

Meeting Notes

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

November 1, 2022 | 1:00 – 2:30 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

Kenny Luebbert opened the meeting reviewing the work the team did last week. The team worked on the Generator Cold Weather Critical Components definition and created a new term, Fixed Fuel Supply Component. The objective of this call is to revise the language to meet Key recommendation 1b.

Phase 2 Recommendations Drafting

The team discussed that when an entity has a CAP, it must also update the Cold Weather Preparedness Plan as well. A team member stated that R2 and R4 has this language in it, but the language fell out of R6 during the final ballot phase. It was suggested to amend R6 to add 6.4 which would match the language in R2 and R4. Additional suggestion to update to R2 regarding implementing freeze protection measures may be needed. FERC staff stated the cold weather critical components are the things that need freeze protection and the additional redline edit should achieve that goal. It was suggested to add “all” to the cold weather critical components language in R2.

FERC staff noted that if entities have no data that shows operation at the ECWT for at least one hour (per R2), then entities will have to document the freeze protection measure that are in place to satisfy R2. Suggestions for additional language on how to prove previous experience with operating in cold weather were proposed as “considering previous freeze-related issues experienced by the units and the mitigation in response”. Some individuals expressed concern that generator owners would just demonstrate 61 minutes of operation at the ECWT. Kenny Luebbert stated a concern about a ‘backwards look in time’ type of Requirement. FERC stated entities need to consider past experience in making cold weather preparedness plan. This is not meant to punish entities for any past issues with freezing. Kenny stated that R6 would come into effect 42 months prior to R2 coming into effect which would catch issues and have CAPs in place to correct them. FERC reiterated that some units have had the same components

freeze in multiple events already, that these repeated issues over the past cold weather events should be addressed now.

Project observer, David Lemmons disagrees with adding “all” in R2. He also stated R2 should be just about operating to the ECWT. FERC stated that the proposed language is now trying to meet Recommendation 1b. David Lemmons stated an entity does not need to upgrade all freeze protection measures on all Critical Components. FERC staff noted that GCWCC is already a limited subset of components and stated concern that the one hour of performance is too limiting. Other team members supported David Lemmons comments. The team discussed if Recommendation 1b language belongs in R3 instead? David Kezell remarked that the “as needed” leaves the decision of what to do up to the GO. He believes that language is already clear that entities should add new or modify existing freeze protection on all their GCWCC as needed. Kenny Luebbert agrees that R2 is a “design” requirement that does not dictate exact freeze protection measures and instead leaves the ‘how’ up to each plant. Brad says the expectation is still one hour of operation or develop a CAP so entities are not penalized if you can’t operate for one hour at the ECWT.

FERC stated that the original language was written to address the ‘retrofit’ Recommendation, and now the team is trying to think through the Recommendation 1b. Additionally, FERC believes that R3 doesn’t obligate entities to identify all possible critical components. The team believes we have to balance the generators who have performed historically in cold weather with generators which have not, and not obligate the good performing generators to have to add a lot more freeze protection measures.

The previously scheduled November 3 meeting was cancelled.

Attachment 1

Name	Organization	11/1
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)	Y
Ryan Salisbury	Oklahoma Gas & Electric	Y
David Deerman	Southern Company Services	Y