

Meeting Agenda

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

February 22, 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.

Review FERC Order

Kenny Luebbert reviewed the FERC Order that approved EOP-011-3 and EOP-012-1. The order issued directives for changes to EOP-012. Lauren Perotti reviewed the directives in the order. The directives in the order are summarized as follows:

1. **Applicability:** The Commission directed NERC to revise the applicability of the standard to ensure that it captures all BES generation resources needed for reliable operation and excludes only those generation resources not relied upon during freezing conditions, consistent with the drafting team's stated intent. As noted above, the Commission deferred its decision on whether to approve the proposed effective date of EOP-011-3 until NERC submits the revised applicability section of EOP-012 to ensure all entities currently covered by the EOP-011-2 standard would remain covered under the revised EOP-012 standard.
2. **Generator Constraints to Implementing Winterization Requirements:** (Requirements R1, R2, and R7): The Commission directed NERC to develop modifications to Requirements R1 and R7 to address concerns related to generator-defined declarations of technical, commercial, or operational constraints that preclude a generator owner from implementing the appropriate freeze protection measures. Specifically, the Commission directed NERC to include auditable criteria on permissible constraints and to identify the appropriate entity that would receive the generator owners' constraint declarations under EOP-012-1 Requirements R1 and R7.
3. **Generator Capability Requirements:** (Requirements R1 and R2): The Commission directed NERC to modify EOP-012-1 Requirement R1 to ensure that generators that are technically incapable of operating for 12 continuous hours (e.g., solar facilities during winter months with less than 12 hours of sunlight) are not excluded from complying with the standard. The Commission also directed NERC to modify the one-hour continuous operations requirement of Reliability Standard

EOP-012-1 Requirement R2 to better align with the stated purpose of the Reliability Standard EOP-012-1.

4. **Corrective Action Plan deadlines:** For any requirement requiring the development of a corrective action plan to address capability or cold weather performance issues, the Commission directed NERC to include a deadline or maximum period for the completion of corrective action plan measures.
5. **Implementation Plan:** The Commission directed NERC to require a shorter implementation period than five years post approval, as well as a staggered implementation for unit(s) across a generator owner's fleet (e.g., 30% compliant by Year X, 60% compliant by Year Y, 100% compliant by Year Z).

These revisions to EOP-012 are due to FERC within one year of the order issue date which is February 15, 2024.

The team will discuss at a future meeting how to address these different topic areas in the most time efficient way possible.

Attachment 1

Name	Organization	2/22
Kenneth Luebbert	Evergy, Inc.	Y
Matthew Harward	Southwest Power Pool, Inc.	Y
Venona Greaff	Oxy	Y
Derek Kassimer	ReliabilityFirst	N
Jonathan Davidson	City Utilities of Springfield	N
David McRee	Duke Energy	N
Thor Angle	Puget Sound Energy	N
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)	Y
Ryan Salisbury	Oklahoma Gas & Electric	Y
David Deerman	Southern Company Services	Y