



Commission’s prior February 2023 Order [approving EOP-012-1].”<sup>2</sup> The Commission directed NERC to revise Reliability Standard EOP-012-2 to address its concerns and to file a revised standard within nine months of the date of the order, or by March 27, 2025.

Since the issuance of the June 2024 Order, NERC has worked diligently to address the Commission’s directives through revisions to the EOP-012 standard and associated defined terms. After an expedited standard development process failed to produce meaningful improvements in consensus across two successive drafts, the NERC Board of Trustees took action at its January 10, 2025 meeting to initiate the special standard development rule described in Section 321.5 of the NERC Rules of Procedure. This rule, initiated for the first time in this proceeding, provides special, non-balloted, notice and comment style processes for developing Reliability Standards to address regulatory directives when the normal standard development process has failed to do so. NERC staff worked with a small team established by the Standards Committee to prepare a third draft of the proposed EOP-012-3 standard. In accordance with Section 321 of the NERC Rules of Procedure, this draft was posted for a 45-day public comment period from January 27, 2025 to March 12, 2025. During this comment period, NERC received 43 sets of responses, including comments from approximately 108 different people from approximately 77 companies representing 7 of the industry segments.

NERC appreciates the participation of stakeholders in its standard development processes. The response to this recent comment period was robust and voluminous, with comments addressing many aspects of the EOP-012 standard and the process by which the ERO Enterprise will ensure a timely review of Corrective Action Plan extension requests and Generator Cold Weather Constraint declarations. To ensure that due consideration may be given to each of these

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<sup>2</sup> *Id.* at P 4.

comments in the final proposed standard that will be submitted to the Commission, NERC respectfully requests that the Commission allow NERC a modest extension of its March 27 deadline. The NERC Board of Trustees is scheduled to meet on April 4, 2025 to consider the proposed standard, along with any modifications it deems appropriate considering the comments received. NERC would file a revised standard with the Commission by no later than April 14, 2025.

NERC respectfully requests that the Commission grant this motion and extend the deadline to submit a standard in response to the June 2024 Order from March 27, 2025 to April 14, 2025.

Respectfully submitted,

*/s/ Lauren A. Perotti*

Lauren A. Perotti  
Assistant General Counsel  
North American Electric Reliability Corporation  
1401 H Street NW, Suite 410  
Washington, D.C. 20005  
202-400-3000  
Lauren.perotti@nerc.net

*Counsel for the North American Electric Reliability Corporation*

March 20, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in the above-referenced proceeding.

Dated at Washington, D.C. this 20th day of March 2025.

*/s/ Lauren A. Perotti*

Lauren A. Perotti  
*Counsel for North American  
Electric Reliability Corporation*