

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 Monday, April 26, 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. On March 22, 2021, the NERC Board of Trustees took action without a meeting to direct the completion of proposed Reliability Standards under Project 2019-06 Cold Weather by June 2021.

Summary of Changes

Many commenters expressed concern regarding the development of a new standard during the SAR phase of Project 2019-06 Cold Weather. A majority of commenters on draft 1 agreed that EOP-011-2 is the appropriate place for the cold weather preparedness modifications. Additionally, the standards drafting team (SDT) determined, from industry comments, that the Balancing Authority should be required to have the same data specifications identified for the Reliability Coordinator (RC) and Transmission Operator (TO). Finally, changes that clarify the data specification requirements have been drafted by the SDT in response to industry comments.

Of particular note, the SDT is posting proposed Implementation Guidance for industry review. The Implementation Guidance is being developed separately by the SDT in response to industry comments but is not subject to ballot body approval. The SDT requests that the ballot body consider the Implementation Guidance separately from the three Reliability Standards impacted by this project when casting votes on the proposed standards. Additionally, the SDT has prepared a technical rationale to accompany this posting.

EOP-011-2

The SDT reviewed the NERC Reliability Standards concluding that EOP-011 was still the best fit out of all the standards for cold weather preparedness, plans, procedures, and awareness training. Based on different scenarios of Generator Owners (GOs) or Generator Operators (GOPs) providing awareness training to operations and maintenance personnel, the SDT developed a new Requirement R8.

The below outlines the EOP-011 modifications at a high level:

- Updated title and purpose to allow for the new Requirements R7 and R8.
- GOP has been added to the Applicability Section. Based on comments received, the SDT determined that adding the GOP as an applicable entity was necessary for providing generating unit-specific training of its maintenance or operations personnel.
- “Provisions to determine potential” added to Requirement R1 Part 1.2.6, and Requirement R2 Part 2.2.9.
- “any other” removed from Requirement R1 Part 1.2.6.2, and Requirement R2 Part 2.2.9.2.
- Clarifying modifications made to Requirement R7 and its respective Parts.
- New Requirement R8 added to require “generating unit-specific training of the maintenance or operations personnel”, separate from the Requirement R7 for cold weather preparedness plan(s).

IRO-010-3

The SDT made modifications to IRO-010-3 to reflect edits to the data specifications consistent with the modifications made to TOP-003-4, as discussed below.

TOP-003-4

The SDT made modifications to TOP-003-4 to require the Balancing Authority (BA) to incorporate provisions for notification of BES generating unit(s) status during local forecasted cold weather in their data specifications for analysis functions and Real-time monitoring. The required provisions include operating limitations and generating unit(s) cold weather performance temperature. The team included similar changes to the Transmission Operator (TOP) data specification requirement in Requirement R1.

Questions:

1. The SDT removed the generator unit-specific training from Requirement R7 and created a new Requirement R8. The new Requirement R8 was created by the SDT to add the GOP to the functional entities responsible for training. Whereas Requirement R7 is narrowly constructed for the GO to be responsible for the cold weather preparedness plan(s), Requirement R8 requires both the GO and GOP to provide the generating unit-specific training to their respective maintenance and operations personnel. 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:

With the ‘or’ language within Requirement R8 (i.e. Generator Operator or Generator Owner), when the GOP and GO functional registrations are not both retained by one of the registered

entities, the responsibility for who must implement training is not clearly defined and may lead to missed compliance obligations.

Suggest looking at TPL-007-4 R1 language that describes a way for multiple functional registrations to determine responsibilities (i.e. "Each PC in conjunction with its TP shall identify the individual and joint responsibilities..."). Proposed EOP-011 R8 language:

Each Generator Operator in conjunction with its Generator Owner shall identify the organization responsible for providing the generating unit-specific training, and that identified entity shall provide the training to its maintenance or operations personnel, as needed, for the implementation of the cold weather preparedness plan(s).

2. In response to comments from the first posting, the SDT added cold weather data specification requirements for the BA within TOP-003, similar to what is required of the RC and TO. Do you agree with the inclusion of these requirements in the TOP-003 standard? If you do not agree, please provide an alternative to address the comments. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

- Yes
 No

Comments:

With the 'generator data specification' Requirement language in IRO-010 and TOP-003 the same for the RC/BA/TOP; which data specification the GO should follow and incorporate into their cold weather preparedness plan may be unclear.

Suggest modifying EOP-011 R7.3 to clarify which data specification should be utilized:

7.3. Generating unit(s) cold weather data (from the RC, BA, or TOP data specification, as needed), to include:....

3. In response to comments, the SDT modified the Implementation Plan to allow eighteen (18) months following the effective date to become compliant with EOP-011, IRO-010, and TOP-003. Do you agree with this modification? If you do not agree, please provide an alternative implementation timeframe. If you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

- Yes
 No

Comments:

EOP-011 R7 contains data specification details that must be included in the cold weather preparedness plan, but without the direction from the BA/RC/TOP on what format this data should be documented, the GO's plan may be inconsistent with the expectations. Suggest IRO-010

and TOP-003 Implementation Plan is 12 months, and EOP-011 Implementation Plan be 18 months to allow GO time to incorporate the data specifications as requested into their plan.

4. The SDT has provided draft Implementation Guidance to address some issues identified by industry during the previous comment period. Recognizing that Implementation Guidance is not subject to ballot body approval, do you agree with the SDT proceeding with the development of the Implementation Guidance? If you do not agree, or have additional topics you would like the SDT to consider in the Implementation Guidance, please provide your explanation and suggested language.

- Yes
 No

Comments:

Requesting that the Guidance document contains examples of freeze protection measures that are existing.

Please consider adding EOP-011-2 Implementation Guidance for Requirement R7.3 and its subparts involving Generating unit(s) cold weather data, in regard to cold weather preparedness plan(s). For example, does the plan simply involve the communication of data to the Reliability Coordinator, Transmission Operator, and Balancing Authority, or does it involve more than a plan to communicate the data that is required by IRO-010-4 and TOP-003-5? Please consider explaining why it is necessary to have the cold weather data within the cold weather preparedness plan(s). The reason for the data in the cold weather preparedness plan(s) could be subject to different interpretations.

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

Comments:

In IRO-010-4 Evidence Retention (1.2), why are there 3 separate retention periods listed? It should be as same for all. "since the last compliance audit."

The Reliability Coordinator (BA, GO, GOP, TOP, TO, & DP for R3, M3) shall retain its dated, current, in force documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments for Requirement R1, R2, R3 Measure M1, M2 & M3 as well as any documents in force since the last compliance audit.

In TOP-003-5, why does the BA, GO, GOP, TOP, TO, & DP receiving data only have a 90-day retention period. It should be three calendar years to be consistent with the rest of the data retention period.

Provide clarification in Section 7.2 that this is for equipment that is permanent. Provide clarification of what the definition of freeze protection "measures" is in relation to procedures and plans. Section 7.2 could be interpreted that the plans have to be maintained annually.