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 two of **EOP-012-3 Extreme Cold Weather Preparedness and Operations** by **8 p.m. Eastern, Friday, December 20, 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-1) 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-2) 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.” FERC provided several examples of how NERC may meet directives in this paragraph and explained that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. The drafting team and industry recognize that every situation that creates a Generator Cold Weather Constraint cannot be listed within Attachment 1 and is the reason for Case-by-Case language provided.

Do you agree with the industry driven edits to Attachment 1? Please provide any additional comments to consider. If you do not agree, please provide your language change suggestions 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 based on industry feedback, while still maintaining the FERC directive. Do you agree that the modifications in Requirement R6 are responsive to the FERC Directives? If you do not agree, please provide your language change suggestions 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 to address the issue of units in different stages of design and construction to support meeting this directive. June 29, 2023 was chosen as a date of demarcation, as that was the date the Extreme Cold Weather Temperature was settled upon, after the approval date of February 16, 2023. Do you agree that the industry driven edits to Requirement R2 are responsive to the FERC directives? If you do not agree, please provide your language change suggestions for the drafting team.

[ ]  Yes

[ ]  No

Comments:

1. 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 (than every five years) to verify that the declaration remains valid.

Based on industry feedback, the drafting team created Requirement 9 to require review every 36 calendar months. Do you agree that the revision addresses this directive and provides an effective balance with administrative efforts to ensure Generator Cold Weather Constraints remain valid? If you do not agree, please provide your language change suggestions for the drafting team.

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