

Meeting Notes

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

December 14, 2023 | 1:00 - 3:00 p.m. Eastern

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. The member attendance sheet is attached as attachment 1.

Review Constraints Definition

The team reviewed four options for this definition and narrowed it down to the top two for discussion.

Option 1:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to the optimum practice, method, or technology, but rather to be acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions.

Criteria used to determine a constraint include practices, methods, or technologies which:

- Are not implemented by a sufficient number of generating units for comparable unit types in regions that experience similar winter climate conditions to provide reasonable assurance of efficacy, given the exercise of reasonable judgment in light of the facts known at the time the decision was made; or
- Could not have been expected to accomplish the desired result, given the exercise of reasonable judgment in light of the facts known at the time the decision was made; or
- Could not have been implemented at a reasonable cost consistent with good business practices, reliability, or safety, given the exercise of reasonable judgment in light of the facts known at the time the decision was made.

Option 2:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components

using the criteria below. Freeze protection measures are not intended to be limited to the optimum practice, method, or technology, but rather to be acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions.

Criteria used to determine a constraint include practices, methods, or technologies which:

- Are not implemented by a majority of generating units for comparable unit types in regions that experience similar winter climate conditions; or
- Could not have been expected to accomplish the desired result, given the exercise of reasonable judgment in light of the facts known at the time the decision was made; or
- Could not have been implemented at a reasonable cost consistent with good business practices, reliability, or safety, given the exercise of reasonable judgment in light of the facts known at the time the decision was made.

The largest difference between the two definitions is the word “majority”. The team discussed that it is not an auditable trait, and therefore, Option 2 may not be the best. Thor discussed using some old language and expressed concern over the term “sufficient” under bullet one. Jill expressed doubts on the language around “reasonable judgment” and asked if there should be more definition. Brad raised a question of “sufficient” and Option 1 was changed to say: “Are not broadly implemented at” removing “by a sufficient number of”. The team made these changes and settled on a new definition for Generator Cold Weather Constraint.

Q4 Comments

Matt Harward and Jonathan Davidson reviewed that Q4 was on how R8 is structured, and the team removed the GO requirement to send constraint to BA. The team reviewed two options for updates to the language.

NAGF Suggestion:

R8. Each Generator Owner that creates a Generator Cold Weather Constraint declaration shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

- 8.1. Review the Generator Cold Weather Constraint declaration at least every five years or as needed when a change of status to the Generator Cold Weather Constraint occurs; and
- 8.2. Update the operating limitations associated with capability and availability per R1.2 if applicable.

EI Suggestion:

R8. Each Generator Owner that creates a Generator Cold Weather Constraint declaration shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

- 8.1. Update the Generator Cold Weather Constraint declaration when a change occurs that would require an updated declaration be made; and
- 8.2. Update the operating limitations associated with capability and availability per R1.2 if applicable.

NAGF representative David Lemmons stated NAGF would support either the five-year or when it happens. Every year is a waste of time. Five years is better to monitor.

The team is going to go with the five-year annual review over the annual review per industry comment, and believe that it is easier to audit.

Q2 Comments

Collin Martin and David McRee reviewed the responses in Q2. Majority of the industry was in support of the changes made to R2. One comment that did not agree felt that a new unit should be able to meet the requirements, and therefore, does not need a CAP. Two entities stated that is it not appropriate to include a CAP “option” in R2? SDT disagrees with this, because a CAP and associated GCW Constraint will still be required for some generators (wind turbine icing). Five entities disagreed with the 20 mph for 12 hours concept. One entity thought the statistical ECWT approach was not stringent enough. One entity proposes that generators need to get a “documented exemption” from their BA. The team discussed these concerns and agreed that no redlines to the standard were needed, only response to comments.

Attachment 1

Name	Organization	12/14
Kenneth Luebbert	Evergy, Inc.	Y
Matthew Harward	Southwest Power Pool, Inc.	Y
Venona Greaff	Oxy	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	N
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)	N
Ryan Salisbury	Oklahoma Gas & Electric	N
David Deerman	Southern Company Services	N