

Meeting Notes

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

July 19 and 21, 2022

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

Chair Remarks

Kenny Luebbert informed the team that EOP-012-1 has gone to QR and he asked that all team members review the standard and provide any feedback at this point. The objective for the week is Consideration of Comments and the questions for the Comment Form for the second ballot.

Summary Response to Comments

The response to comments address the NERC jurisdiction issue regarding Recommendation 1f and the “retrofit” language at the top. The language was drafted by Lauren Perotti, NERC Legal, and speaks to Section 215 of the Federal Power Act language. The team had no suggested edits to this language.

Question 1

This question was regarding UFLS/UVLS and EOP-011-3. The responses were drafted by Collin Martin, Jill Loewer, and Keith Smith. There were four general responses which address the comments received from the industry.

Question 2

The responses will be drafted by Matt Harward, there are no draft responses to review at this time.

Question 3

This question was regarding Applicable Facilities. The responses were drafted by Thor Angle and Brad Pabian. One topic was about the exception criteria for generation units, i.e. not specifically using the term summer peaking unit, but instead explaining exemptions based on temperature and generators still remaining exempt if called on during Emergencies. Venona Greaff mentioned that the question about the Market Principals will come up as well in Question 4 and that through a conversation with Alison Oswald, NERC staff, they had agreed the response should be that this is not the SDT’s responsibility to address.

The team decided to add a specific line item titled “Market Rules”, and the team suggested to use the phrase “multiple comments” as opposed to the “majority of comments”.

Question 4

The response for this question will be drafted by Venona Greaff and David Kezell. Venona reports that a lot of comments were NERC jurisdiction and Market Rules comments. Other comments also stated that cost recovery should be implemented first. Some of the comments about the 1975 date and continuous operation term are addressed with the 1-hour run and 12-hour run language. Venona noted that the two new defined terms should also be covered as well as the language for the “continuous operation” concept.

Question 5

The response to this question will be drafted by Ryan Salisbury. He stated that a lot of comments are saying that new and existing units shouldn’t be differentiated and R1 and R2 should be combined. There were comments that this should be part of an Interconnect Agreement. Ryan believes that the updates to R1 and R2 should address most of the comments received.

Implementation Time Frame

These responses were drafted by David McRee and Jonathan Davidson. David suggests moving the language about the starting date for when to look back for temperature data, to the Extreme Cold Weather temperature definition section. The SDT decided to not change Implementation Plan timing based on the comments. Requirement R4 will have its own timeline which starts in 6 ½ years after the standard is effective. Kenny suggests this Implementation Plan language should be at the end of the consideration of comments document.

Question 8

Chad Wiseman and Derek Kassimer are drafting the response to this question. They stated there are about 15 general comments. Kenny suggests that the main topics should be: administrative burden and cost recovery. Kenny suggests adding language that the standard was written to address reliability, and does not favor one generation type over another. David Lemmons suggests the cost recovery matter should be passed onto NERC and it is not the responsibility of the SDT.

The comments were reorganized as follows:

1. Legal/NERC Jurisdiction
2. Market Rules/Cost Recovery
3. Definitions
4. Applicable Facilities
5. Continuous Operation (R1 and R2)/ New Extreme Cold Weather Requirement Impact
6. Data Collection
7. Additional Communication Requirement (Covered under Phase 2)

- a. Interconnection studies comments could be addressed here? More research needed on this comment – David Deerman will look into this
 - b. Communicate CAPs to BAs
- 8. Implementation Plan/Timeframe
 - 9. UFLS/UVLS

Comment Form for EOP-012

Heather Polzin, FERC staff, suggested some redline edits to the questions originally drafted on 7/19 to add clarity. Several team members suggested a few additional edits. The team then discussed the definitions questions and if two questions were needed. Several team members suggested edits to the two questions and the team decided to keep the questions separate. The team reordered the questions in the Comment form to start with definitions and then Applicability to flow like the Standard.

Alison Oswald, NERC staff, drafted the question about the implementation plan. The team discussed edits to the language, in particular Requirement R4. David Kezell suggested a table/chart to explain all the Implementation Plan timeframes. The team also reviewed Requirement R4 language to see if any edits are needed but ultimately decided no changes were needed at this time. A chart will be developed to explain the dates needed to be compliant in the Implementation Plan. The current language for IP states entities shall not be required to comply with Requirement R3 until 60 months after the effective date of the standard, entities will have to calculate the temperature 18 months after standard approval and then have an additional 42 months to develop the CAPs. Finally, R1 and R2 have a 60-month implementation time frame and R4 has a 78-month IP timeframe.

Consideration of Comments

The team discussed the edits to draft comment form from Tuesday. Lauren Perotti, NERC staff, added to the Cost Recovery response. Venona Greaff added to the cold weather critical component response quoting NERC guideline suggestion of components. It was noted that the current guideline does not have suggestions for wind or solar generation components. The team reviewed the Applicable Facilities and 'winter season' responses drafted by Matt Harward. Brad Pabian also drafted some language for this section. In Q4, David Kezell added comments. David K. will list the concerns and then the response. Alison O. suggested organizing by 'many commentors said the following' and reminded the team that all minor comments must be responded to also. David K. and Venona G. are still working on the "continuous operation" comments from R1 and R2. The data collection responses from David Deerman and Kenny L. were reviewed. The responses drafted don't seem to fit under the data collection header. One of the three responses under this header were moved to another section and a new header title is needed to better describe these responses. The Implementation timeframe section was slightly reworded to match what was decided upon during the Comment Form discussion earlier during today's call. For Q10, cost recovery, Derek Kassimer has some responses, but needs to review to see if there are any 'one off' types of comments that need a response. The team made a lot of changes to this document so Alison O. will create a clean version and post to extranet so SDT can review prior to next week's calls. Kenny asks that all team members make sure that all unique comments are addressed.

Next Steps

The team will have QR calls next week. Alison Oswald displayed a graphic from TPL -001-5 IP that Lauren forwarded. David McRee agreed to create a draft for EOP-012 IP that the team might use to explain the dates/timeframes for each requirement.

Attachment 1

Name	Organization	7/19	7/21
Kenneth Luebbert	Evergy, Inc.	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	N	Y
Venona Greaff	Oxy	Y	N
Derek Kassimer	ReliabilityFirst	Y	Y
Jonathan Davidson	City Utilities of Springfield	N	N
David McRee	Duke Energy	Y	Y
Thor Angle	Puget Sound Energy	Y	N
Keith Smith	Orsted Onshore North American	Y	Y
Chad Wiseman	Newfoundland & Labrador Hydro	N	N
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	Y
Collin Martin	Oncor Electric Delivery, LLC	N	Y
Jill Loewer	Utility Services	Y	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	N	Y
Ryan Salisbury	Oklahoma Gas & Electric	Y	N
David Deerman	Southern Company Services	Y	Y