Unofficial Comment Form

Project 2025-01 Canadian-Specific Revisions to EOP-012-3

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Project 2025-01 Canadian-Specific Revisions to EOP-012-3 Standard Authorization Request (SAR)** by **8 p.m. Eastern, Thursday, June 26, 2025.  
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2025-01-Canadian-Specific-Revisions-to-EOP-012-3.aspx). If you have questions, contact Senior Standards Developer, [Ben Wu](mailto:Ben.Wu@nerc.net) (via email), or at (470) 542-6882.

## Background Information

Registered entities from across Canada have stated that the EOP-012 Reliability Standard poses compliance difficulties for Canadian entities due to the differences between Canadian and United States regulatory environments. Canadian entities have also identified issues with how the EOP-012 standard may be applied in their consistently cold climates. This SAR seeks Canadian-specific revisions to the proposed EOP-012-3 Reliability Standard that would be designed to reflect the geographical differences. In Canada, peak demand typically occurs during winter months and where generating units are economically constrained to be suitable for winter operation. The Canadian-specific revisions would also address differences in regulatory frameworks that make several of the FERC-directed changes in EOP-012 for the U.S. impractical to implement in the Canadian jurisdictions.

## Questions

1. Do you agree that a Canadian-specific variance would be the best way to address the project scope? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation or explanation.

Yes

No

Comments:

1. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to incorporate Canadian-specific language regarding applicable governmental authorities and their applicable processes when it comes to development, approval, implementation, and extension requests for Corrective Action Plans and Generator Cold Weather Constraint declarations?

Yes

No

Comments:

1. Do you agree that the EOP-012 Reliability Standard should be revised, or a variance should be developed, to allow Canadian entities to account for the geographical and winter climate characteristics of the Canadian provinces, including allowing additional flexibility in the definition of Extreme Cold Weather Temperature (ECWT) and Generator Cold Weather Reliability Event (GCWRE)?

Yes

No

Comments:

1. Do you agree that the EOP-012 Reliability Standard should be updated, or a variance should be developed, to address the difference between freezing risk and cold temperature operating risk where the operating temperature is far below the freezing point, as it is in many of the Canadian provinces?

Yes

No

Comments:

1. Do you agree that the EOP-012 Reliability Standard requires further revision or a variance to avoid imposing retroactive compliance obligations on jurisdictions with standard effective dates later than those established in the United States?

Yes

No

Comments:

1. Do you agree that the EOP-012-3 Reliability Standard should modify or remove requirement language that may potentially conflict with Canadian law or regulatory processes?

Yes

No

Comments:

1. Please provide any additional comments for the Drafting Team to consider, if desired.

Comments: