

Consideration of Comments

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

Comments Received Summary

There were 54 sets of responses, including comments from approximately 152 different people from approximately 109 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President of Engineering and Standards, [Howard Gugel](#) (via email) or at (404) 446-9693.

Consideration of Comments

The Project 2021-07 SAR Drafting Team (SAR DT) thanks all of industry for your time and comments. The SAR DT revised the SAR based on industry comment and the final FERC, NERC, and Regional Entity Staff Report (“Joint Report”). Language was added to the SAR to clearly provide the Standard Drafting Team (SDT) with the flexibility needed to develop practicable Reliability Standards that address the reliability objectives of the recommendations. Due to the similar nature of multiple comments received during the SAR comment period, the SAR DT has chosen to respond to comments in summary format as provided for by section 4.2 of the Standard Processes Manual.

NERC Jurisdiction

The SAR DT received multiple comments regarding the authority of FERC and NERC to make some of the recommendations as standard revisions. Recommendation 1f was of concern and the language around “design new or retrofit existing generating units” solicited multiple entity responses. In addition, recommendation 1h also received comments.

The SAR DT recognizes the jurisdictional concerns raised by some entities, but declines to strike any recommendations from the SAR or to offer any opinion on legal issues regarding NERC’s jurisdiction under Section 215 of the FPA. It is the opinion of the SAR DT that the SAR provides flexibility to the drafting team to develop NERC Reliability Standards that address the reliability objectives of the recommendations, and the comments will be forwarded to the SDT for their consideration in that context. The SAR DT does not believe it is appropriate for the SAR DT to resolve legal questions regarding NERC’s jurisdiction under Section 215 of the FPA.

Standards to be Revised/New Cold Weather Standard

The SAR DT received comments suggesting current standards to revise, multiple suggestions to write a standalone cold weather standard, and suggestions to write a cold weather standard but keep training in existing standards (e.g., PER-006). In addition, comments were received asking for multiple definitions, e.g., critical elements or critical components.

The industry suggestions have been reviewed by the SAR DT and language has been added to the SAR, listing the standards that “should be reviewed by the Standard Drafting Team (SDT) and may be revised to meet the recommendations”. If necessary and appropriate, the drafting team may develop a new standard(s) to address all or part of the recommendations. Preference will be given to the EOP or FAC suite of standards based on the industry comments that we received. The suggestion to draft a new cold weather standard while retaining training requirements in existing standards was received from industry multiple times and will be considered by the SDT. The SAR DT has included the “Add, Modify or Retire a Glossary Term” on the SAR to allow the SDT to have discussion of definitions. All comments that propose defining terms shall be forwarded to the SDT for consideration.

The SAR DT received multiple comments containing draft reliability standard language to address the recommendations.

The SAR DT would like to thank entities that included draft reliability standard language within their comments. Although the SAR DT declines to include examples of specific reliability standard language within the SAR, all comments that propose draft reliability standard language to address specific recommendation(s) shall be forwarded to the SDT for consideration.

Specific Language in the Recommendations

Multiple comments were received regarding specific language used in the recommendations listed in the SAR. For example, concerns were raised about recommendation 1a and 1b around “*the use of the term ‘protect’ in this recommendation. Some of the examples provided (footnote 261) in the Joint Inquiry report for cold-weather-critical components cannot be “protected” against certain cold weather ambient conditions.*” In addition, there was a comment that “*Key Recommendation 1b appears to not be fully addressed in the SAR recommendations.*”

The SAR DT recognizes the concerns regarding specific language (e.g., protect) used in the recommendations included in the initial SAR. These concerns will be forwarded on to the SDT for consideration when drafting actual standard language.

The recommendations in the initial SAR were sourced from the preliminary [findings and recommendations presentation](#), which included nine recommendations. In the final Joint Report, recommendation 1 was expanded to be Key Recommendation 1a and 1b. In addition, implementation time frames for recommendations 1c, 1f, 1g, 1h and 1j were adjusted from the preliminary presentation to the final report. The SAR DT has updated the SAR to use the ten recommendations and the implementation timeframes included in the final Joint Report. In some cases, the recommendation language in the final Joint Report has been modified from the recommendation language in the

preliminary presentation and the modified recommendation language (e.g., identify and implement freeze protection measures) addresses many of the concerns voiced in the comments provided for the initial SAR. The SAR DT discussed the recommendations and the use of the word “prioritize” instead of protect in relation to recommendation 1i.

The SAR DT retained the recommendation language from the final Joint Report in full. Language was added to the SAR to clearly provide the SDT with the flexibility needed to develop practicable Reliability Standards that address the reliability objective of the recommendations.

Impact on the 2019-06 Standards

A comment was received stating that the implementation period for FERC approved EOP-011-2 is set for April 1, 2023 and asked if the SAR would change that approved implementation date.

The standards drafted by the 2019-06 SDT will be effective April 1, 2023. The effective date of the standards revised or drafted by this drafting team will have an effective date based on the implementation plan developed by the 2021-07 SDT and approved by FERC.

Additional comments suggested that this project, 2021-07, be delayed until the 2019-06 approved standards are in effect.

Project 2021-07 has a phase one deadline of September 30, 2022 and cannot be delayed until the 2019-06 effective date of April 1, 2023. NERC’s rules do not prohibit multiple projects to work concurrently on the same standards or revisions to standards not yet in effect. The drafting teams coordinate and take into account the work of other projects.

Multiple comments received suggested retiring EOP-011 R7 and R8 and using the language in different standards to meet the SAR for this project.

The 2021-07 team will build upon and compliment the work done by the 2019-06 drafting team to address the reliability objectives contained in the Joint Report. The suggestion of retiring requirements will be forwarded to the SDT.

The SAR DT received comments that additional recommendations are in the Joint Report that are not addressed in the SAR. Specifically, *“In addition, it was noted that Key Recommendation 4 does not appear in the SAR.”*

The Joint Report list the recommendations that should be addressed through NERC standards revisions in Recommendation 1 and its subparts. Recommendation 4 is intended to provide guidance to the Generator Owner for inclusion in their plan, not a revision to the standard.

Cost Impact

The SAR comment form contained a question around cost effective options and alternatives to address the recommendations in the Report. Multiple comments were received, specifically recommendation 1f

was of concern and the language around *“design new or retrofit existing generating units”* solicited multiple entity responses.

The Project 2021-07 Extreme Cold Weather SAR DT recognizes that numerous industry comments to the proposed SAR identified concerns with the technical and economic implications of new or revised NERC standards which may result from the Joint Report key recommendations. Such concerns include the practicality of some technical solutions as well as the potential for forced retirement of generating assets if mandatory actions prove uneconomic. These concerns are recognized; cost and technical feasibility are important components of the standards drafting process. The SDT will be guided by all applicable NERC processes and principles, including the Market Interface Principles.

Expanding Beyond Cold Weather

The SAR DT received a comment *“that there might be an opportunity to consider these (extremely high temperatures, widespread forest fires and extremely dense smoke, wind and precipitations) broader impacts in addition to extreme cold weather impacts.”*

The Joint Report highlights four cold weather events impacting reliability: 2011 ERCOT and Southwest, 2014 Polar Vortex, 2018 South Central U.S., and the most recent February 2021 cold weather in Texas and the South-Central U.S. These events show how impactful extreme cold weather can be. These recent events do not discount events such as forest fires and extreme high temperatures and their potential effects. If these types of events prove to be at the same level of impact, they can be addressed by future drafting teams. However, at this time, in alignment with the SAR, the drafting team will address the specific recommendations in the Joint Report.

SAR Recommendation Grouping

The SAR DT received comments suggesting the recommendations found in the Report be grouped based on concept. The following groupings were suggested:

Generator Owner, Generator Operator and Balancing Authority SDT Project	Load Shedding and Demand Response SDT Project	Future SDT Project
Item 1 (page 3 of the SAR)	Item 7 (page 4 of the SAR)	Item 2 (page 3 of the SAR);
Item 3 (page 3 of the SAR)	Item 8 (page 4 of the SAR)	
Item 4 (pages 3-4 of the SAR)	Item 9 (page 4 of the SAR)	
Item 5 (page 4 of the SAR)		
Item 6 (page 4 of the SAR)		

The SAR DT has organized the recommendations into two phases based on the timeframes listed in the Joint Report. Only one drafting team has been seated, so this drafting team will take on the entirety of the

recommendations. The SDT is aware of the NERC Standards Efficiency Review project and will make every effort to align our work with the intent of that project.