Unofficial Comment Form

Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination | Phase 2

**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 | Phase 2** by **8 p.m. Eastern, Thursday, November 30, 2023.   
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 Manager of Standards Development, [Alison Oswald](mailto:alison.oswald@nerc.net) (via email), or at 404-446-9668.

## Background Information

Extreme cold weather and precipitation affected the south-central United States February 8-20, 2021. Many generating units experienced 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 outage megawatts (MW) of Load after the August 2003 northeast blackout and the August 1996 west coast blackout. The Event was most severe February 15-18, 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.

On February 16, 2023, the Commission issued an order approving proposed Reliability Standards EOP‐011‐3 and EOP‐012‐1. The order directed changes in five areas of the standard. Reliability Standard EOP-012-2 was revised to address Recommendations 1a, 1b, and 1c as well as the Federal Energy Regulatory Commission (“FERC”) directives in the February 2023 order approving the Phase 1 standards EOP-011-3 and EOP-012-2.[[1]](#footnote-1)

## Questions

*In Paragraph 66 of the FERC order, the Commission directed NERC to address concerns related to the ambiguity of generator-defined declarations of technical, commercial, or operational constraints in EOP-012-1.*

1. To address the P66 directive, the SDT removed the three examples contained in the proposed definition of Generator Cold Weather Constraint and revised the definition to utilize “good utility practice” which has a common understanding as used in the pro forma OATT as approved by FERC. Good utility practice encompasses the three examples previously proposed and additional context is provided in the Technical Rationale. Do you agree that the revised definition of Generator Cold Weather Constraint provides sufficient clarity to the requirements in EOP-012-2, and is auditable? If you do not agree, please provide your recommended language.

Yes

No

Comments:

1. Based upon industry comments received, the SDT has re-structured R2 to require generating units to either implement appropriate freeze protection measures or develop a CAP. Do you agree that the revised language provides sufficient clarity? If not, please provide suggested clarifying language.

Yes

No

Comments:

*Paragraph 88 directed NERC to revise EOP-012 to require a shorter implementation period and staggered implementation for unit(s) in a generator owner’s fleet. Such an approach will reduce reliability risks more quickly.*

1. In order to meet the FERC directive and reduce reliability risks more quickly, the SDT added new Requirement R7 Part 7.1.4. *“For one or more Corrective Action Plan(s) that address multiple units in a fleet, the Corrective Action Plan shall stagger implementation across those generating units.”* Do you agree with this proposed language? If you do not agree, please provide your recommended language.

Yes

No

Comments:

*In P 64 of the FERC order, the Commission expressed concern that a generator owner may make a constraint declaration without informing planning and operational entities (e.g., the balancing authority) that are expecting the reliable operation of the generating unit to its Extreme Cold Weather Temperature. To address this concern, the SDT has developed R8 to require the GO to update the generating unit’s data specification regarding operational limitations to the generator unit’s capability and availability under R1.*

1. Do you agree that Requirement R8 is sufficient to update the generating unit’s data specifications that are available to the Balancing Authority thereby providing the potential impacts a constraint declaration may have on the generating unit’s performance to its Extreme Cold Weather Temperature? If you do not agree, or if you do agree but have an alternative approach that will more effectively address the concern, please provide your recommendation and, if appropriate, technical, or procedural justification.

Yes

No

Comments:

1. Per the FERC directive to shorten the timeframe to implement freeze protection measures on existing units, the SDT proposes an implementation plan where all requirements of EOP-012-2 go into effect on the effective date of the standard except Requirement R3 which has a 12-month implementation time frame. The chart below is included to compare the EOP-012-1 and EOP-012-2 IPs for this requirement which requires GOs to have the capability to operate at the ECWT or a CAP written by the effective date of the requirement. Do you agree with this proposed timeframe? 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.

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| --- | --- | --- |
|  | **EOP-012-1** | **EOP-012-2** |
| **Effective Date** | 10/1/2024 | 10/1/2024 |
| **Have Capability to Operate at ECWT or CAP Developed** | 4/1/2028 | 10/1/2025 |
| **CAP Completed** | no end date specified | 10/1/2027 (R7.1.1) or 10/1/2029 (R7.1.2) |

Yes

No

Comments:

1. The SDT proposes that the modifications in EOP-012-2 meet the key recommendations in The Report as well as the directives in the FERC order 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. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments:

1. [Order](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230216-3062&optimized=false). [↑](#footnote-ref-1)