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, March 19, 2019.

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 initial posting concluded November 5, 2019 and the drafting team has reviewed the comments received.

Based on the review and further discussions, the drafting team is recommending the SAR be modified to: 1) clarify aspects of the recommendations contained in the Report; and 2) ensure communication between functional entities when generator unit availability is expected to be affected by all ambient weather conditions (including, but not limited to, cold weather temperatures)¹. Of particular note, the requirements of this SAR are intended to apply to Generator Owners/Generator Operators that own/operate facilities that qualify as Bulk Electric System, regardless of fuel-type.

¹ The basis for NERC Staff’s recommendation is that communication is important for reliability as it allows RCs and BAs to be better prepared for next day studies and even hour ahead studies. It is important that entities know that a unit can be counted on based on the data provided. NERC Staff recommended including the issue in this project, rather than addressing in a subsequent project, in the interest of administrative efficiency and to avoid the burdens that could come from having multiple successive versions of a standard become effective in a short time.
Questions

1. The drafting team modified the SAR to include communication between functional entities when generator unit availability is expected to be affected by all ambient weather conditions. (Note: the preparedness will remain focused on cold weather.) Do you agree with this proposed scope as described in 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:
On item 3, GO/GOP should communicate with the TOP as well as the BA and RC.
On item 4, the TOP, as well as the BA and RC should use performance and availability information in OPAs.

2. If you have any additional comments on the SAR, please provide them here.

Comments: