

Comment Report

Project Name: 2024-03 Revisions to EOP-012-2 | Standard Authorization Request
Comment Period Start Date: 7/18/2024
Comment Period End Date: 8/16/2024
Associated Ballots:

There were 24 sets of responses, including comments from approximately 94 different people from approximately 72 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. In paragraph 47 of the June 2024 Order, FERC directs NERC to revise EOP-012-2 to “ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Reliability Standard are objective and sufficiently detailed so that applicable entities understand what is required of them.” FERC provides several examples of how NERC may meet directives in this paragraph and explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns.

Do you agree with any of the examples provided by FERC in how it may meet the directives? If so, please explain. If you do not agree, but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

2. In paragraph 47 of the June 2024 Order, FERC directs NERC to develop and submit modifications to the Generator Cold Weather Constraint definition of Reliability Standard EOP-012-2, to remove the references to “cost,” “reasonable cost,” “unreasonable cost,” and “good business practices” and replace them with criteria that are objective, unambiguous, and auditable. FERC further explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. Do you believe there are alternative criteria that are objective, unambiguous, and auditable? If so, please provide your suggestions for the drafting team. If you do not believe there are alternative criteria, or believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

3. In paragraph 54 of the June 2024 Order, FERC directs NERC to modify EOP-012-2 so that NERC receives, reviews, evaluates, and confirms for validity the Generator Cold Weather Constraint declarations in a timely manner. FERC further explains that NERC may address its concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. Would you recommend the drafting team modify EOP-012-2 to provide for an ERO pre-review process for constraint declarations? If not, please provide your suggestions that would address FERC’s concerns in an equally efficient and effective manner.

4. In paragraph 68 of the June 2024 Order, FERC directs 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 provides 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. Do you agree with modifying 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? If so, please provide your suggestions for alternative timeframes. If you do not agree, or believe the directive may be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

5. In paragraph 70 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to ensure that any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the proposed Reliability Standard is pre-approved by NERC. Do you agree with this approach? If so, please provide your suggestions for standards revisions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

6. In paragraph 72 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to clarify that any Requirement R7 corrective action plans for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit’s commercial operation date. Do you agree that revisions to Requirement R7 would best address this directive? If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

7. In paragraph 76 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to address certain ambiguities by expanding on Requirement R7.1.1 and 7.1.2 to make it clear which corrective action plan implementation deadline applies to which generator owner, explaining that it is not clear which timeline applies when a generator owner must implement both existing and new equipment for freeze protection measures. Do you agree with this approach? If so, please provide your suggestions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

8. In paragraph 94 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations (than every five years) to verify that the declaration remains valid. NERC may propose to develop modifications that address the Commission's concerns in an equally efficient and effective manner, however, NERC must explain how its proposal addresses the Commission's concerns. Do you agree with revising Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to require more frequent reviews to address this directive? If so, please provide your suggestions for an alternative timeframe, along with supporting rationale. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

9. In the June 2024 Order, FERC directs NERC to submit the directed modifications within nine (9) months of the date of the order, or by March 27, 2025. If you have any recommendations for how the drafting team may best conduct consensus building activities within the directed timeframe and in consideration of the shorter-than-typical comment periods meeting this timeframe will require, please provide and explain your suggestions below.

| Organization Name | Name | Segment(s) | Region | Group Name | Group Member Name | Group Member Organization | Group Member Segment(s) | Group Member Region |
|-------------------|-----------------------------------|-------------|--------|------------|-------------------|--|-------------------------|---------------------|
| 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 Performance) | 1,3,5,6 | MRO |
| | | | | | Kimberly Bentley | Western Area Power Administration | 1,6 | MRO |
| | | | | | Jaimin Patal | Saskatchewan Power Corporation (SPC) | 1 | MRO |
| | | | | | George Brown | Pattern Operators LP | 5 | MRO |
| | | | | | Larry Heckert | Alliant Energy (ALTE) | 4 | MRO |
| | | | | | Terry Harbour | MidAmerican Energy Company (MEC) | 1,3 | 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 |
| | | | | | Andrew Coffelt | Board of Public Utilities-Kansas (BPU) | 1,3,5,6 | MRO |
| | | | | | Peter Brown | Invenergy | 5,6 | MRO |
| Angela Wheat | Southwestern Power Administration | 1 | MRO | | | | | |

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|---|--------------------|-----------|--|--|--------------------|---|-----------|----------|
| | | | | | Bobbi Welch | Midcontinent ISO, Inc. | 2 | MRO |
| Electric Reliability Council of Texas, Inc. | Kennedy Meier | 2 | | ISO/RTO Council Standards Review Committee (SRC) | Kennedy Meier | Electric Reliability Council of Texas, Inc. | 2 | Texas RE |
| | | | | | Joshua Phillips | Southwest Power Pool, Inc. (RTO) | 2 | MRO |
| | | | | | Helen Lainis | Independent Electricity System Operator | 2 | NPCC |
| | | | | | Bobbi Welch | Midcontinent ISO, Inc. | 2 | RF |
| | | | | | Gregory Campoli | New York Independent System Operator | 2 | NPCC |
| | | | | | Thomas Foster | PJM Interconnection, L.L.C. | 2 | RF |
| 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 |
| Black Hills Corporation | Rachel Schuldt | 1,3,5,6 | | | Micah Runner | Black Hills Corporation | 1 | WECC |

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|--------------------------------------|-----------|----------------------|------|--|-------------------------|--|----|------|
| | | | | Black Hills Corporation - All Segments | Josh Combs | Black Hills Corporation | 3 | WECC |
| | | | | | Rachel Schuldt | Black Hills Corporation | 6 | WECC |
| | | | | | Carly Miller | Black Hills Corporation | 5 | WECC |
| | | | | | Sheila Suurmeier | Black Hills Corporation | 5 | WECC |
| Northeast Power Coordinating Council | Ruida Shu | 1,2,3,4,5,6,7,8,9,10 | NPCC | NPCC RSC | Gerry Dunbar | Northeast Power Coordinating Council | 10 | NPCC |
| | | | | | Deidre Altobell | Con Edison | 1 | NPCC |
| | | | | | Michele Tondalo | United Illuminating Co. | 1 | NPCC |
| | | | | | Stephanie Ullah-Mazzuca | Orange and Rockland | 1 | NPCC |
| | | | | | Michael Ridolfino | Central Hudson Gas & Electric Corp. | 1 | NPCC |
| | | | | | Randy Buswell | Vermont Electric Power Company | 1 | NPCC |
| | | | | | James Grant | NYISO | 2 | NPCC |
| | | | | | Dermot Smyth | Con Ed - Consolidated Edison Co. of New York | 1 | NPCC |
| | | | | | David Burke | Orange and Rockland | 3 | NPCC |
| | | | | | Peter Yost | Con Ed - Consolidated Edison Co. of New York | 3 | NPCC |
| | | | | | Salvatore Spagnolo | New York Power Authority | 1 | NPCC |
| | | | | | Sean Bodkin | Dominion - Dominion Resources, Inc. | 6 | NPCC |
| | | | | | David Kwan | Ontario Power Generation | 4 | NPCC |
| | | | | | Silvia Mitchell | NextEra Energy - Florida Power and Light Co. | 1 | NPCC |

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|--|-----------------|----|--|--------------------|---|--------|------|------|
| | | | | Sean Cavote | PSEG | 4 | NPCC | |
| | | | | Jason Chandler | Con Edison | 5 | NPCC | |
| | | | | Tracy MacNicoll | Utility Services | 5 | NPCC | |
| | | | | Shivaz Chopra | New York Power Authority | 6 | NPCC | |
| | | | | Vijay Puran | New York State Department of Public Service | 6 | NPCC | |
| | | | | David Kiguel | Independent | 7 | NPCC | |
| | | | | Joel Charlebois | AESI | 7 | NPCC | |
| | | | | Joshua London | Eversource Energy | 1 | NPCC | |
| | | | | Jeffrey Streifling | NB Power Corporation | 1,4,10 | NPCC | |
| | | | | Joel Charlebois | AESI | 7 | NPCC | |
| | | | | John Hastings | National Grid | 1 | NPCC | |
| | | | | Erin Wilson | NB Power | 1 | NPCC | |
| | | | | James Grant | NYISO | 2 | NPCC | |
| | | | | Michael Couchesne | ISO-NE | 2 | NPCC | |
| | | | | Kurtis Chong | IESO | 2 | NPCC | |
| | | | | Michele Pagano | Con Edison | 4 | NPCC | |
| | | | | Bendong Sun | Bruce Power | 4 | NPCC | |
| | | | | Carvers Powers | Utility Services | 5 | NPCC | |
| | | | | Wes Yeomans | NYSRC | 7 | NPCC | |
| Western Electricity Coordinating Council | Steven Rueckert | 10 | | WECC | Steve Rueckert | WECC | 10 | WECC |
| | | | | | Curtis Crews | WECC | 10 | WECC |

1. In paragraph 47 of the June 2024 Order, FERC directs NERC to revise EOP-012-2 to “ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Reliability Standard are objective and sufficiently detailed so that applicable entities understand what is required of them.” FERC provides several examples of how NERC may meet directives in this paragraph and explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns.

Do you agree with any of the examples provided by FERC in how it may meet the directives? If so, please explain. If you do not agree, but believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

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

Answer No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 47 comments. In addition to the NAGF comments, Duke Energy notes that: (a) the suggested preapproval concept would interfere with and possibly impede an entities CAP process and timing of its corrective actions and (b) this approach is an outlier in comparison to other NERC Reliability Standard relative to preapproval by NERC of an entities internal activities.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation does not agree with FERC’s recommendation. The criteria are currently defined adequately. Requiring pre-approval is an undue burden not only on the industry, but on NERC staff as well. A “clearly defined list” of constraints is inappropriate and not feasible as equipment varies between generating industries. Existing internal controls and processes at facilities are in play to ensure that equipment is operational and protected.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Though Minnesota Power believes that the list of circumstances of acceptable constraints in NERC's technical rationale document is helpful, it may not capture all circumstances which would make it unreasonable for the Owner to add freeze protection. A pre-approval process in theory sounds effective, however Minnesota Power is concerned that NERC may not have the resources to allow for a timely and effective response to the Constraint declaration, leading to uncertainty on how to address the compliance risk.

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| Likes | 0 |
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| Dislikes | 0 |
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Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

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| Answer | No |
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Comment

Black Hills Corporation agrees with NAGF's concerns for the constraints with extreme Deadlines, expertise related to new technologies, new technologies versus current "Best Practices", NERC approval of constraints, and the expectations to the GO having a CAP completed by start of winter and thus the NERC approval of said CAP will not have sufficient time.

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| Likes | 0 |
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| Dislikes | 0 |
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Response

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

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| Answer | No |
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Comment

The NAGF is concerned that FERC believes NERC could provide pre-approval for constraints with the extreme deadlines FERC has ordered related to a Corrective Action Plan. While it is possible that some of these constraints will be identified, it is unclear who at NERC will have expertise related to new technologies versus current "best practices" versus "promising technologies" that may receive positive reviews from non-operating entities. The NAGF points to recent documents coming out of NERC stating that all IBR resources should be installed with grid forming technologies that have yet to be tested in real world situations similar to the North American grid. The technology in question may very well be a positive improvement, but that does not mean we should be adopting it everywhere without significant testing. The same is true for any technology or means to address a freezing issue at a power plant.

If NERC begins pre-approving constraints, thereby endorsing some technologies over others, there may be some unintended consequences such as creating significant shortages and potential price gouging if a manufacturer is unable to meet a sudden demand for equipment to meet NERC and FERC's extremely short timelines for implementation.

The NAGF also points out that since the expectation is that a Generator Owner will either have to have the CAP completed or a constraint declared by the start of winter, NERC staff will not have sufficient time to research any issue before making a determination. Anything more than a week will be unfair to the Generator Owner. The Generator Owner will need to know if the expectation is that they will have to complete some effort prior to the winter start.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

Southern Company's stance is that the Standard drafting team, not the SAR, should be given the freedom to work with industry to develop criteria that are objective and sufficiently detailed, given the FERC directives and NERC guidance. Southern Company would recommend the Standard drafting team, once formed, consider a method other than the pre-approval process as the back-and-forth could be time consuming and delay approval.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

While a clearly defined list may be preferable, a pre-approval process could be established to ensure entities' declared Generator Cold Weather Constraints are appropriate and can be supported and defended.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

Yes

Document Name

Comment

Industry's goal should not be to rely on Generator Cold Weather Constraint declarations, but rather, to correct the issues and maintain a reliable generation fleet in a consistent manner across the footprint. AEP recognizes the GO's need to manage risk as part of their business and not all risks can be mitigated. As an example, GOs owning wind turbine farms will most likely not address potential icing on wind turbine blades due to technology limitations. This type of cold weather event raises several questions such as:

1. If one GO experiences this issue, do all GOs need to mitigate it? Is there a way to make that fair for all market participants within a regional market and/or adjacent markets?
2. Some GOs operate in a large footprint. If they have a Generator Cold Weather Reliability Event, does it make sense from a risk perspective to implement a modification across the GO's entire fleet due to geographical differences?
3. What Generator Cold Weather Reliability Events have the RTO's evaluated and determined to have a significant impact to generation across their entire RTO footprint?
4. What market levers do the RTO's have in place to address generator performance during cold weather events? This is another risk that a GO needs to manage.

There are parallel efforts in other concurrent projects such Project 2023-07 that also seek to identify temperature-related events. AEP recommends that these drafting teams remain aware of these similar, yet distinct, event identifications in these projects to ensure that no problems are unintentionally created by perhaps requiring system planning using one set of criteria and seeking to mitigate issues using a different set of criteria.

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| Likes | 0 |
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| Dislikes | 0 |
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Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

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| Answer | Yes |
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| Document Name | |
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Comment

A specified list of scenarios that qualify as a constraint would take some subjectivity out of the declaration process. Developing a pre-approval process could reduce potential issues during regulatory reviews or audits. Specific criteria for what a constraint is would make it more clear for the GO/GOp.

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| Likes | 0 |
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| Dislikes | 0 |
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Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

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| Answer | Yes |
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| Document Name | |
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Comment

We agree with both a clearly defined list and a pre-approval process. A clearly defined list will give us clear direction of what kind of constraints are acceptable. A pre-approval process will be useful when declaring special constraints that are not on the list.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

WECC agrees that FERC examples are appropriate and would encourage the DT to incorporate discrete descriptive language into the Standard (with explanations provided in the Technical Rationale). This will support consistency in the approach by registered entities.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

AZPS Supports EEI's comments submitted on behalf of their members. AZPS does not object to the SAR but agrees that it's important that the drafting team is not constrained only to the examples listed in the SAR.

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 supports EEI's comments and also offers a response.

FirstEnergy supports EEI's comments which state:

EEI does not object to this SAR. However, the SAR comment form includes questions that appear to be intended to expedite work and help the DT. It is important to ensure that the DT is not constrained to using only these examples.

FE also request that the draft includes a catch all situation that could be followed by industry. We also request to have a method for citing an exception as well as a method for industry members to submit exceptions under an Appeal Process.

While we agree that list of technical constraints to serve as a starting point for a list of circumstances would fall under NERC's jurisdiction, we also recommend that the Regional Entity hold responsibility for maintaining this list.

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) on question 1 while agreeing with concerns expressed by the North American Generator Forum (NAGF) response.

Likes 0

Dislikes 0

Response**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC**

Answer

Yes

Document Name

Comment

SPP agrees with the pre-approved list. This will help determine if a facility has a viable constraint. An approval process could be ambiguous and too subjective. The pre-approved list would be fair and consistent. NERC could review to determine if the facility met the list.

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

The ISO/RTO Council (IRC) Standards Review Committee (SRC) (consisting, for the purposes of these comments, of ERCOT, IESO, PJM, MISO, NYISO, and SPP) agrees with many of the examples in the [Technical Rationale for EOP-012-2 \(Feb 2024\)](#) that FERC references in its Order as a starting point for developing a list of circumstances that would qualify as acceptable constraints. More specifically, the SRC agrees with all of the listed technical constraints on page 4 except for the last item: “[t]echnology not utilized by a significant portion of the electric utility industry.”

Evaluating how widely a given technology is used is not an appropriate method of determining whether a constraint exists, as this evaluation could exclude newly developed, effective technologies that the industry has simply not had time to widely implement. Determining whether a given technology is used by a significant portion of the electric utility industry would require the development of an arbitrary threshold for each Extreme Cold Weather Temperature and technology regarding what constitutes a significant portion of the electric utility industry (51%? 62%? 66.67%? 75%? 80%?). The focus instead should be on the technical merits of the technology in question, as reflected by the other items listed on page 4 of the Technical Rationale.

Finally, as detailed in its response to Question 3, the SRC strongly supports NERC’s establishment of a pre-approval process for all Generator Cold Weather Constraint declarations.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EI does not object to this SAR. However, the SAR comment form includes questions that appear to be intended to expedite work and help the DT. It is important to ensure that the DT is not constrained to using only these examples.

While EEI appreciates the suggested alternatives provided by the Commission, there is insufficient time within the SAR comment period to ensure any preferences EEI might suggest, relative to the Commission proposed alternatives, accurately reflect the views of our members, therefore, we are unable to provide that level of detail during the SAR comment period.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

1. We believe the Standard Drafting Team should focus on developing a limited and discrete list of circumstances that would qualify as acceptable Generator Cold Weather Constraints (GCWC). We have already seen registered entities and Regional Entities interpret that more general constraints should be included in a Generator Owner's Cold Weather Preparedness Program, even if such constraints do not meet the GCWCC definition (e.g. using Heating, Ventilation, and Air Conditioning (HVAC) blower systems and the second law of thermodynamics to heat a building).

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE supports the purpose of this project to address the directives identified by FERC in its June 27, 2024 order approving Reliability Standard EOP-012-2 and directing further modifications. N. Am. Elec. Reliability Corp., 187 FERC ¶ 61,204 (2024).

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Regarding this question and all subsequent questions, MRO NSRF disagrees with the approach taken in developing this SAR. Simply copying and pasting language from a FERC order into the Project Scope section of a SAR is insufficient. Those who developed this SAR should have taken the necessary effort to fully review the language contained in the FERC Order and write a concise Project Scope that adequately captures FERC's intent without unnecessary language or specific examples that may seem binding to the Standard Drafting Team and prevent the development of previously unconsidered solutions.

Additionally, for Canadian Utilities, copying and pasting language directly from FERC is problematic as it seems that we are solely working of FERC directives without consideration of impacts to non-FERC jurisdictional entities.

While NERC is moving quickly to find and address issues, real constraints must be considered to develop feasible regulations. Better reliability is always the goal. Ratepayers ultimately fund system upgrades. Regulations cannot destroy project economics potentially bankrupting utilities. Many technologies are new and changing so industry may not have time to develop in-house experts.

Industry remains concerned FERC and NERC continue to divert from the standards development process. Overly prescriptive FERC / NERC directives and suggestions to speed the process ultimately compel the Standard Drafting Teams to narrowly address solutions and limit the SDTs ability to effectively address issues. While industry understands FERC / NERC concerns, it's better to give the experts (the SDT) the necessary latitude to develop effective solutions.

The amount and speed of impactful regulations is significant. As FERC / NERC continue to shorten implementation, the industry needs sufficient time to understand, vet, and provide meaningful solutions.

Finally, with the unreasonable timeframe set forth by FERC, which NERC has acquiesced to, any revisions made to this SAR would only further delay and hamper the SDT's efforts, therefore MRO NSRF does not recommend any changes be made to this SAR.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

Ameren is supportive of the objective of the SAR; however, as written, the SAR is too ambiguous and may result in confusion and challenges for both the standard drafting team and industry when attempting to develop modifications to the existing requirements. More direction and clarification are needed from NERC to develop modifications to the existing requirements that would address the directive. Additionally, Ameren supports EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response

2. In paragraph 47 of the June 2024 Order, FERC directs NERC to develop and submit modifications to the Generator Cold Weather Constraint definition of Reliability Standard EOP-012-2, to remove the references to “cost,” “reasonable cost,” “unreasonable cost,” and “good business practices” and replace them with criteria that are objective, unambiguous, and auditable. FERC further explains that NERC may address these concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC’s concerns. Do you believe there are alternative criteria that are objective, unambiguous, and auditable? If so, please provide your suggestions for the drafting team. If you do not believe there are alternative criteria, or believe the directive can be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Cold weather protection implementation is somewhat subjective overall and site dependent. consider using scale and scope to assess if the spend or practice is justifiable in relation to the budget or impact.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with NAGF that removal of references to “cost”, “reasonable cost”, “unreasonable cost” and “good business practices” could lead Generator Owners to make different decisions on how to operate their units which could be detrimental to overall grid reliability. Companies have obligations to stakeholders to manage resources in the most cost-effective manner while ensuring reliability. The industry needs to consider reliability on a 24/7/365 basis, not just during extreme cold.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

1. We believe the Standard Drafting Team should adopt an approach like that used in NERC Reliability Standard PRC-004-6 regarding Corrective Action Plans. In that Standard, the registered entity would need to document an explanation why no actions were implemented. Their reasoning can be because such actions were beyond its control or would not improve Bulk Electric System reliability.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

See EEI's response to question 1 above.

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

As further detailed in its response to Question 1, the SRC supports criteria that are based on objective technical, operational, environmental, or safety constraints. The SRC does not support subjective criteria or criteria based on economics or cost alone, and does not believe that use of any economic or cost-based criteria would be consistent with FERC's directives.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Southern Company believes that refinement of the SAR should be limited to clarification of the SAR scope and the FERC directives. Once created, the Standard drafting team in coordination with industry, should draft criteria that define what “cost prohibitive” means. For example, at a calculated Extreme Cold Weather Temperature (ECWT), it may be reasonable to expect a generator to recuperate the cost of additional winterization in one or two years, but 10 years may not be reasonable. Another example could be using a quantitative risk analysis that considers the number of hours/availability/reliability gain from implementing additional winterization measures. Using similar methods, the Standard drafting team can create agreement between industry and NERC on what is reasonable, and what threshold(s) would constitute “unreasonable cost”.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

If NERC were to limit the issues addressed by the standard to addressing equipment that failed and not requiring the Generator Owner to make potentially significant modifications to the equipment, the standard can be written to clearly address the failure of equipment. The current standard is attempting to address issues that were not part of the original construction plan for many generators. There is a line to be drawn between optional-extra retrofits and fundamental alterations to the nature of power generation facilities. Forcing owners apply any and all measures physically possible regardless of cost is unambiguously and objectively objectionable, essentially putting NERC on the, “Ban the plant,” bandwagon. The NAGF is concerned that Generator Owners may determine it is better for their investment to not operate generators in the winter times, which will be detrimental to overall grid reliability. But with a stated expectation for Generator Owners to have an obligation to modify their plants to address cold weather events that were unplanned for during the engineering and construction of a facility, the NAGF does not see a means that is reasonable to address an unlimited cost potential, especially with the extremely short time period that FERC is demanding for Generator Owners to obtain funds, engineer these changes and have them installed. The NAGF looks forward to working with NERC to determine a reasonable means to address these conflicted requirements.

Finally, the NAGF notes that there is not a comparable requirement for any other entity to redesign their equipment to address severe weather with an unlimited cost potential. While we appreciate the concerns raised by the IRC, we also note that we are unaware of any of the IRC members that are currently working to address the cost issue in their market designs.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer Yes

Document Name

Comment

SPP agrees with FERC conclusion that “unreasonable costs” is ambiguous. The constraints should not be subjective or consider costs alone. Though there is considerable amount of labor in installing and in normal maintenance of equipment that is winterized. One way that cost could be considered in a constraint is to consider facilities in a region that rarely experiences below freezing temps. Historical temperature data such as from NOAA could show whether the facility would experience freezing temperatures.

SPP also supports the SRC’s comments on “technologies in one area may not be effective in another”. Installing expensive technology that is applicable at higher latitudes may not be const effective further south.

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 2.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Yes

Document Name

Comment

FE has no objection to this scope.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

Yes

| | |
|---|-----|
| Document Name | |
| Comment | |
| <p>Black Hills Corporation agrees with NAGF in that if NERC were to limit the issues addressed by the standard to addressing equipment that failed and not requiring the Generator Owner to make potentially significant modifications to the equipment, the standard can be written to clearly address the failure of equipment. The current standard is attempting to address issues that were not part of the original construction plan for many generators. The NAGF is concerned that Generator Owners may determine it is better for their investment to not operate generators in the winter times, which could be detrimental to grid reliability. Additionally, Black Hills Corporation concurs with the NAGF comment on there not being a comparable requirement for any other entity to redesign their equipment to address severe weather with an unlimited cost potential.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |
| <p>AZPS supports EEI's comments submitted on behalf of its members as documented in question 1 above.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC | |
| Answer | Yes |
| Document Name | |
| Comment | |
| <p>Very few of the examples provided in the Technical Rationale could be incorporated could be adjusted to become objective, unambiguous, and auditable. Each would require evidence to support the constraint. Examples could be 1. Warranties voided by applying freeze protection measures— This should not be applicable if a warranty changes as a result of freeze protection measures (i.e., a new warranty period or coverage is put in place to cover the freeze protection measure). An OEM may not support a proposed freeze protection measure (e.g., could be structural stress exceeds engineering criteria.) 2. Addition of freeze protection measures will violate environmental or local regulations. Can not say “introduces a risk” as that is ambiguous. 3. Application of freeze protection measures would reduce capability by 10% or more. Should not be limited to summer per se but also has to be directly related to the freeze protection measures</p> | |

There is not an accepted measure for “accelerated retirement”, cancellation of new generation, or compromised ability to provide ancillary services. All are cost-based examples.

WECC supports reduction of personnel and safety risks but could envision entities using those declarations as an overarching reason not to implement freeze protection measures with unsupportable and un-auditable justifications. No one wants to discuss, rationally, whether the addition of a freeze protection measure that requires a crane (or ladder) to implement introduces (or doesn’t introduce) safety risk above what might already be actions completed by personnel.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Reclamation agrees that there may be other methods and terminology that may be used, however we do not provide any recommendations at this time.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer Yes

Document Name

Comment

Yes, we believe there are alternative criteria that are objective, unambiguous, and auditable. For example, providing a clearly defined list and a pre-approval process will make the criteria objective, unambiguous, and auditable.

Likes 0

Dislikes 0

Response**Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC****Answer**

Yes

Document Name**Comment**

More objective criteria will allow the GO/GOp to bake in clearer expectations when making a declaration. Things like cost/benefit analysis, feasibility studies, and industry benchmarking could be strong arguments to make a declaration.

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 3,5,6****Answer**

Yes

Document Name**Comment**

The Standard Drafting Team should consider using historical data from past extreme cold weather events and also taking into consideration whether the generating units are dispatchable to establish a BES reliability risk to justify a Generator Cold Weather Constraint.

Likes 0

Dislikes 0

Response**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC****Answer**

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Robert Stevens - CPS Energy - 1,3,5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 1,3,6****Answer****Document Name****Comment**

See our response to question 1 above.

Likes 0

Dislikes 0

| | |
|--|--|
| Response | |
| | |
| Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group | |
| Answer | |
| Document Name | |
| Comment | |
| See response to question 1. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |

3. In paragraph 54 of the June 2024 Order, FERC directs NERC to modify EOP-012-2 so that NERC receives, reviews, evaluates, and confirms for validity the Generator Cold Weather Constraint declarations in a timely manner. FERC further explains that NERC may address its concerns in an equally efficient and effective manner, provided NERC explains how it addresses FERC's concerns. Would you recommend the drafting team modify EOP-012-2 to provide for an ERO pre-review process for constraint declarations? If not, please provide your suggestions that would address FERC's concerns in an equally efficient and effective manner.

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

Answer No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 54 comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation does not agree with FERC's recommendation. The existing requirement must be met at the local and regional compliance levels. Adding another process layer places an unreasonable and unnecessary burden on personnel. Currently NERC is considering a 1600DR yearly which could encompass this recommendation, making it invalid for Standard compliance requirements.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

As described in Question #1, a pre-approval process in theory sounds effective, however Minnesota Power is concerned that NERC may not have the resources to allow for a timely and effective response to the Constraint declaration, leading to uncertainty on how to address the compliance risk.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer No

Document Name

Comment

Black Hills Corporation feels it is unclear how NERC can maintain any such list without having a significant delay between identification of a constraint and including the constraint in any document pertaining to compliance. It is unclear to us what NERC would expect from the GO to determine what constitutes a constraint.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Any list of constraints will likely not address issues seen by Generator Owners as time moves forward. And as seen in past processes used with NERC standards, an appendix, attachment or other document that can impact the compliance of entities must be changed through modification by a Standard Drafting Team. It is unclear how NERC can create, maintain and change any such list without having a significant lag period between the identification of a constraint and including the constraint in any document pertinent to compliance. It appears that during the lag period, any entity claiming that constraint would be in violation of the standard.

It is also unclear what NERC would expect from a Generator Owner to allow NERC staff to determine what constitutes a constraint. If such a process is put in place, the Generator Owner will need to know if the issue is determined a constraint nearly immediately or it will likely subject the Generator Owner to compliance issues due to the short time period that has been ordered for a Corrective Action Plan to be completed.

Finally, this type of review appears to be an administrative issue, which FERC has previously ordered be removed from Reliability Standards.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

| | |
|--|-----|
| Answer | No |
| Document Name | |
| Comment | |
| <p>Southern Company reiterates that this should not be addressed by the SAR drafting team but allow the Standard drafting team to work with industry to meet the FERC directive for NERC to receive, review, evaluate, and confirm declarations in a timely manner.</p> <p>Southern Company would suggest as an alternative to an ERO pre-approval process for Generator Cold Weather Constraint (GCWC) declarations that NERC enhance its data requests to collect sufficient data from registered entities. There may only be a limited subset of Generator Owners that will declare a GCWC, further reducing the amount of data to collect and review. NERC can utilize Compliance Monitoring and Enforcement Program (CMEP) tools (e.g., self-certifications, spot checks, and preliminary screens) for those few entities. This could be addressed without revisions to EOP-012-2.</p> <p>Should the Standard drafting team consider an ERO pre-approval, Southern Company would suggest that any requirements must also include a process through which Generator Owners can appeal a denial of a declaration or move forward if the ERO does not respond in a timely manner. This would be to prevent the confirmation process from becoming a bottleneck in the process.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable | |
| Answer | No |
| Document Name | |
| Comment | |
| <ol style="list-style-type: none"> We believe the Standard Drafting Team should focus on developing a limited and discrete list of circumstances that would qualify as acceptable Generator Cold Weather Constraints Components (GCWCC). Appendix 4C (Compliance Monitoring and Enforcement Program) of the NERC Rules of Procedure is an existing mechanism for the ERO Enterprise to receive, review, evaluate, and confirm compliance with NERC Reliability Standards. Between guided self-certifications and compliance audits, these activities can be completed in a timely and equally efficient and effective manner. | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Thomas Foltz - AEP - 3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |

AEP supports having a pre-review process for constraint declarations, but if an ERO pre-review process is implemented, there needs to be a defined review period to allow the GO time to address any rejected constraint declarations to ensure compliance with implementation of corrective measures stated in R7 Part 7.1.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

This approach would require more ERO oversight but could circumvent comments and question during audits. This would be similar to a pre-enforcement package approach. However, it would need to be very clear that pre-reviews could be incomplete and change prior to final submittal.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Yes

Document Name

Comment

An ERO pre-review process for constraint declarations is reasonable way to improve compliance.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

FERC suggested such an option in paragraph 47 (a pre-review process). In one respect that will eliminate rejection to some degree but also lengthen timeframes. If **discreet language** is provided as to what constitutes a Generator Cold Weather Constraint the review process would be more streamlined. Care should be taken to balance the need for reliability and the allowance of deferred reliability when considering constraints.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

AZPS supports EEI on an ERO pre-review process for constraint declarations.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Yes

Document Name

Comment

We agree with the pre-approve direction proposed. By including a list directed by NERC but allowing for additional approval on a situational regional basis, this hybrid approach ensures coordination from the various levels of EOP-012.

Regarding a regional approach, FirstEnergy recommends assigning the BA, RC and TOP to review evaluate, and confirm the validity of the Generator Cold Weather Constraint Declarations in a timely manner.

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) on question 3 while agreeing with concerns expressed by the North American Generator Forum (NAGF) response.

Likes 0

Dislikes 0

Response**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC****Answer**

Yes

Document Name**Comment**

SPP agrees, there should be a pre-established list of types of constraints. The ERO can pre-review constraint declarations to determine if the declaration meet the constraint list.

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**

The SRC supports the establishment of an ERO pre-review/pre-approval process for all Generator Cold Weather Constraint declarations to ensure that declared Generator Cold Weather Constraints are appropriate and to ensure that inappropriate constraints are not allowed to go into effect. Without a pre-approval process, an entity may rely on a constraint that is subsequently determined to be inappropriate, resulting in inadequate weatherization of the impacted Facilities for at least the period of time between the initial declaration of the constraint and the determination that the constraint was inappropriate. No available after-the-fact oversight or enforcement mechanism can undo or mitigate the risk to the BES of an entity's reliance on a constraint declaration that is only determined to be inappropriate when it is too late to correct the inadequate weatherization before the upcoming winter season.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

See EEI's response to question 1 above.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

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

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

Answer

Document Name

Comment

See response to question 1.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

See our response to question 1 above.

Likes 0

Dislikes 0

Response

4. In paragraph 68 of the June 2024 Order, FERC directs 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 provides 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. Do you agree with modifying 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? If so, please provide your suggestions for alternative timeframes. If you do not agree, or believe the directive may be addressed in an equally effective and efficient manner, please provide your suggestions for the drafting team.

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

1. We question how much shorter of a duration is needed to gain acceptance across the ERO Enterprise and industry. Instead, we believe the Standard Drafting Team should adopt an approach like for implementing Corrective Action Plans under NERC Reliability Standard PRC-004-6 and Section 1600 of the NERC Rules of Procedure. In the Standard, the registered entity continues to update the Plan until its actions or timetable changes are completed. Under Section 1600, each Corrective Action Plan is filed and quarterly updated with the Regional Entity using the Misoperation Information Data Analysis System (MIDAS) Portal. It may be possible for NERC to utilize its Align and the Secure Evidence Locker (SEL), the tools of its Compliance Monitoring and Enforcement Program, to collect the list of existing or new equipment or the freeze protection measures that need to be replaced or installed on those generating units that experienced a Generator Cold Weather Reliability Event.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer No

Document Name

Comment

Southern Company would suggest the Standard drafting team consider prior industry feedback in EOP-012-2 on the challenges of scheduling units around service, labor and material availability, as well as equipment lead-times to complete needed improvements identified in a Corrective Action Plan. The Standard drafting team may find a shortened deadline that provides flexibility for minor enhancements but should work with industry to identify what is realistic.

Likes 0

Dislikes 0

Response

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

| | |
|---|----|
| Answer | No |
| Document Name | |
| Comment | |
| <p>{C}1. for the drafting team.</p> <p>{C}{C} Yes</p> <p>{C}{C} No</p> <p>As mentioned above, the NAGF is concerned with expecting Generator Owners to address issues not contemplated by the Generator Owner, Original Equipment Manufacturer or General Contractors during the engineering and construction process for a generator. There is also a concern related to equipment availability for either new or replacement parts for equipment that does not have off-the-shelf availability. The NAGF is also greatly concerned that FERC appears to be putting such an emphasis on these issues that generators will suffer from the lack of needed maintenance to allow the Generator Owner the time and resources to correct or modify their plants. As an example, if the Generator Owner forgoes doing planned maintenance to enhance the reliability of the generator at all times to instead address a freezing issue, will grid reliability be improved when the generator has a mechanical failure but does not freeze? The NAGF believes that reliability at all times should not be overlooked due to well intentioned, but potentially erroneous or overzealous focus on specific events and issues.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments | |
| Answer | No |
| Document Name | |
| Comment | |
| <p>As stated prior, Black Hills Corporation is concerned with expecting the GO to address issues not contemplated by the GO, Original Equipment Manufacturer or General Contractors during the engineering and construction process for a generator.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Hillary Creurer - Allete - Minnesota Power, Inc. - 1 | |
| Answer | No |
| Document Name | |

Comment

Minnesota Power is concerned that depending on the corrective action required, the planning, equipment, or contractor availability to safely execute the work could require significant lead times. The Standard language needs to include language which allows for these unexpected and uncontrollable situations which may arise.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation recommends that the current timeframes for freeze protection implementation measures are sufficient. As weather seasons are unpredictable, it is not feasible to design, manufacture and implement freeze protection measures for industry as components vary at every facility/region. Depending on the size of the facility, a staggered approach will be required to implement measures on all equipment, which will involve scheduling equipment outages with our partners (TOP/BA, etc..), where overall implementation can take years, depending on outage scheduling. Also, as challenges in supply chain, manpower resources and other unforeseen circumstances are always of a concern. Mass production of a certain measure for one industry typically cannot be used for another (i.e. wind cannot cross over to hydropower), or even within the same industry based on varying manufactures of equipment.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 68 comments.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

Requiring shorter timeframes could pose a challenge to the GO/GOP. These requirements should drive the CAP process to fix identified issues in a reasonable timeframe. Events that occur in a winter season would be reviewed and dispositioned late spring. Giving the GO/GOP less than 8 months to complete the CAP. 24 months for existing equipment/FPMS make sense.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Providing timing is reasonable.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl supports shorter timeframes for those units that have experienced issues and allowing longer timeframes to address similar potential issues across a fleet for those units that have not experienced issues. However, registered entities should have the ability to request an extension of time for certain circumstances.

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

The SRC supports shortening the deadlines in Requirement R7, and recommends deadlines of no longer than 12 months for implementation of corrective actions that do not require the installation of new equipment and no longer than 24 months for corrective actions that do require the installation of new equipment. These shortened deadlines will more appropriately reflect the urgency of winterizing generating units and the amount of time industry has already had to winterize generating units based on the lessons learned from Winter Storms Uri and Elliott, as documented in the joint FERC/ERO Enterprise reports on those storms, and the development process of EOP-012 to date. If specific circumstances prevent an entity from being able to meet the shortened deadlines, an extension process would still be available, as further discussed in the response to Question 5.

To further reflect the urgency of winterization, the SRC also supports the addition of language requiring entities to document the generator's best efforts to promptly implement all immediate and near-term actions that it can undertake prior to the next upcoming winter season to winterize the generating unit(s) to operate at its calculated Extreme Cold Weather Temperature.

The SRC agrees that the fact that generating units should already have appropriate freeze protection measures implemented to be capable of operating at their respective Extreme Cold Weather Temperature to comply with EOP-012-2 Requirements R2 and R3 by the time these revisions become effective supports shortening the timeframe to implement corrective actions.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer Yes

Document Name

Comment

SPP supports FERC's recommendation as in P.68 is not overly burdensome.

Likes 0

Dislikes 0

Response

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

Answer Yes

| | |
|---|-----|
| Document Name | |
| Comment | |
| Eenergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 4 while agreeing with concerns expressed by the North American Generator Forum (NAGF) response. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter | |
| Answer | Yes |
| Document Name | |
| Comment | |
| <p>FirstEnergy supports EEI's comments and also offers a response.</p> <p>FirstEnergy supports EEI's comments which state:</p> <p>EEI supports shorter timeframes for those units that have experienced issues and allowing longer timeframes to address similar potential issues across a fleet for those units that have not experienced issues. However, registered entities should have the ability to request an extension of time for certain circumstances.</p> <p>FirstEnergy further adds:</p> <p>Putting constraints on return may lead to industry not meeting deadlines or obligations. Consideration of planned outages, supply chain and system conditions need to be included for industry to meet completion of CAPs. FirstEnergy asks the DT to maintain timeframe for new protection measures installed to allow installation and verification of operational criteria.</p> <p>If going beyond the deadline, allow members ability to request declaration for extended time for completion.</p> | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |

AZPS supports EEI's comments around shorter implementation times for units that have experienced a Generator Cold Weather Reliability Event. AZPS also agrees that entities should have the ability to request time extension for certain circumstances.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Yes, in general, those existing generating units should be able to respond in a more timely manner when addressing root causes of a Generator Cold Weather Reliability Event (GCWRE). The generating units would be actively trying to mitigate the cause. After mitigation there would be a need to provide an evaluation period for other existing units and a concurrent (at least partially) evaluation period for any proposed future units that may be exposed to similar conditions. The entity could develop a process that takes into consideration several factors—equipment that caused the GCWRE, that equipment's use within the fleet, conditions of the equipment (e.g., age, location at site, manufacturer, maintenance history, etc.), factors causing the equipment to be the catalyst for a GCWRE, ECWT of plant suffering a GCWRE, ECWT's of other sites, ect. that could be used to facilitate evaluation. Development would likely reduce time needed in determination of applicability to other and new generation. Industry like to quote PRC-004 as a model for CAP development timelines. Only reliability concern is there is no defined period for completion of CAPs (in PRC-004) and should be here to mitigate the risk. For existing units, immediate freeze protection measure upgrades should take a relatively short time with longer term be completed before the next winter season. Applicability to other sites/new generation may start as soon as cause determination is complete and evaluation done before next winter season to allow implementation efforts to be completed. Size of entity (e.g., number of similar locations subject to conditions) may dictate timing and prioritization of efforts.

Outside a permanent enclosure, freeze protection measures can be implemented, initially, in a relatively short time (entity has to in order to get unit back on line and prevent re-occurrence). Other items such as permanent heat tracing or permanent enclosures would take longer but the initial freeze protection measure should remain in place until a more permanent solution is implemented.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Yes

Document Name

Comment

We agree with modifying Requirement R7 of EOP-012-2 to require shorter deadlines. But there should be an exemption for the units in long term shut down.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

AEP believes most Generator Cold Weather Event corrective action plans can be performed within 12 months following the event. In cases where the corrective action plan will require more time, the GO can request an extension as stated in R7.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

Ameren recommends allowing entities to ask for more time to implement a corrective action. This would give entities more time to address issues and solve them. We suggest implementing a CAP process similar to other standards, such as PRC-004.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

See response to question 1.

Likes 0

Dislikes 0

Response

5. In paragraph 70 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to ensure that any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the proposed Reliability Standard is pre-approved by NERC. Do you agree with this approach? If so, please provide your suggestions for standards revisions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

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

Answer No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 70 comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation does not agree that NERC has the authority to approve any extension of a corrective action plan at the industry or local level. A declaration with justification is sufficient as is already mandated by the standard.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

As described in Question #1, a pre-approval process in theory sounds effective, however Minnesota Power is concerned that NERC may not have the resources to allow for a timely and effective response to the Constraint declaration, leading to uncertainty on how to address the compliance risk.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer No

Document Name

Comment

Black Hills Corporation agrees with the NAGF in that - The NAGF does not believe that NERC has the expertise nor the personnel to provide a meaningful review of this type of technical documentation in the very short time that will be required if NERC meets the timelines FERC has ordered. The NAGF also notes that any request for an extension will be time critical with issues beyond the control of the Generator Owner, including the need to schedule an outage during the summer months, scheduling resources to be available to implement the modifications and engineering modifications discovered due to non-temperature related issues, including rain, snow, icing and wind speeds causing the issues identified. The NAGF notes that temperature is the only variable used to identify a Generator Cold Weather Reliability Event, but these other variables are very likely to contribute to if not outright cause the 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 does not believe that NERC has the expertise nor the personnel to provide a meaningful review of this type of technical documentation in the very short time that will be required if NERC meets the timelines FERC has ordered. The NAGF also notes that any request for an extension will be time critical with issues beyond the control of the Generator Owner, including the need to schedule an outage during the summer months, scheduling resources to be available to implement the modifications and engineering modifications discovered due to non-temperature related issues, including rain, snow, icing and wind speeds causing the issues identified. The NAGF notes that temperature is the only variable used to identify a Generator Cold Weather Reliability Event, but these other variables are very likely to contribute to if not outright cause the event.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer No

| | |
|--|----|
| Document Name | |
| Comment | |
| <p>Southern Company suggests that the Standard drafting team considers industry identified factors outside of the Generator Owners' control, such as scheduling of material delivery and labor. Pre-approvals have the potential to cause problems should the volume of requests cause delays in timely responses from ERO that cause Generator Owners to miss the window for outage planning, labor scheduling, work delays, or additional cost to be incurred due to overtime or expedited equipment delivery. Any of these delays could cause compliance issues. No liability should be placed on a Generator Owner that submits a Corrective Action Plan extension request that is not answered by ERO in a timely manner.</p> | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable | |
| Answer | No |
| Document Name | |
| Comment | |
| <p>1. We believe Requirement R7 should be rewritten to focus on the development of a Corrective Action Plan without defined timelines. This is like the approach used within NERC Reliability Standard PRC-004-6 and Section 1600 of the NERC Rules of Procedure. In the Standard, the registered entity continues to update the Plan until its actions or timetable changes are completed. Under Section 1600, each Corrective Action Plan is filed and updated with the Regional Entity using the Misoperation Information Data Analysis System (MIDAS) Portal. We consider the quarterly reporting of a Corrective Action Plan by a registered entity to its Regional Entity like an approval process.</p> | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Israel Perez - Salt River Project - 1,3,5,6 - WECC | |
| Answer | No |
| Document Name | |
| Comment | |
| <p>We don't understand the basis for the FERC directive. There are reasons for delays outside of the control of the Generator Owner. NERC pre-approval doesn't eliminate very real reasons for delay. Why isn't the documentation of the justification for exceeding the timetable sufficient? Would advise mimicking the standard 132 language and modify to fit this standard.</p> | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

AEP agrees with this approach, but if an approval process is implemented, there needs to be a defined review/approval period to allow the GO time to address any rejected requests to ensure compliance with implementation of corrective measures stated in R7 Part 7.1.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

This would be similar to extending a NERC Work Order beyond the violation date. Processes are already in place for other standards and this would be somewhat easy to implement. The language would have to be very clear on what happens if NERC does not approve. However, the review process can be lengthy. It would take more engagement from the regulator to ensure that reviews are done in a timely manner. This would have to be in addition to CAP timeline requirements or you risk GO/GOP's having to move up their timeline in order to account for approval timing.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

With any approval or pre-approval process being contemplated, there needs to be language developed for non-approval. The approval process will generate a lot of concern and will provide an environment where professional judgement is questioned needlessly. As such there should be language, that can be supported through appropriate documentation, that provides explicit reasons for an extension request. The ERO should seek industry input but not allow the bar of reasonability to slip below the horizon. It is understood that plans do not always work out but lack of planning should not equate to an auto-extension.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

AZPS supports EEI's comments submitted on behalf of its members as documented in question 1 above.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer Yes

Document Name

Comment

See our response to Q3 and Q4.

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) on question 5 while agreeing with concerns expressed by the North American Generator Forum (NAGF) response.

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 | |
| <p>Consistent with its support for a pre-approval process for constraint declarations (as further detailed in its response to Question 3), the SRC agrees that it is also appropriate to require NERC pre-approval of any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the Reliability Standard. Generator Cold Weather Constraint declarations and corrective action plan implementation deadline extensions both result in weatherization work either being delayed or not being performed at all; consequently, both should be subject to a pre-approval process to ensure that no unnecessary weatherization delays occur due to entities relying on declarations or extensions that are later determined to be inappropriate. The SRC believes that TPL-007-4, Requirement R7, Part 7.4 may be a useful starting point for developing language to implement this portion of FERC's directives.</p> | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable | |
| Answer | Yes |
| Document Name | |
| Comment | |
| See EEI's response to question 1 above. | |
| Likes | 0 |
| Dislikes | 0 |
| Response | |
| Nazra Gladu - Manitoba Hydro - 1,3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |
| Likes | 0 |

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

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 | |
| | |
| See response to question 1. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| David Jendras Sr - Ameren - Ameren Services - 1,3,6 | |
| Answer | |
| Document Name | |
| Comment | |
| | |
| See our response to question 1 above. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |

6. In paragraph 72 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to clarify that any Requirement R7 corrective action plans for new generation (i.e. commercially operational after October 1, 2027) must be completed prior to the generating unit's commercial operation date. Do you agree that revisions to Requirement R7 would best address this directive? If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Would advise provisioning Weatherization grace period with respect to COD consistent with other NERC standards.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

1. Although we believe Requirement R7 should be rewritten, we also believe the Standards Drafting Team should address the calendar dates associated with this directive through the Standard's Implementation Plan.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Based on efforts by the NAGF membership, it appears that this directive may have the potential to essentially "outlaw" certain types of generation across a fairly wide swath of the northern United States. It is unclear if that is FERC's intent. The NAGF is concerned that a standard that meets this directive will be overstepping the limits intended. As examples, it is unclear if a new wind farm must be built with active blade de-icing, even if this technology is not efficient or effective. It also appears to say that a wind turbine cannot be built in the Northern part of the US where the ECWT is below the design temperature available from the OEMs. This issue needs to be discussed with FERC so the SDT understands what is expected of them.

The NAGF would also note the potential impacts to in-flight construction projects that may have already ordered equipment that will not meet the more stringent requirements of EOP-012-2 and need to have costly redesign work completed that could further impact the original COD, affecting overall reliability to the grid by reducing the expected generation available within a long-term forecast. For example, if a generator owner has placed a large order for solar panels/wind turbines with the expectation that they would be deployed at various locations over several years, this requirement for generation facilities with a COD post Oct 1, 2027, to have all CAPs completed prior to COD could delay the project timelines so that there is enough time to review the impacts of the new requirements with the OEM.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Eergy supports and incorporates by reference the comments of the North American Generator Forum (NAGF) on question 6.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

No

Document Name

Comment

While newly commissioned units would include freeze protection measures based on a minimum temperature, industry members cannot verify these freeze protection measures until such an event would occur to test those settings. We suggest maintaining the CAP timeframe as previously noted and agreed upon by industry.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

No

| | |
|---|----|
| Document Name | |
| Comment | |
| Black Hills Corporation is unclear of what is FERC's intent for this paragraph. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Hillary Creurer - Allele - Minnesota Power, Inc. - 1 | |
| Answer | No |
| Document Name | |
| Comment | |
| The Generator Owner can build new assets with the best available technology, and it may still not be able to operate down to the ECWT. An example would be building a new wind farm in the northern United States which comes equipped with the Cold Weather Package. As shared by NAGF, under the standard, one may assume that a wind turbine cannot be built in the Northern part of the US where the ECWT is below the design temperature available from the OEMs. These resources help meet renewable energy standards and offer additional generation to a region that may require it. This rule disincentivizes these new builds, which hurts overall reliability instead of helping it. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Richard Jackson - U.S. Bureau of Reclamation - 1,5 | |
| Answer | No |
| Document Name | |
| Comment | |
| Reclamation does not agree, and recommends wording stay the same. It is unclear how a CAP can be generated and implemented on equipment that is not commissioned or in operation yet. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF | |

| | |
|--|-----|
| Answer | No |
| Document Name | |
| Comment | |
| Duke Energy agrees with and suggest the adoption of NAGF paragraph 72 comments. Additionally, items discovered late in design, construction, or a new facility could require corrective actions to extend beyond the commercial operation date. If FERC's proposal is codified, a new facility would be barred from operation, thereby potentially reducing BES reliability, until the corrective action can be implemented. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Thomas Foltz - AEP - 3,5,6 | |
| Answer | No |
| Document Name | |
| Comment | |
| AEP does not agree revising Requirement R7 in the manner described, as a CAP cannot be developed *before* a Generator Cold Weather Reliability Event has been experienced and identified. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable | |
| Answer | Yes |
| Document Name | |
| Comment | |
| See EEI's response to question 1 above. | |
| 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 | |
| The SRC agrees that revisions to Requirement R7 would best address this directive. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC | |
| Answer | Yes |
| Document Name | |
| Comment | |
| Southern Company views the revision to R7 to address this FERC directive as appropriate as long as constraint declarations are an option as factors outside of the Generator Owners' control are always a possibility. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |
| AZPS supports EEI's comments submitted on behalf of its members as documented in question 1 above. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC | |
| Answer | Yes |
| Document Name | |

Comment

It would be beneficial to have a unit properly prepared (or able to be properly prepared prior to the winter season) for extreme weather upon initial synch to the system and not simply COD. Would suggest upon initial synch and prior to cold weather season as modifiers to ensure reliable operations. There appears to be time to develop any freeze protection measures plans to ensure operation to the ECWT for units after 10/1/2027.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

The new generation unit should be fully compliant and able to execute the cold weather preparedness plan.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

| | |
|---|--|
| Answer | |
| Document Name | |
| Comment | |
| See our response to question 1 above. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group | |
| Answer | |
| Document Name | |
| Comment | |
| See response to question 1. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |

7. In paragraph 76 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R7 of Reliability Standard EOP-012-2 to address certain ambiguities by expanding on Requirement R7.1.1 and 7.1.2 to make it clear which corrective action plan implementation deadline applies to which generator owner, explaining that it is not clear which timeline applies when a generator owner must implement both existing and new equipment for freeze protection measures. Do you agree with this approach? If so, please provide your suggestions for the drafting team. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

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

Answer No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 76 comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation does not agree. As stated above it is not clear how a CAP is applicable for new and not in service generation. However, for technical review, existing timeframes for all generators are clearly defined in R7, delineating between new and existing is not necessary.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allele - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power agrees with NAGF, who does not believe that this should be an issue since FERC has also ordered that all CAPs be completed by the next winter, at least for the unit where the event occurred. Therefore, it does not appear relevant whether there is a correction or new equipment required to meet the CAP deadline. If NERC has been ordered to require this short timeline for all CAPs, this issue goes away completely.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

No

Document Name

Comment

Black Hills Corporation agrees with the NAGF in that this should not be an issue as FERC has also ordered that all CAPs be completed by the next winter.

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 does not believe that this should be an issue as FERC has also ordered that all CAPs be completed by the next winter, at least for the unit where the event occurred. Therefore, it does not appear relevant whether there is a correction or new equipment required to meet the CAP deadline. If NERC has been ordered to require this short timeline for all CAPs, this issue goes away completely.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

Southern Company would caution that the broad situations across the NERC footprint will make further clarifying Corrective Action Plan deadlines challenging and may require a large list of criteria to cover all potential situations.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

1. Although we believe Requirement R7 should be rewritten, we also believe the Standards Drafting Team should address the calendar dates associated with this directive through the Standard's Implementation Plan.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

A combination of question 4 and question 5 should address this. Rewrite the two sections with the deadlines in question 4 to address units that are operating prior to the 2027 date, and separately units COD after the 2027 date.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

Yes

Document Name

Comment

AEP agrees with the proposed approach. AEP recommends the SDT have only one timeline for implementation of all corrective measures. The GO can request an extension when necessary.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

A table similar to what PRC-005 uses for timelines could be more clear.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Should be relatively easy to modify to “each GO with a CAP must include the following in each CAP.”

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

AZPS supports EEI’s comments on more frequent reviews, but no more than every three years.

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 prefers the latter of the implementation timeframe to ensure efficient CAP documentation of the units for operation. Referring to our Q4 response, FirstEnergy requests the DT take the implementation timeframe into consideration when addressing this situation presented in Q7.

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) on question 7.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Yes

Document Name

Comment

SPP suggests that the timeline for both new and existing equipment should be the longer of the time limits. This would provide adequate time for each type of equipment.

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

The SRC agrees with this approach, and the SRC recommends that the applicability of the timelines be based on whether the corrective action requires the installation of new equipment. Under this approach (as further detailed in the SRC's response to Question 4), the shorter of the two timelines would apply to corrective actions that do not require the installation of new equipment, and the longer of the two timelines would apply to corrective actions that do require the installation of new equipment.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

See EEI's response to question 1 above.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Stevens - CPS Energy - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

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

See response to question 1.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

See our response to question 1 above.

Likes 0

Dislikes 0

Response

8. In paragraph 94 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations (than every five years) to verify that the declaration remains valid. NERC may propose to develop modifications that address the Commission's concerns in an equally efficient and effective manner, however, NERC must explain how its proposal addresses the Commission's concerns. Do you agree with revising Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to require more frequent reviews to address this directive? If so, please provide your suggestions for an alternative timeframe, along with supporting rationale. If not, please provide your suggestions for addressing this directive in an equally effective and efficient manner.

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

We would suggest an annual review, given the expected dramatic transition to IBRs. Another recommendation would be to lining it up with the annual inspection and maintenance in R4. It could include a review of the constraints and any updates to this, however, R8 seems more of a function to review constraint declarations. Maintenance and corrective actions are already established through various Requirements.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

1. We question how much more frequent these reviews must occur to gain acceptance across the ERO Enterprise and industry. There are other engineering-related studies that are required in a similar timeframe (e.g., once every five calendar years for activities related to NERC Reliability Standard PRC-019-2 — Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection). The purpose of the Generator Cold Weather Constraint declaration is to document a justification why selected corrective actions could not be implemented. Such reasons could be because a Generator Owner is awaiting their next extended planned outage period to implement such actions. If the Standard Drafting Team was to adopt an approach like used for implementing Corrective Action Plans under NERC Reliability Standard PRC-004-6 and Section 1600 of the NERC Rules of Procedure (i.e., the registered entity continues to update the Plan until its actions or timetable changes are completed and the registered entity files a quarterly update with the Regional Entity for any open Corrective Action Plans), then we believe the timeframe should be adjustable by the Generator Owner with an accompanying justification.

Likes 0

Dislikes 0

Response

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

| | |
|--|----|
| Answer | No |
| Document Name | |
| Comment | |
| Southern Company believes the current 5-year review is valid, a 3 or 4-year review period could be deemed appropriate so long as industry agrees that this can provide a good balance between providing reliable winter operation and compliance burden. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF | |
| Answer | No |
| Document Name | |
| Comment | |
| If NERC creates a list of constraints as recommended in Paragraph 54 of the order, there will be no reason for the Generator Owner to review their list of constraints. NERC would only need to make an announcement to industry stating that a constraint has been deemed no longer appropriate, and NERC can contact individual Generator Owners that have taken the constraint to inform them that there is now a means to address the constraint and they need to implement this means to address the constraint. There should not be any review needed by the individual Generator Owner. This would be consistent with the process of the Generator Owner not being able to declare a constraint without first getting approval from NERC. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments | |
| Answer | No |
| Document Name | |
| Comment | |
| Black Hills Corporation agrees with the NAGF in that if NERC creates a list of constraints, there will be no reason for the GO to review their list of constraints. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |

Hillary Creurer - Allele - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power does not believe that more frequent reviews of the Cold Weather Constraint declarations will provide value. However, Minnesota Power acknowledges that this would not require considerable time to review more often if necessary.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation does not agree. Freeze protection technology advancement does not come from declarations of constraints, but awareness of generating protection challenges. This is already covered in the standard, reviewing declared constraints more frequently does not provide any benefit, but is a hinderance with more administrative burden on an already short-staffed industry.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph 94 comments.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

Annual reviews are already performed on the cold weather preparedness plans and training. Timers are required to develop CAP to address issues and report events. The declarations will be impacted by all these reviews more frequently than 5 years. Additionally, the ECWT calculations are to be updated every 5 years. This is a reasonable timeline and could change conclusions in the declaration CAP. It makes more sense to keep 5 years as a requirement and not force the GO/GOP to add undue pressure while changing and adapting the winter preparedness program annually.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EI does not object to more frequent reviews, but no more than every three calendar years.

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

The SRC supports more frequent reviews and recommends that the standard require annual reviews. The SRC believes that constraint reviews can provide an opportunity for entities to identify, evaluate, and potentially adopt new freeze protection technologies. Consequently, the SRC is concerned that the longer the period between constraint reviews, the more that identification and adoption of new freeze protection technologies may be delayed. As a result, the SRC recommends an annual review cadence.

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) on question 8.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer Yes

Document Name

Comment

While FirstEnergy has no objection to a more frequent review time, we request the DT consider a 3-year cycle to on industry.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

AZPS supports EEI's comments submitted on behalf of its members as documented in question 1 above.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

If **discreet language** is provided for Constraints that is not based on cost, then a review should be shorter and more streamlined.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

AEP agrees with the concept of pursuing more frequent reviews. AEP suggests that if a pre-approval process is implemented by the EROs, the EROs should establish a review frequency as part of that process which is based on each specific Generator Cold Weather Constraint declaration.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer Yes

| | |
|---|-----|
| Document Name | |
| Comment | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Robert Stevens - CPS Energy - 1,3,5 | |
| Answer | Yes |
| Document Name | |
| Comment | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy | |
| Answer | Yes |
| Document Name | |
| Comment | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Nazra Gladu - Manitoba Hydro - 1,3,5,6 | |
| Answer | Yes |
| Document Name | |
| Comment | |
| Likes 0 | |
| Dislikes 0 | |

| | |
|---|--|
| Response | |
| | |
| David Jendras Sr - Ameren - Ameren Services - 1,3,6 | |
| Answer | |
| Document Name | |
| Comment | |
| See our response to question 1 above. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |
| Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group | |
| Answer | |
| Document Name | |
| Comment | |
| See response to question 1. | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| | |

9. In the June 2024 Order, FERC directs NERC to submit the directed modifications within nine (9) months of the date of the order, or by March 27, 2025. If you have any recommendations for how the drafting team may best conduct consensus building activities within the directed timeframe and in consideration of the shorter-than-typical comment periods meeting this timeframe will require, please provide and explain your suggestions below.

Thomas Foltz - AEP - 3,5,6

Answer

Document Name

Comment

EOP-012 was recently approved, and we believe it should be given a chance to prove itself before any revisions are made to it. Industry is currently attempting to mitigate risk by meeting the obligations of EOP-012, including cold weather plans. Industry will emerge from the next winter with data and lessons-learned as a result of EOP-12, and industry should be allowed to collect, evaluate, and disseminate this information before any efforts are made to revise the standard. If there are concerns about the adequacy of the standard, we recommend that other means such as RFIs and NERC Alerts be used before any efforts to revise EOP-012 would be pursued. Collectively, we believe doing so would be the way to meet any existing concerns in a thoughtful, strategic way. In short, because the overall project timeline is extremely aggressive, we suggest that consideration be given to allow opportunity for the benefits of EOP-012 to first be fully known and understood from its actual enforcement, followed by thoughtful review of its results, before revisions to EOP-012 are pursued. This would help ensure that any revisions pursued are driven by the merits that EOP-012 has realized in practice, as well as by any deficiencies that might still remain. We believe this approach would be preferable, as not only would it achieve the desired improvements, but also in a way that we believe would result in a higher quality subsequent version of the standard.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Document Name

Comment

Industry working group meetings hosted by EPRI were very helpful to network and get the latest status updates for everyone. Recommend continuing this touchpoint.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

There is no reliability gap for the Canadian Entities, as they are successfully operating in a cold climate. There should be an exception in the applicable Facilities to exclude the Canadian BES generating units. It will help the drafting team focus on the facilities which really require extreme cold weather preparedness and meet the shorter modification timeframe.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy agrees with and suggest the adoption of NAGF paragraph Question 9 comments. Additionally, Duke Energy agrees with the EEI comment regarding "posting the draft informally for industry review and comment, and then conduct Webinars to seek industry input prior to a formal posting."

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Recommend the implementation team submit a request for extension to 18 months due to other higher priority items and lack of manpower resources.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

Document Name**Comment**

Minnesota Power has reviewed NAGF comments and shares concern about perceived misalignment between the Technical Rationale document from EOP-012-2 versus the things being shared by Compliance and Enforcement groups. Minnesota Power has developed a compliance plan based on the Standard as well as guidance from the Technical Rationale.

Likes 0

Dislikes 0

Response

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

Answer**Document Name****Comment**

See response to question 1.

Likes 0

Dislikes 0

Response

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

Answer**Document Name****Comment**

Reliability, rather than compliance, should drive the conversation.

There was not a question regarding “other considerations” for the DT but there are some concerns that need cemented in the SAR. If not within the SAR, a DT may not address the concerns as language is being developed. As is, with EOP-012-2 set to be enforceable, there will likely be Generator Cold Weather Constraints declared using the justification that FERC ordered to be changed. There needs to be clear direction provided to update or rescind those declared Constraints with the implementation of the new Requirements. While an Implementation Plan will be required for the new language, the DT should not ignore the “existing” EOP-012-2 Constraints, nor should the Implementation Plan be extended to allow five years of compliance using the “existing” EOP-012-2 Constraints. While the ERO Enterprise supports the idea projected with EOP-012-2 that use of Constraints should be limited, the industry discussions, especially with renewable energy participants, are significantly slanted towards “cost” being used as a Constraint justification. That indicates the possibility of several Constraints being developed using justifications that will likely be not supportable or in line with FERC directives.

Additionally, Requirement 4 Part 4.5 lacks clarity and needs additional supportive language to avoid confusion. Requirement 4 requires documentation of Generator Cold Weather Critical Components and their freeze protection measures. Requirement 4 Part 4.5 requires “annual inspection and

maintenance of generating unit(s) freeze protection measures” which appears to imply those freeze protection measures placed on Generator Cold Weather Critical Components but the language is not explicit. While WECC believes other freeze protection measures will exist, the reliability risk focus should be placed on the Generator Cold Weather Critical Component freeze protection measures. Suggest the DT consider the following for Requirement R4 Part 4.5:

“Annual inspection and maintenance of generating unit(s) Generator Cold Weather Critical Component(s) freeze protection measures documented in Requirement 4 Part 4.4.”

Other freeze protection measures may be in place for components not considered Generator Cold Weather Critical Components that can be, and should be, managed differently than those freeze protection measures on Generator Cold Weather Critical Components.

Should consider adding reference to Generator Cold Weather Critical Components in 7.1.1 and 7.1.2.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

AZPS agrees with EEI’s comments submitted on behalf of their members on the suggestions for the drafting team to seek input during the initial development process of the new directives. AZPS also agrees with the suggested language EEI included to clarify and clearly state the scope of the project.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

Document Name

Comment

Black Hills Corporation agrees with the NAGF comments, plus the identified “issue of conflicting guidance related to the calculation of the ECWT”.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

Ameren recommends establishing a standard drafting team with an accelerated schedule to deliver the appropriate requirements language. We would also like clarity around the term "Generator Cold Weather Constraint." Additionally, we recommend ensuring that all GCWC declarations are technically justified. We are concerned that NERC will not be able to perform a thorough review of documentation in order to meet the FERC deadline. We also believe there is not a need for NERC to create a list of constraints.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Document Name

Comment

In order to reduce reiteration of stages for this project's review, FirstEnergy suggest the reporting process for CAP procedures and obligations mimic other standard's reporting process such as PRC-004

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), North American Generator Forum (NAGF), and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 9.

Likes 0

Dislikes 0

| | |
|---|--|
| Response | |
| Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC | |
| Answer | |
| Document Name | |
| Comment | |
| This deadline is very tight if following NERC procedures | |
| Likes 0 | |
| Dislikes 0 | |
| Response | |
| Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF | |
| Answer | |
| Document Name | |
| Comment | |
| <p>The drafting team and NERC staff must focus on developing any revised requirements with input from Generator Owners across the broad spectrum of owner types and not as much input from entities that will not have to implement the standard. NERC needs to ensure that IPPs have equal representation with integrated utilities, while non-generator entities would have very few representatives on the SDT. In addition, very few meetings should be held with the regulators without the full attendance of the SDT and the public being invited.</p> <p>The NAGF has also identified issues related to the current interpretation by the Compliance and Enforcement groups at NERC and the Regional Entities that should be addressed during the drafting effort. These issues include whether the cold weather plan must address maintenance on only those freeze protection measures related to Generator Cold Weather Critical Components (GCWCC), or if it must address any and all freeze protection measures at a plant. The NAGF points out that the Technical Rationale document from EOP-012-2 states clearly that the standard only addresses the freeze protection measures associated with the GCWCC but the Compliance and Enforcement groups have communicated to industry participants that they will be auditing all freeze protection measures at a plant, including things that do not impact generation output, in direct opposition to the Technical Rationale that was the basis for industry approval of EOP-012-2. This issue must be addressed quickly as part of any modification to EOP-012-2 or it is highly likely that industry participants will vote down the proposed changes.</p> <p>Another issue where the Regional Entities are providing conflicting guidance relates to the calculation of the Extreme Cold Weather Temperature (ECWT). At least one region is telling industry participants that entities must have a temperature value for every hour since January 1, 2000. A different region is telling industry participants that entities will have to justify the data used to calculate ECWT regardless of missing data points or not. This issue again needs addressed as part of the revisions to EOP-012-2 to ensure industry participants will support other modifications.</p> | |
| Likes 2 | Jennie Wike, N/A, Wike Jennie; Tim Kelley, N/A, Kelley Tim |
| Dislikes 0 | |
| Response | |

Sharon Darwin - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Answer

Document Name

Comment

Southern Company supports the EEI comments that the SAR should provide a clear scope for the Standard drafting team which includes the FERC directives listed in the SAR in a clear and concise manner.

Additionally, Southern Company would encourage the Standard drafting team, once formed, to reach out to industry for input, specifically plant engineering and maintenance personnel, to gain a better understanding of the challenges to implementation of Corrective Action Plans. Southern Company agrees that winter operation is important, but the implementation timeframe should be reasonable based on the individual Generator Owner. Southern Company also agrees that needed improvement should and must be done, but an unrealistic timeframe for Corrective Action Plan implementation could create reliability issues in other times of the year (i.e. summer).

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 SRC suggests the following to build consensus and in consideration of the shorter-than-typical comment periods:

- Have the Standard Drafting Team (SDT) meet with representatives from each of the segments to understand their concerns and to ask what would need to be done to garner their support.
- Following the individual meetings, have the SDT host some meetings across segments to identify and build areas of consensus.
- Consider appointing a mixture of new and returning members to the SDT. While past members will have more familiarity with EOP-012-2 and the considerations that drove its development, it is equally important to have SDT members who can bring new perspectives as the team works to expeditiously meet FERC's directives. To ensure efficiency in discussions, members of the team should also understand the evolution of EOP-012 and the present and past FERC Orders related to EOP-012, as noted in the "Detailed Description" portion of the SAR.

The SRC also recommends that the project scope be revised to clarify which tasks are the SDT's responsibility and which will be addressed by NERC Staff. While the scope indicates that NERC Staff will address issues related to compliance monitoring approaches, it also includes FERC directives that appear to be more appropriately handled (at least in part) by NERC Staff in the list of standards modification directives that the SDT will be charged with, including (but not necessarily limited to):

- "To the extent that NERC continues to believe that the extent of industry adoption for winterization technologies should be a criterion for declaring a constraint, **NERC should clearly explain in its filing how it will assess the extent of such adoption in a way that provides for consistent compliance and enforcement outcomes**" (SAR pg. 2) (emphasis added);
- "Alternatively, NERC could establish a pre-approval process for all Generator Cold Weather Constraint declarations" (SAR pg. 2);
- "We also direct NERC to include in its compliance filing, a plan to timely review such declarations to verify compliance with proposed Reliability Standard EOP-012-2 and its successors or obligations in a corrective action plan and take corrective action where necessary" (SAR pg. 3); and
- "It is up to NERC whether it would like to delegate this task to the relevant Regional Entities" (SAR pg. 3).

Revising the SAR to better clarify which tasks the SDT will handle and which tasks NERC Staff will address will enable the SDT and industry to more appropriately focus their efforts and attention on the tasks and issues that are necessary to build consensus among the members of the Registered Ballot Body.

Likes 0

Dislikes 0

Response

Kristine Martz - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

EEl suggests that the DT post the draft informally for industry review and comment, then conduct Webinars to seek industry input prior to a formal posting and meet with the various trades and forum members.

Additionally, EEl suggests the DT consider a reporting process for CAP procedures similar to other standards reporting, such as PRC-004.

EEl offers the following input regarding the SAR Scope to provide clarity:

1. Revise the newly developed glossary term "Generator Cold Weather Constraint" to ensure that its use within EOP-012 is clear and understandable by applicable entities, while providing auditors a clear understanding of what the term means. Additionally, all references to "reasonable cost," "unreasonable cost," "cost," and "good business practices" are to be removed and replaced by language that is clear and auditable.
2. Revise EOP-012-2 to include new requirements that obligate GOs submitting a Generator Cold Weather Constraint declaration to submit those declarations to NERC for review and approval in order to ensure all declarations are technically justified in a timely manner.
3. Revise EOP-012-2 Requirement R7 to require shorter deadlines to implement corrective action plans for existing or new equipment or freeze protection measures for generating units that experience a Generator Cold Weather Event.
4. Revise EOP-012-2 Requirement R7 to ensure that any extension of a corrective action plan implementation deadline beyond the maximum implementation timeframe required by the Standard is pre-approved by NERC and requires the GO to inform affected registered entities of operating limitations of the resource during extreme cold weather events during the period of the extension.
5. Revise EOP-012-2 to clarify that any Standard Authorization Requirement R2 corrective action plans must be completed prior to the generating unit's commercial operation date.
6. Revise EOP-012-2 to address the ambiguities by expanding on Requirement R7.1.1 and 7.1.2 to make it clear which corrective action plan implementation deadline applies to which generator owner
7. Revise EOP-012-2 Requirement R8, part 8.1 to implement more frequent reviews of Generator Cold Weather Constraint declarations to reassess and validate that the constraint declaration is still justified.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

1. We believe the Standard Drafting Team should address the directives under three separate smaller groups. The first group should address the directives directly related to creation of Corrective Action Plans (Requirement R7). We believe those directives are from Paragraphs 68, 70, and 76 of the June 2024 Order (i.e., Order approving Reliability Standard EOP-012-2 on June 27, 2024). The second group should address the directive related to the frequency of reviewing a Generator Cold Weather Constraint declaration. We believe that directive is from Paragraph 94 of the June 2024 Order. The third team would address the other directives identified within the June 2024 Order (i.e., Paragraphs 47, 54, and 72).
2. Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Document Name

Comment

Suggest creating a more succinct summary of the FERC directives and to frequently offer forums to educate the stakeholders. The FERC directives may be difficult to understand and to garner industry support on, but we are stuck with developing responses, hopefully thoughtful, practical responses.

Likes 0

Dislikes 0

Response