Comment Report

Project Name:	2024-03 Revisions to EOP-012-2 | Draft 3
Comment Period Start Date:	1/27/2025
Comment Period End Date:	3/12/2025
Associated Ballots:	

There were 43 sets of responses, including comments from approximately 108 different people from approximately 77 companies representing 7 of the Industry Segments as shown in the table on the following pages.

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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1,3,5	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System Preformance)	1,3,5,6	MRO
					Kimberly Bentley	Western Area Power Adminstration	1,6	MRO
					George Brown	Pattern Operators LP	5	MRO
					Amy Key	MidAmerican Energy Company (MEC)	1	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Peter Brown	Invenergy	5,6	MRO
					Angela Wheat	Southwestern Power Administration	1	MRO
					Joshua Phillips	Southwest Power Pool	2	MRO

					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
					Hayden Maples	Evergy	1,3,5,6	MRO
					Kirsten Rowley	MISO	2	MRO
WEC Energy Group, Inc.	Christine Kane	3,4,5,6		WEC Energy Group	Christine Kane	WEC Energy Group, Inc.	3	RF
					Michelle Hribar	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
					Candace Morakinyo	WEC Energy Group, Inc.	4	RF
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NPCC,RF,SERC,Texas RE,WECC	ACES Collaborators	James Shultz	Hoosier Energy Electric Cooperative	1	RF
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
					Jordan Mcclellan	Southern Illinois Power Cooperative	1	SERC
					Jason Procuniar	Buckeye Power, Inc.	4	RF
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Bill Pezalla	Old Dominion Electric Cooperative	3,4	SERC
Black Hills Corporation	Josh Schumacher	1,3,5,6		Black Hills Corporation Segments 1, 3, 5, 6	Trevor Rombough	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
					Josh Schumacher	Black Hills Corporation	6	WECC
Electric Reliability Council of Texas, Inc.	Kennedy Meier	2		ISO/RTO Council Standards Review	Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE

				Committee (SRC)	Joshua Phillips	Southwest Power Pool, Inc. (RTO)	2	MRO
					Kirsten Rowley	Midcontinent ISO, Inc.	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Thomas Foster	PJM Interconnection, L.L.C.	2	RF
					Darcy O'Connell	California ISO	2	WECC
					John Pearson	ISO New England, Inc.	2	NPCC
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
DTE Energy - Detroit Edison Company	Mohamad Elhusseini	3,5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF
					Marvin Johnson	DTE Energy - Detroit Edison Company	3	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC

					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern Company Generation	5	SERC
Dominion - Dominion Resources, Inc.	Sean Bodkin	5,6		Dominion	Victoria Crider	Dominion Energy	3	NA - Not Applicable
					Sean Bodkin	Dominion Energy	6	NA - Not Applicable
					Steven Belle	Dominion Energy	1	NA - Not Applicable
					Barbara Marion	Dominion Energy	5	NA - Not Applicable
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC
Sacramento Municipal Utility District	Tim Kelley	1,3,4,5,6	WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

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.

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	

Ruchi Shah - AES - AES Corporation - 5	
Answer	No
Document Name	
Comment	

AES US Renewables support NAGF comments.
While we agree that some of the constraint criteria have been clarified and refined, we are concerned the language used in several of the criteria can be left to interpretation by the Regional Entities. For example, the phrase used in several of the constraint criteria: "comparable types in regions that experience similar winter climate conditions" can be interpreted differently if there is no guidance provided. We request NERC to provide more clarity and consistency via updates in the technical rationale or a CMEP practice guide.

AES US Renewables also supports ACP's comment regarding the first criterion under Known Generator Cold Weather Constraints, particularly on the October 1, 2029 date for wind turbine towers. Additionally, we request that the second date (currently listed as October 1, 2031) be removed. The rationale for this is that commercial operation date of a new wind project can face delays due to multiple factors (eg: supply chain, weather, etc). So,

setting up a second date does not allow flexibility for Generator Owners or developers to account for these delays that are beyond the control of the Generator Owner or developer.	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	No
Document Name	
Comment	
NextEra does not agree that the proposed revisions to EOP-012-3 satisfy paragraph 47 of the FERC directive, particularly the language *"Specifically, we direct NERC 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,"* as there are still many unknowns regarding specific criteria for solar generation. NextEra appreciates the efforts made by the Standard Drafting Team to include additional constraint language for icing on wind turbines, however there should be similar language provided that addresses solar panels. As such, the modifications are not objective and sufficiently detailed so that applicable entities understand what is required of them.	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	No
Document Name	
Comment	
Black Hills Corporation agrees with the comments provided by NAGF and EEI.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	

Comment
MP agrees with NAGF comments, in that there needs to be a standardized process and documentation to follow to eliminate regional inconsistencies.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 5,6	
Answer	No
Document Name	

Comment
Constellation concurs with NAGF comments. In addition, while the revised wording is an improvement over prior revisions, and elements of the "Known" Constraints are sufficiently clear to allow consistent application, many of the Constraint determinations rely on an uncertain "analysis", which while allowing latitude for particulars of each situation, also render the result subject to interpretation and difficult to audit. These uncertainties may be defined through application during the "abeyance" period, or implementation guidance, or by further refinement in a later version of the Standard. Kimberly Turco, on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5,6	
Answer	No
Document Name	

Comment
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Likes 0	
Dislikes 0	

Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	
Dominion Energy supports the EEI comments but has the folowing additional comments. While Dominion Energy agrees with the revised definition of Generator Cold Weather Constraint, we contginue to have concnerns that the first 9 scenarios listed under “Case-by-case Determinations of Generator Cold Weather Constraints” in Attachment 1 belong in the “Known Generator Cold Weather Constraints”. Each of the scenarios are specific in nature and required to be validated by the CEA and a subjective view by NERC. These scenarios should be expected to be confirmed and approved automatically rather than relying on “interpretation”. The 10th scenario is the only one that is general enough to warrant further review on a case-by-case basis.	
Likes 0	
Dislikes 0	
Response	
Usama Tahir - Seminole Electric Cooperative, Inc. - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
Seminole Electric Cooperative SMEs request sufficient detail on how to adjust missing or invalid data. For example, is the missing/invalid data to be excluded from the dataset? If not, should the data be supplemented or estimated? Will the *Determination of Location’s Extreme Cold Weather Temperature* guide be updated to include specific criterion for adjustment of missing/invalid data?	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	No
Document Name	
Comment	
The NAGF notes that the proposed EOP-012-3 Draft #3 does not contain the information necessary to ensure consistent application of the proposed “Known Generator Cold Weather Constraints” or “Case-by-Case Generator Cold Weather Constraints” as shown in Attachment 1. Without sufficient	

details provided to ensure the process is followed consistently across all regions, the end results of the process does not appear to be auditable. As such, it fails to meet the expectations of FERC as well as NERC's Ten Benchmarks of an Excellent Reliability Standard. If NERC continues to move the proposed standard forward, the NAGF asks that NERC staff work with industry to develop a new high-priority Standards Authorization Request to address this and other issues identified by industry to address this and other identified issues.

As currently structured, there is no consideration of the cost versus reliability benefits for investing in hardening generator facilities for extreme cold weather. For example, how will NERC and the CEA evaluate the need to implement freeze protection measures to meet an ECWT of -15.1 degrees with a design minimum of -15 degrees at cost of $20 million to make a change to meet this ECWT? The existing documentation does not provide clarity related to the process, needed information or any level of cost/benefit or other means to determine what is expected to meet compliance.

Likes 0	
Dislikes 0	

Response

Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC

Answer	No
Document Name	

Comment

Ameren supports EEI's and NAGF's comments, with more support towards NAGF's comments.

Likes 0	
Dislikes 0	

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer	No
Document Name	

Comment

WEC Energy Group supports the NAGF comments as submitted.

Likes 0	
Dislikes 0	

Response

Zahid Qayyum - New York Power Authority - 1,3,5,6

Answer	No

Document Name	
Comment	
NYPA supports NAGF Comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	No
Document Name	
Comment	

The ISO/RTO Council (IRC) Standards Review Committee (SRC) (consisting, for purposes of these comments, of CAISO, ERCOT, ISO-NE, PJM, MISO, NYISO, and SPP) appreciates the work undertaken to date. The SRC through these comments responds to NERC's questions as to whether the revised draft of EOP-012-3 adequately addresses FERC's directives. The SRC notes that, for the reasons outlined below, the proposed revisions to the definition of Generator Cold Weather Constraint do not fully address the FERC directives in paragraph 47 of the June 2024 Order. Specifically, the second sentence of the revised definition is inconsistent with paragraph 47 and should be deleted or revised. Additionally, to fully address the Commission's concern that constraint declaration criteria be "sufficiently detailed so that applicable entities understand what is required of them," certain constraint criteria in Attachment 1 need to be accompanied by a detailed, well-documented evaluation process to ensure entities understand what will be required of them and reduce the risk of uneven application of the constraint criteria undermining EOP-012-3's underlying goal of improving winterization across the generating fleet. In order to provide constructive comments for NERC's consideration, the SRC proposes specific recommendations that would address these concerns and bring the proposed standard in line with FERC's directives.

Constraint Definition: The Generator Cold Weather Constraint definition defines a constraint as any condition that would preclude a Generator Owner from implementing freeze protection measures on Generator Cold Weather Critical Components, then goes on to indicate that freeze protection measures include winterization technologies and practices implemented by similarly situated members of the electric industry. This effectively links the concept of a constraint to existing industry practice, but does not provide guidance on how similar an industry peer might need to be in order to be relevant to the entity declaring a constraint. Linking the constraint concept to existing industry practice is inappropriate for a standard like EOP-012-3 that is designed to improve the overall state of winterization across the generation fleet, not merely maintain the winterization status quo.

Even with the list of potential constraints in Attachment 1, the second sentence of the definition does not meet FERC's directive to be objective and sufficiently detailed to enable applicable entities to understand what is required of them. While the SRC recognizes and supports the drafting team's goal of clarifying that unreasonable freeze protection measures are not required, the second sentence of the definition does not achieve this goal, as it gives the impression that the status quo is a sufficient benchmark.

Proposed Remedy: This SRC concern can be addressed by deleting the second sentence of the revised definition and retaining the first sentence, or by revising the second sentence of the definition to replace the link to existing industry practice with a link to freeze protection measure effectiveness. If NERC elects to revise the second sentence, the SRC recommends the sentence be revised to read as follows: "Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include practices, methods, or technologies that would reasonably be expected to result in effective facility performance while operating at the Extreme Cold Weather Temperature."

Attachment 1 Constraint Criteria: While the SRC believes that EOP-012-3's proposed approach of requiring Compliance Enforcement Authority (CEA) review and approval of constraint declarations is a significant improvement over EOP-012-2, two of the example constraints from the *Case-by-case Determinations of Generator Cold Weather Constraints* section of Attachment 1 require additional clarification regarding how NERC will ensure the

Commission's concern that the standard's provisions be "objective and sufficiently detailed so that applicable entities understand what is required of them" is adequately addressed. The SRC outlines its concerns below and proposes as a remedy that, as part of its submission, the NERC Board commits to developing and filing a well-documented, rigorous evaluation process to ensure consistent, objective evaluation of constraints that are based on these two example constraints.

Specifically, constraint declarations that resemble the examples found in items 5.a (accelerated premature retirement of an existing generating unit) and 5.b (cancellation of plans to finish development of a new generating unit) in the *Case-by-case Determinations of Generator Cold Weather Constraints* section of Attachment 1 should be reviewed under a well-documented evaluation process to ensure they meet the FERC directive that constraint criteria provide sufficient detail for applicable entities to understand what is required of them. This evaluation process will need to explain how the CEA will evaluate the following factors for these constraint criteria:

Item 5.a. For item 5.a, the evaluation process will need to address how the CEA will determine how "accelerated" or "premature" a retirement must be in order to qualify as a constraint under this example. It will also need to specify how the CEA will determine that the requirement to implement freeze protection measures was the clear cause of the premature retirement.

To effectively evaluate whether the requirement to winterize would result in an accelerated premature retirement, the CEA could need to examine the cost of the freeze protection measures, forecasts of future energy prices, and commercially sensitive data about unit operating costs and profitability to determine whether winterizing the unit would truly be uneconomic over the unit's future remaining life. Moreover, the analysis could also need to consider the across-the-board electricity price impacts that could result from competitors of that unit attempting to pass through the costs of similar weatherization work. Such price increases could offset the costs of implementing freeze protection measures, making it extremely difficult to effectively review a determination that the requirement to implement the winterization measure would **result** in accelerated premature retirement. Such a review would likely require a complete examination of the projected future profitability of the unit under a range of scenarios.

This degree of economic analysis and forecasting would also involve what could be a highly subjective examination of that unit's competitive position relative to its peers on a forward-looking basis, and the entire process will need to be thoroughly documented to ensure consistency with FERC's directive that constraint declaration criteria be objective and sufficiently detailed so that applicable entities understand what is required of them. Along these same lines, the constraint evaluation process for item 5.a should address how the CEA will determine whether an "acceptable replacement" is available for the unit in question. In competitive markets, this information is highly confidential and market sensitive, which means the Generator Owner declaring the constraint will need clear, detailed guidance on how to make the required showing. The SRC raises these issues to highlight the difficult nature of consistently and objectively applying this evaluation and to emphasize the importance of developing a well-documented evaluation process to ensure consistent application of the exception enabling the intent of EOP-012-3 for improving weatherization across the generation fleet.

Item 5.b. Item 5.b similarly needs a detailed process documenting how the CEA will determine whether implementation of the freeze protection measures would **cause** the Generator Owner to cancel plans to finish development of a new generating unit.

Decisions to cancel a unit could be based on many factors, including changes to the underlying economics of developing the unit. In this case, evaluating the asserted basis for cancelling the development of the planned new generating unit could require the CEA to attempt to forecast future generator revenues while accounting for higher wholesale electricity prices resulting from increased costs faced by other units as a result of installing freeze protection measures. Without clear processes, the CEA could have to examine minutes of board meetings and interview company officials in order to effectively determine whether the decision to cancel the development of the new unit would truly be caused by the requirement to install freeze protection measures instead of some other factor, such as higher interest rates or increased permitting costs (as compared to expected future revenues).

The constraint evaluation process should require more than a simple assertion or attestation that the Generator Owner would prematurely retire the unit or cancel the construction of a new generating unit if required to implement the freeze protection measure in question. Otherwise, it will be difficult to distinguish constraint declarations that truly implicate the existence of a generating unit from those that are driven by a desire to avoid costs that are inconvenient but manageable. Inconsistent application of this example constraint criterion could undermine the goal of ensuring reliability by bringing all generating units up to a minimum winterization level (subject to only a limited set of constraints based on the physical limitations of certain units) based on expected conditions.

To ensure constraint approvals are consistent, the case-by-case considerations for these constraint criteria should be supported by a rigorous, well-documented evaluation process. This would not eliminate the CEA's authority to evaluate special circumstances, rather it would avoid a potential race to the bottom where units could arbitrarily seek constraints, ultimately resulting in a class of partially winterized units with lower operating costs (and

therefore a competitive advantage when they are able to operate) compared to fully winterized units in the same region. Inconsistent application of these constraint criteria could incentivize unit owners to declare these constraints to protect their competitive positions relative to other units. This could be detrimental to reliability, as it could result in uneven winterization of generation units within a region, posing operational challenges for grid operators seeking to manage the grid during extreme cold weather conditions. To help avoid this result, the NERC Board must develop a detailed process explaining how these types of constraint declarations will be evaluated and the types of documentation it will expect Generator Owners to provide to support declarations of these types of constraints. The process should be filed with FERC to provide industry an opportunity to review the process and provide comments on the process before EOP-012-3 goes into effect and Generator Owners begin submitting constraint declarations for review and approval. Given time constraints, the SRC acknowledges that such a filing could be made as a supplemental filing after EOP-012-3 is filed.	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
See comment to question 8.	
Likes 0	
Dislikes 0	
Response	
Michael Goggin - Grid Strategies LLC - 5	
Answer	No
Document Name	Comments on EOP-012.docx
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1,3,6	
Answer	Yes
Document Name	

Comment	
No Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
AEPC has signed on to ACES comments. See ACES comments.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

AZPS does not object to the proposed Generator Cold Weather Constraint criteria. AZPS agrees with comments submitted by EEI on behalf of their members listed below that the Section titled Case by Case Determination of Generator Cold Weather Constraints is too subjective and could result in regional inconsistencies.

In paragraph 47, the Commission recognized this concern and suggested that NERC "establish a pre-approval process for all Generator Cold Weather Constraint" and while that process was left to NERC to establish, the Commission was clear that the process needed to provide consistent compliance and enforcement outcomes. The process document titled "Generator Cold Weather Extension and Constraint Process", does not appear to meet the expectations set by the Commission. To address this concern, we suggest modifying the process to include oversite that ensures that Cold Weather Constraints are approved in a manner that makes certain that GO declarations are reviewed and approved consistently across all regions. Also, the process should be enhanced to provide clearer guidance regarding entity submissions to ensure consistency in both entity submissions and CEA assessments. (See EEI comments regarding the Compliance Process in our response to Question 8.)

Likes 0	
Dislikes 0	

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer	Yes
Document Name	

Comment

WECC supports the development of Attachment 1 and additional materials delivered by the drafting team/321 team in meeting the FERC directives. Industry should work towards providing clarity in freeze protection measures and Generator Cold Weather Critical Components which, effectively, are the basis for a Generator Cold Weather Constraint declaration. It would be beneficial for the ERO Enterprise to consider posting (anonymized) examples of case-by-case determinations of Generator Cold Weather Constraints to support overall industry efforts.

Likes 0	
Dislikes 0	

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer	Yes
Document Name	

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the North American Generator Forum (NAGF) on question 1

Likes 0	

Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
It is the opinion of ACES that the proposed revisions to Attachment 1 are largely insubstantial changes and overall provide greater clarity over the previous revision.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not object to the proposed definition of Generator Cold Weather Constraints or proposed Attachment 1. While we do not object to Attachment 1 and support the list of Known Generator Cold Weather Constraints, the second part of Attachment 1, which includes a Section titled Case by Case Determination of Generator Cold Weather Constraints is too subjective and could result in regional inconsistencies. In paragraph 47, the Commission recognized this concern and suggested that NERC “establish a pre-approval process for all Generator Cold Weather Constraint” and while that process was left to NERC to establish, the Commission was clear that the process needed to provide consistent compliance and enforcement outcomes. The process document titled “Generator Cold Weather Extension and Constraint Process”, does not appear to meet the expectations set by the Commission. To address this concern, we suggest modifying the process to include oversite that ensures that Cold Weather Constraints are approved in a manner that makes certain that GO declarations are reviewed and approved consistently across all regions. Also, the process should be enhanced to provide clearer guidance regarding entity submissions to ensure consistency in both entity submissions and CEA assessments. (See EEI comments regarding the Compliance Process in our response to Question 8.)	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Southern Company agrees if EEI's "Proposed Language for Review and Comment" concerns are met.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	
PacifiCorp supports MRO-NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Flanary - Midwest Reliability Organization - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
The definition of a cold weather constraint appears unchanged.	
Likes 0	

Dislikes 0	
Response	

2. 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.

Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
See comment to question 8.	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	No
Document Name	
Comment	
Requirement R8 is not fully responsive to the FERC directive in paragraph 54. In paragraph 54, the example FERC included to illustrate its intent contemplated NERC or Regional Entity review of both new constraint declarations and changes to existing constraint declarations. However, Requirement R8 does not require NERC or Regional Entity review of changes to existing constraint declarations. To address this omission, the SRC recommends that the following language be added to the end of Requirement R8, Part 8.1: "For changes to existing Generator Cold Weather Constraints, submit within 45 calendar days of identifying the change to the Generator Cold Weather Constraint."	
Likes 0	
Dislikes 0	
Response	

Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	No
Document Name	
Comment	
NYPA supports NAGF Comments.	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the NAGF comments as submitted.	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	No
Document Name	
Comment	
Ameren supports EEI's and NAGF's comments, with more support towards NAGF's comments.	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	No

Document Name	

Comment

As stated above, FERC does not require NERC to approve the constraint. The CEA has to validate the submitted constraint. The NAGF recommends that NERC modify the proposed standard to ensure NERC is informed of any constraints and confirm the Generator Owner has appropriately addressed all areas of reasonableness.

The NAGF is also concerned that the CEAs do not have the expertise, staff or processes in place to manage this process. Several CEAs currently have a large backlog of compliance and enforcement efforts outstanding. The NAGF is concerned that adding the review and determination of constraints under the needed timeline will cause the backlog to grow even more.

The NAGF has concerns related to interaction between the EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process document. While we appreciate that the drafting team added language in the latest version concerning the ability to request a joint NERC and CEA review of a denial of a constraint declaration, this still does not resolve our concern regarding the scenario of a denial of constraint declaration from second NERC and CEA review. Particularly, our concern is in regard to a new project that has reached commercial operation status under R2.2 where no CAP is allowed. The process does not specify next steps that the Generator Owner can take. For example, does the Generator Owner cease operation of a brand-new generation facility to avoid going into non-compliance because the Generator Owner could not get constraint declaration approved? In addition, the process document is not part of EOP-012-3, but there are timelines specified in the process document. It is not clear what happens if the timelines are not followed by the Generator Owner/Operator.

Additionally, the process document only describes the process that should be followed but does not provide the criteria in which the CEA will use to approve/deny a CAP extension or Constraint Declaration. This raises a concern that the CEAs will not be following a consistent set of criteria across the ERO.

Likes 0	
Dislikes 0	

Response

Usama Tahir - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer	No
Document Name	

Comment

Seminole Electric Cooperative requests the standard drafting team to modify the standard to submit to the regional CEA considering the established relationship between Generator Owners and their regional entities.

Likes 0	
Dislikes 0	

Response

Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE

Answer	No

Document Name	

Comment

Recommend the following modification of R8.4 (the addition of the word ‘if’ to the first sentence):

Document and provide notice to the CEA, when a generating unit experiences a Generator Cold Weather Reliability Event, **if** the cause of Generator Cold Weather Reliability Event is the same as that of a previous Generator Cold Weather Reliability Event at the same or a similar unit, and one or more corrective actions to address the cause of the more recent Generator Cold Weather Reliability Event are addressed by an existing validated Generator Cold Weather Constraint for the same or a similar unit.

Likes 0	
Dislikes 0	

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer	No
Document Name	

Comment

It is the opinion of ACES that the timeline identified for new units identified in Requirement R8, part 8.1 bullet point one is unclear. It is not readily apparent to ACES how this requirement applies to any potential Generator Cold Weather Constraint(s) determined after the generating unit(s) began commercial operation.

Furthermore, the term commercial operation is listed in the NERC Glossary of Terms as a WEEC Regional Definition. Is this term meant to have a different application in the WECC region as opposed to other NERC regions?

We recommend striking the WECC Regional Term “Commercial Operation” and adding a new Continent-wide Term “Commercial Operation” with the following definition:

Commercial Operation:

The stage when an Element connected to the Bulk-Power System begins operating under a contractual or regulatory agreement.

Note: This phase typically

- follows initial start-up testing and/or commissioning activities.
- is associated with the ability of the owner/operator of the Element to begin collecting revenue from said Element.

Additionally, we recommend the following modification to Requirement R8 for the sake of clarity:

R8. Each Generator Owner that declares a Generator Cold Weather Constraint in accordance with Attachment 1 shall:

8.1 Submit its Generator Cold Weather Constraint declaration(s) to the CEA as follows:

8.1.1 For any Generator Cold Weather Constraint(s) determined prior to a generating unit(s) beginning Commercial Operation (in accordance with Requirement R2), submit no later than fifteen (15) calendar days after beginning Commercial Operation;

Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	No
Document Name	
Comment	
Constellation supports comments of NAGF. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	No
Document Name	
Comment	
Constellation supports comments of NAGF. Kimberly Turco, on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	
Comment	

MP agrees with NAGF – stating CEA's are do not have the expertise, staff, or process to manage validation. The current backlog would likely increase, delaying the approval process.

Likes 0	
Dislikes 0	

Response

Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer	No
Document Name	

Comment

Black Hills Corporation agrees with the comments provided by NAGF.

Likes 0	
Dislikes 0	

Response

Richard Vendetti - NextEra Energy - 5

Answer	No
Document Name	

Comment

NextEra does not agree that the proposed revisions to EOP-012-3 satisfy paragraph 47 of the FERC directive, particularly the language *"Specifically, we direct NERC 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,"* as there are still many unknowns regarding specific criteria for solar generation. NextEra appreciates the efforts made by the Standard Drafting Team to include additional constraint language for icing on wind turbines, however there should be similar language provided that addresses solar panels. As such, the modifications are not objective and sufficiently detailed so that applicable entities understand what is required of them.

Likes 0	
Dislikes 0	

Response

Ruchi Shah - AES - AES Corporation - 5

Answer	No
Document Name	

Comment
AES US Renewables still has concerns about the process described in the EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process. Although the timelines listed in the document (eg: no less than 60 calendar days) are considered un-enforceable, we are concerned that this document leaves a lot of room for interpretation by each Regional Entity's team that will be utilizing this document to review and approve CAP Extensions and Constraint Declarations. We do appreciate that there is language added in the latest version concerning the ability to request a joint NERC and CEA review of a denial (applies to both CAP extension and constraint declaration). However, this still does not resolve the concern regarding the second NERC and CEA review resulting in a denial, particularly for a new project that has reached commercial operation status under R2.2 where no CAP is allowed. The process does not specify next steps that the Generator Owner can take. For example, what choices does the Generator Owner have if there are no commercially available solutions to mitigate the freeze protection issue? We request that NERC take these scenarios into account to provide further clarifications or include additional language in the "Generator Cold Weather CAP Extension and Constraint Process" document to make the process clearer, including guidance on next steps when a constraint declaration is denied under R2.2 (after a joint NERC and CEA review) and whether the GO can continue to operate the facility as is. The EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process document also does not have sufficient detailed language to ensure that Cold Weather Constraints declarations would be reviewed consistently across all regions for approvals. Also, since the process falls outside of Reliability Standard EOP-012-3, changes to the defined process may not include industry review and comment. We request that NERC consider addressing consistency concerns as well as clarifying to industry how this document will be enforced or otherwise.

Likes 0	
Dislikes 0	

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	No
Document Name	

Comment
AEPC has signed on to ACES comments. See ACES comments.

Likes 0	
Dislikes 0	

Response

Brian Lindsey - Entergy - 1,3,6	
Answer	No
Document Name	

Comment

Entergy notes that the NERC “Generator Cold Weather CAP Extension and Constraint Process” (Step 2 – ERO Enterprise Review, page 2) requires the CEA to “*complete the review within 45 calendar days of acknowledgement or provide notification to the submitting entity that they are extending the time needed for review*”, but does not limit or cap the amount of time the CEA has to complete the review explicitly, which could result in significant delays.

Likes 0	
Dislikes 0	

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer	No
Document Name	

Comment

Duke Energy supports and agrees with EEI comments. Additionally, changes to R8 do not support standard language regarding administrative burden for this question. For example, Duke Energy notes that changes to R8, and the associated reasoning provided in the Technical Rationale document for Paragraph 54's directive, to add a timeliness component for the CEA to review constraints does not appear to meet the FERC directive. R8 does not provide guidelines or processes on how the CEA will provide or perform reviews in timely manner.

Likes 0	
Dislikes 0	

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer	Yes
Document Name	

Comment

Agree with modification. Please consider adding language that any findings when reviewing Corrective Action Plans (CAP) should be communicated to the RC, PC, BA, etc.

Likes 0	
Dislikes 0	

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	Yes
Document Name	

Comment
Southern Company agrees with EEI’s concerns and agrees with the statement if EEI's concerns are addressed for Question 2.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	

Comment
EEI agrees that the modifications made to Requirement R8 are responsive to the directive in paragraph 54 of the FERC Order, however, the language in Requirement R8, subpart 8.4 appears to be incorrectly linked to subpart 8.3 through the addition of the “and” after the Requirement. We additionally suggest some minor non-substantive changes to 8.4 to improve the clarity of this requirement. To address our concerns, we suggest removing the “and” at the end of subpart 8.3 and make the following changes to 8.4 (All changes are in boldface below): **8.3.** If the CEA determines the declared Generator Cold Weather Constraint is invalid, update its Corrective Action Plan(s) to require corrective actions be completed in accordance with Requirement R6 or Requirement R7, as applicable, subject to any extensions approved by the CEA, or implement freeze protection measures to provide the necessary capability in accordance with Requirement R2; **8.4.** Document and provide notice to the CEA, when a generating unit experiences a Generator Cold Weather Reliability Event **when:** 8.4.1. **T**he cause of Generator Cold Weather Reliability Event is the same as that of a previous Generator Cold Weather Reliability Event at the same or a similar unit, and one or more corrective actions to address the cause of the more recent Generator Cold Weather Reliability Event are **in place; or** 8.4.2. **Covered through an** existing validated Generator Cold Weather Constraint for the same or similar unit.

Likes 0	
Dislikes 0	

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI), Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF), and the North American Generator Forum (NAGF) on question 2

Likes 0	
Dislikes 0	

Response

Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable

Answer	Yes
Document Name	

Comment

1. Suggest NERC develop a form for submission of constraint declarations so GOs provide all the needed information to expediate the process for the CEA to make a determination on validity.

2. For generation facilities that have repeated Generator Cold Weather Reliability Events during a winter season that fall into the 'known constraint' category in Attachment 1 (e.g., wind turbine blade icing events), does the GO need to file constraint declarations for each occurrence of the same type of Generator Cold Weather Reliability Event?

Likes 0	
Dislikes 0	

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer	Yes
Document Name	

Comment

WECC supports the development of NERC process by NERC staff and additional materials delivered by the drafting team/321 team in meeting the FERC directives. Industry should be preparing Generator Cold Weather Constraint materials now to prepare for submittal per the timelines noted within the Standard. While each case may have different facts and circumstances the ERO Enterprise should provide further guidance on expectations of material to be provided to support timely review. That effort would benefit the ERO Enterprise and the industry.

Likes 0	
Dislikes 0	

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the modifications made to Requirement R8 are responsive to the directive apart from the recently added Subpart 8.4. AZPS is unclear of certain aspects of 8.4 including what the intent or expectation is. It is unclear how this data will be submitted, including applicable timeframes, while also appearing to possibly duplicate reporting of similar events through the Section 1600 Data Request for Generator Cold Weather Data.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Mark Flanary - Midwest Reliability Organization - 10	
Answer	Yes
Document Name	
Comment	
Please see our comment in question number 7.	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	
Document Name	
Comment	
Tri-State Supports MRO NSRF Comments	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	
Document Name	
Comment	

PacifiCorp supports MRO-NSRF comments.

Likes 0	
Dislikes 0	

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer	
Document Name	

Comment

BC Hydro appreciates the opportunity to comment and offers the following.

The Generator Cold Weather CAP Extension and Constraint Process sets timeline expectations for CAP extensions, including for the CEA. There could be situations where, if the CEA exceeds the 45-day expectation to approve an extension, the submitting GO would be in potential noncompliance to EOP-012-3 if the extension rejection is received after the initial CAP implementation deadline.

BC Hydro recommends a provision to allow flexibility for compliance enforcement should there be a case where the CAP timetables are exceeded while an extension request is being processed by the CEA.

Likes 0	
Dislikes 0	

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer	
Document Name	

Comment

To provide a certainty to this process and ensure that entities have a path to ensure documented compliance MRO NSRF would suggest that this standard include language to allow for “automatic” approval of any request if after 60 days no response has been provided by the ERO. This is similar to how FERC has a 60-day approval if no action taken.

MRO NSRF has concerns that the Generator Cold Weather CAP Extension and Constraint Process may not be enforceable and is subject to change outside of the standard development process. because it is not part of standard EOP-012-3.

To address this, MRO NSRF suggests adding the Generator Cold Weather CAP Extension and Constraint Process as attachment 2 to the standard.

MRO NSRF recommends the following modification of R8.4 (the addition of the word ‘if’ to the first sentence):

Document and provide notice to the CEA, when a generating unit experiences a Generator Cold Weather Reliability Event, if the cause of Generator Cold Weather Reliability Event is the same as that of a previous Generator Cold Weather Reliability Event at the same or a similar unit, and one or more

corrective actions to address the cause of the more recent Generator Cold Weather Reliability Event are addressed by an existing validated Generator Cold Weather Constraint for the same or a similar unit.	
Likes 0	
Dislikes 0	
Response	

3. 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.

Brian Lindsey - Entergy - 1,3,6	
Answer	No
Document Name	
Comment	

Entergy agrees that the revision generally addresses paragraph 68, but does not agree with utilization of a footnote in section 6.3.5.1 to address an issue that should be included directly in the Standard Requirement. The footnote language is also ambiguous, a more precise wording such as "*events that occur x days prior to December 1 in the current season*" would be preferred.

Likes 0	
Dislikes 0	
Response	

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	No
Document Name	
Comment	

AEPC has signed on to ACES comments. See ACES comments.

Likes 0	
Dislikes 0	

Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	
Comment	
MP agrees with NAGF in adding footnote 11 into the last paragraph of 6.1.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	No
Document Name	
Comment	
Constellation supports comments of NAGF. Kimberly Turco, on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Reclamation does not agree. Shortening time frames does not alleviate the burden of lack of material, contracting resources, outages or other schedulable items.	
Likes 0	

Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	No
Document Name	
Comment	
Constellation supports comments of NAGF. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	
Dominion Energy generally supports eei comments but has the following additional comments. Section 6.1 of the proposed standard states: *"The Generator Owner shall **develop** a Corrective Action Plan for the generating unit that experienced a Generator Cold Weather Reliability Event no later than prior to the first day of the first December following the Generator Cold Weather Reliability Event."* Section 6.3.5 requires the CAP to be implemented on the unit that experienced a Cold Weather Reliability Event prior to the first day of the first December following the Event. Since this is the same date, and development of the CAP must occur before the implementation. Dominion Energy recommends that the wording being changed to make the time-tables clear. Dominion Energy recommends combining 6.1 and 6.3 so that the timetables are clear for the unit that experienced a Cold Weather Reliability Event and move the CAP timetables for units affected by the applicability review in 6.2 to that section.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	

Comment

We at ACES greatly appreciate the tremendous effort put forth by the drafting team in developing the proposed updates to EOP-012-2 in accordance with the FERC directives.

From the perspective of ACES, the proposed modifications to Requirement R6 are an improvement over previous drafts; however, we believe further refinement would be beneficial. We believe that, as written, the timelines identified in Requirement R6 are too ambiguous and may unduly discriminate against a GO based solely upon the date the generating unit(s) experienced a Generator Cold Weather Reliability Event ("GCWRE").

It is our opinion that any required compliance timelines would be best defined by removing the inherent obscurity associated with using specific calendar days. In short, we recommend using a timeline based solely on a clearly defined quantity of calendar days and removing all references to explicit months and/or days. Please consider the following hypothetical scenarios as an illustration:

- Generating Unit 1, belonging to Entity A, is a 2x1 combined cycle unit.
    - Unit 1 experiences a GCWRE on October 22nd, 2025, due to a previously unknown freezing issue with the steam turbine lube oil polisher.
    - Per the currently proposed version of Requirement R6 Part 6.3.5.1, Entity A has until December 1st, 2026, to develop and implement a CAP.
        - Entity A develops a CAP for Unit 1 in May 2026.
            - During the development of the CAP, Entity A determines that installing new freeze protection measures (heat trace and insulation) on the lube oil polisher will resolve the identified cause of the GCWRE.
- Generating Unit 2, belonging to Entity B, is a 2x1 combined cycle unit.
    - Unit 2 experiences a GCWRE on March 16th, 2026, due to a previously unknown freezing issue with a coalescing filter on the Station Air system.
        - Unit 2's Station Air system is used for both "Service/Plant" Air and "Instrument" Air.
        - Due to the dual-use nature of the Station Air system, a coalescing filter was installed near each air-operated valve throughout the Combined Cycle plant.
    - Per the currently proposed version of Requirement R6 Part 6.3.5.1, Entity B has until December 1st, 2026, to implement a CAP.
        - Entity B develops a CAP for Unit 2 in August 2026.
            - During the development of the CAP, Entity B determines that installing new freeze protection measures (heat trace and insulation) for the coalescing filter drain will resolve the identified cause of the GCWRE; however, as this is a "Balance of Plant (BOP)" system, Entity B also discovers that 35 such devices exist.
    - Entity B implements the CAP for Unit 2 in November 2026.

In the above examples, Entity A is allowed 405 calendar days after the date of the GCWRE to implement a CAP whereas Entity B is only allowed 260 calendar days after the date of the GCWRE. This results in an unequal application of the Reliability Standard by granting Entity A an additional 145 calendar days to complete the same, or substantially similar, compliance activities as Entity B.

It is the viewpoint of ACES that entities should be provided with an EQUIVALENT length of time to complete compliance activities required by a Reliability Standard. We recommend that the timeline in parts 6.1 and 6.3.5.1 be modified to twelve (12) calendar months regardless of when the Generator Cold Weather Event occurs.

Thus, we recommend modifying Requirement R6 as follows (note: for the sake of brevity, any sections without recommended changes have been omitted):

R6.

6.1 The Generator Owner shall develop a Corrective Action Plan for the generating unit that experienced a Generator Cold Weather Reliability Event no later than twelve (12) calendar months following the Generator Cold Weather Reliability Event.

6.3

6.3.5 A timetable specifying that implementation of the Corrective Action Plan(s) shall be completed as follows: 6.3.5.1 For the generating unit experiencing the Generator Cold Weather Reliability Event, no later than twelve (12) calendar months following the Generator Cold Weather Reliability Event.	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	No
Document Name	
Comment	
The NAGF recommends that Footnote 11 should be moved to be the last sentence of 6.1.	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the NAGF comments as submitted.	
Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	No
Document Name	
Comment	

NYPA supports NAGF Comments.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	
Comment	
Tri-State agrees with MRO NSRF Comments	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
See comment to question 8.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
The NSRF appreciates the changes made for clarity.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
R6 could be made even better by including the timelines for corrective action plan implementation in the same section, i.e., move item 6.2 (requirement for implementation of CAP for similar units) to section 6.3.5, so that all the specific timeline requirements for meeting CAPS are together.	
Likes 0	
Dislikes 0	
Response	

Mark Flanary - Midwest Reliability Organization - 10	
Answer	Yes
Document Name	
Comment	
Please see our comments on Question number 4.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the changes are responsive to the FERC directive.	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	

Answer	Yes
Document Name	
Comment	

NextEra further agrees with including non-substantive changes to R8.3, R8.4, including:

8.3. If the CEA determines the declared Generator Cold Weather Constraint is invalid, update its Corrective Action Plan(s) to require corrective actions be completed in accordance with Requirement R6 or Requirement R7, as applicable, subject to any extensions approved by the CEA, or implement freeze protection measures to provide the necessary capability in accordance with Requirement R2; **and**

8.4. Document and provide notice to the CEA, when a generating unit experiences a Generator Cold Weather Reliability Event **when:**

The cause of Generator Cold Weather Reliability Event is the same as that of a previous Generator Cold Weather Reliability Event at the same or a similar unit, and one or more corrective actions to address the cause of the more recent Generator Cold Weather Reliability Event are **in place; or**

Covered through an existing validated Generator Cold Weather Constraint for the same or similar unit.

Likes 0	
Dislikes 0	
Response	

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer	Yes
Document Name	
Comment	

WECC supports the development of Requirement R6 language and additional materials delivered by the drafting team/321 team in meeting the FERC directives. However, the change to 36 calendar months for other units in a fleet may not meet FERC's expectations and a 24 calendar month timeline seemed reasonable to WECC. Is there any data available from Winter Storm Uri or Elliot to support the longer timelines?

Likes 0	
Dislikes 0	
Response	

Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer	Yes

Document Name	
Comment	
Black Hills Corporation supports the changes made to Requirement R7 and agrees that the changes are responsive to the FERC directives contained in paragraph 68. However, Black Hills Corporation also agrees with the comments provided by NAGF regarding moving Footnote 11 into the verbiage of the Standard.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Noting the allowance to update an existing CAP in lieu of developing a new one (per Footnote 10 to Requirement R6 and Requirement R9.1), BC Hydro suggests that a similar provision to update an existing CAP also be added to Requirement R7. This would allow increased efficiencies for where a CAP already exists, not just when experiencing an GCWRE subject to Requirement R6 or upon determination of a GCWC declaration where the declaration is no longer valid.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the North American Generator Forum (NAGF) on question 3	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
EEI supports the changes made to Requirement R7 and agrees that the changes are responsive to the directives contained in paragraph 68 of the FERC Order.	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Ameren supports EEI's and NAGF's comments, with more support towards NAGF's comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company supports the changes made to Requirement R7.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	

Comment	
PacifiCorp supports MRO-NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

4. 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.

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer	No
Document Name	

Comment

See comment to question 8.

Likes 0	
Dislikes 0	

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer	No
Document Name	

Comment

This comment applies to both R6.4 and R7.2. MRO has concern that there may be a potential issue to enforce the Generator Cold Weather CAP Extension and Constraint Process because it is a separate document/process outside of the standard language. Specifically, MRO is concerned that the 60-day recommendation in this document is not enforceable. To provide clarity and enforceability, MRO recommends either including the Generator

Cold Weather CAP Extension and Constraint Process in the standard, for example, as an Attachment 2 OR “no later than 60-day” requirement stated in the process should be explicitly included in the requirement language.	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1,3,6	
Answer	No
Document Name	
Comment	
The language does require the GO to seek approval from the CEA, but neither section 6.4 nor 7.2 explicitly requires the GO to "inform relevant registered entities" of operating limitations during the extension. The Standard also fails to specify which registered entities would be considered "relevant" or provide guidance on the notification process.	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Agree with modification. Please consider adding language that any findings when reviewing Corrective Action Plans (CAP) should be communicated to the RC, PC, BA, etc.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	

PacifiCorp supports MRO-NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company agrees the modifications in R6 and R7 are responsive to the FERC directives in paragraph 70.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the modifications in Requirement R6, subpart 6.4 and Requirement R7, subpart 7.2 are responsive to the FERC directives in paragraph 70.	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	

Constellation supports comments of NAGF.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable

Answer	Yes
Document Name	

Comment

Suggest that this standard include language to allow for “automatic” approval of any request if after 15 days no response has been provided by the CEA. This is similar to how FERC has a 60-day approval if no action taken. USV understands that timelines are established within the Generator Cold Weather CAP Extension and Constraint Process, however, this may be better understood if included within the standard itself.

To address this, USV suggests, as a minimum, adding the Generator Cold Weather CAP Extension and Constraint Process as attachment 2 to the standard.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 5,6

Answer	Yes
Document Name	

Comment

Constellation supports comments of NAGF.

Kimberly Turco, on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
MP agrees. This mechanism for a CAP extension.	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation agrees that the modifications in Requirement R6, subpart 6.4 and Requirement R7, subpart 7.2 are responsive to the FERC directives in paragraph 70.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
WECC supports the development of the extension language in Requirements R6 and R7 and additional materials delivered by the drafting team/321 team in meeting the FERC directives.	
Likes 0	
Dislikes 0	
Response	

Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
NextEra agrees that the modifications in Requirement R6 Part 6.4 and Requirement R7 Part 7.2 are responsive to the FERC directives above.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the changes are responsive to the FERC directive.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes

Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

5. 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.

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
In Manitoba, EOP-012-1 will not be effective until 2030. The language and dates still create confusion for our effective date. For instance if we contractually commit to design criteria in 2028 and do not enter commercial operation before 2030 its unclear if R2 is enforceable. Regardless we normally operate in cold weather and design for long cold winters.	
Likes 0	
Dislikes 0	
Response	

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	No
Document Name	

Comment
AEPC has signed on to ACES comments. See ACES comments.

Likes 0	
Dislikes 0	

Response

Ruchi Shah - AES - AES Corporation - 5	
Answer	No
Document Name	

Comment
While AES US Renewables appreciates the additional clarification provided under R2.1 and the intent of the February 16, 2023 date, we want to repeat that we do not agree that compliance date should be aligned to a regulatory approval date that is not widely known. The industry as a whole relies on the NERC published implementation plan of EOP-012-1 as that is usually what registered entities are held accountable to. In the case of EOP-012-1's implementation plan, the effective date is supposed to be 10/1/2024. Therefore, we request that the drafting team revise the June 29, 2023 date to October 1, 2024.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 5,6	
Answer	No
Document Name	

Comment
Constellation generally supports comments of NAGF regarding the dates of commercial operation, i.e., that there may be generators that establish design criteria and go commercial outside of the dates established in the Standard. Constellation recognizes that the window of concern ends in 2027, i.e., in a relatively short time, and that a period of abeyance may allow such exceptions to exist as necessary until the limiting time of 2027 is past. However, absence a period of abeyance, the current wording may result in inadvertent exclusion of some generators from the Standard Requirements. Kimberly Turco, on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Alison MacKellar - Constellation - 5,6	
Answer	No
Document Name	
Comment	

Constellation generally supports comments of NAGF regarding the dates of commercial operation, i.e., that there may be generators that establish design criteria and go commercial outside of the dates established in the Standard. Constellation recognizes that the window of concern ends in 2027, i.e., in a relatively short time, and that a period of abeyance may allow such exceptions to exist as necessary until the limiting time of 2027 is past. However, absence a period of abeyance, the current wording may result in inadvertent exclusion of some generators from the Standard Requirements.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	
Response	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	

It is the opinion of ACES that the current language of Requirement 2.1 is only partially responsive to paragraph 72 of the FERC directive. Furthermore, it is our opinion that by including an additional date provision to Part 2.1, the applicability of this part is more confusing than ever.

Additionally, considering the newly added “commercial operation” date range of 10/01/2027-03/21/2028 for applicability, an April 1, 2028, CAP deadline seems at best arbitrary. As written, an entity falling under this provision may only have one (1) calendar day to comply. In this hypothetical one (1) calendar day scenario, what is the point of establishing a CAP process at all?

Paragraph 72 of the FERC directive does not explicitly require a corrective action plan (“CAP”), merely that, if a CAP is needed, “…it should be completed by the time that such generating units go into commercial operation.” We contend that by directing that a CAP must be completed prior to beginning commercial operations, FERC has rendered the formalized CAP process both superfluous and moot for Requirement R2.

In brief, ACES recommends removing the date of demarcation entirely and striking any provisions for a CAP from Requirement R2.

However, if the industry is unwaveringly committed to including a conditional provision for including a CAP process, then, in the opinion of ACES, the date of demarcation for contractual commitments is best defined by the effective date of EOP-012-2. It is our perspective that Implementation Plans are a useful and valuable tool that provide the industry with time to interpret and implement any required compliance actions or activities.

Succinctly stated, it is our opinion that the SDT should NOT break from established precedent by tying compliance date(s) to the governmental authority approval date in lieu of the effective date of the NERC Reliability Standard.

To comply with the FERC directive, ACES recommends using language that is substantially similar to EOP-012-2 as demonstrated below:

R2. Applicable to generating units that begin commercial operation on or after October 1, 2027: Each Generator Owner, for each generating unit that has a calculated Extreme Cold Weather Temperature at or below thirty-two (32) degrees Fahrenheit (zero (0) degrees Celsius) as determined in Requirement R1, and that self-commits or is required to operate at or below a temperature of thirty-two (32) degrees Fahrenheit (zero (0) degrees Celsius), shall either:

2.1 Prior to beginning commercial operations, implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the generating unit(s)' Extreme Cold Weather Temperature with sustained concurrent twenty (20) mph (thirty-two (32) km/h) wind speed for (i) a period of not less than twelve (12) continuous hours, or (ii) the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours; or

2.2 Document in a declaration, with justification, if applicable, a Generator Cold Weather Constraint in accordance with Requirement R8.

Likes 0	
Dislikes 0	

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	No
Document Name	

Comment

The NAGF recommends that the Standard Committee delete the last phrase from R2.1 "and which enter commercial operation between October 1, 2027 and March 31, 2028". Otherwise, a generator that signed agreements in 2022 and goes commercial in June 2028 has no obligation under R2 or R3. This is a clear example of why the NERC Standards Development Process is structured to allow a reasonable time for discussion and review of a proposed standard. Time is required to meet the expected level of excellent standards, as detailed in NERC' Ten Benchmarks of an Excellent Reliability Standard. FERC's continued insistence on deadlines that cause NERC to shortcut the development process are resulting in subpar, problematic standards.

Likes 0	
Dislikes 0	

Response

Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC

Answer	No
Document Name	

Comment

Ameren supports EEI's and NAGF's comments, with more support towards NAGF's comments.

Likes 0	
Dislikes 0	

Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy group supports the NAGF comments as submitted.	
Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	No
Document Name	
Comment	
NYPA supports NAGF Comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	No
Document Name	
Comment	
The modifications to Requirement R2 are not fully responsive to the FERC directives. Requirement R2, Part 2.1 allows certain generating units that enter commercial operation between October 1, 2027, and March 31, 2028, to develop, implement, and complete a CAP by April 1, 2028. This is contrary to FERC's directive that generators that are commercially operational after October 1, 2027, should complete any necessary CAP by the time they go into commercial operation and that any CAPs under Requirement R2 must be completed before the generating unit's commercial operation date. Fully complying with FERC's directive would require revising the second bullet point in Part 2.1 as follows: "Develop, implement, and complete by ***the earlier of*** April 1, 2028, ***or the generating unit's commercial operation date*** a Corrective Action Plan . . . ."	
Likes 0	

Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
See comment to question 8.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	2024-03_BCHydro_Comments_EOP-012-3_321_Question5_2025-03-07.pdf
Comment	

(1) The addition of June 29, 2023 to Requirement R2 Part 2.1 creates a potential gap. Generating units that may have their design criteria committed before June 29, 2023 and will enter commercial operation on or after April 1, 2028 do not appear to be subject to the proposed EOP-012-3 R2. Suggest revising to close this potential gap.

The following table may provide further clarification:

Commercial operation	**Design before June 29, 2023**	**Design after June 29, 2023**
Before October 2027	R3	R3
October 2027 – March 2028	R2 Part 2.1	R2 Part 2.2
After March 2028	No Requirement	R2 Part 2.2

(2) Requirement R2 Footnote 4 allows non-U.S. jurisdictions the use of the date the applicable government authority in the relevant jurisdiction approved the first version of the EOP-012 Reliability Standard and the definition of Extreme Cold Weather Temperature. However, there are no similar provisions for the “first winter” period.

BC Hydro requests that similar flexibility to that granted to non-U.S. jurisdictions for the June 29, 2023 design criteria date also be afforded for CAP(s) implementation timelines. This will allow flexibility to align with their regulatory approval processes.

Likes 0	

Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the changes are responsive to the FERC directive.	
Likes 0	
Dislikes 0	
Response	

Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
NextEra agrees that the modifications in EOP-012-3 Requirement R2 are responsive to the FERC directives.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
WECC supports the development of Requirement R2 language and additional materials delivered by the drafting team/321 team in meeting the FERC directives.	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation does not object to the modifications made to Requirement R2.	
Likes 0	
Dislikes 0	
Response	

Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
MP agrees, however NAGF identifies a compliance gap that could lead to generators not falling under the standard.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) and the North American Generator Forum (NAGF) on question 5	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI does not object to the modifications made to Requirement R2.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	Yes
Document Name	
Comment	
Southern Company agrees with EEI’s position on Requirement R2.	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Flanary - Midwest Reliability Organization - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	
Document Name	
Comment	

MRO NSRF believes that this should be the date that a standard became effective which brought the term ECWT became part of a Reliability Standard that is Subject to Enforcement, which occurred when EOP-012-2 became effective on 10/1/2024 for US Entities.

While this change would not have a substantial material impact on the implementation of this standard, using dates that are not determined by the Standard Drafting Process as part of Standard language adds a level of uncertainty that may have negative repercussions for entities moving forward in many areas. One such area is the wording of contractual obligations for building new or modifying existing facilities.

There is a difference in the dates between R7 and Attachment 1.

Attachment 1

Individual wind turbine towers manufactured prior to October 1, 2029, that have structural limitations established by Original Equipment Manufacturers (OEMs) based on a minimum temperature that is higher than the Extreme Cold Weather Temperature calculated per

Requirement R1 for generating units that began commercial operation prior to October 1, 2031.

MRO NSRF suggests a single timeline to avoid confusion, utilizing the language from Attachment 1.

Likes 0	
Dislikes 0	

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
Document Name	

Comment

Since the change was made to add verbiage in Requirement Part 2.1, Texas RE recommends revising Requirement R7 to include Requirement R2 (change in bold):

R7. Each Generator Owner that is required to develop a Corrective Action Plan under Requirements R1, **R2**, R3, or R9 shall develop and implement the Corrective Action Plan in accordance with the following:

Likes 0	
Dislikes 0	

Response

Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6

Answer	
Document Name	

Comment

PacifiCorp supports MRO-NSRF comments.

Likes 0	
Dislikes 0	

Response

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer	
Document Name	
Comment	
Tri-State Supports MRO NSRF Comments	
Likes 0	
Dislikes 0	
Response	

6. 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.

Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
See comment to question 8.	
Likes 0	
Dislikes 0	
Response	

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	
Comment	
Tri-State supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	

Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
PacifiCorp supports MRO-NSRF comments.	

Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Reclamation does not agree. Shortening time frames to 24 months does not alleviate the burden of lack of material, contracting resources, outages or other schedulable items.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
CAPs and implementation should be at the discretion of utilities that normally operate reliably during seasonal cold weather.	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	No
Document Name	
Comment	
Regarding R6.5, this requirement creates a variable time frame from 8 months to 13 months. A generator experiencing a cold weather event in February only has 8 months to develop a CAP whereas a unit experiencing a cold weather event in October has 13 months to develop a CAP.	

MRO NSRF suggests that requiring all CAPs have the same fixed time frame for development and completion would still address the issue while also providing timing certainty to entities, for example the requirement could state that CAPs need to be completed within 12 calendar months from the occurrence of the Generator Cold Weather Reliability Event.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Yes, Southern Company agrees with the modifications made to R7.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the modifications made to Requirement R7 are sufficiently clear and align with the FERC directives in paragraph 76.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	

Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 6	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Constellation supports comments of NAGF. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Constellation supports comments of NAGF. Kimberly Turco, on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	Yes

Document Name	
Comment	
Black Hills Corporation agrees that the modifications made to Requirement R7 are sufficiently clear and align with the FERC directives in paragraph 76.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
WECC supports the development of language for Requirement R7 and additional materials delivered by the drafting team in meeting the FERC directives. The additional clarity provided in the Technical Rationale around “new” and “existing” freeze protection measures should minimize issues associated with extension requests if used effectively by industry. However, if we are reading the requirment correctly, it creates a variable time frame from 8 months to 13 months. A generator experiencing a cold weather event in February would only have 8 months to develop a CAP whereas a unit experiencing a cold weather event in October would have 13 months to develop a CAP. Would it not be more consistent if all CAPs had the same fixed time frames, say one year from the occurrence orf the CWRE?	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
NextEra agrees that the edits are responsible to the FERC directive in paragraph 76.	
Likes 0	
Dislikes 0	
Response	

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the changes are responsive to the FERC directive.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Mark Flanary - Midwest Reliability Organization - 10	
Answer	Yes
Document Name	
Comment	
MRO recommends that all CAPs to have a fixed period for development and completion instead of creating variable periods.	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1,3,6	

Answer	Yes
Document Name	
Comment	
No Comment	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

7. 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.

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	

Comment

Duke Energy supports and agrees with EEI comments with the following enhancements:

9.1. If a Generator Cold Weather Constraint is determined "upon review" to be no longer needed "or requires modification", then within six (6) calendar… These improvements are needed to address not only the removal of constraints that are no longer necessary, but also the modifications of constraints whose reviews determine scope changes.

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	No
Document Name	

Comment

Shortening the review period to at least once every 36 calendar months is not adequately responsive to the FERC directive. Paragraph 94 is clear that FERC's underlying goal is to incentivize timely adoption of new freeze protection methodologies, even at the cost of additional administrative burden to the Generator Owner. A 36-month review period allows for substantial lag between the availability of a new freeze protection technology and the evaluation and adoption of that technology, particularly if the technology first becomes available shortly after the completion of a 36-month review. To address this issue and more fully implement FERC's directive, the SRC recommends that Requirement R9 be revised as follows to require Generator Owners to react to knowledge of changed circumstances that comes by way of regulatory entities outside of the 36-month review cycle, such as any guidance NERC or FERC might issue as part of their oversight of the constraint declaration process and monitoring of the technological state of freeze protection measures in the industry:

"The Generator Owner shall review each Generator Cold Weather Constraint declaration validated by the CEA at least once every 36 calendar months to determine if it remains valid in accordance with Attachment 1. ***The Generator Owner shall also review each Generator Cold Weather Constraint declaration validated by the CEA upon receiving notification from a regulatory authority with jurisdiction over the Generator Owner of a***

material change in the circumstances that formed the basis for the Generator Cold Weather Constraint declaration to determine if it remains valid in accordance with Attachment 1."

Finally, the SRC recommends that Requirement R9 be revised to require the Generator Owner to submit the results of each constraint review to the CEA. This would provide the CEA additional insight into the overall state and usage of constraints within the industry, and may help the CEA stay informed of the overall pace of changes to freeze protection technology within the industry. It would also help NERC maintain a database of best practices and technological advancements.

Likes 0	
Dislikes 0	

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer	No
Document Name	

Comment

See comment to question 8.

Likes 0	
Dislikes 0	

Response

Brian Lindsey - Entergy - 1,3,6

Answer	Yes
Document Name	

Comment

No Comment

Likes 0	
Dislikes 0	

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer	Yes

Document Name	
Comment	
MRO recommends clarifying R8.4. The sentence is excessively long and therefore susceptible to causing confusion. MRO recommends breaking the sentence into bullets. In its current form, it is hard to understand what R8.4 is trying to address or its objective.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that the changes are responsive to the FERC directive.	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	

NextEra agrees that the modifications reflection in new Requirement R9 are responsive to the FERC directives. NextEra further aligns with EEI's proposed modifications below:

9.1. If a Generator Cold Weather Constraint is determined to be no longer **valid needed**, then within six (6) calendar months of such determination, the Generator Owner shall **develop or notify the CEA that the update** Corrective Action Plan **is no longer required and submit updates in conformance with that determination** pursuant to Requirement R7.

Likes 0	
Dislikes 0	

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer	Yes
Document Name	

Comment

WECC supports the development of language for Requirement R9 and additional materials delivered by the drafting team in meeting the FERC directives.

Likes 0	
Dislikes 0	

Response

Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer	Yes
Document Name	

Comment

However, Black Hills Corporation agrees with the suggested changes to subpart 9.1 provided by EEI.

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 5,6

Answer	Yes
Document Name	
Comment	
Constellation supports comments of NAGF. Kimberly Turco, on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Constellation supports comments of NAGF. Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company agrees with the proposed changes suggested by EEI in response to this question.	
Likes 0	
Dislikes 0	
Response	

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
EEI does not object to the intent of the proposed modifications contained in Requirement R9 or its alignment to the directives contained in paragraph 94. However, the proposed language in subpart 9.1 is not sufficiently clear and suggest the following non-substantive changes to clarify the intent of subpart 9.1 (changes in boldface): **9.1.** If a Generator Cold Weather Constraint is determined to be no longer **needed**, then within six (6) calendar months of such determination, the Generator Owner shall **notify the CEA that the** Corrective Action Plan **is no longer required and submit updates in conformance with that determination** pursuant to Requirement R7.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	
Document Name	
Comment	
PacifiCorp supports MRO-NSRF comments.	
Likes 0	
Dislikes 0	
Response	

8. 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.

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer	
Document Name	

Comment

Proposed modifications to NERC reliability standard EOP-012-2 requires some GOs (not all) that experience a Cold Weather Reliability Event, to develop a Corrective Action Plan CAP (without considering cost), and obtain approval of their CAP from their Regional Entity (RE).

This proposal and the current version are only applicable to GOs that are required to operate at any temperature below, or equal to, 32-degrees F. But, it is not applicable to GOs that are not required to operate below 32-degrees F. Furthermore, the standard footnote 9, in summary says GOs that are not required to operate at or below 32-degrees are exempt from this requirement, but maybe be called to operate anyway, without making any modifications to their Facilities and they do not have to develop a CAP if they have a Cold Weather Reliability Event.

First off, the standard lacks clarity as to who decides if a unit is required to operate during Cold Weather, FERC, NERC, the RE, the BA, the RC?

The current version of the standard and this proposal violates of the NERC Marketing Principle that states: A reliability standard shall not give any market participant an unfair competitive advantage. It requires some GOs to spend personnel time and money, along with capital dollars which increases their costs and thus market bid pricing 24/7. While others GOs are allowed to operate under the exact same operating weather conditions 24/7 and not have to spend or do anything.

NERC, by developing the current standard and endeavoring to make modifications to this standard, are making a Reliability must be available to run standard. By making requirements that force some GOs Facilities to be available, not just at their design temperature, but at newly calculated CCWTs.

This standard and NERCs proposed modifications to it, has requirements that make it a Resource Adequacy based standard. Thus, it violates the NERC marketing principle that states: Standards shall not define an adequate amount of, or require expansion of, bulk power system resources or delivery capability. NERC is forcing some GOs to increase their operating temperature ranges in order to increase delivery capability during Cold Weather periods.

There is no transparency since there is no provision to make available anonymized CAPs. NERC needs to make all entities CAPs available to all GOs. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. If NERC shared anonymized CAPs, it would not be violating the NERC Market Principle that states: A reliability standard shall not require the public disclosure of commercially sensitive information.

Likes 0	
Dislikes 0	

Response

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer	
Document Name	

Comment	
Tri-State supports MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	
Document Name	
Comment	
PacifiCorp supports MRO-NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	
Document Name	
Comment	
The IRC SRC recommends that the Compliance Abeyance Period language in C.1.4 of the standard be revised to require entities that failed to correctly calculate the Extreme Cold Weather Temperature despite acting in good faith to complete a mitigation plan to correct the identified deficiencies. This will help enhance the overall efficacy of the standard, as the Extreme Cold Weather Temperature is a linchpin of the standard, and incorrect calculations have the potential to significantly undermine effective winterization of generation units.	
Likes 0	
Dislikes 0	
Response	
Zahid Qayyum - New York Power Authority - 1,3,5,6	
Answer	
Document Name	

Comment	
NYPA supports NAGF Comments.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
Southern Company agrees with EEI's comments on Questions 8 recognizing NERC needs a standardized form to include all entities in North America.	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	
Document Name	
Comment	
WEC Energy Group supports the comments of the NAGF as submitted.	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Ameren - Ameren Services - 1,3,5,6 - MRO,SERC	
Answer	
Document Name	
Comment	

Ameren supports EEI's and NAGF's comments, with more support towards NAGF's comments.

Likes 0	
Dislikes 0	

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	
Document Name	

Comment

The NAGF believes that the proposed standard needs to include a cost/benefit evaluation or similar methodology to determine if a constraint is justified. This issue was raised by the NAGF during the technical conference and to this date, there has been no discussion of what is a reasonable cost justified threshold. The NAGF views this extreme cold weather issue as just another form of the resource adequacy issue and therefore should be treated as such. The ultimate goal of this standard is to ensure that the resources exist to meet the loads. We note that there is not a standard addressing how to meet peak loads if there is not sufficient capacity, but we are putting a requirement of the Generator Owners to ensure their resources perform without any means to pay for the costs that may be incurred to upgrade existing generation.

The NAGF notes that the proposed standard is not a design criterion. A design criterion would state that a generator that meets the design requirement, such as under R2 and R3, would not be at risk of a Corrective Action Plan due to a “freeze” event after running for 48 hours at a temperature below the ECWT and then experiences a GCWRE as temperatures begin to slowly warm. Regardless of any language in the Requirements, as currently structured, the number of hours operated below the generator’s ECWT does not matter. This failure in the structure of the standard means it is not practical, technically sound or technically feasible. This issue must be addressed in the SAR discussed under Question 1 above.

Specific Requirement Issues:

Requirement 8.3 does not provide a means to appeal the CEA’s decision that a constraint is invalid. NERC and the regions have suggested that the appeals process for a potential non-compliance would be available. The NAGF recommends that R8.3 be revised accordingly to address this issue.

In Requirement R1.1, the SDT made a change that is not addressing the FERC order and NAGF believes this change cause more uncertainty and therefore should be removed: “and adjustments utilized for missing or invalid hourly temperature data, if necessary,”.

The NAGF requests that this language be removed and be replaced with more accurate and clear language under the efforts of the SAR discussed in Question 1.

Finally, the NAGF is concerned that NERC and the CEAs may not have the necessary expertise needed to determine if a constraint is valid or not. The NAGF suggests that the RSTC be assigned the review of declared constraints and the associated validity of them. The RSTC can assign this obligation to a subcommittee (either existing or stood up for this express purpose) as the RSTC is the recognized experts on technical matters at NERC.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	
Document Name	

Comment

EEI would like to note our appreciation for the changes made to EOP-012 that addressed the concerns cited in our earlier comments and those by our members during the technical conference. Additionally, EEI provides the following comments:

Concern: EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process Document

General Comment: While EEI appreciates the improvements made to the Generator Cold Weather CAP Extension and Constraint Process document, we do not agree that supporting process documents developed for EOP-012-3 should be outside of the approved Reliability Standard. The changes within process documents have direct impacts on entity compliance and any change to a process document that directly or indirectly impacts responsible entities compliance should be included in the Reliability Standard. Our concerns with this specific process document are as follows:

Enforceable Requirements Not Identified in EOP-012-3

1. Cap Extension Request Review Process: It states that "If a registered entity has determined that a Corrective Action Plan (CAP) developed in accordance with EOP- 012-3 Requirements R6 or R7 cannot meet the timetable provided per R6 Part 6.3 or R7 Part 7.1, then the entity will submit an extension request to the ERO Enterprise for approval no less than 60 calendar days prior to the original required CAP completion date." See Process Overview & Step 1

- While EEI does not object to the requirement, there is nothing in the requirements of EOP-012-3 that aligns this deadline. Moreover, it is unclear how this could be effectively enforced without it being included in EOP-012-3.

2. Step 3 (Registered Entity Notification/Cap Extension Request): If a CAP extension request was denied, the submitting entity may request, within five (5) calendar days of denial, a joint NERC and CEA review of the denial.

- EEI again notes that there are no deadlines contained in EOP-012-3 and either the deadline should be added to EOP-012-3 or include the process document as an attachment to this standard. Additionally, it is important to note that 5 days is a very short period of time to expect an entity to review and request a review of a time extension denial. It is also unclear if this 5 day deadline is inclusive of weekends and holidays. Regardless, EEI asks that GOs be given sufficient time to review and respond review and respond to the denial. For this reason, we ask that the process document be changed to provide GOs with 10-15 business days consistent with the NERC/CEA reviews.

Insufficient Guidance provided for Entity Data Submission

1. The process document supporting EOP-012-3 is inadequate to ensure entities provide the CEA complete and sufficient documentation with their CAP Extension Requests and Constraint Declarations.

- In the CAP Extension Request Review Process it states that Generator Owners are obliged and responsible for providing clear documentation with the extension request, yet there is nothing in the process document that might guide what might be expected. To address this concern, the Process document should be revised to include examples of the types of documentation that should be provided with a Cap Extension Request for synchronous resources, wind turbines and solar facilities. Without this level of guidance in the Process Document entity submission will vary causing delays and inconsistencies between regions in what is acceptable.
- Similar to the CAP Extension Process, the Constraint Review Process does not provide any details or examples of what would constitute "requisite data" necessary to meet the document requirements required by the CEA and NERC. And while we appreciate the Commission's desire that the process result in "consistent compliance and enforcement outcomes" (ref. P47 or FERC Order), this is only achievable through a clear process that sufficiently guides GOs in their Constraint declaration submissions. To do this, the process should be made clear what must be submitted, including examples of documents that would serve that outcome. This should be done for each type of resource. (i.e., synchronous resources, wind, solar facilities, etc.)

Align is not an appropriate tool for submission of Compliance Obligations under EOP-012-3

1. EEI does not agree that Align is a suitable tool for submission of compliance obligations under EOP-012-3. And is NERC proposing a separate module for these submittals? As currently configured, submittals within Align will be unduly burdensome and will co-mingle self-reports and mitigation plans regarding potential non-compliance items with operational reporting. We are additionally concerned that the use of Align will not just be burdensome to the reporting entities, but also to CEA staff leading to processing delays that might be avoided through the use of another system.

Alternatively, EEI suggests using modules similar to what is used for TADS and GADS be considered as a better alternative. Such a change would avoid security risks and concerns.

Process lacks Transparency sufficient to ensure consistent compliance and enforcement outcomes

1. The Process document lacks sufficient transparency and clarity regarding the process reviews and resulting outcomes when CAP extensions or Constraint Declarations are denied. To address this concern, criteria should be added to the document to ensure consistency in entity submission and guide CEA/NERC reviews. Additionally, the process should include periodic reviews by NERC that assess the consistency of declaration outcomes ensuring all regions have consistent outcomes.

Likes 0	
Dislikes 0	

Response

Michael Goggin - Grid Strategies LLC - 5

Answer	
Document Name	

Comment

Without the revisions ACP recommends in response to Question 1, we do not believe Draft 3 of EOP-012-3 can be considered practical, technically sound, technically feasible, or cost-justified.

Likes 0	
Dislikes 0	

Response

Scott Thompson - PNM Resources - 1,3,5 - WECC,Texas RE

Answer	
Document Name	

Comment

PNM agrees with the comments provided by EEI.

Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	
Document Name	
Comment	
During our review, ACES noticed a minor clerical inconsistency throughout this draft of EOP-012-3. The proposed language is inconsistent in how numbers are written. For example, Requirement R1 requires an action every five calendar years, whereas Requirement R1 Part 1.1.1 requires an action within six (6) calendar month. Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI), Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF), and the North American Generator Forum (NAGF) on question 8	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5,6	
Answer	
Document Name	
Comment	

Constellation supports comments of NAGF.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0	
Dislikes 0	

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer	
Document Name	

Comment

Reclamation does not agree that this standard is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the Bulk Power System. Comments provided on multiple drafts were not considered. Some examples of that are wind speed, precipitation, lack of temperature data, etc.… This standard will put undo administrative burden on industry without providing adequate weather analysis and protection measures, where required, on components that may be exposed as only 25 years of data are being considered. Also, possible rare weather events that are not predictable (i.e. a 500-year storm) are being ignored.

Likes 0	
Dislikes 0	

Response

Devon Tremont - Utility Services, Inc. - 4 - NA - Not Applicable

Answer	
Document Name	

Comment

Suggest NERC provide clarity on how a wind farm that has derated turbines going into a Generator Cold Weather Reliability Event (e.g., low wind availability) determines the possible derate percentage for determining if a GCWRE has occurred. Is this derate percentage calculated based on the nameplate capacity of the facility or the generation availability of facility going into an event (if less than nameplate capacity)?

Likes 0	
Dislikes 0	

Response

Kimberly Turco - Constellation - 5,6

Answer	
Document Name	
Comment	
Constellation supports comments of NAGF. Kimberly Turco, on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
The standard does little to increase reliability of the bulk electric system. The short and long-term burden of the high-cost investments (equipment upgrades, administrative and engineering/research) required to meet one-off low temperature events outweighs the benefit to overall reliability. There appears to be a lack of concern for overall resource adequacy and cost when focused on such a narrow scope. Expediting the deadline for this standard creates time pressure, limiting a thorough review process, resulting in inferior standard(s). MP align with both EEI and NAGF comments.	
Likes 0	
Dislikes 0	
Response	
Josh Schumacher - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	
Document Name	
Comment	
Black Hills Corporation supports the additional comments provided by both EEI & NAGF.	
Likes 0	
Dislikes 0	
Response	

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	
Document Name	
Comment	
It is apparent that compliance fear and other issues not in the FERC Order (e.g., ECWT concerns) played a large part in the balloting failures associated with this Standard and the resulting ROP Section 321 action. The ROP Section 321 path should not be utilized by industry as a way to disagree with FERC. The performance of the generation fleet during extreme cold temperature is the underlying reason a Standard was mandated. Standards are created to support reliable operations and should not be focused on compliance proofing. WECC supports the efforts of the DT in trying to balance the differences in opinions and agendas presented during the development of EOP-012-3.	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	
Document Name	
Comment	
NextEra would like to see industry visibility on the approval and denial of Cold Weather Constraints. NERC should be transparent in the release of this information, as all of the industry faces similar challenges in dealing with extreme cold weather and would benefit in understanding what type of constraints are being approved and denied by the CEA. This could be accomplished in a manner such as quarterly reports and CEA subcommittee meetings. The submitting entity need not be recognized within the reports, however the type of constraint with reasons for approval or denial should be stated.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	
Document Name	
Comment	

AZPS agrees with comments submitted by EEI on behalf of their members on concerns with the EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process Documents as listed below.

Concern: EOP-012-3 Generator Cold Weather CAP Extension and Constraint Process Document

General Comment: While EEI appreciates the improvements made to the Generator Cold Weather CAP Extension and Constraint Process document, we do not agree that supporting process documents developed for EOP-012-3 should be outside of the approved Reliability Standard. The changes within process documents have direct impacts on entity compliance and any change to a process document that directly or indirectly impacts responsible entities compliance should be included in the Reliability Standard. Our concerns with this specific process document are as follows:

Enforceable Requirements Not Identified in EOP-012-3

1. Cap Extension Request Review Process: It states that "If a registered entity has determined that a Corrective Action Plan (CAP) developed in accordance with EOP- 012-3 Requirements R6 or R7 cannot meet the timetable provided per R6 Part 6.3 or R7 Part 7.1, then the entity will submit an extension request to the ERO Enterprise for approval no less than 60 calendar days prior to the original required CAP completion date." See Process Overview & Step 1

- While EEI does not object to the requirement, there is nothing in the requirements of EOP-012-3 that aligns this deadline. Moreover, it is unclear how this could be effectively enforced without it being included in EOP-012-3.

2. Step 3 (Registered Entity Notification/Cap Extension Request): If a CAP extension request was denied, the submitting entity may request, within five (5) calendar days of denial, a joint NERC and CEA review of the denial.

- EEI again notes that there are no deadlines contained in EOP-012-3 and either the deadline should be added to EOP-012-3 or include the process document as an attachment to this standard. Additionally, it is important to note that 5 days is a very short period of time to expect an entity to review and request a review of a time extension denial. It is also unclear if this 5 day deadline is inclusive of weekends and holidays. Regardless, EEI asks that GOs be given sufficient time to review and respond review and respond to the denial. For this reason, we ask that the process document be changed to provide GOs with 10-15 business days consistent with the NERC/CEA reviews.
- · **Insufficient Guidance provided for Entity Data Submission**

1. The process document supporting EOP-012-3 is inadequate to ensure entities provide the CEA complete and sufficient documentation with their CAP Extension Requests and Constraint Declarations.

- In the CAP Extension Request Review Process it states that Generator Owners are obliged and responsible for providing clear documentation with the extension request, yet there is nothing in the process document that might guide what might be expected. To address this concern, the Process document should be revised to include examples of the types of documentation that should be provided with a Cap Extension Request for synchronous resources, wind turbines and solar facilities. Without this level of guidance in the Process Document entity submission will vary causing delays and inconsistencies between regions in what is acceptable.
- Similar to the CAP Extension Process, the Constraint Review Process does not provide any details or examples of what would constitute "requisite data" necessary to meet the document requirements required by the CEA and NERC. And while we appreciate the Commission's desire that the process result in "consistent compliance and enforcement outcomes" (ref. P47 or FERC Order), this is only achievable through a clear process that sufficiently guides GOs in their Constraint declaration submissions. To do this, the process should be made clear what must be submitted, including examples of documents that would serve that outcome. This should be done for each type of resource. (i.e., synchronous resources, wind, solar facilities, etc.)

Process lacks Transparency sufficient to ensure consistent compliance and enforcement outcomes

1. The Process document lacks sufficient transparency and clarity regarding the process reviews and resulting outcomes when CAP extensions or Constraint Declarations are denied. To address this concern, criteria should be added to the document to ensure consistency in entity submission and

guide CEA/NERC reviews. Additionally, the process should include periodic reviews by NERC that assess the consistency of declaration outcomes ensuring all regions have consistent outcomes.

Likes 0	
Dislikes 0	

Response

Ruchi Shah - AES - AES Corporation - 5

Answer	
Document Name	

Comment

R2.1 allows for CAP to add new or modify existing or previously planned freeze protection measures for new generating unit that enter commercial operation between 10/1/2027 and 3/31/2028. However, it is not clear what is required to be documented in the CAP (similar to what is listed under R7). Although the CAP in R2.1 needs to be implemented and completed by 4/1/2028, will the CAP be required to document a list of corrective actions, updates to cold weather preparedness plan or identification of operating limitations while the CAP is being implemented? We request NERC to provide clarity on this via changes to R2 Part 2.1 or a guidance document.

AES US Renewables believe that R8.4 is unnecessary and will add to administrative burden that does not provide any additional reliability benefit. A Generator Cold Weather Constraint that has been approved by the CEA and will be applicable to another Generator Cold Weather Reliability Event or a similar generating unit does not require the approved constraint declaration to be documented and notified to the CEA. As the ERO is required by FERC to submit section 1600 data annually, these events and their associated CAPs and constraint declarations can be provided to the ERO at that time. An alternative to R8.4 is to develop a section 1600 data request similar to that of MIDAS (for protection system operations) where entities will be able to input their cold weather events, corresponding CAP information and any constraint declaration that was used to address any of the corrective actions. This avoids having a purely administrative burden on registered entities that can create unnecessary compliance risks.

Likes 0	
Dislikes 0	

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer	
Document Name	

Comment

AEPC has signed on to ACES comments. See ACES comments.

Thank you for the opportunity to comment.

Likes 0	
Dislikes 0	

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	
Document Name	
Comment	
SMUD and BANC appreciate NERC's inclusion of the Compliance Abeyance Period language in Section C of the EOP-012-2 Standard. This thoughtful addition reflects a commitment to enhancing the ERO Compliance Monitoring and Enforcement Program processes, that were proposed by NERC last year. Given that we were only permitted to comment on these proposed changes to EOP-012-2 without the opportunity for a ballot, we commend NERC for taking this progressive step as it may instill greater confidence among entities adopting this revised Standard, even if it may not be flawless.	
Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	
Document Name	
Comment	
FirstEnergy has no additional comments.	
Likes 0	
Dislikes 0	

Response

Brian Lindsey - Entergy - 1,3,6	
Answer	
Document Name	
Comment	
No Comment	
Likes 0	

Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy supports and agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
For utilities that routinely operate reliably in seasonal cold weather months, EOP12-3 will not improve BES reliability. It will increase the administrative burden without improving BES reliability.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 3,5,6	
Answer	
Document Name	
Comment	
If the CEA does not agree with the substance of the declaration in R8 and declares it invalid, how would that decision be dealt with in the existing requirements or process? In addition, how soon would the CEA have to provide their determination? In general, there appears to be a lack of clarity regarding the timeline that occurs between R8.1 and R8.3. R8.4 requires that a Generator Owner declaring a Generator Cold Weather Constraint “document and provide notice to the CEA” of the circumstances described in the obligation, however there is no mention of how soon that documentation and notice be given, nor any timeline that the CEA would hold	

to in providing their response. AEP requests that clarity be added to R8.4 regarding when the GO must provide their documentation and notification, as well as insight be added to the Technical Rationale document regarding what the timeline is for the CEA's response.

If the CEA has a list of constraints, it follows that they would likely be maintaining that list as well for all the entities involved. And if they are maintaining it, what would the process be for aligning their own maintained list with the one that each GO is maintaining on *their* end for their own assets?

AEP is confused by certain aspects of R8.4, including what its primary intent might be and what it is designed to accomplish. For example, if there is already a constraint in place, why would it be necessary to include "one or more corrective actions to address" an underlying cause? Also, what is being requested in R8.4 appears to be redundant with the Section 1600 Data Requests currently being drafted regarding cold weather, so care should be taken to ensure there is no duplications of effort or obligations. We believe that additional content added to the Technical Rationale document would be beneficial to further explain the intent-of and reasoning-behind R8.4. That being said, we believe that R8.4, if it were retained, could be more clearly written while still retaining its (perceived) meaning. As a result, AEP recommends revising R8.4 as follows:

8.4 Document and provide notice to the CEA, when a generating unit experiences a Generator Cold Weather Reliability Event with the same cause as that of a previous Generator Cold Weather Reliability Event at the same or a similar unit, and one or more corrective actions to address the cause are addressed by an existing validated Generator Cold Weather Constraint for the same or a similar unit.

In addition, it should be noted that only those causations within the Generator Owner's control would be subject to the root cause analysis. As a result, fuel supply issues (were they found to be a cause) would not be included in the information provided.

Section E "Associated Documents" specifies the "Calculating Extreme Cold Weather Temperature" document, but does not include a hyperlink to it. We suggest that a hyperlink be added for this document, perhaps as a footnote or similar.

Requirement R2.2 states, "Implement freeze protection measures…" and is inferred by measure M2 that the freeze protection measures need to be implemented by the commercial operation date (COD). We recommend the phrase be revised to state "Implemented freeze protection measures…" to reflect the work is done by COD.

Requirement R3 states, "Implement freeze protection measures…; or Develop a Corrective Action Plan…". We recommend the phrase be revised to state "Implemented freeze protection measures…" to reflect the work is done or if not, a CAP is required to complete the work.

Requirement R6 is not clear how a prior approved Generator Cold Weather Constraint is to be addressed when a Generation Cold Weather Reliability Event occurs where the root cause of the event is covered by the constraint. Is a CAP required or does the GO just follow the R8.4?

Likes 0	
Dislikes 0	

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer	
Document Name	2024-03_Unofficial_Comment_Form_EOP-012-3_321 MRO_NSRF_Final.docx

Comment

MRO NSRF does also appreciate the opportunity to comment, but the lack of ballot and short turnaround time from closing to the Board of Trustees meeting does not instill confidence much input will be utilized.

MRO NSRF recognizes the tight timelines and specific guidelines prescribed by FERC, but is concerned that reliability impacts may result from some of the changes compared to EOP-012-2.

To that point, MRO NSRF would suggest that NERC review the dates of R2, as currently written it would seem that all generating units that "contractually committed to design criteria" prior to June 29, 2023 but does enter commercial operation until after March 21, 2028 are not subject to any compliance obligation under R2. While there will likely be very few generating units that fall under this oversight, this is illustrative of MRO NSRF's concern regarding developing Standards on such extremely tight timelines.

Requirement 2 has the bullet: "Document in a declaration, with justification, if applicable, a Generator Cold Weather Constraint in accordance with Requirement R8." For clarity, suggest adding, "Document in a declaration, with justification, if applicable, a Generator Cold Weather Constraint in accordance with Requirement R8." To requirement 3.

Likes 0	
Dislikes 0	

Response