Unofficial Comment Form

Project 2019-06 Cold Weather | Standard Authorization Request

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the **Project 2019-06 Cold Weather Standard Authorization Request (SAR).** Comments must be submitted by **8 p.m. Eastern, Thursday, May 21, 2020.**

Additional information is available on the project page. If you have questions, contact Senior Standards Developer, Jordan Mallory (via email), or at 404-446-2589.

Background Information

In July 2019, the FERC and NERC staff report titled *The South Central United States Cold Weather Bulk Electronic System Event of January 17, 2018* (Report) was released. Following the Report, Southwest Power Pool, Inc. (SPP) submitted a SAR proposing a new standard development project to review and address the recommendations in the Report. The formal comment period for the SAR's second posting concluded on March 19, 2020. The SAR drafting team (DT or SAR DT) has reviewed the formal comments submitted in response to the SAR's initial posting.

Based on the review and discussions, the DT modified the SAR and a third draft is re-posted for a 30-day informal comment period. The main substantive modifications to the SAR include, but are not limited to: 1) deleting references to "all ambient weather;" 2) focusing the SAR's scope on communications between functional entities when generator unit availability is expected to be impacted by cold weather conditions; 3) adding the Transmission Operator (TOP) to the communications deliverables, wherein the TOP will receive communications from the Generator Owner/Generator Operator and incorporate such information into the TOP's required system and operational planning analysis; and 4) clarifying that the requirements apply to all Bulk Electric System generating units.

The SAR DT will review all responses and incorporate, as appropriate, proposed revisions to the SAR. In the documents posted for informal comment, the highlighted language is intended to indicate that the revision includes a substantive change. The SAR DT requests that you focus your informal comments on these highlighted revisions.

1. Do you agree with the redline modifications made to the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

   ☐ Yes
   ☒ No
   Comments: TAPS does not support creating a continent-wide standard to address a very specific regional issue, particularly given that, as stated in previous comments, existing Reliability Standards already cover most of the issues this SAR attempts to address. It is neither feasible nor desirable for

Reliability Standards to specifically call out each and every ambient condition or operational situation that could occur across North America; attempting to do so requires the industry to spend valuable resources and our customers' money on non-stop standards projects.

There is no need for a new or revised standard "to ensure communications between functional entities of cold weather impacts to generator unit availability" (revised SAR at 1); such communications are already required by existing standards. In response to the comments submitted by TAPS on the prior posting of this SAR, the drafting team stated that "it is not clear that the conditions of [IRO-010 and TOP-003] focus on data specific to cold weather issues." The standards are written broadly by design, and thus include data specific to cold weather issues, as well as everything else that each RC, BA, or TOP needs to perform its operational functions.

Nor is there any indication in NERC's enforcement data that failure to respond to data specifications is a widespread problem. If RCs, BAs, and TOPs are, in fact, having trouble getting the information they need, that is a CMEP problem, not a standards problem, since, as noted above, IRO-010-2 and TOP-003-3 *already* require each RC, BA, and TOP to request, without limitation, "the data necessary for it to perform" its operational functions, and require the entities receiving the data specifications to provide all such data.

As NERC said in its petition for approval of (among others) IRO-010-1a, which used the same top-down approach as IRO-010-2 and TOP-003-3, "[t]he requirements in the standard specify a formal request as the method for the Reliability Coordinator to explicitly identify the data and information it needs for reliability; and require the entities with the data to provide it as requested. This method is sound because *the Reliability Coordinator is the only entity that knows what data it needs to properly perform its reliability tasks, and the most efficient format for accepting this data*." Docket No. RM10-15, at 35 (Dec. 31, 2009) (emphasis added). The alternative approach—listing each type of data that must be provided—will unavoidably be both under- and over-inclusive, since in addition to varying from one entity to another, data needs change over time as new technologies and risks emerge.

Much more recently, NERC stated in its April 6, 2020 comments on FERC's NOPR regarding the Phase 1 SER retirements (RM19-16 and RM19-17, at 9 (emphasis added)):

> Reliability Standards MOD-032-1, IRO-010-2, and TOP-003-3 provide the entities responsible for the reliable modeling, planning, and operation of the BPS with the authority to obtain the information they need from Generator Owners and Transmission Owners to complete their reliability tasks, which may include next most limiting equipment information. *Now that these broader data specification standards are in place, NERC has identified no reliability need to maintain additional requirements expressly requiring the provision of this data in the FAC-008 standard.*

It is counterproductive to add specific requirements with respect to cold weather data at the same time that the industry and NERC are proposing to retire analogous requirements with respect to next

most limiting equipment information. If the SAR drafting team maintains the position that additional clarity with respect to cold weather is needed, then a better use of industry resources would be development of Implementation Guidance to provide examples for implementing these standards to address cold weather events.

Finally, to the extent that clarifications to TOP-003 and IRO-010 *are* needed, we note that a draft SAR developed by the SER Phase 2 team proposes to clarify those standards—in a holistic manner—as to the scope and format of data specifications. TAPS supports the SER effort, and urges the Cold Weather drafting team not to spend resources developing piecemeal requirements to address an issue that can be handled more efficiently and effectively by the SER project.

With respect to the SAR's other prong—"To enhance the reliability of the BES during cold weather events by ensuring Generator Owners, Generator Operators, Reliability Coordinators, and Balancing Authorities prepare for cold weather conditions" (SAR at 1)—we refer the drafting team to our comments on that issue in response to the previous posting of this SAR, to which the drafting team did not respond. If this SAR proceeds, the SDT should take care to draft a results-based standard, avoiding unnecessary administrative burdens. In addition, the SDT should recognize that it would be uneconomic and inappropriate to require that every generator on the continent plan to operate under all conditions; generators must be permitted to identify their ambient design parameters and decline to make themselves available outside those parameters.