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:
Purpose or Goal: We suggest removing the word “optimal” since reliability does not need to be described within the SAR. NERC has defined “Adequate Level of Reliability” which is used primarily to guide NERC Reliability Standards development.