

Meeting Notes

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

April 18 and 20, 2023

Review NERC Antitrust Compliance Guidelines and Public Announcement

Alison Oswald, NERC staff, called attention to the NERC Antitrust Compliance Guidelines and the public meeting notice.

Roll Call and Determination of Quorum

A team roll call was taken and quorum was determined on both days. The member attendance sheet is attached as attachment 1.

April 18

Initial Ballot Results for EOP-011 and TOP-002

Alison Oswald reviewed the results of the initial ballot which did not pass. The standards received approximately 45% approval. The following team members are assigned to review comment questions as follows:

- Q1-4: Collin Martin & Keith Smith
- Q5-6: Matt Harward & David McRee
- Q7: Alison Oswald
- Q8: Kill Loewer & Kenny Luebbert
- Q9-10: Thor Angle & Ryan Salisbury

Alison will distribute comments to team after the meeting. The team is targeting discussion by May.

EOP-012 Generator Capability

FERC, per the order, wants to ensure that generators that are not capable of operating for more than 12 continuous hours are not excluded from the standard. In R2 it is proposed to add “or the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours” to both bullets to ensure clarity that these resources are in-scope. The team also believes that additional explanation of this item should be included in technical rationale. David Kezell and Matt Harward will work outside the meeting to consolidate and simplify R2 to move the first bullet into the parent requirement, and have the second bullet address the declaration.

The team next discussed possibly removing R5 and adding the language to require a review be performed at least every five years to R1. The team agrees that this would help simplify and clarify EOP-012. Next,

the team discussed removing the one-hour concept from R3 and moving that, and related content, to R1. The team discussed the original purpose of one-hour time frame and the need to ensure that where the standard lands does not require full engineering studies for plants that successfully operate at ECWT.

Continue discussion on CAP

Kenny Luebbert presented a proposal to strike 8.3 and instead require a data submittal. He proposes, after a discussion with NERC Compliance staff, to not include CEA notification in standard. It will be up to GO to maintain documentation for submittal. The team agrees with this concept.

Continue discussion on Generator Cold Weather Constraint(s) Definition

The team walked through the definition and the group is generally ok with Technical Constraint bullet. The team discussed what constitutes a “non-standard modification” and decided to modify the language to focus on “novel application of technologies”.

The team was tasked with considering any additional changes to this definition outside of the meeting.

April 20

NERC Staff Remarks

Allison Oswald requested that all persons intending to attend the in-person meetings in Louisville, KY in early May assure that they have properly registered.

FERC Staff Remarks

Lauren Perotti reported that the re-hearing request submitted by an industry group representing Generator Operators was recently denied by FERC. She also indicated the potential exists for FERC to address some of the issues/concerns raised in the re-hearing request in other ways.

Discussion on Revisions to EOP-012-2

David Kezell presented a proposed modification to R2 moving most of the first bullet into the base requirement. After some discussion regarding structure of the now larger R2 paragraph, it was decided to send the new revision out to the team and allow for consideration of suggested revisions in the next meeting.

The team then discussed R4 and specifically excluding the requirement to create a cold weather preparedness plan for generating units with an ECWT > 32F and that are not ever expected to operate below 32F. Matt Harward and Venona Greaff suggested that requiring a plan for these units is seen as an administrative burden that does not contribute to system reliability. David Kezell committed to reach out to the owner of a unit southeast of San Diego to get their opinion on the importance of excluding units as described above from the cold weather preparedness plan requirement.

The team then discussed aspects of R8 describing CAP requirements. A discussion ensued over the most appropriate way for GOs to update their Corrective Action Plans to either their RE or NERC. R12 of PRC-002 requires that CAPs be submitted to the Regional Entity. Periodic Data Submittals as used in FAC-003-4 may be another way to submit CAP updates.

Attachment 1

Name	Organization	4/18	4/20
Kenneth Luebbert	Evergy, Inc.	X	X
Matthew Harward	Southwest Power Pool, Inc.	X	X
Venona Greaff	Oxy	X	X
Derek Kassimer	ReliabilityFirst	N	X
Jonathan Davidson	City Utilities of Springfield	X	X
David McRee	Duke Energy	N	N
Thor Angle	Puget Sound Energy	X	N
Keith Smith	Orsted Onshore North American	X	X
Chad Wiseman	Newfoundland & Labrador Hydro	N	N
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	X	N
Collin Martin	Oncor Electric Delivery, LLC	X	X
Jill Loewer	Utility Services	X	X
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	X	X
Ryan Salisbury	Oklahoma Gas & Electric	N	X
David Deerman	Southern Company Services	X	X