Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the <u>NERC Help Desk</u>. Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

		Requeste	d inform	ation	
SAR Title:		Cold Weather Prep Functional Entities	aredness a	nd Communication Requirements bet	ween
Date Submitted: September 20, 201			9	N N	
SAR Requester					
Name:	Name: Michael Desselle, VP Process Integrity/Chief Compliance and Administrative Officer				cer
Organization:					
Telephone: (501) 614-3206		Email: mdesselle@spp.org			
SAR Type (Chec	k as many as a	ipply)			
New Stand	dard		Imi	ninent Action/ Confidential Issue (SPN	Λ
	o Existing Star			ection 10)	
=	•	Glossary Term		iance development or revision	
Withdraw/retire an Existing Standard Other (Please specify)					
Justification for prioritize develo		d standard developm	ient proje	t (Check all that apply to help NERC	
 Regulatory Initiation Emerging Risk (Reliability Issues Steering Committee) Identified Reliability Standard Development Plan NERC Standing Committee Identified Industry Stakeholder Identified 			anced Periodic Review Initiated		
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):					
Generator Oper conditions. Add impacts to gene	ators, Reliabil itionally, to er rator unit ava	ity Coordinators, and sure communication ilability.	d Balancin ns betwee	ents by ensuring Generator Owners, g Authorities prepare for cold weather n functional entities of all ambient we e reliability-related benefit described	
,	nal reliability h	v preparing generat	ion for col	d weather performance and ensure	
situational awareness in both planning and operations by applicable registered entities.					
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Requested information

Project Scope (Define the parameters of the proposed project):

The project scope will address Recommendation 1 in the 2019 FERC and NERC Staff Report: The South-Central United States Cold Weather BES Event of January 17, 2018; and will include the development of new or revised NERC Reliability Standards to consider such activities as winterization activities on generating units, winter-specific and plant-specific operator awareness training, and processes to ensure situational awareness for the registered functions.

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification¹ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (*e.g.*, research paper) to guide development of the Standard or definition):

Technical justification can be found in the findings and recommendations contained in the 2019 FERC and NERC Staff Report: The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018, July 2019 at the following link: <u>https://www.ferc.gov/legal/staff-reports/2019/07-18-19-ferc-nerc-report.pdf</u>.

The deliverable will be new or revised Reliability Standards to promote reliability of the BES during cold weather and maximize generating unit availability.

- 1. Generator Owner/Generator Operator develops and implements cold weather preparedness plans, procedures, and awareness training based on factors such as geographical location and plant configurations. Elements for consideration may include:
 - a. A generating unit's historical demonstrated performance and operating limitations during ambient cold weather;
 - b. Implementing freeze protection measures;
 - c. Performing periodic adequate maintenance and inspection of freeze protection measures; and
 - d. Providing advance notification (when available) of curtailments of natural gas supply to a gas-fueled generating unit's Reliability Coordinator and Balancing Authority.
- 2. Generator Owner/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators the generating unit's associated historical demonstrated performance and operating limitations during ambient cold weather.
- 3. Generator Owner/Generator Operator communicates with the Balancing Authorities and Reliability Coordinators when forecasted ambient weather conditions (including, but not limited to, cold weather temperatures) are expected to impact generating unit performance or generating unit availability for the appropriate next day operating horizon.

¹ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

Requested information

4. Reliability Coordinators and Balancing Authorities use of the generating unit performance and availability provided through deliverable #3 above to perform their respective Operational Planning Analysis, develop its Operating Plans, or determine the expected availability and contingency reserves for the appropriate next day operating horizon.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Cost impact is unknown. However, a question should be asked during the SAR comment period to ensure all aspects are considered.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (*e.g.*, Dispersed Generation Resources):

Each BES facility considered here may have numerous unique characteristics based on factors such as construction, technical configuration, geographic differences, etc. The substantive differences may require flexibility for each generation resource to develop the appropriate plans to implement during cold weather events.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (*e.g.*, Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Balancing Authority, Generator Operator, Generator Owner, Reliability Coordinator

Do you know of any consensus building activities² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

The 2019 FERC and NERC Staff Report: The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018, July 2019 was publicly noticed and shared with regulators and industry.

² Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Requested information

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

The proposed deliverables, as well as other proposed requirements applicable to Generator Owners, Generator Operators, Balancing Authorities and Reliability Coordinators, that may result from this project should be reviewed to ensure any conflicts or overlap with current requirements are mitigated. For example, IRO-010-2 and TOP-003-3 may address some of these aspects already. These standards require the Reliability Coordinator (IRO-010-2) and Balancing Authority (TOP-003-3) to maintain documented data specifications that include a list of data and information they need to support the Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. Applicable Registered Entities, which include Transmission Operators, Balancing Authorities, Generator Operators, Generator Owners, Transmission Owners, and Distribution Providers, are then required to provide the data per the data specifications.

The Operating and Planning suite of standards will be considered for this project.

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

A number of recommendations contained in the following FERC and NERC reports could be utilized by the standard drafting team:

2019 FERC and NERC Staff Report: The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018, July 2019

Polar Vortex Review, September 2014

Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011: Causes and Recommendations, August 2011

Reliability Guideline: Generating Unit Winter Weather Readiness – Current Industry Practices.

Reliability Principles			
Does this proposed standard development project support at least one of the following Reliability			
Princ	ciples (<u>Reliability Interface Principles</u>)? Please check all those that apply.		
	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner		
\square	to perform reliably under normal and abnormal conditions as defined in the NERC Standards.		
	2. The frequency and voltage of interconnected bulk power systems shall be controlled within		
	defined limits through the balancing of real and reactive power supply and demand.		

		Reliability Principles
\square	3.	Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems
		reliably.
\square	4.	Plans for emergency operation and system restoration of interconnected bulk power systems
		shall be developed, coordinated, maintained, and implemented.
\square	5.	Facilities for communication, monitoring, and control shall be provided, used and maintained
		for the reliability of interconnected bulk power systems.
	6.	Personnel responsible for planning and operating interconnected bulk power systems shall be
		trained, qualified, and have the responsibility and authority to implement actions.
	7.	The security of the interconnected bulk power systems shall be assessed, monitored, and
		maintained on a wide area basis.
	8.	Bulk power systems shall be protected from malicious physical or cyber-attacks.

Market Interface Principles			
Does the proposed standard development project comply with all of the following Market Interface Principles?			
 A reliability standard shall not give any market participant an unfair competitive advantage. 	Yes		
A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes		
A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes		
 A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. 	Yes		

Identif	Identified Existing or Potential Regional or Interconnection Variances		
Region(s)/	Explanation		
Interconnection			
None			

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SAR Status Tracking (Check off as appropriate).			
 Draft SAR reviewed by NERC Staff Draft SAR presented to SC for acceptance DRAFT SAR approved for posting by the SC 	 Final SAR endorsed by the SC SAR assigned a Standards Project by NERC SAR denied or proposed as Guidance document 		

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk