Unofficial Comment Form

Project 2024-03 Revisions to EOP-012-2

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments ondraft one of **EOP-012-3 Extreme Cold Weather Preparedness and Operations** by **8 p.m. Eastern, Tuesday, November 5, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2024-03-Revisions-to-EOP-012-2.aspx). If you have questions, contact Senior Standards Developer, Ben Wu (via email), or at 470-542-6882.

## Background Information

NERC developed the original version of the generator cold weather preparedness Reliability Standard EOP-012-1 in 2022, under Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination. The purpose of this project was to address standards-related recommendations from the Federal Energy Regulatory Commission (FERC)/NERC/Regional Entity staff review of operations during the February 2021 Winter Storm Uri event.

NERC developed Reliability Standard EOP-012-2 in 2023-2024 to address Commission directives from the February 2023 order approving Reliability Standards EOP-012-1 and EOP-011-3.[[1]](#footnote-2) In the February 2023 Order, the Commission directed that NERC revise EOP-012-1 to clarify the applicability of the standard’s requirements for generator cold weather preparedness, further define the circumstances under which a Generator Owner may declare that constraints preclude them from implementing one or more corrective actions to address freezing issues, and to shorten the implementation timeline so cold weather reliability risks would be addressed more quickly.

On June 27, 2024, FERC issued an order approving Reliability Standard EOP-012-2.[[2]](#footnote-3) While finding Reliability Standard EOP-012-2 represented an improvement over the prior version and addressed many of its concerns, FERC found the standard requires further improvement to address certain concerns remaining from its February 2023 order. FERC therefore directed NERC to revise the standard in five areas and to submit a revised standard within nine (9) months of the date of the order, or by March 27, 2025.

## Questions

1. In paragraph 47 of the June 2024 Order, FERC directed NERC to revise EOP-012-2 to “ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Reliability Standard are objective and sufficiently detailed so that applicable entities understand what is required of them.” In paragraph 47 of the June 2024 Order, FERC directed NERC to develop and submit modifications to the Generator Cold Weather Constraint definition of Reliability Standard EOP-012-2, to remove the references to “cost,” “reasonable cost,” “unreasonable cost,” and “good business practices” and replace them with criteria that are objective, unambiguous, and auditable. In paragraph 54 of the June 2024 Order, FERC directs NERC to modify EOP-012-2 so that NERC receives, reviews, evaluates, and confirms for validity the Generator Cold Weather Constraint declarations in a timely manner. In paragraph 94 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations (more than every five years) to verify that the declaration remains valid.

The drafting team has done the following to address the FERC directives:

1. Provided an updated definition of Generator Cold Weather Constraint
2. Updated language within Requirement R8
3. Provided EOP-012-3 Attachment 1 for clarity on expectations for registered entities

Do you agree with the approach and associated language the drafting team chose to meet the directives? Please provide any additional comments to consider. If you do not agree but believe the directives can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 68 of the June 2024 Order, FERC directed NERC to modify Requirement R7 of EOP-012-2 to require shorter deadlines to implement corrective actions for existing or new equipment or the freeze protection measures for those generating units that experience a Generator Cold Weather Reliability Event. FERC provided an example for how to address this directive, such as to require shorter timeframes for those units that have experienced issues and allow longer timeframes to address similar potential issues across a fleet for those units that have not experienced issues.

The drafting team modified Requirement R6 of EOP-012-2 to require a shorter deadline to implement corrective actions for those generating units that experience a Generator Cold Weather Reliability Event. Do you agree with the revised timelines? Please provide any additional comments to consider. If you do not agree but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team. Please review the posted draft ERO Enterprise document, EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 70 of the June 2024 Order, FERC directed NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP‑012‑2 to ensure that any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the proposed Reliability Standard is pre-approved by NERC.

The drafting team provided language changes in Requirements R6 and R7 for a Corrective Action Plan extension process. Do you believe that the proposed language changes meet the intent of paragraph 70 of the FERC Order? Please provide any additional comments to consider. If you do not agree but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 72 of the June 2024 Order, FERC directed NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to clarify that any Requirement R7 corrective action plans for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit’s commercial operation date.

The drafting team provided updated language in Requirement R2 Part 2.1 to address the issue of units in different stages of design and construction. February 16, 2023 was chosen as a date of demarcation as that was the date the Extreme Cold Weather Temperature was approved by FERC. Do you agree that revisions to Requirement R2 Part 2.1 address this directive? If you do not agree but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 72 of the June 2024 Order, FERC directed NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to clarify that any Requirement R7 corrective action plans for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit’s commercial operation date.

The drafting team provided updated language in Requirement R2 Part 2.2 to address the issue of units in newer stages of design and construction. February 16, 2023 was chosen as a date of demarcation as that was the date the Extreme Cold Weather Temperature was approved by FERC. Units committed to design criteria on or after February 16, 2023 do not have the option to utilize a Corrective Action Plan but may still declare a Generator Cold Weather Constraint. Do you agree that revisions to Requirement R2 Part 2.2 address this directive? If you do not agree but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 76 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to address certain ambiguities by expanding on Requirement R7.1.1 and 7.1.2 to make it clear which corrective action plan implementation deadline applies when a generator owner must implement both remedying issues with existing and installing new freeze protection measures.

The drafting team clarified Requirement R7 for Corrective Action Plans developed in accordance with Requirements R1, R2, or R3. Do you agree that revisions to Requirement R7 address this directive to differentiate between the existing and new freeze protection measures? If you do not agree but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. The drafting team provided language in the Implementation Plan to address parts 3 through 5 of paragraph 4 of the June 2024 Order addressing FERC’s concerns regarding urgency. The Standard language updates were written to meet the core directives in an effective and efficient manner while providing language that is objective, unambiguous, and auditable. With EOP-012-2 already effective October 1, 2024 (with the exception of Requirement R3), the changes made were intended to meet the FERC Directives without adding significantly to the efforts already in progress. Do you agree that the associated Implementation Plan meets the Directives? If you do not agree but believe the Directives can be addressed in an equally effective and efficient manner, please provide your suggestions in the form of specific language changes for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the Implementation Plan for EOP-012-3? If you do not agree, please propose an alternate implementation plan with a detailed explanation.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that EOP-012-3 is cost effective to address the Directives in the FERC Order? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical, or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the standard drafting team to consider, if desired.

Comments:

1. *N. Am. Elec. Reliability Corp*., 182 ¶ 61,094 (2023) (“February 2023 Order”). [↑](#footnote-ref-2)
2. *N. Am. Elec. Reliability Corp.*, 187 FERC ¶ 61, 204 (2024) (“June 2024 Order”). [↑](#footnote-ref-3)