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

April 6, 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.

Corrective Action Plans Proposal

Brad Pabian presented proposed draft language for Corrective Action Plan (CAP) updates in Requirements R8. Proposal includes timeline of two years for repair/replacement and four years for new equipment installation. The team had a discussion around complexity of using two different timelines. Brad stated he used TPL-007 as a guide and the team reviewed TPL-007 and the FERC comments. The group notes that FERC is only proposing timelines for implementing CAP as done in TPL-007 and not use of timelines specified in TPL-007. The team will continue to think about what timelines are appropriate.

The team had a discussion around the need to update timetables in the CAP if timelines change or if GOs should only be required to complete CAP within required timelines. Team determined that it is appropriate to require entities to update timetables to show control of identified corrective actions.

Next, the team discussed the need to update timetables for each action vs need to update overall timeline for CAP. Proposed Part 8.1.1 language was updated to "implement CAP" instead of "implement actions within CAP" to add flexibility and make clear that only timetables for implementation of entire CAP are required to be included/updated.

FERC staff noted concerns around the proposed timelines for CAP and indicated objective should be to correct issues before next winter season. The SDT members voiced concerns around tight timelines for implementation, specifically for CAPs that identify issues across a fleet. Additionally, there were concerns raised about how to address corrective actions that are implemented at the time the issue is discovered. The team decided to handle guidance on documentation for this scenario in the measure.

The team discussed timelines for CEA approval for extensions. It was noted that there may be issues maintaining compliance if an entity discovers it cannot implement CAP right before timelines specified in



Standard. The question was raised if the entity would be out of compliance if the extension was not approved by timelines specified in Standard. The team still has concerns around CEA approval being included in standard language. Some individuals believe the CEA may not have the expertise to approve/deny extension requests. The standard language was changed to require entities to notify the CEA when exceeding timelines instead of requiring CEA approval for extension.



Attachment 1

Name	Organization	4/6
Kenneth Luebbert	Evergy, Inc.	Y
Matthew Harward	Southwest Power Pool, Inc.	Y
Venona Greaff	Оху	Y
Derek Kassimer	ReliabilityFirst	Y
Jonathan Davidson	City Utilities of Springfield	Y
David McRee	Duke Energy	Y
Thor Angle	Puget Sound Energy	Y
Keith Smith	Orsted Onshore North American	Y
Chad Wiseman	Newfoundland & Labrador Hydro	Y
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y
Collin Martin	Oncor Electric Delivery, LLC	Y
Jill Loewer	Utility Services	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y
Ryan Salisbury	Oklahoma Gas & Electric	N
David Deerman	Southern Company Services	Y