

Meeting Notes

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

September 7, 8, 13, 14, 15, and 19, 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.

September 7

Opening Remarks

Kenny Luebbert said thanks to industry for passing the 2nd ballot. We understand that industry knows the standard isn't perfect, but we're going to work to get it right and better in phase 2. Understand that we can only make clarifying language from now until final ballot. Comments were good and helpful. Alison Oswald reviewed the next steps. EOP-011 and EOP-012 will get published clean, same with implementation plans and TR, all in final ballot package. Votes from previous ballots carry forward; entities are allowed to change if desired. Our final ballot is only eight days. There is no comment period associated with this ballot.

Kenny told the team that we want to clarify EOP-012 as much as possible, but don't want to change a vote to "no". We do want to look at comments, but we can't make changes until phase 2. We can only implement a comment if it clarifies the standard.

Revisions to Applicability Section

The team discussed language provided from EEI and the SRC on the applicability section of EOP-012-1. Part of that discussion included black start resources, specifically, did the team intend to include blackstart resources or only those that operate in cold temperature. Team concluded the EEI language was in line with the team's intent and it was included in the standard.

Response to Comments

The questions were assigned to individual team members for an initial assessment. At the next meeting the team will start to address the comments that are clarifying in nature only. The comments were assigned as listed below:

- Q1 and Q2: Kenny Luebbert, David Deerman, and Jill Lower
- Q3: Matt Harward and Keith
- Q4 & Q5: David McRee and David Kezell
- Q6: Brad Pabian and Collin Martin
- Q7: Venona Greaff and Ryan Salisbury
- Q8 & Q9: Derek Kassimer and Alison Oswald

September 8

Chair Remarks

The chair welcomed everyone and stated he was looking forward to another productive meeting. The chair requested Collin to review the first ballot comments for EOP-011-3 to determine if there were any open comments or clarifications needed prior to the final ballot.

Review of EOP-012-1 Comments submitted for Question 1&2

Comments for question 1 were reviewed with a focus on items that had potential for clarification without changing the intent of the standard.

The first item discussed was a comment concerning clarity on forced outages due to freezing issues on the BES that could potentially impact a generator. It was agreed that clarifying language could be added to the Technical Rationale document to address this concern. Kenny volunteered to provide the clarifying language.

The second item discussed was concerning clarity on the thresholds listed in the Generator Cold Weather Reliability Event definition. The comment was asking if the 10% and 20 MW thresholds are inclusive of the values listed or only greater than the values listed. There was considerable time spent on this item and the team endeavored to find a solution that would clarify without the possibility of changing the interpretation of the intent.

In addition, the team discussed a comment concerning the start-up time mentioned in the definition of Generator Extreme cold Weather Event. Replacing the word “specified” with “scheduled” was proposed and discussed, but the consensus was this change could be viewed as substantive, and the final decision was not to make any changes to the proposed definition but consider additional clarification in phase 2. A suggestion to consider the NERC GADS language for failure to start could be helpful.

Also, there was a comment from question 6 related to “capacity” and how to define this term. Also, the question came up about seasonal ratings and net vs. gross. The point was made if we include “winter” as a criterion, then we would need to define winter. Nameplate capacity was also considered as an option. After some discussion, the SDT members felt it better to leave the existing wording at this time and address clarifying these items in Phase II of the project.

Review of EOP-012-1 Comments submitted for Question 3

Review of question 3 was moved to next meeting.

Review of EOP-012-1 Comments submitted for Question 4 & 5

A review of comments for question 4 began with a discussion about a comment concerning the different time criteria (12hr vs. 1hr) between R1 (new units) and R2 (existing units). The team had already discussed this in previous meetings and any change on this topic would be a substantive change.

The team also reviewed several comments concerning the word “continuous” in R1 as not all generation technologies operate at continuous output. Other comments expressed the desire for criteria to exceed 12-continuous hours as many extreme events last longer than 12 hours. The decision was to consider these comments in phase 2. Also, for R1, a comment was discussed concerning the wind speed criteria of 20 mph as seeming arbitrary, but a consideration of adding clarification in the Technical Rationale for wind speed was made.

Additional comments were reviewed concerning the 20 mph criteria for R1, no wind speed criteria in R2, and the words “cooling effects of wind” in R3. Review of comments related to this topic will be reviewed in phase 2.

September 13

The team reviewed the redline language from NERC legal for the applicability section. Matthew Harward stated he likes this new language with inclusions and exclusions, as prior to this it was just implied what was excluded. This new language is much clearer as to which units have to calculate the Extreme Cold Weather Temperature and review it every five years.

September 14

Review of EOP-012-1 Comments submitted for Question 4 & 5

Mathew Harward stated he will review Facilities Technical Rationale and update as needed. The team started reviewing comments on question 5 starting with the comment from SRC. The team decided on no changes based on this comment. The Talen comment did not offer any specific solution. The team had the discussion about accounting for wind on existing units. The team thanked those comments that supported the team.

Review of EOP-012-1 Comments submitted for Question 6

Some commentors thought that the 20 MW minimum on generation should be changed to 75MVA distributed resource. The team discussed that this would be a significant change to consider anything other than 20 MW's and should go to phase 2. SIGE's comment referenced their response in Q2. Collin will write a response that it has been addressed. The next comment had lots of confusion around comment. The team thinks the commentor was confusing standards R2 and R6. Collin will write a response to clarify difference in R2 and R6.

Review of EOP-012-1 Comments submitted for Question 8

The team decided that the Applicability language will be handled in phase 2. Next comment the team addressed stated that are not allowed to comment on cost recovery measures. The team included NERC legal comments at front of document and referenced in the response to the question. The team next discussed R5 on unit specific or site specific. This requirement is from EOP-011 which will go into effect April 1, 2023 and the SDT just added annual. The team will not change the language because it is already approved language. This standard would not be a huge burden on entities that are already winterized and practice cold weather preparedness. The team decided the NAGF comments response is moving to phase 2. David Lemmons from NAGF is concerned EOP-011 is being undermined by this. Matthew Harward stated that everything is approved by NERC and FERC and the team may have to address some of this in phase 2. David Lemmons agreed and said it definitely needs to be fixed in phase 2.

Reclamation comments stated that if some items in EOP-012 are approved, the SDT will not be willing to change items during phase 2. Matthew Harward reminded the team that if language is approved, the majority or industry, the team does not have to change language based on one commentor not agreeing. He also stated they should not assume no changes will be made because it is a 2-phase approach. David Lemmons suggested to make sure that it is clear in the response. Team decided that Commercial constraint will be addressed in phase 2

Review of EOP-011 Comments

Comment to capitalize “load” in 1.2.5. was addressed. Next comment asked how do we define critical loads, to which the team responded that there is language in TR that characterizes critical loads. Many comments were received on limiting critical loads for integrity of BES. The team asked if we should revise this definition. Mathew Harward would like FERC to weigh in. Heather Polzin says FERC intentions was for BES reliability. Mathew asked SDT if anyone opposed making changes, to which the team replied no objections. Alison made redline changes in TR and capitalized load in EOP 11-3 1.2.5.

September 15

Continued Discussion of Comments

The team discussed the comment section for Questions Q7 and Q9. The comments received were requesting that the implementation time be shorter. Team discussed the rules that were implemented in ERCOT and the plants had until December 2021 to implement what they could and report updates if they did not meet the timeframe. Team decided that it will not change the implementation plan, but will review in Phase 2. The comment received about updating the graphic or verbiage on Governmental approval should be updated. Venona will get clarity from Texas RE about their comment and get back with Alison.

Team reviewed Question 9 which related to the various miscellaneous comments. Responses were generated for the comments. A change was made to R2 to align with R1 in formatting without making any changes to the requirement as written, but after more discussion, this was reverted back to the original

format because concern was raised on how it was reading. Matt agreed to draft up a response to the CAP comment and meeting the compliance requirements.

The Team then reviewed the Technical Rationale. Matt reviewed his changes with the team and no one objected to his changes. Kenny's changes were reviewed and needed not be clarified.

September 19

Review of Ballot Documents

The team reviewed the implementation plan and approved it for posting for final ballot. The team decided to add the definition of "apparent" to the Technical Rationale as additional clarification to support the standard language. Alison Oswald notified the team that the final ballot will be starting on September 23.

Attachment 1

Name	Organization	9/7	9/8	9/13	9/14	9/15	9/19
Kenneth Luebbert	Evergy, Inc.	X	X	N	X	X	X
Matthew Harward	Southwest Power Pool, Inc.	X	X	X	X	X	X
Venona Greaff	Oxy	X	X	N	X	X	X
Derek Kassimer	ReliabilityFirst	X	N	X	X	N	X
Jonathan Davidson	City Utilities of Springfield	N	N	X	X	X	X
David McRee	Duke Energy	X	X	X	X	X	X
Thor Angle	Puget Sound Energy	N	N	N	N	N	X
Keith Smith	Orsted Onshore North American	X	X	X	X	N	X
Chad Wiseman	Newfoundland & Labrador Hydro	N	N	N	X	N	X
Bradley Pabian	Louisville Gas & Electric and Kentucky Utilities	X	X	X	X	X	X
Collin Martin	Oncor Electric Delivery, LLC	X	X	X	X	X	X
Jill Loewer	Utility Services	X	X	X	X	X	X
David Kezell	Electric Reliability Council of Texas, Inc. (ERCOT)	X	X	X	X	X	N
Ryan Salisbury	Oklahoma Gas & Electric	X	X	X	N	X	N
David Deerman	Southern Company Services	X	X	X	X	X	X