SAR Comment Form

Project 2024-03 Revisions to EOP-012-2

**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 2024-03 Revisions to EOP-012-2** by **8 p.m. Eastern, Friday, August 16, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2024-03-Revisions-to-EOP-012-2.aspx). If you have questions, contact Senior Standards Developer, Ben Wu (via email), or at 470-542-6882.

## Background Information

NERC developed the original version of the generator cold weather preparedness Reliability Standard EOP-012-1 in 2022, under Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination. The purpose of this project was to address standards-related recommendations from the Federal Energy Regulatory Commission (FERC)/NERC/Regional Entity staff review of operations during the February 2021 Winter Storm Uri event.

NERC developed Reliability Standard EOP-012-2 in 2023-2024 to address Commission directives from the February 2023 order approving Reliability Standards EOP-012-1 and EOP-011-3.[[1]](#footnote-1) In the February 2023 Order, the Commission directed that NERC revise EOP-012-1 to clarify the applicability of the standard’s requirements for generator cold weather preparedness, further define the circumstances under which a Generator Owner may declare that constraints preclude them from implementing one or more corrective actions to address freezing issues, and to shorten the implementation timeline so cold weather reliability risks would be addressed more quickly.

On June 27, 2024, FERC issued an order approving Reliability Standard EOP-012-2.[[2]](#footnote-2) While finding Reliability Standard EOP-012-2 represented an improvement over the prior version and addressed many of its concerns, FERC found the standard requires further improvement to address certain concerns remaining from its February 2023 order. FERC therefore directed NERC to revise the standard in five areas and to submit a revised standard within nine (9) months of the date of the order, or by March 27, 2025.

## Questions

1. In paragraph 47 of the June 2024 Order, FERC directs NERC to revise EOP-012-2 to “ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Reliability Standard are objective and sufficiently detailed so that applicable entities understand what is required of them.” FERC provides several examples of how NERC may meet directives in this paragraph and explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns.

Do you agree with any of the examples provided by FERC in how it may meet the directives? If so, please explain. If you do not agree, but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 47 of the June 2024 Order, FERC directs NERC to develop and submit modifications to the Generator Cold Weather Constraint definition of Reliability Standard EOP-012-2, to remove the references to “cost,” “reasonable cost,” “unreasonable cost,” and “good business practices” and replace them with criteria that are objective, unambiguous, and auditable. FERC further explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. Do you believe there are alternative criteria that are objective, unambiguous, and auditable? If so, please provide your suggestions for the drafting team. If you do not believe there are alternative criteria, or believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 54 of the June 2024 Order, FERC directs NERC to modify EOP-012-2 so that NERC receives, reviews, evaluates, and confirms for validity the Generator Cold Weather Constraint declarations in a timely manner.  FERC further explains that NERC may address its concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. Would you recommend the drafting team modify EOP-012-2 to provide for an ERO pre-review process for constraint declarations? If not, please provide your suggestions that would address FERC’s concerns in an equally efficient and effective manner.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 68 of the June 2024 Order, FERC directs NERC to modify Requirement R7 of EOP-012-2 to require shorter deadlines to implement corrective actions for existing or new equipment or the freeze protection measures for those generating units that experience a Generator Cold Weather Reliability Event. FERC provides an example for how to address this directive, such as to require shorter timeframes for those units that have experienced issues and allow longer timeframes to address similar potential issues across a fleet for those units that have not experienced issues. Do you agree with modifying Requirement R7 of EOP-012-2 to require shorter deadlines to implement corrective actions for existing or new equipment or the freeze protection measures for those generating units that experience a Generator Cold Weather Reliability Event? If so, please provide your suggestions for alternative timeframes. If you do not agree, or believe the directive may be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 70 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP‑012‑2 to ensure that any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the proposed Reliability Standard is pre-approved by NERC. Do you agree with this approach? If so, please provide your suggestions for standards revisions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 72 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to clarify that any Requirement R7 corrective action plans for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit’s commercial operation date. Do you agree that revisions to Requirement R7 would best address this directive? If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 76 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to address certain ambiguities by expanding on Requirement R7.1.1 and 7.1.2 to make it clear which corrective action plan implementation deadline applies to which generator owner, explaining that it is not clear which timeline applies when a generator owner must implement both existing and new equipment for freeze protection measures. Do you agree with this approach? If so, please provide your suggestions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 94 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations (than every five years) to verify that the declaration remains valid.  NERC may propose to develop modifications that address the Commission’s concerns in an equally efficient and effective manner, however, NERC must explain how its proposal addresses the Commission’s concerns. Do you agree with revising Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to require more frequent reviews to address this directive? If so, please provide your suggestions for an alternative timeframe, along with supporting rationale. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

[ ]  Yes

[ ]  No

Comments:

1. In the June 2024 Order, FERC directs NERC to submit the directed modifications within nine (9) months of the date of the order, or by March 27, 2025. If you have any recommendations for how the drafting team may best conduct consensus building activities within the directed timeframe and in consideration of the shorter-than-typical comment periods meeting this timeframe will require, please provide and explain your suggestions below.

Comments:

1. *N. Am. Elec. Reliability Corp*., 182 ¶ 61,094 (2023) (“February 2023 Order”). [↑](#footnote-ref-1)
2. *N. Am. Elec. Reliability Corp.*, 187 FERC ¶ 61, 204 (2024) (“June 2024 Order”). [↑](#footnote-ref-2)