

Unofficial Comment Form

Project 2019-06 Cold Weather

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on the **2019-06 Cold Weather** project by **8 p.m. Eastern, Friday, March 12, 2021**.

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

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 Standards Authorization Request (SAR) proposing a new standard development project to review and address the recommendations in the Report. The industry need for this project is to enhance the reliability of the BES during cold weather events.

Summary of Changes

Many commenters expressed concern regarding the development of a new standard during the SAR phase of Project 2019-06 Cold Weather. Therefore, the initial draft standards reflects modifications to currently existing standards EOP-011, IRO-010, and TOP-003.

EOP-011-2

The standards drafting team (SDT) reviewed the NERC Reliability Standards concluding that EOP-011 was the best fit out of all the standards for cold weather preparedness, plans, procedures, and awareness training. The SDT developed a new Requirement R7 with respective parts as the minimum requirement for entities. As such, the below outlines the EOP-011 modifications at a high level:

- Updated title and purpose to allow for this new requirement.
- Generator Owner (GO) has been added to the Applicability Section. The team discussed the addition of Generator Operator, but determined GO would suffice respective requirement situation as the GO owns the generating site.
- “Cold weather conditions” added to Requirement R1 Part 1.2.6, and Requirement R2 Part 2.2.9.
- New Requirement R7 and its respective Parts.

IRO-010-3

The SDT made modifications to IRO-010-3 to address the Reliability Coordinators (RCs) incorporating data specifications communicated by the GO/GOP to their respective Operational Planning Analysis, develop its Operating Plans, or determine the expected availability of contingency reserves for the appropriate next day operating horizon.

TOP-003-4

The SDT made modifications to TOP-003-4 to address the Transmission Operator (TOPs) incorporating data specifications communicated by the GO/GOP to their respective Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

Questions:

1. The SDT placed the Generator Owner cold weather preparedness plan(s) requirements within EOP-011. Do you agree with this new requirement placement in the EOP-011 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Yes
 No

Comments:

2. The SDT placed the Reliability Coordinator data specification requirements within IRO-010. Do you agree with this modified requirement placement in the IRO-010 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Yes
 No

Comments:

3. The SDT placed the Transmission Operator data specification requirements within TOP-003. Do you agree with this modified requirement placement in the TOP-003 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Yes
 No

Comments:

4. The SDT placed the Balancing Authority data specification requirements within EOP-011. Do you agree with this modified requirement placement in the EOP-011 standard? If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Yes
 No

Comments: **The BA data specification requirements should be added to TOP-003, as the SDT is proposing to do for the TOP data specification requirements. The BA language should mirror the TOP and RC language, as described below; using different language, and putting it in a different location from other BA data specification requirements, will lead to unnecessary confusion. BAs, RCs, and TOPs need the same data with respect to cold weather limitations, and it will be more efficient for GOs to be able to provide the same data to each entity.**

Proposed EOP-011, R7.3 is essentially a data specification requirement; it should thus be moved to IRO-010 and TOP-003 and combined with the new proposed language in those standards. The wording should also be revised to more accurately reflect the requirement’s goal: that entities that need the information be made aware of the conditions under which the generator will be inoperable. That goal can be accomplished via the communication of known cold weather operating limitations, the minimum design temperature, the minimum demonstrated historical performance during cold weather, or an engineering analysis. It would be inappropriate to require entities to provide multiple forms of evidence of the same fact.

In addition, “in the previous 5 years” should be deleted from R7.3.2.2, because it results in an unnecessary administrative requirement to update the information every year regardless of whether there has been a change. Referring simply to the “minimum demonstrated historical performance during cold weather” requires an update only if there is a change.

The data specification requirement for BAs, TOPs, and RCs (renumbered as appropriate) should read:

7.3. Provisions for notification of BES generating unit-specific data related to expected performance in cold weather, to include:

7.3.1. Generating unit(s):

7.3.1.1 operating limitations in cold weather; or

7.3.1.2. minimum design temperature; or

7.3.1.3. minimum demonstrated historical performance during previous cold weather events; or

7.3.1.4 engineering analysis of expected operation limitations in cold weather.

5. EOP-011-2 (Requirement R7 Part 7.2): The SDT suggest maintenance and inspection be, at a minimum, an annual requirement. Does the requirement provide enough specificity for an industry wide standard?

Yes

No

Comments:

6. The SDT modified the Implementation Plan to allow twelve (12) months following the effective date to become compliant with EOP-011, IRO-010, and TOP-003. If you do not agree, please provide an alternative. If you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

Yes

No

Comments: **The implementation period for EOP-011 should be at least 18 months. Winterization may be a capital-intensive undertaking for some generators, and twelve months may not be enough time for some entities to finance and perform the necessary work. Reliability would be better served**

by allowing registered entities a bit more time to truly winterize, than by imposing an unrealistic deadline that may lead some entities to water down their plans to avoid being noncompliant.

7. Proposed TOP-003-5 Requirement R1 and IRO-010-4 Requirement R1 would require TOPs and Reliability Coordinator to maintain cold weather parameter. For consistency with the data specification requirements and to ensure the BA has the necessary information to perform its analysis during cold weather, do you believe that similar parameters should be required? Please provide your reasoning as to why it should be required or should not be required.

- Yes
 No

Comments: **As noted in response to Question 4, the BA data specification requirement should be consistent with the TOP and RC requirements.**

8. Please provide any additional comments for the SDT to consider, if desired.

Comments:

EOP-011 Applicability: To avoid confusion, the SDT should delete the “Facilities” subsection from the Applicability section, and instead replace instances of “generating unit(s)” throughout the standard with “BES generator(s).” For example, the first sentence of Requirement R7 would read “Each Generator Owner shall... implement one or more cold weather preparedness plan(s) for its BES generator(s).” If the SDT nevertheless retains the Facilities subsection, to avoid confusion about whether facilities that do not fit the definition can nevertheless be “generating unit(s),” the subsection should be revised to read “For the purpose of this standard, the term “generating unit” means BES generators.”

EOP-011 Purpose statement: The proposed purpose statement is unclear. We suggest that it instead read: “To ensure applicable entities have developed plan(s) to prepare and mitigate operating Emergencies.”

EOP-011 Requirement R7: Overall, proposed R7 does not state a clear, measurable objective, and thus does not meet the attributes of a results-based standard as described in Section 2.4 of the Standards Process Manual. Absent a clearly stated objective, the requirement may not achieve its intended outcome or provide a measurable reliability benefit. Moreover, because the objective is not clearly stated, there is a significant risk that members of the drafting team or stakeholders are in fact working at cross-purposes due to having differing understandings of the objective.

“Develop, maintain, and implement”: The standard should require entities to “implement” a plan, not “develop, maintain, and implement” it. It is impossible to implement a plan without developing and maintaining it; including independent requirements to “develop” and “maintain” the plan simply results in more opportunities for administrative noncompliance, with no benefit to reliability. We recognize that the SDT is using the same language as the existing requirements in the standard, but

doing so unnecessarily perpetuates a preexisting mistake; the SDT should instead correct the mistake throughout the standard.

For the sake of clarity, R7.1 should be revised to refer to “specific” rather than “unique” factors: “Generating unit(s) freeze protection measures based on specific factors such as geographical location and plant configuration.”

The drafting team should also revise the data/evidence retention requirements in the standards in accordance with the recommendations from the Standards Efficiency Review Project. See item 9 from the December 2019 Standards Committee meeting materials.

Finally, with respect to EOP-011, proposed R7.4, it is not at all clear from the balance of proposed R7 what, if any, “roles and responsibilities of site personnel” would be “contained in the cold weather preparedness plan.” If the objective is for plant operating personnel (i.e. *GOP* personnel) to understand the freeze protection measures implemented at the generator, then the subrequirement should read “Inform Generator Operator(s) with responsibility for Generator Owner’s BES generator(s) of freeze protection measures in place at the applicable BES generator(s).” To the extent that the SDT believes that training of GO and/or GOP personnel is necessary, any such requirements belong in PER-006, not EOP-011.