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 three of **EOP-012-3 Extreme Cold Weather Preparedness and Operations** by **8 p.m. Eastern, Wednesday, March 12, 2025.**
**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 and/or the definition of Generator Cold Weather Constraint 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. FERC further directed NERC to remove references to “cost”, “reasonable cost”, “unreasonable cost” and “good business practices” and to replace them with clear and auditable criteria.

Proposed EOP-012-3 would revise the definition of Generator Cold Weather Constraint and provide a list in Attachment 1 to the standard of situations which would comprise “known” generator constraints, as well as a list of situations which may constitute constraints, depending on the facts and circumstances. In developing this list, the drafting team considered remarks from the November 2024 technical conference and industry comments on prior drafts.

Do you agree that the proposed revisions to the definition of Generator Cold Weather Constraint and addition of Attachment 1 address the FERC directives in paragraph 47? Please provide any additional comments to consider. If you do not agree, please provide your language change suggestions.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 54 of the June 2024 Order, FERC directed 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.”

To address this directive, proposed EOP-012-3 would require each Generator Owner that declares a constraint to submit it to the CEA for validation (Requirement R8 Part 8.1). Constraints shall be submitted within 45 calendar days of determining that the Generator Cold Weather Constraint is applicable (for new units this time is within 15 days of entering commercial operation). The process for ERO review is addressed separately in an ERO process document.

Do you agree that the modifications in Requirement R8 are responsive to the FERC directive in paragraph 54? If you do not agree, please provide your language change suggestions.

[ ]  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.

In proposed EOP-012-3, requirements for Corrective Action Plans for Generator Cold Weather Reliability Events are combined in Requirement R6. Requirement R6 now includes timeframes for CAP implementation for the unit that experiences the Generator Cold Weather Event (before the next winter season), timeframes for reviewing similar units for the same issue (12 months from the event) and timeframes for implementing CAPs on similar units that were determined to be susceptible to the identified freezing issues (24 months from the review, or 36 months from the event). In developing these modifications, feedback from previous postings of the EOP-012-3 standard were considered.

Do you agree that the modifications in Requirement R6 are responsive to the FERC directive in paragraph 68? If you do not agree, please provide your language change suggestions.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 70 of the June 2024 Order, FERC directed NERC “to develop and submit modifications to Requirement R7 of proposed 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.” In paragraph 3 of the June 2024 Order, FERC stated that NERC should “ensure that the generator owner informs relevant registered entities of operating limitations in extreme cold weather during the period of the extension.”

In proposed EOP-012-3, Requirement R6 Part 6.4 and Requirement R7 Part 7.2 were added to require any Generator Owner seeking to extend a Corrective Action Plan (CAP) implementation deadline beyond the maximum implementation timeframe, to seek pre-approval of the extension by the CEA. The standard specifies the information that must be included in any submission to allow for this review, including an explanation of the circumstances causing the delay and why those circumstances are beyond the control of the GO, revisions to the CAP in the interim, and an updated timetable for completion.

The drafting team determined that any entities with a need could request information on operating limitations – temporary or otherwise - under the data specification standards (TOP-003, IRO-010), or through other mechanisms for obtaining up-to-date information on the status and availability of generators, and determined to not include a separate requirement for such notifications in EOP-012-3.

Do you agree that the modifications in Requirement R6 Part 6.4 and Requirement R7 Part 7.2 are responsive to the FERC directives above? If you do not agree, please provide your language change suggestions.

[ ]  Yes

[ ]  No

Comments:

1. Paragraph 72 June 2024 Order, FERC stated: “[W]e…find that generators that are commercially operational after October 1, 2027, should have freeze protection measures either designed into their generating systems, or, if a corrective action plan is needed, then it should be completed by the time that such generating units go into commercial operation.” FERC directed NERC to develop and submit modifications to Requirement R7, Reliability Standard EOP-012-2 to clarify that any Requirement R7 Corrective Action Plans (CAPs) for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit’s commercial operation date.

To remove the CAP option from new generation entering commercial operation on or after October 1, 2027, which is consistent with the original EOP-012-1 standard. The drafting team chose to allow a limited CAP option for certain generators whose design criteria were finalized prior to the first version of the EOP-012 standard being approved, and that will come into commercial operation during the first winter the more stringent requirements for new generation are in effect (i.e. winter 2027-2028). These units would be allowed the option to enter commercial operation and complete any required CAPs by April 1, 2028.

To address industry comments on previous drafts, further clarification is made in Requirement R6 as to scope and applicability and to confirm no retroactive applicability is intended, and additional supporting rationale for the selected bookend dates is provided in the Technical Rationale.

Do you agree that the modifications in EOP-012-3 Requirement R2 are responsive to the FERC directives? If you do not agree, please provide your language change suggestions.

[ ]  Yes

[ ]  No

Comments:

1. In paragraph 76 of the June 2024 Order, FERC directs NERC to remove ambiguities in the Corrective Action Plan implementation plan timelines. As an example, FERC cites the timelines for new, compared to existing, freeze protection measures.

Requirement R7 was revised to clarify that actions to address issues with existing measures must be completed within 24 months, regardless of any longer timeframes for new measures. Requirements for Corrective Action Plans for Generator Cold Weather Reliability Events are discussed in further detail above. Do you agree that the edits are responsive to the FERC directive in paragraph 76? If you do not agree, please provide your language change suggestions.

[ ]  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 proposed Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations” (i.e. more frequent than every five years) “to verify that the declaration remains valid”.

In proposed EOP-012-3, new Requirement 9 was created to require a review of each constraint at least once every 36 calendar months. In establishing this timeframe, the drafting team considered feedback provided on appropriate periodicities and sought to balance the burdens of more frequent reviews with the benefit to reliability of implementing new technologies as they become available. Do you agree that the modifications reflected in new Requirement R9 are responsive to the FERC Directives? If you do not agree, please provide your language change suggestions.

[ ]  Yes

[ ]  No

Comments:

1. Under Section 321.5.1 of the NERC Rules of Procedure, the Board of Trustees is to consider whether any proposed standard developed under that section is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System, among other things. Considering the FERC directives provided above, please provide any other comments you wish the Board of Trustees to consider in whether to adopt proposed Reliability Standard EOP-012-3.

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)