

## Meeting Notes

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

June 28, 29, and 30, 2022 | 1:00 – 3:00 p.m. Eastern

WebEx

### **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.

### **Opening Remarks**

Kenny Luebbert, chair, remarked that the focus going forward will be getting the requirement language firmed up before responding to all comments. This is due to the fact that the revised language will determine how comments will be responded to.

### **Revise Standards**

The standard drafting team (SDT) organized their discussion on standards revisions based on the comments received on the comment form during the project posting.

#### *Facilities Section of EOP-012 (Question 2 and 3)*

The SDT discussed the revised language of the operating criteria to “at or below 32 degrees Fahrenheit” (option b) instead of “during the winter season” (option a). A poll was taken with the SDT to decide which path to continue down and the results are included in Attachment 1. The team was split down the middle. The topic was tabled for the time being to see if discussion on the other questions might provide a clearer picture.

The question was raised, “Are units allowed to participate in the market or operate below 32 degrees even if they are not meant to operate below 32 degrees?” May need more detail around “plan to operate”. The SDT also discussed the potential need to revise the “one hour” time component within EOP-012 R1; that discussion is included below.

### *Retrofit (Question 4 and 5)*

Several comments received in the comment report pointed towards industry groups like NAGF and EEI showing support of the comments made by those groups. The phrase, “at its location” was said to be too ambiguous. The SDT agreed, and discussed adding language “at or near its location” to help clarify. Additionally, the SDT noted that the Technical Rationale addresses this area of the standard.

Additionally, the phrase, “shall be designed and maintained to be” did not receive industry support. The phrase, “shall be capable of” was a suggested revision. There were also several legal concerns shared that were directed to NERC legal to review.

The one hour criterion within EOP-012 R1 received responses that it was too conservative and stringent. Industry has concerns around simply using temperature alone as an indicator of freezing, and recommend a time component be added. The SDT used the example from the NRC Updated Safety Analysis Report which referenced ASHRAE as a starting point to discuss revised language, overall a more statistical based approach to revise EOP-012 R1.1. A reference from the FERC Technical Conference on cold weather from April 2022 was presented to the team to review before next meeting for more background.

David Deerman shared two charts that reviewed EOP-012 to provide a visual to see if any gaps in the requirement language existed. The two charts describe two possible options in meeting EOP-012. Option A removes summer peaking units and units not expected to operate below 32 degrees F from applicability. Option B includes them, but they can document constraints, which precludes them from meeting R1. The team decided to move forward with Option A to provide clarity for Registered Entities.

Facilities definition of generating unit was discussed and a time component was added, “at or below 32 degrees F for 12 continuous hours”. R1.1 also added the same time component

The team discussed revising language within R1.1 to include “new” generators and revising language within R1.2 to include existing generators. Additionally, the team discussed the removal of CAP from the cold weather preparedness plan within R3 into its own requirement.

### *Proposed New EOP-012 Format*

Matt Harward reviewed a draft of a proposed new format that combined suggestion from several industry comments and NERC input. One proposed change was to add clarity to the definition of included units and base an exception for summer peaking units solely on a limited time of operation below freezing. Therefore, there would be no need to define a winter season. Clarity on the inclusion of Blackstart resources was discussed to ensure it was clear these resources are included per the NERC definition of Bulk Electric System. The new format provided more clarity on requirements for new and existing units.

### *Requirement on Cold Weather Criteria (R1)*

During the previous meeting, a discussion was held on the possibility of modifying the temperature-based requirements and a decision was made to table that specific requirement while reviewing the newly proposed standard format. A discussion on the inclusion of wind and precipitation as a criterion resulted

in the conclusion that both the cooling effect of wind and precipitation impacts should be included per the SAR.

*Addition of words “components and systems”*

A discussion was held on the appropriateness of including these words as part of the requirements or hold this concept for phase 2. It was mentioned that in Texas, there already exist a requirement to identify critical components related to cold weather. Also mentioned, was the need to clarify the scope a GO would have as it relates to components and systems. The answer was that anything outside of the GO’s control would not be included.

It was mentioned that NERC has already developed a Reliability Guideline, (Generating Unit Winter Weather Readiness – Current Industry Practices) listing many items (systems and components) to consider when preparing units for winter.

The chair emphasized the intent of the standard is to only require freeze protection measures and to not require major component upgrades or replacements.

*Discussion of Historical Operation*

A discussion was held to clarify if historical performance could be used to prove compliance during an audit based on the direction of having a criterion of X-continuous hours of a low temperature. Comments were made that it would be very difficult or impossible to have an exact weather event to match the desired design criteria. It was stated that for existing units, successful continued operation through historical events along with documented freeze protection measures should be sufficient as a starting basis. However, if a cold weather failure occurs, then a CAP would be needed to address the issues encountered.

*Performance-Based Standard*

It continued to be emphasized that this standard is not intended to be performance-based and a failure to operate under the conditions specified by the GO would result in the need for a CAP. Violation would occur if there was failure to timely and adequately create a CAP.

# Attachment 1

Name	Organization	6/28	A vs B	6/29	6/30
Kenneth Luebbert	Evergy, Inc.	Y	B	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	Y	A	Y	Y
Venona Greaff	Oxy	Y	B	Y	Y
Derek Kassimer	ReliabilityFirst	Y	A	Y	Y
Jonathan Davidson	City Utilities of Springfield	Y	A	Y	Y
David McRee	Duke Energy	Y	B	Y	Y
Thor Angle	Puget Sound Energy	N	-	Y	Y
Keith Smith	Orsted Onshore North American	Y	A	Y	Y
Chad Wiseman	Newfoundland & Labrador Hydro	Y	A	N	Y
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	B	Y	Y
Collin Martin	Oncor Electric Delivery, LLC	Y	-	Y	N
Jill Loewer	Utility Services	Y	A	Y	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y	B	Y	N
Ryan Salisbury	Oklahoma Gas & Electric	Y	B	Y	Y
David Deerman	Southern Company Services	Y	B	Y	Y