

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination

Action

- Approve the following waiver of provisions of the Standard Processes Manual (SPM) for Project 2021-07:
 - Initial formal comment and ballot period reduced from 45 days to as little as 30 days, with ballot(s) conducted during the last 10 days of the comment period. Form ballot pool in first 15 days. (Sections 4.7-4.9)
 - Additional formal comment and ballot period (s) reduced from 45 days to as little as 25 days, with ballot conducted during the last 10 days of the comment period. (Sections 4.9 and 4.12)
 - Final ballot reduced from 10 days to 5 calendar days. (Section 4.9)
- Authorize initial posting of proposed Reliability Standards EOP-011-3 and EOP-012-1 and the associated Implementation Plan for a 30-day formal comment period, with ballot pool formed in the first 15 days, and parallel initial ballots and non-binding polls on the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs), conducted during the last 10 days of the comment period.

Background

As stated in the SAR, the primary purpose of this project is intended to address reliability related findings from the FERC, NERC, and Regional Entity Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations (“Joint Inquiry”). From February 8 through February 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. Additionally, the February 2021 event is the fourth cold weather event in the past 10 years which jeopardized bulk-power system reliability.

At its November 2021 meeting, the NERC Board of Trustees (the Board) approved the following resolution regarding Project 2021-07:

FURTHER RESOLVED, that the Board hereby directs that the development of new or revised Reliability Standards to address the recommendations of the joint inquiry team for cold weather operations, preparedness, and coordination to be completed in accordance with the timelines recommended by the joint inquiry team, as follows:

- New and revised Reliability Standards to be submitted for regulatory approval before Winter 2022/2023: development completed by September 30, 2022, for the Board’s consideration in October 2022;

- New and revised Reliability Standards to be submitted for regulatory approval before Winter 2023/2024: development completed by September 30, 2023, for the Board's consideration in October 2023.

Summary

The Project 2021-07 SDT leadership and NERC staff request that the Standards Committee consider a waiver of certain provisions of the SPM in order to meet the September 30, 2022 development deadline set by the Board for the first set of standards.

The requesters ask to shorten (1) the initial comment and ballot period(s) for draft standards EOP-011-3 and EOP-012-1 from 45 days to as few as 30 days and (2) any subsequent formal comment and ballot periods from 45 days to as few as 25 days, with a ballot and non-binding poll during the last 10 days of the 25 day period. In addition, the requesters ask to shorten final ballot from 10 days to 5 days.

The shortened comment periods proposed above would allow for up to two comment and ballot periods to achieve consensus on the proposed standards while still meeting the Board's deadline. In developing the proposed posting schedule, the requesters considered the Board's September 30 deadline, the potential need for two comment periods to achieve consensus, and the time necessary to consider comments and prepare subsequent drafts for posting. The proposed schedule represents the minimum comment periods for this project; where possible, the team will post for additional time.

The Quality Review (QR) for this posting was performed April 20 – 27, 2022. NERC Staff included Linda Jenkins, Marisa Hecht, Lauren Perotti, Sylvia Bryant, and Jon Hoffman. Industry QR members were Alan Kloster (Evergy), Dana Showalter (ERCOT), David Daniels (AEP), Todd Bennett (AECI), Mike Brytowski (Great River Energy), Mark Gray (EEl), and Nathan Truninger (MidAmerican). The SDT considered the QR inputs and revised the proposed standard where appropriate.