



Reliability Principles						
	2.	The frequency and voltage of interconnected bulk power systems shall be controdefined limits through the balancing of real and reactive power supply and demandations.				
	3.	Information necessary for the planning and operation of interconnected bulk poshall be made available to those entities responsible for planning and operating reliably.	•			
	4.	Plans for emergency operation and system restoration of interconnected bulk poshall be developed, coordinated, maintained and implemented.	ower systems			
	5.	Facilities for communication, monitoring and control shall be provided, used and for the reliability of interconnected bulk power systems.	l maintained			
	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.					
	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.					
	8.	Bulk power systems shall be protected from malicious physical or cyber attacks.				
Market Interface Principles						
		proposed standard development project comply with all of the following nterface Principles?	Enter (yes/no)			
1	. A	reliability standard shall not give any market participant an unfair competitive				

Market Interface Principles				
Does the proposed standard development project comply with all of the following	Enter			
Market Interface Principles?	(yes/no)			
 A reliability standard shall not give any market participant an unfair competitive advantage. 	yes			
A reliability standard shall neither mandate nor prohibit any specific market structure.	yes			
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	yes			
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	yes			

Identified Existing or Potential Regional or Interconnection Variances			
Region(s)/	Explanation		
Interconnection			
e.g., NPCC			

For Use by NERC Only

SAR Status Tracking (Check off as appropriate).				
	Draft SAR reviewed by NERC Staff		Final SAR endorsed by the SC	
	Draft SAR presented to SC for acceptance		SAR assigned a Standards Project by NERC	



DRAFT SAR approved for posting by the SC	SAR denied or proposed as Guidance
	document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer