

Meeting Notes

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

March 15 and 17, 2022 | 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 performed and quorum was determined. The member attendance sheet is attached as attachment 1.

Chair Remarks

The Chair provided opening remarks and discussed timelines to allow for industry review of first draft. Noted first draft will need to be completed by April 12 to accommodate industry review of first draft.

Recommendation 1j

Matt Harward shared input from discussion with other Balancing Authorities and suggested moving “operator-controlled language to Part 1.2.5 to clarify applicability to all Parts under Part 1.2.5. Also added “during an Emergency” to clarify that the plan addresses actions during Emergency conditions.

An approach to combine proposed Parts 1.2.5.2 (minimize overlap between manual load shed and critical loads) and Part 1.2.5.3 (minimize overlap between manual load shed and UFLS/UVLS) was discussed by team. The team raised concerns that the proposed language could be interpreted as an “either/or” statement. Team decided to keep the parts addressing critical load and UFLS/UVLS loads separate.

The team confirmed the need to add language to clarify that all Parts under 1.2.5 are required and that the order of parts do not indicate prioritization. The team also discussed the need to capitalize “Load” in Requirement language as was done in EOP-011-1 and EOP-011-2.

M. Harward discussed input from other BA’s on Part 2.2.8. The suggested approach is to add language to modify existing Part 2.2.8 to include specification that BA will have provisions for operator controlled manual load shedding in accordance with R1 Part 1.2.5. The team was asked if the BA has the ability to require that TOPs follow Load shed specifications.

FERC communicated the need for the BA to have a plan that specifies the need for TOPs to minimize the overlap between manual load shed and automatic load shed during a balancing Emergency.

The team asked if Capacity and Energy Emergencies are adequately captured by relating BA requirements to manual load shed requirements in Part 1.2.5. The team determined that an Emergency in a Transmission Operator Area could be a Capacity and Energy Emergency as identified in R2.

The team then discussed the inclusion of Distribution Provider (DP) and Transmission Owner (TO) in the recommendation language. The team discussed how to best address the provision of data to TOP to allow for implementation of manual load shed that minimizes overlap with automatic load shedding. The team asked if provisions to minimize implies that coordination must take place for it to be accomplished. FERC indicated that the intent was for there to be an understanding that the DP/TO plays a role in minimizing overlap and that current language addresses the need for coordination. FERC to review in further detail and come back with input as needed.

A suggestion was received to address provision of data from UFLS entities to TOP to allow for TOP to minimize overlap with UFLS/UVLS. The suggestion was for Planning Coordinator to provide UFLS data to BAs and TOPs upon request in addition to other Planning Coordinators under PRC-006 R7. The team discussed how this addition of BAs and TOPs to R7 improves reliability in scope of the cold weather preparedness. The team ultimately decided it was not appropriate to include the BA and removed that addition.

Recommendation 1f Introduction

The leadership team had a working session leading up to meeting to discuss this recommendation. Two key concepts were discussed during the meeting:

- Not every unit actively participates during the winter season. Some units take outages in the fall season and do not participate in markets during the winter season. May not make sense to retrofit these units based on various factors. May need to define which units will be applicable to retrofit requirements.
- How to address wind turbine icing and inability to retrofit to address icing issues. Possibility for a technical feasibility exception to address scenarios where icing could not be addressed.

The team raised multiple concerns which included:

- The cost effectiveness of this recommendation.
- Generators possibly opting out of being available during the winter season to not have this requirement be applicable.
- Pricing model and energy market address acquiring sufficient availability and allowing units to make commitments based on design and holding accountable.
- Blade deicing packages are not available for turbines manufactured by many of the major vendors.

- Questions related to cost recovery and if that is possible. Comments indicating some generators may not be able to recover cost and concerns voiced related to generators opting to retire rather than retrofit.

Recommendation 1d: Corrective Action Plans

The team discussed the two options presented during previous meetings. The Chair noted that, based on feedback from NAGF, there may be issues getting a more prescriptive option through ballot. There was a general preference for Option 2.

The team discussed timelines for development of Corrective Action Plans (CAPs) and there was a preference for 60 days or before the next winter season. Multiple parties voiced a preference to use next winter season as it allowed all failures experienced during the winter season to be evaluated at once and CAPs developed to address all failures.

A suggestion was made to replace the term “freezing” with “extreme cold weather” since freezing may not cause all failures or derates. The team agreed to this change. A question was raised if extreme cold weather is only a scenario that needs to be addressed. The team confirmed that the scope of the SAR is only extreme cold weather and no other extreme weather scenarios. The team had further discussion about definition of “extreme cold weather”. Proposal to define “extreme cold weather” such that Corrective Action Plans are only required if outage, failure to start, or derate occurs under EEA conditions. FERC communicated the following:

- Intent was that issues due to freezing or cold weather would be remedied in expedient manner so they could be prepared for future cold weather conditions during current winter season or future winter seasons.
- Approach to limit need for Corrective Action Plan to only times when outage, failure to start, or derate occurs during EEA would not meet this intent.
- Need healthy dialogue to ensure this requirement is intended to be common sense approach and not excessive administrative burden.
- Freezing and fuel issues most frequent or common issue in report which is why “freezing” was used in the report.

Recommendation to change “extreme cold weather” back to “freezing” as was used in the report, since “extreme cold weather” may be too vague.

A concern was raised about if implementation or development of the CAP would be required by next winter season. It was noted that only development of the CAP would be required by next winter season. It was also noted that intent is to have issues corrected by next winter season, but there needs to be methods to address issues where the CAP cannot be implemented by next winter season. FERC confirmed that intent is to correct the issue before next winter season with exception for scenario where implementation of the CAP prior to next winter season is not feasible.

The team discussed the omission of RC approval requirements and CAP timeline requirements in option 2. It was noted that the NERC definition of CAP includes “associated timetable for implementation”. FERC noted no element in report that specifies the need for RC oversight or approval. FERC also noted various issues may require substantially different timelines for implementation. The team agreed that RC approval is not appropriate for purposes of this standard.

The team discussed the practicality of implementing more intensive CAPs prior to next winter season based on budget and resources. FERC communicated that this could be addressed by identifying and communicating updated operating limitations to appropriate parties. FERC communicated that communication of operating limitations could be addressed under R7.

The team discussed language as it applies to review of outage, failure to start, or derate and development of the CAP. Noted that review should occur within 60 days and the CAP developed before next winter season. Concerns were raised about the need to review every outage, failure to start, or derate for auditability purposes. The team does not want to create an administrative burden to document and review of every outage.

FERC questioned if direction of team is to have no timelines for implementation of CAP within the standard. Chair noted that it is a challenge to define without knowing content of plan. FERC will take this away from the table and bring back feedback to next meeting. The team will develop additional strawman language for CAP requirements and send out for review prior to next meeting.

Attachment 1

Name	Organization	3/15	3/17
Kenneth Luebbert	Evergy, Inc.	Y	Y
Matthew Harward	Southwest Power Pool, Inc.	Y	Y
Venona Greaff	Oxy	Y	Y
Derek Kassimer	ReliabilityFirst	Y	Y
Jonathan Davidson	City Utilities of Springfield	Y	Y
David McRee	Duke Energy	Y	Y
Thor Angle	Puget Sound Energy	Y	Y
Keith Smith	Orsted Onshore North American	Y	Y
Chad Wiseman	Newfoundland & Labrador Hydro	Y	N
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	Y	Y
Collin Martin	Oncor Electric Delivery, LLC	Y	Y
Jill Loewer	Utility Services	Y	Y
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	Y	Y
Ryan Salisbury	Oklahoma Gas & Electric	Y	Y
David Deerman	Southern Company Services	Y	Y