Project 2013-01

Cold Weather Preparedness

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=e5972ba5569c48d2b08cbb30ebfac024) to submit comments on the SAR. The electronic comment form must be completed by 8 p.m. ET **October 24, 2012**.

If you have questions please contact Howard Gugel at howard.gugel@nerc.net or by telephone at 609-651-2269.

[Project 2013-01 Project Page](http://www.nerc.com/filez/standards/Project2013-01_Cold_Weather.html)

Background Information

Repeated occurrences of generation shortfall in winter weather conditions in the southern United States, indicate that institutionalization of extreme weather preparation and reporting of generation availability is needed.

During the 2011 SW Cold Weather event, load shed was required to meet the demand due to loss of generation. During this weather event, cold weather conditions froze critical plant instrument sensors and equipment, causing generation to trip offline or not be able to come online to generate electricity when it was critically needed. Simultaneously, BAs and TOPs were basing their operations and operations planning on uncertain generation availabilities and capacities from the GO/GOPs, because the data available to them did not include availability based on severe winter weather. This uncertain information caused the BAs and TOPs to over-estimate the available generation, which resulted in the need to use load shedding to balance the actual available generation and load.

Based on the FERC-NERC report of the Southwest Cold Weather Event of February 1-5, 2011, in many cases, generation plants did not effectively utilize their cold weather maintenance practices that were in place to reliably perform under severe winter weather conditions. During the critical load time, many plants were in the mode of having to unfreeze equipment and make weather-proofing modifications in real time to keep plant equipment from freezing or refreezing.  This subsequently caused generation to not be available during critical peak times, causing the GO/GOPs, BAs and TOPs to be unaware of the state of the generation resources.  The FERC-NERC report concluded there would be a reliability benefit from amending the EOP Reliability Standards to require Generator Owner/Operators to develop, maintain, and implement plans to winterize plants and units prior to extreme cold weather, in order to maximize generator output and availability.

The SAR is being posted for a 30-day comment period through October 24, 2012 to gather additional input from the industry.

You do not have to answer all questions.  Enter all comments in plain text format.  Bullets, numbers, and special formatting will not be retained.

**Questions**

1. Do you agree with this scope? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

[ ]  Yes

[ ]  No

Comments:

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the Regional Variance.

[ ]  Yes

[ ]  No

Comments:

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice.

[ ]  Yes

[ ]  No

Comments:

5. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here.

 Comments: