

## **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:
  - 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 five calendar days. (Section 4.9)

### **Background**

As stated in the SAR, the primary purpose of this project is intended to address reliability related findings from FERC, NERC, and Regional Entity Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations (joint inquiry). From February 8 - 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 - 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 that jeopardized bulk-power system reliability.

At its November 2021 meeting, the NERC Board of Trustees (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.

Work under Project 2021-07 has since proceeded in two phases, consistent with the Board's resolution. The first phase of work completed in the fall of 2022 and resulted in Reliability Standards EOP-011-3 and EOP-012-1. The second phase of work, which is underway, is developing Reliability Standards EOP-011-4 and TOP-002-5.

On February 16, 2023, shortly before the first ballot on the phase two standards, FERC issued an order approving Reliability Standards EOP-011-3 and EOP-012-2 while directing five areas for additional revisions. FERC directed NERC to submit a revised EOP-012 standard by February 2024.<sup>1</sup>

In summary, there are two sets of deadlines governing Project 2021-07: the Board's September 30, 2023 deadline for the completion of EOP-011-4 and TOP-002-5, and FERC's February 2024 deadline for completion of EOP-012-2.

NERC Standard Processes Manual Section 16.0 Waiver provides as follows:

The Standards Committee may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System or cyber attack on the Bulk Electric System;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the Standards Committee determines that a modification to a proposed Reliability Standard or its Requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a Variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

## **Summary**

Due to the issuance of FERC's February 16, 2023 Order directing further revisions to EOP-012 by February 2024, the Project 2021-07 drafting team was delayed in the planned development timeline for the standards addressing the phase 2 recommendations of the February 2021 joint inquiry report. The Project 2021-07 SDT leadership and NERC staff request that the SC consider a waiver of certain provisions of the SPM regarding the length of comment periods and ballots in order to meet the September 30, 2023 development deadline for EOP-011-4 and TOP-002-5 set by the Board.

The Project 2021-07 SDT leadership and NERC staff also request that the SC consider a waiver of these same provisions for EOP-012-2, in the event shortened comment and ballot periods are needed to develop a consensus standard by the February 2024 FERC deadline.

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<sup>1</sup> *Order Approving Extreme Cold Weather Reliability Standards EOP-011-3 and EOP-012-2 and Directing Modification of Reliability Standard EOP-012-1*, 182 FERC ¶ 61,094 (Feb. 16, 2023), available [here](#).

The requesters ask to shorten the additional formal comment and ballot period(s) for Project 2021-07 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 the final ballot from 10 days to five days.