Unofficial Comment Form

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

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination** by **8 p.m. Eastern, June 17, 2022.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2021-07-ExtremeColdWeather.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

From February 8 through February 20, 2021, extreme cold weather and precipitation caused large numbers of generating units to experience outages, derates or failures to start, resulting in energy and transmission emergencies (referred to as “the Event”). The total Event firm Load shed was the largest controlled firm Load shed event in U.S. history and was the third largest in quantity of outaged megawatts (MW) of Load after the August 2003 northeast blackout and the August 1996 west coast blackout. The Event was most severe from February 15 through February 18, 2021, and it contributed to power outages affecting millions of electricity customers throughout the regions of ERCOT, SPP and MISO South. Additionally, the February 2021 event is the fourth cold weather event in the past 10 years, which jeopardized bulk-power system reliability. A joint inquiry was conducted to discover reliability-related findings and recommendations from FERC, NERC, and Regional Entity staff. The FERC, NERC, and Regional Entity staff Joint Staff Inquiry into the February 2021 Cold Weather Grid Operations (“Joint Inquiry Report”) was published on November 16, 2021.

The scope of the proposed project is to address the ten recommendations for new or enhanced NERC Reliability Standards proposed by the Joint Inquiry Report. In November 2021, the NERC Board of Trustees (Board) approved a Board Resolution directing that new or revised Reliability Standards addressing these recommendations be completed in accordance with the timelines recommended by the joint inquiry team, as follows:

* New and revised Reliability Standards to be submitted for regulatory approval before Winter 2022/2023: development completed by September 30, 2022, for the Board’s consideration in October 2022 to address Key Recommendations 1d, 1e, 1f, and 1j;
* New and revised Reliability Standards to be submitted for regulatory approval before Winter 2023/2024: development completed by September 30, 2023, for the Board’s consideration in October 2023 to address Key Recommendations 1a, 1b, 1c, 1g, 1h, and 1i.

## Questions

1. The SDT revised EOP-011-3 requirements R1 and R2 for the TOP to minimize the overlap of UFLS and UVLS circuits from those used for manual load shed or those that serve critical loads. Should PRC-006-5 Requirement R7 and PRC-010-2 Requirement R8 also be modified to include a Requirement that Planning Coordinators shall provide UFLS and/or UVLS (as applicable) program database data to Transmission Operator’s upon request, in order to ensure that all TOPs have the necessary data to minimize the overlap of circuits as required in the newly proposed EOP-011-3 Requirement R1.2.5.3? Please provide any explanation with your response.

[ ]  Yes

[ ]  No

Comments:

1. Should the BA be the entity to determine the “winter season”, which is used to define applicable generating units in proposed EOP-012-1 Section 4.2 Facilities? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes to include as applicable Facilities in EOP-012-1 only those generating units that operate during the winter weather season, while exempting those units utilized for summer peaking purposes only (and without penalizing such units that may be called upon by the BA during winter weather in response to energy emergencies). Do you agree with the applicability of EOP-012-1 as drafted? If you do not agree, please provide recommended language for how to address from the standard’s applicability consistent with the recommendations of The Report.

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed language in EOP-012-1 requirement R1 that require existing units to implement new freeze protection measures or modification of existing freeze protection measures, raise any stakeholder concerns? If so, please provide details of the concern, suggestions to the proposed language that addresses the risk presented in recommendation 1f, and if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has proposed that owners of new generation that determine that they are not able to implement freeze protection measures due to technical, commercial, or operational constraints review their determination every five years for EOP-012-1 Requirement R2. Is this separate requirement for “new” generation necessary, given that proposed Requirement R4 provides for Generator Owners to perform a similar review every five years to address the ongoing need to review freeze protection measures and historical cold weather temperatures? Please provide any explanation with your response.

[ ]  Yes

[ ]  No

Comments:

1. The Standard, as proposed, would require Generator Owners to develop plans for modifying generating units to operate to the minimum hourly temperature over the next five years after Commission approval. While Generator Owners identify those generating units that need modifications, develop corrective action plans, and implement modifications, it is important for the ERO Enterprise to have aggregated data about the status of Generation Owners’ extreme cold weather preparedness for its generating units for use in its reliability oversight activities.

The SDT believes that there is benefit to having the ERO Enterprise collect information on progress of Generator Owner plans for modifying generating units. The information could be collected through reporting under mandatory Reliability Standard requirements, through a Periodic Data Submittal under Section 400 of the Rules of Procedure (which may or may not be specified in the Compliance section of the standard), or through a request for data under Section 1600 of the Rules of Procedure. Which of these options do you believe is the best procedural option for collecting this information?

Comments:

1. The drafting team has developed a proposed data collection framework which could form the basis for a periodic data submittal. If you have any comments or edits to the suggested language, please propose an alternative to address the identified risk during the phased-in compliance period.

**Collection framework**:

* The Generator Owner will submit an annual summary table **by October 1 of each year** to its Regional Entity regarding the status of its generating units (as that term is used in EOP-012-1 4.2 Facilities) having freeze protection measures in accordance with Requirements R1 and R2, along with a nine-year projection of status based on the timetables it has determined for Requirement R1. All projections will be based on the Generator Owner’s timetables under Requirement R1.4.2; if timetables are not complete for all units, some MW can be designated as “to be determined.” The summary table shall contain:
	+ Status year (for current year, and future years 1-9);
	+ Sum of capacities (in MW) of all generating units applicable under Facilities, section 4.2;
	+ Sum of capacities (MW) of generating units meeting (for current year) and projected to meet (for each of the future years 1-9) the criteria of Requirement R1.1;
	+ Sum of capacities (MW) of generating units not meeting (for current year) and projected to not meet (for each of the future years 1-9) the criteria of Requirement R1.1;
	+ Sum of the capacities (MW) of existing generating units declared for no action under Requirement R1 (for current year, and projected for future years 1-9);
	+ Sum of the capacities (MW) of new generating units identified for no action under Requirement R2 (for current year, and projected for future years 1-9).

Comments:

1. The SDT proposes that the modifications in EOP-011-3 and the newly drafted EOP-012-1 meet the key recommendations in The Report in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is proposing an 18-month implementation time frame for all revised and new requirements except EOP-012-1 Requirements R1 and R2 which have a 5-year implementation time frame. Do you agree with this implementation time frame? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments: