

# Implementation Plan

## Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination Phase 2 Reliability Standard EOP-012-2

### Applicable Standard(s)

- EOP-012-2 Extreme Cold Weather Preparedness and Operations

### Requested Retirement(s)

- EOP-012-1

### Prerequisite Standard(s)

- None

### Proposed Definition(s)

- Generator Cold Weather Critical Component
- Fixed Fuel Supply Component
- Generator Cold Weather Reliability Event
- Generator Cold Weather Constraint(s)
- Extreme Cold Weather Temperature (unchanged from EOP-012-1)

### Applicable Entities

- Generator Owner
- Generator Operator

### Background

The purpose of Project 2021-07 is to develop Reliability Standards to enhance the reliability of the Bulk Electric System (BES) through improved operations, preparedness, and coordination during extreme cold weather, as recommended by the Federal Energy Regulatory Commission (FERC), NERC, and Regional Entity Joint Staff Inquiry into the February 2021 extreme cold weather event (the “Report”).<sup>1</sup>

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<sup>1</sup> See FERC, NERC and Regional Entity Staff Report, *The February 2021 Cold Weather Outages in Texas and the South Central United States* (Nov. 2021) (referred to as “the Report”).

## Project 2021-07

Project 2021-07 is a two-phase project to address the 10 sub-recommendations in Key Recommendation 1 of the Report which called for development of new or enhanced NERC Reliability Standards. Reliability Standard EOP-012-1 was originally developed to address Recommendations 1d, 1e, and 1f of the Report through new and enhanced requirements for generator preparedness for extreme cold weather conditions. This implementation plan addresses Reliability Standard EOP-012-2, which revises the EOP-012-1 standard to address FERC directives in the February 2023 order approving the Phase 1 standards EOP-011-3 and EOP-012-1.<sup>2</sup>

Proposed Reliability Standard EOP-012-2 revises the EOP-012-1 standard by clarifying the applicability of the standard and its individual requirements, and making other enhancements directed by FERC in the Phase 1 Approval Order. Proposed EOP-012-2 Requirement R1 is a new requirement that consolidates and clarifies existing requirements for each Generator Owner to calculate the Extreme Cold Weather Temperature for its generating unit location(s) and identify generating unit cold weather data, and to review these calculations and data every five years. Proposed EOP-012-2 Requirement R4 and R5 continue the current requirements, under EOP-011-2/EOP-012-1, that all Generator Owners develop cold weather preparedness plans and that all Generator Owners or Generator Operators (as appropriate) conduct annual training on those plans. Proposed EOP-012-2 clarifies which generating unit(s) are subject to the winter operations capability requirements of the standard (Requirements R2 and R3). Proposed EOP-012-2 Requirement R7 specifies timelines for the completion of Corrective Action Plans, consistent with the Phase 1 Approval Order, and proposed Requirement R8 requires Generator Owners to review declarations at least every five years, or as needed, when a change of status occurs and ensures operating limitations caused by the constraints are clearly identified. New and revised *Glossary* terms provide clarity to the requirements of the standard.

For additional information on the Phase 1 Approval Order directives addressed in proposed Reliability Standard EOP-012-2, see the Phase 2 Mapping Document on the Project 2021-07 project page.

## General Considerations

This implementation plan reflects consideration that entities will need time to develop, implement, and maintain cold weather plans and freeze protection measures, and considers the FERC directives regarding the effective date of directed changes and abbreviated implementation periods for generator winterization measures in the Phase 1 Approval Order.

## Effective Date and Phased-In Compliance Dates

The effective dates for the proposed Reliability Standards are provided below. Where the standard drafting team identified the need for a longer implementation period for compliance with a particular

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<sup>2</sup> *N. Am. Elec. Reliability Corp.*, 182 FERC ¶ 61,094 (Feb. 16, 2023) (hereinafter “Phase 1 Approval Order”), *notice denying reh’g and providing for further consideration*, 183 FERC ¶ 62,034 (Apr. 20, 2023). In this order, FERC approved the effective date for EOP-012-1 but deferred approving the requested retirement of EOP-011-2 until presented with a revised EOP-012 standard addressing its concerns regarding standard applicability.

section of a proposed Reliability Standard (i.e., an entire Requirement or a portion thereof), the additional time for compliance with that section is specified below. The phased-in compliance date for those particular sections represents the date that entities must begin to comply with that particular section of the Reliability Standard, even where the Reliability Standard goes into effect at an earlier date.

### **Standard EOP-012-2 and Definitions**

Where approval by an applicable governmental authority is required, the standard and associated definitions shall become effective on the later of: (1) October 1, 2024; or (2) the first day of the first calendar quarter that is three (3) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

### **Compliance Date for EOP-012-2 - Requirement R3**

Entities shall not be required to comply with Requirement R3 until twelve (12) months after the effective date of Reliability Standard EOP-012-2.

## **Retirement Date**

### **Standard EOP-012-1**

Reliability Standard EOP-012-1 shall be retired immediately prior to the effective date of Reliability Standard EOP-012-2 in the particular jurisdiction in which the revised standard is becoming effective.

## **Initial Performance of Periodic Requirements**

Entities shall be compliant with Requirement R1 by the effective date. Entities shall perform their first periodic review under Requirement R1 by no more than 60 months after the effective date of EOP-012-2.