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:
   Agree with the addition, however, our Generators are located in North East (Temperate Region), they are prepared for extreme but possible conditions. This would just cause an Administrative redundancy of cold weather plans that already exist and have historically been in place from their initial design.

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:
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:

This does not capture the freeze protection measures that are put in place on an as needed basis such as heaters, blankets, etc.

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:

Instead of 12 months 18 months – It takes time to install winterization equipment.

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:

The Balancing Authority should have a similar requirement for consistency and to perform its analysis during cold weather.

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

Comments:

RE: EOP-011-2 R1.2.6.2 and R2.2.9.2 “any other extreme weather conditions”: We suggest the removal of the word “any.” The inclusion of the word “any” expresses a lack of restriction and could result in audit and compliance difficulties.

RE: TOP-003-5 R2.2: There appears to be an error in the revision of R2.2. We suggest that R2.2 should read as, “Provision for notification of current Protection System and Remedial Action Scheme (RAS) status or degradation that impacts System reliability.” Instead of “Provisions for
notification of current Protection Remedial Action Scheme status or degradation that impacts System reliability.”
RE: Guidelines and Technical Basis (GTB) sections of EOP-011, IRO-010, and TOP-003. Technical Rationale documents should be posted for industry review and comment since the GTB sections of EOP-011, IRO-010, and TOP-003 are being removed.

**EOP-011-2, R1: addition for clarification**
1.2.6. **Provisions to determine potential** Reliability impacts of:
Requirement 1.2 states the TOP’s Operating Plans(s) should include processes to prepare for and mitigate Emergencies. Reliability impacts of cold weather conditions and any other extreme weather conditions are not a process, but rather a type of Emergency that the TOP must have a plan(s) to address. This addition will clarify that a process should be in place to address cold weather and other extreme conditions.

The drafting team should consider revising the use of the term cold weather conditions. Cold weather has different meanings to different locations. The drafting team should consider terms such as “below normal” or a “certain percentile below normal”. Also is time a factor, a couple of hours to a couple of days?