

Comment Report

Project Name: 2024-03 Revisions to EOP-012-2 | Draft 1
Comment Period Start Date: 10/17/2024
Comment Period End Date: 11/5/2024
Associated Ballots: 2024-03 Revisions to EOP-012-2 | Draft 1 EOP-012-3 IN 1 ST
2024-03 Revisions to EOP-012-2 | Draft 1 Implementation Plan IN 1 OT

There were 60 sets of responses, including comments from approximately 165 different people from approximately 109 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 directed NERC to revise EOP-012-2 to “ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Reliability Standard are objective and sufficiently detailed so that applicable entities understand what is required of them.” In paragraph 47 of the June 2024 Order, FERC directed NERC to develop and submit modifications to the Generator Cold Weather Constraint definition of Reliability Standard EOP-012-2, to remove the references to “cost,” “reasonable cost,” “unreasonable cost,” and “good business practices” and replace them with criteria that are objective, unambiguous, and auditable. In paragraph 54 of the June 2024 Order, FERC directs NERC to modify EOP-012-2 so that NERC receives, reviews, evaluates, and confirms for validity the Generator Cold Weather Constraint declarations in a timely manner. In paragraph 94 of the June 2024 Order, FERC directs NERC to develop and submit modifications to Requirement R8, Part 8.1 of Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations (more than every five years) to verify that the declaration remains valid.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System 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
					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
Santee Cooper	Carey Salisbury	5		Santee Cooper	Paul Camilletti	Santee Cooper	1,3,5,6	SERC
					Kevin Baker	Santee Cooper	1,3,5,6	SERC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group, Inc.	3	RF
					Michelle Hribar	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
					Candace Morakinyo	WEC Energy Group, Inc.	4	RF
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NPCC,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Jason Procuniar	Buckeye Power, Inc.	4	RF
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Bill Pezalla	Old Dominion Electric Cooperative	3,4	SERC

					Nick Fogleman	Prairie Power, Inc.	1,3	SERC
					Jordan McClellan	Southern Illinois Power Cooperative	1	SERC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
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
					Kirsten Rowley	Midcontinent ISO, Inc.	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Thomas Foster	PJM Interconnection, L.L.C.	2	RF
					Darcy O'Connell	California ISO	2	WECC
					John Pearson	ISO New England, Inc.	2	NPCC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		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	5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF
					Marvin Johnson	DTE Energy - Detroit Edison Company	3	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern Company Generation	5	SERC
Black Hills Corporation	Rachel Schuldt	6		Black Hills Corporation - All Segments	Travis Grablander	Black Hills Corporation	1	WECC
					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	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power	10	NPCC

Coordinating
Council

	Coordinating Council		
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
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
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
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Victoria Crider	Dominion Energy	3	NA - Not Applicable
					Sean Bodkin	Dominion Energy	6	NA - Not Applicable
					Steven Belle	Dominion Energy	1	NA - Not Applicable
					Barbara Marion	Dominion Energy	5	NA - Not Applicable
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC

					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

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

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

Answer No

Document Name

Comment

MRO NSRF recommends there be an “approval by default” if the CEA does not respond within a given period, for example 30 days after submittal to CEA.

Likes 1

JEA, 1, McClung Joseph

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

R8.2 should be its own requirement. R8.4 timing is too restrictive. Suggest adding a statement with a timeframe (150 days). A CEA rejection of a CAP could force an unplanned maintenance outage and be longer than expected timeframes.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Manitoba Hydro supports BC Hydro's comment: "BC Hydro is supportive of the revisions to the revised Generator Cold Weather Constraint definition. However, to add clarity on Freeze Protection Measures, BC Hydro recommends retaining the following wording "Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions" in EOP-012-3 associated documentation, such as the Technical Rationale." And "Please also clarify in the language of the Requirement whether these are calendar or business days."

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 supports NAGF's position on modifications to the wording of R8 and their stance on the lack of CEA obligations related to the approval process.

Duke Energy agrees in general with changes to the definition of a Generator Cold Weather Constraint and the use of Attachment 1. Attachment 1 does not though provide sufficient guidance for freeze protection modifications that are unsustainable due to cost. While Attachment Sections 3a through 3c does offer guidance, it provides no guidance for modifications that are financially unfeasible. Please provide additional guidance regarding unsustainability due to cost.

Duke Energy does not support the pre-approval requirement for declarations. The declaration process should be driven by clear criteria and the acceptability of declarations should be evaluated as part of the audit process. Please provide clear guidance and criteria for declarations as stated.

The status of the CEA in the declaration process is an area of concern. The CEA by statute, perform the enforcement role for standards published by NERC. The preapproval process places the CEA in the position of a performer or approver on implementation of the standard. The SDT should modify the process to reflect a more amiable solution that excludes the CEA.

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI), the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF), and the North American Generator Forum (NAGF) on question 1

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Black Hills Corporation supports the comments submitted by NAGF and EEI.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC agrees with EEI's comments and criteria used to determine a Generator Cold Weather Constraint.

The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

No

Document Name

Comment

HQ supports BC Hydro's comment: "BC Hydro is supportive of the revisions to the revised Generator Cold Weather Constraint definition. However, to add clarity on Freeze Protection Measures, BC Hydro recommends retaining the following wording "Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions" in EOP-012-3 associated documentation, such as the Technical Rationale." And "Please also clarify in the language of the Requirement whether these are calendar or business days."

HQ supports NBPow's comment: "The pre-approved Generator Cold Weather Constraints (GCWCs) in Attachment 1 could be problematic in some jurisdictions, since Requirement R8 and Attachment 1 are referenced for Requirement R2 Part 2.2 for new designs on a go-forward basis. In particular, the pre-approved GCWC should not be set up in such a way as to exempt generating unit developers from doing proper due diligence. At least for future designs (Requirement R2 Part 2.2) all Generator Cold Weather Constraints should be assessed on a case-by-case basis. Pre-approved GCWCs should be avoided, or if used at all, limited to existing or already committed designs, since technology and the needs of the grid may be expected to change in the future and existing pre-approvals may no longer be appropriate."

HQ supports OPG's comments "Additional clarification is required regarding GCWC CEA applicability/validity confirmation & determination implications for unit present/future operation.

Please clarify the role of CEA – review for constraint presence, validity confirmation, or approval, and the requirements the CEA need to satisfy to perform it's role.

Attachment 1 bullet #3 appears to be the BA purview and not the CEA.

In the context of this standard a freeze protection measure can negatively impact the revenue of a market participant, yet still be required to be implemented for compliance purposes. Please explain how was derived the "more than three percent" criterion and the justification for argument that it will fit all the market participants, from any geographical location.

Attachment 1 last paragraph state that "An approved Generator Cold Weather Constraint declaration for any specific Generator Cold Weather Critical Component does not relieve the Generator Owner of its obligation to otherwise prepare its applicable generating unit(s) to meet the requirements of EOP-012-3."

The overall intent of the Extreme Cold Weather Preparedness and Operations standard is to: "Implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature;"

By definition, the "**Generator Cold Weather Constraint** – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.". As written this appears to be an actual requirement to operate at the ECWT, which cannot be reconciled with an approved Generator Cold Weather Constraint declaration."

There is a risk for future generation designs introduced by Attachment 1 via geographical limitation for specific technologies in the Pre-Approved Generator Cold Weather Constraints list.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

No

Document Name

Comment

PG&E Supports NAGF recommended modifications to the drafted R8 language.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

No

Document Name

Comment

NRG is in concurrence that the direction that the SDT has taken to address the ambiguity of the language of the constraints is sound as it has allowed for acceptance of known technical constraints that the industry has identified. It also has provided sound examples of those examples that may be presented on case by case basis. However, strict guidance should be provided to reviewers to ensure consistency of acceptance of these constraints for the case by case basis. The process may also need to be modified that if an Extreme Cold Weather Reliability event continually occurs due to same mechanism-say wind turbine blade icing or PV icing- that a single declaration for the year should suffice and not required for each event and filed through the required approval process.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

No

Document Name

Comment

NRG is in concurrence that the direction that the SDT has taken to address the ambiguity of the language of the constraints is sound as it has allowed for acceptance of known technical constraints that the industry has identified. It also has provided sound examples of those examples that may be presented on case by case basis. However, strict guidance should be provided to reviewers to ensure consistency of acceptance of these constraints for the case by case basis. The process may also need to be modified that if an Extreme Cold Weather Reliability event continually occurs due to same mechanism-say wind turbine blade icing or PV icing- that a single declaration for the year should suffice and not be required for each event and filed through the required approval process.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Tri-State supports MRO NSRF Comment.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

While AES US Renewables agrees with the approach of updating definition of Generator Cold Weather Constraint, we believe there are still some gaps in the proposed R8 as well as Attachment 1 that need to be addressed:

- The 24 calendar month timeline for reviewing GCWC declaration that has been validated by CEA is too frequent. We believe that at a minimum, it should be set to 36 calendar months. We prefer 60 months if possible since a lot of the pre-approved constraints listed in Attachment 1 for renewable generators are likely not going to be alleviated anytime soon as OEMs are not actively working to address them (unlike the IEEE 2800 requirements where various ISO/RTOs are driving the change requirements due to being perceived as more impactful and urgent).
 - It was mentioned during the 10/24/2024 webinar that 24-calendar month reviews do not require submittal to CEA for reviews and approvals. However, it is currently not clear on what the process entails when a constraint declaration is no longer valid. Is the GO required to notify the CEA that the constraint declaration that was approved is no longer valid due to solutions being available to mitigate the constraint? Since the Constraint and CAP Process document stated that NERC will be sending NERC a quarterly report, we are assuming that NERC/CEA will have to keep track of retirement of constraint declarations in addition to what they have approved/denied.

- Neither R8 nor Attachment 1 addresses the timeline for implementing the mitigation if the declared constraint is no longer valid. We have concerns about situations where one vendor or OEM has developed a solution for the constraint, but the amount of investment needed to incorporate that solution is too high and impacts revenue and profitability negatively in operating the generation facility. How will this type of scenario be taken into account under the proposed Attachment 1 criteria?
- Will the pre-approved list in Attachment 1 be revised if new constraints are identified in the future? Or if commercially viable solutions to those constraints appear in the future, will those constraints be removed from the pre-approved list? We are concerned about the static nature of the pre-approved list as it can greatly impact the ability to declare constraints for projects that are in the interconnection queue at various ISO/RTOs currently.
- In the Constraint and CAP Process document provided along with EOP-012-3 proposed draft and Implementation Plan, there is no mention on what registered entities can do if their constraint declaration is denied related to R2.2. The current language only focused on updating CAPs related to R6.1 and R7.1. As written currently, R2.2 does not have the option to create a corrective action plan.
- Under the proposed Attachment 1, item 3 (c) allows constraint declaration if application of freeze protection measures would cause the Generator Owner to cancel plans to finish the development of a new generating unit. We would like to find out if further guidance can be provided either in Attachment 1 or Technical Rationale for this constraint criteria in regards to financial/cost impacts. This question was posed during the 10/24/2024 webinar and the answer provided was not clear and it was suggested that it can be evaluated on a case-by-case basis.
- More clarification is needed on a few constraints listed under Attachment 1:
- *“Wind turbine towers that have structural limitations established by Original Equipment Manufacturers (OEMs) based on a minimum temperature that is higher than the Extreme Cold Weather Temperature calculated per Requirement R1.”*
- Does structural limitations imply design limitations? Please clarify that or include clarification in the Technical Rationale document.
- *“Heat tracing or other de-icing technologies for wind turbine blades that are not available in the Generator Owner’s location.”*
- Does the phrase “not available” also mean not effective? There is a difference between both. There are currently some not-so-effective methods to prevent icing (like spraying the blades with anti-icing coatings). Are Generator Owners required to use solutions that are not effective or can it be part of constraint declaration?
- Does the phrase “Generator Owner’s location” mean regionally? For example, does it mean if a wind turbine uses a solution that is available in New York, and the solution is not used in Texas, the Generator Owner can declare constraint that it is not available for wind turbines in Texas? Or should the constraint be modified to: *“Heat tracing or other de-icing technologies for wind turbine blades that are not available in **all NERC regions**”*? Our rationale is that if it is not available in the US, but available in Europe, then, we are allowed to declare constraint. It should be based on availability within each country.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

The NAGF recommends that R8 be modified to address the following issues:

a. Requirement 8.2 should not be part of R8 as it is a separate requirement and requires actions different than R8;

b. The language used in 8.4, specifically as it relates to R6, is not clear, or it may require an entity to have a CAP implemented on the day they are notified that the declaration has been rejected;

c. The time stated in 8.1 does not agree with the process document posted in support of the standard. In addition, the document requires an entity to coordinate with the CEA before filing a declaration, without any obligation on the CEA to respond in a timely manner. These two documents, the requirement in the standard and the process document, must be coordinated before Requirement R8 is clear, unambiguous and enforceable.

To address these issues, the NAGF recommends the following language be used:

R8. Each Generator Owner that declares a Generator Cold Weather Constraint in accordance with Attachment 1 shall: *[Violation Risk Factor: Medium]*
[Time Horizon: Long-term Planning]

8.1. Submit its Generator Cold Weather Constraint declaration(s) to the CEA within 45 days of determining that the Generator Cold Weather Constraint is applicable. For Generator Cold Weather Constraints determined in accordance with Requirement R2 for generating unit(s) upon beginning commercial operation, submit the Generator Cold Weather Constraint declaration(s) no later than 15 days after commercial operation;

8.2 Update the operating limitations associated with capability and availability under Requirement R1 Part R1.2 if applicable; and

8.3 If the CEA determines the declared Generator Cold Weather Constraint is invalid, update its Corrective Action Plan(s) to require corrective actions be completed;

8.3.1 Within 150 days or longer as agreed to by the CEA to meet compliance with R6 to begin the date the Generator Owner is notified that the Generator Cold Weather Constraint is invalid, or

8.3.2 Consistent with Requirement R7 Part 7.1 or longer as agreed to by the CEA, to begin from the date the Generator Owner is notified that the Generator Cold Weather Constraint is invalid.

R9. Review any Generator Cold Weather Constraint declaration validated by the CEA every 24 calendar months to determine if it remains valid under Attachment 1.

The NAGF has significant concerns related to the requirement to modify or repair equipment within an extremely confined period under these requirements. This issue is discussed in further detail under question 2.

The NAGF does not see any process that will be followed in the event the review of the declaration determines that it is now possible to correct, there are no timelines or other process. Is it the intent to allow the GO to determine when this will be implemented without any notifications to the CEA?

The NAGF also has concerns about situations where one vendor or OEM has developed a solution for the constraint, but the amount of investment needed to incorporate that solution is too high and impacts revenue and profitability negatively for operating the generation facility. How will this type of scenario be considered under the proposed Attachment 1 criteria?

The NAGF requests additional clarification regarding the constraints in Attachment 1:

As an example, for the constraint "Wind turbine towers that have structural limitations established by Original Equipment Manufacturers (OEMs) based on a minimum temperature that is higher than the Extreme Cold Weather Temperature calculated per Requirement R1." Do structural limitations imply design limitations? Please clarify that or include clarification in the Technical Rationale document.

As another example for the constraint "Heat tracing or other de-icing technologies for wind turbine blades that are not available in the Generator Owner's location." Does the phrase "not available" also mean not effective? There is a difference between both. There are currently some not-so-effective methods to prevent icing (like spraying the blades with anti-icing coatings). Since cost is not to be considered, are Generator Owners required to use solutions that are not effective if they are available, or can it be part of constraint declaration?

Does the phrase "Generator Owner's location" mean regionally? For example, does it mean if a wind turbine uses a solution that is available in New York, and the solution is not used in Texas, the Generator Owner can declare a constraint that it is not available for wind turbines in Texas? Or should the constraint be modified to: "Heat tracing or other de-icing technologies for wind turbine blades that are not available in all NERC regions"? Our rationale is that if it is not available in the US, but available in Europe, then, we are allowed to declare constraint. It should be based on availability within each country.

The NAGF looks forward to working with the SDT to address these issues and concerns.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

No

Document Name

Comment

While Avista supports in part the approach that the Drafting Team has taken to address FERC Commission Directives contained in the June 27, 2024 FERC Order, Approving Extreme Cold Weather Reliability Standard EOP-012-2 And Directing Modifications, we do not support the proposed definition for Generator Cold Weather Constraint. The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version. And while we see value in the information provided in Attachment 1, that information could be contained in another technical document supporting this standard (i.e., Technical Rationale or Implementation Guidance), if the definition and criteria were revised to more closely align to the directives contained in the Order. To address our concerns, we offer the following edits (in boldface) to the Generator Cold Weather Constraints definition:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions. *(Strikethroughs have been omitted for clarity)*

Criteria used to determine a **Generator Cold Weather Constraint** shall consider the following:

{C}· **A determination through an engineering analysis that the freeze protection measures lack reasonable assurances of efficacy and there is no record that such protections have been effectively utilized on** generating units of a comparable types in regions that experience similar winter climate conditions;

{C}· **A determination through engineering analysis that there are no available freeze protection measures, commercially available, that have been proven to be effective at mitigating the effects of the Extreme Cold Weather Temperature identified in the region where the resource is installed;** or

{C}· **A determination through an engineering economic analysis has been made that determines that the implementation of freeze protection measures necessary to mitigate the effects of the Extreme Cold Weather Temperature, while feasible, would result in the early retirement of the resource.**

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer	No
Document Name	
Comment	
Ameren agrees with EEI's and NAGF's comments.	
Likes 0	
Dislikes 0	
Response	
Jeffrey Streifling - NB Power Corporation - 1	
Answer	No
Document Name	
Comment	
<p>NB Power supports BC Hydro's comment: "BC Hydro is supportive of the revisions to the revised Generator Cold Weather Constraint definition. However, to add clarity on Freeze Protection Measures, BC Hydro recommends retaining the following wording "Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions" in EOP-012-3 associated documentation, such as the Technical Rationale." And "Please also clarify in the language of the Requirement whether these are calendar or business days."</p> <p>The pre-approved Generator Cold Weather Constraints (GCWCs) in Attachment 1 could be problematic in some jurisdictions, since Requirement R8 and Attachment 1 are referenced for Requirement R2 Part 2.2 for new designs on a go-forward basis. In particular, the pre-approved GCWC should not be set up in such a way as to exempt generating unit developers from doing proper due diligence. At least for future designs (Requirement R2 Part 2.2) all Generator Cold Weather Constraints should be assessed on a case-by-case basis. Pre-approved GCWCs should be avoided, or if used at all, limited to existing or already committed designs, since technology and the needs of the grid may be expected to change in the future and existing pre-approvals may no longer be appropriate.</p> <p>Additional clarification is required regarding GCWC CEA applicability/validity confirmation & determination implications for unit present/future operation.</p> <p>Please clarify the role of CEA – review for constraint presence, validity confirmation, or approval, and the requirements the CEA need to satisfy to perform it's role.</p> <p>Attachment 1 bullet #3 appears to be the BA purview and not the CEA.</p> <p>In the context of this standard a freeze protection measure can negatively impact the revenue of a market participant, yet still be required to be implemented for compliance purposes. Please explain how was derived the "more than three percent" criterion and the justification for argument that it will fit all the market participants, from any geographical location.</p> <p>Attachment 1 last paragraph state that "An approved Generator Cold Weather Constraint declaration for any specific Generator Cold Weather Critical Component does not relieve the Generator Owner of its obligation to otherwise prepare its applicable generating unit(s) to meet the requirements of EOP-012-3."</p>	

The overall intent of the Extreme Cold Weather Preparedness and Operations standard is to:” Implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the unit(s)’ Extreme Cold Weather Temperature;”

By definition, the “**Generator Cold Weather Constraint** – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.”. As written this appears to be an actual requirement to operate at the ECWT, which cannot be reconciled with an approved Generator Cold Weather Constraint declaration.”

There is a risk for future generation designs introduced by Attachment 1 via geographical limitation for specific technologies in the Pre-Approved Generator Cold Weather Constraints list.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

No

Document Name

Comment

While we support in part the approach that the Drafting Team has taken to address FERC Commission Directives contained in the June 27, 2024 FERC Order, Approving Extreme Cold Weather Reliability Standard EOP-012-2 And Directing Modifications, we do not support the proposed definition for Generator Cold Weather Constraint. The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version. And while we see value in the information provided in Attachment 1, that information could be contained in another technical document supporting this standard (i.e., Technical Rationale or Implementation Guidance), if the definition and criteria were revised to more closely align to the directives contained in the Order. To address our concerns, we offer the following edits (in boldface) to the Generator Cold Weather Constraints definition:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions. *(Strikethroughs have been omitted for clarity)*

Criteria used to determine a **Generator Cold Weather Constraint** shall consider the following:

- 1} **A determination through an engineering analysis that the freeze protection measures lack reasonable assurances of efficacy and there is no record that such protections have been effectively utilized on** generating units **of a** comparable types in regions that experience similar winter climate conditions;
- 2} **A determination through engineering analysis that there are no available freeze protection measures, commercially available, that have been proven to be effective at mitigating the effects of the Extreme Cold Weather Temperature identified in the region where the resource is installed; or**
- 3} **A determination through an engineering economic analysis has been made that determines that the implementation of freeze protection measures necessary to mitigate the effects of the Extreme Cold Weather Temperature, while feasible, would result in the early retirement of the resource.**

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

While EEI supports in part the approach that the DT has taken to address FERC Commission Directives contained in the June 27, 2024 FERC Order, Approving Extreme Cold Weather Reliability Standard EOP-012-2 And Directing Modifications, we do not support the proposed definition for Generator Cold Weather Constraint. The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version. And while we see value in the information provided in Attachment 1, that information could be contained in another technical document supporting this standard (i.e., Technical Rationale or Implementation Guidance), if the definition and criteria were revised to more closely align to the directives contained in the Order. To address our concerns, we offer the following edits (in boldface) to the Generator Cold Weather Constraints definition:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions.

Criteria used to determine a **Generator Cold Weather Constraint shall consider the following:**

- **A determination through an engineering analysis that the freeze protection measures lack reasonable assurances of efficacy and there is no record that such protections have been effectively utilized on generating units of a comparable types in regions that experience similar winter climate conditions;**
- **A determination through engineering analysis that there are no available freeze protection measures, commercially available, that have been proven to be effective at mitigating the effects of the Extreme Cold Weather Temperature identified in the region where the resource is installed; or**
- **A determination through an engineering economic analysis has been made that determines that the implementation of freeze protection measures necessary to mitigate the effects of the Extreme Cold Weather Temperature, while feasible, would result in the early retirement of the resource.**

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer

No

Document Name

Comment

Vistra agrees with comments made by Duke Energy.

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1**

Answer

No

Document Name

Comment

Most of the definition on Page 2 of the redlined document removes Generator Cold Weather Constraint without directing to Attachment 1. Also, depending on the CEA, a constraint may be applicable to the facility but disagreed upon by the CEA, in which the facility would have to update its corrective action plan without being able to contest the analysis of the CEA. Recommend that any Constraint that is requested be handled by a single senior management official with overall authority and responsibility for leading and managing implementation of and continuing adherence to the requirements within the NERC EOP-012 cold weather standards and not at the Compliance Enforcement Authority (CEA).

Likes 0

Dislikes 0

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

Answer

No

Document Name

Comment

MP agrees with several aspects of Attachment 1 but aligns more closely with the edits EEI provided for the Cold Weather Constraint definition. EEI refers to effective freeze protections on units of comparable types in regions with similar winter climate conditions, commercially available and effective freeze protection for the region, and evaluation of where freeze protection installation could force early retirement. Early retirement of units will not support overall grid reliability.

Likes 0

Dislikes 0

Response**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)**

Answer	No
Document Name	
Comment	
<p>The ISO/RTO Council (IRC) Standards Review Committee (SRC) (consisting, for purposes of these comments, of CAISO, ERCOT, IESO, ISO-NE, PJM, MISO, NYISO, and SPP) generally agrees with the updated definition of Generator Cold Weather Constraint, the updated language within Requirement R8, and the provision of Attachment 1 to provide further detail on constraints. However, the SRC recommends the following revisions to Attachment 1:</p> <p>-- Rename the first list of constraints “Potential Generator Cold Weather Constraints that Would be Candidates for Accelerated Approval” to better reflect the CEA review that is required for these constraints.</p> <p>-- Revise the second constraint on the accelerated approval list to read as follows to clarify that it is not intended to address shipping difficulties: “Heat tracing or other de-icing technologies for wind turbine blades that the supplier will not sell or otherwise provide to the Generator Owner.”</p> <p>-- Revise the fourth constraint on the accelerated approval list to read as follows to allow for the possibility of the future development of technically feasible solar panel de-icing technology: “Applying heat to remove accumulated frozen precipitation on solar panels when generating the heat would require 50% or more of the amount of energy the solar panels would produce in the absence of the accumulated frozen precipitation.”</p> <p>The SRC recommends that items 3.a and 3.b of the case-by-case constraint list be consolidated into a single item that reads as follows: “The application of freeze protection measures would result in the imminent premature retirement of an existing generating unit.” This would help clarify that (for example) changing a unit’s planned retirement date from a day 20 years in the future to a day 19 years in the future does not justify a constraint, while also avoiding any potential ambiguity regarding what constitutes proper publication of a retirement date.</p> <p>The SRC recommends that the three percent threshold used in items 3.d and 3.e of the case-by-case constraint list be replaced with language that would allow the CEA to determine the appropriate threshold for the particular region or portion of a region that would be impacted by the requested constraint. This would allow the CEA to consider whether, for example, a reduction in summer net dependable capacity is likely to have a more significant reliability impact the farther south a generating unit is located.</p> <p>Regardless of the threshold that is ultimately selected, the SRC recommends that item 3.d be modified by adding language limiting item 3.d to performance reductions that occur “during weather conditions other than extreme cold weather conditions.” This would help clarify that no constraint exists if a freeze protection measure would cause a performance reduction only during extreme cold weather conditions.</p> <p>The SRC recommends that the last paragraph in Attachment 1 be revised to read as follows to clarify that the relevant Reliability Coordinator or Balancing Authority may provide information that would assist the CEA in evaluating certain types of constraints and to clarify that a valid constraint declaration does not necessarily carry any weight for purposes of any non-EOP-012 regulatory regimes that may apply to the unit in question:</p> <p>When submitting a Generator Cold Weather Constraint declaration to the CEA per Requirement R8, the Generator Owner must include documentation that defends and supports the declared constraint and also describes other compensating or mitigating freeze protection measures, if applicable, that the Generator Owner will apply. <i>If a Generator Cold Weather Constraint declaration indicates that the application of a specific freeze protection measure or measures would adversely affect the reliability of the Bulk-Power System to an extent that outweighs the reliability benefit of applying the freeze protection measure(s), the documentation that defends and supports the constraint should include any assessment that the applicable Balancing Authority or Reliability Coordinator might agree to provide concerning the impact to the reliability of the Bulk-Power System if the constraint were to be granted.</i> An approved Generator Cold Weather Constraint declaration for any specific Generator Cold Weather</p>	

Critical Component does not relieve the Generator Owner of its obligation to otherwise prepare its applicable generating unit(s) to meet the requirements of EOP-012-3, **and does not in any way purport to relieve the Generator Owner of any other legal obligations or requirements outside of the requirements of EOP-012-3, including tariff, regulatory, or statutory obligations or requirements.**

The SRC also recommends that Part 8.1 of Requirement R8 be revised to require units beginning commercial operations to submit constraint declarations on or before the commercial operation date rather than 15 days after commercial operation. This would help minimize the amount of time between the commercial operation date and the CEA determination regarding the validity of the constraint.

Additionally, the SRC recommends that Part 8.2 be revised as follows to require Generator Owners to react to knowledge of changed circumstances outside of the 24-month review cycle: “Review any Generator Cold Weather Constraint declaration validated by the CEA every 24 calendar months **and upon gaining actual knowledge of a material change in the circumstances that formed the basis for the Generator Cold Weather Constraint declaration** to determine . . .”

Finally, the SRC recommends that Part 8.4 be clarified by ending the first sentence at “Part 7.1” and turning the remaining language into a separate sentence, as follows: “. . . Part 7.1. The deadlines from the Part 6.1 and Part 7.1 timetables shall be calculated based on the date the Generator Owner is notified that the Generator Cold Weather Constraint is invalid.”

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

While NV Energy supports in part the approach that the DT has taken to address FERC Commission Directives contained in the June 27, 2024 FERC Order, Approving Extreme Cold Weather Reliability Standard EOP-012-2 And Directing Modifications, we do not support the proposed definition for Generator Cold Weather Constraint. The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version. And while we see value in the information provided in Attachment 1, that information could be contained in another technical document supporting this standard (i.e., Technical Rationale or Implementation Guidance), if the definition and criteria was revised to more closely aligned to the directives contained in the Order. To address our concerns, we offer the following edits (in boldface) to the Generator Cold Weather Constraints definition:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions. (*Strikethroughs have been omitted for clarity*)

Criteria used to determine a **Generator Cold Weather Constraint** shall consider the following:

- **A determination through an engineering analysis that the freeze protection measures lack reasonable assurances of efficacy and there is no record that such protections have been effectively utilized on generating units of a comparable types in regions that experience similar winter climate conditions;**
- **A determination through engineering analysis that there are no available freeze protection measures, commercially available, that have been proven to be effective at mitigating the effects of the Extreme Cold Weather Temperature identified in the region where the resource is installed; or**
- **A determination through an engineering economic analysis has been made that determines that the implementation of freeze protection measures necessary to mitigate the effects of the Extreme Cold Weather Temperature, while feasible, would result in the early retirement of the resource.**

NV Energy also recommends there be an “approval by default” if the CEA does not respond within a given period, for example 30 days after submittal to CEA.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

No

Document Name

Comment

PNM agrees with the comments of EEI:

While EEI supports in part the approach that the DT has taken to address FERC Commission Directives contained in the June 27, 2024 FERC Order, Approving Extreme Cold Weather Reliability Standard EOP-012-2 And Directing Modifications, we do not support the proposed definition for Generator Cold Weather Constraint. The definition for Generator Cold Weather Constraints contained in the previous version provided the industry with useful criteria that has been lost in the revised version. And while we see value in the information provided in Attachment 1, that information could be contained in another technical document supporting this standard (i.e., Technical Rationale or Implementation Guidance), if the definition and criteria were revised to more closely align to the directives contained in the Order. To address our concerns, we offer the following edits (in boldface) to the Generator Cold Weather Constraints definition:

Generator Cold Weather Constraint – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the criteria below. Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions. (Strikethroughs have been omitted for clarity)

Criteria used to determine a **Generator Cold Weather Constraint shall consider the following:**

A determination through an engineering analysis that the freeze protection measures lack reasonable assurances of efficacy and there is no record that such protections have been effectively utilized on generating units of a comparable types in regions that experience similar winter climate conditions;

A determination through engineering analysis that there are no available freeze protection measures, commercially available, that have been proven to be effective at mitigating the effects of the Extreme Cold Weather Temperature identified in the region where the resource is installed; or

{C} **A determination through an engineering economic analysis has been made that determines that the implementation of freeze protection measures necessary to mitigate the effects of the Extreme Cold Weather Temperature, while feasible, would result in the early retirement of the resource.**

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Southern Company Agrees with the comments from EEI and NAGF.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer No

Document Name

Comment

Invenergy appreciates the SDT's approach to addressing the FERC directives and we believe the changes in EOP-012-3 work toward meeting those directives. Still, we have concerns regarding the administrative burden placed upon Generator Owners and we would like to offer the recommendations below that provide additional clarity and/or address the directives in an equally effective manner.

Definition:

Consider revising the definition to read, "Any condition, subject to validation by the Compliance Enforcement Authority, that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components." This clarifies that certain criteria must be validated for a condition to be considered a Generator Cold Weather Constraint.

R8:

Invenergy recommends simplifying R8.1 to read, "Submit its Generator Cold Weather Constraint declaration(s) to the CEA within 45 days of determining that the Generator Cold Weather Constraint is applicable." As drafted, the multiple constraint declaration tracks introduce confusion for no real reliability gain.

Invenergy recommends allowing 36 months for the revalidation of any constraint declaration. Constraint declarations are unlikely to change frequently. Additionally, please clarify in R8.2 if the revalidation of constraint declarations is to occur 24 calendar months following the date of CEA validation. It may be beneficial to create a separate requirement for the actions currently prescribed in R8.2.

Attachment 1:

If the intent of the standard is that all Generator Cold Weather Constraint declarations must be submitted to the CEA for validation, then Invenergy recommends replacing "Pre-Approved Generator Cold Weather Constraints" with "Known Generator Cold Weather Constraints."

The final two bullets under the Pre-Approved Generator Cold Weather Constraint header seem to refer more to possible solutions to a constraint, rather than the circumstances that constitute the constraint. Consider reframing the bullets to reference the lack of deployable solutions to remove accumulated frozen precipitation on solar panels or on combustion turbine inlet air filters.

Invenergy is worried that the disregard in Attachment 1 of commercial concerns that do not rise to the level of premature retirement of an existing facility places unreasonable expectations on the Generator Owner to procure equipment or apply freeze protection measures that, based on the Generator Owner's operating experience or analysis, may not suit the needs of the Generator Owner. We recommend that the language make more accommodations for Generator Owners to be able to pursue reliable generation in a manner that best fits their unique circumstances.

We recommend striking the final sentence of Attachment 1 as it does not provide any additional criteria relevant to the declaration of a constraint.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer	No
Document Name	
Comment	
<p>Invernergy appreciates the SDT’s approach to addressing the FERC directives and we believe the changes in EOP-012-3 work toward meeting those directives. Still, we have concerns regarding the administrative burden placed upon Generator Owners and we would like to offer the recommendations below that provide additional clarity and/or address the directives in an equally effective manner.</p> <p>Definition:</p> <p>Consider revising the definition to read, “Any condition, subject to validation by the Compliance Enforcement Authority, that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.” This clarifies that certain criteria must be validated for a condition to be considered a Generator Cold Weather Constraint.</p> <p>R8:</p> <p>Invernergy recommends simplifying R8.1 to read, “Submit its Generator Cold Weather Constraint declaration(s) to the CEA within 45 days of determining that the Generator Cold Weather Constraint is applicable.” As drafted, the multiple constraint declaration tracks introduce confusion for no real reliability gain.</p> <p>Invernergy recommends allowing 36 months for the revalidation of any constraint declaration. Constraint declarations are unlikely to change frequently. Additionally, please clarify in R8.2 if the revalidation of constraint declarations is to occur 24 calendar months following the date of CEA validation. It may be beneficial to create a separate requirement for the actions currently prescribed in R8.2.</p> <p>Attachment 1:</p> <p>If the intent of the standard is that all Generator Cold Weather Constraint declarations must be submitted to the CEA for validation, then Invernergy recommends replacing “Pre-Approved Generator Cold Weather Constraints” with “Known Generator Cold Weather Constraints.”</p> <p>The final two bullets under the Pre-Approved Generator Cold Weather Constraint header seem to refer more to possible solutions to a constraint, rather than the circumstances that constitute the constraint. Consider reframing the bullets to reference the lack of deployable solutions to remove accumulated frozen precipitation on solar panels or on combustion turbine inlet air filters.</p> <p>Invernergy is worried that the disregard in Attachment 1 of commercial concerns that do not rise to the level of premature retirement of an existing facility places unreasonable expectations on the Generator Owner to procure equipment or apply freeze protection measures that, based on the Generator Owners operating experience or analysis, may not suit the needs of the Generator Owner. We recommend that the language make more accommodations for Generator Owners to be able to pursue reliable generation in a manner that best fits their unique circumstances.</p> <p>We recommend striking the final sentence of Attachment 1 as it does not provide any additional criteria relevant to the declaration of a constraint.</p>	
Likes 0	
Dislikes 0	
Response	
Robert Blackney - Edison International - Southern California Edison Company - 1	
Answer	No

Document Name	
Comment	
See comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Stephanie Kenny - Edison International - Southern California Edison Company - 6	
Answer	No
Document Name	
Comment	
See EEI comments	
Likes 0	
Dislikes 0	
Response	
Natalie Johnson - Enel Green Power - 5	
Answer	No
Document Name	
Comment	
Enel North America agrees with the MRO NSRF recommendation that there be an “approval by default” if the CEA does not respond within a given period, for example 30 days after submittal to CEA.	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	

OPG supports BC Hydro's comment: "BC Hydro is supportive of the revisions to the revised Generator Cold Weather Constraint definition. However, to add clarity on Freeze Protection Measures, BC Hydro recommends retaining the following wording "Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions" in EOP-012-3 associated documentation, such as the Technical Rationale." And "Please also clarify in the language of the Requirement whether these are calendar or business days."

OPG supports NBPower's comment: "The pre-approved Generator Cold Weather Constraints (GCWCs) in Attachment 1 could be problematic in some jurisdictions, since Requirement R8 and Attachment 1 are referenced for Requirement R2 Part 2.2 for new designs on a go-forward basis. In particular, the pre-approved GCWC should not be set up in such a way as to exempt generating unit developers from doing proper due diligence. At least for future designs (Requirement R2 Part 2.2) all Generator Cold Weather Constraints should be assessed on a case-by-case basis. Pre-approved GCWCs should be avoided, or if used at all, limited to existing or already committed designs, since technology and the needs of the grid may be expected to change in the future and existing pre-approvals may no longer be appropriate."

OPG has the following comments: Additional clarification is required regarding GCWC CEA applicability/validity confirmation & determination implications for unit present/future operation.

Please clarify the role of CEA – review for constraint presence, validity confirmation, or approval, and the requirements the CEA need to satisfy to perform it's role.

Attachment 1 bullet #3 appears to be the BA purview and not the CEA.

In the context of this standard a freeze protection measure can negatively impact the revenue of a market participant, yet still be required to be implemented for compliance purposes. Please explain how was derived the "more than three percent" criterion and the justification for argument that it will fit all the market participants, from any geographical location.

Attachment 1 last paragraph state that "An approved Generator Cold Weather Constraint declaration for any specific Generator Cold Weather Critical Component does not relieve the Generator Owner of its obligation to otherwise prepare its applicable generating unit(s) to meet the requirements of EOP-012-3."

The overall intent of the Extreme Cold Weather Preparedness and Operations standard is to:" Implement freeze protection measures to protect Generator Cold Weather Critical Components that provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature;"

By definition, the "**Generator Cold Weather Constraint** – Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.". As written this appears to be an actual requirement to operate at the ECWT, which cannot be reconciled with an approved Generator Cold Weather Constraint declaration."

There is a risk for future generation designs introduced by Attachment 1 via geographical limitation for specific technologies in the Pre-Approved Generator Cold Weather Constraints list.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

BC Hydro appreciates the drafting team's efforts and the opportunity to comment, and offers the following comments and suggestions:

1. BC Hydro is supportive of the revisions to the revised Generator Cold Weather Constraint definition. However, to add clarity on Freeze Protection Measures, BC Hydro recommends retaining the following wording "*Freeze protection measures are not intended to be limited to optimum practices, methods, or technologies, but are also intended to include acceptable practices, methods, or technologies generally implemented by the electric industry in areas that experience similar winter climate conditions*" in EOP-012-3 associated documentation, such as the Technical Rationale. Please also clarify in the language of the Requirement whether these are calendar or business days.
2. For Requirement R8 Part 8.1 BC Hydro recommends adding "or" after "is applicable" to further clarify the two separate timeline requirements.

Likes 2

JEA, 1, McClung Joseph; SaskPower, 1, Guttormson Wayne

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

AZPS agrees with the approach.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

R6 contains the phrase “The Generator Owner shall” in two places. Suggest deleting the second phrase as follows:

R6. *Each Generator Owner shall, for each generating unit that has a calculated Extreme Cold Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius) as determined in Requirement R1 and that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius), develop and implement a Corrective Action Plan when the generating unit experiences a Generator Cold Weather Reliability Event. The Corrective Action Plan shall be developed before the first day of July, but not more than 150 days after the Generator Cold Weather Reliability Event. The Generator Owner shall:*

Suggest modifying R6.2 as follows (replacing “where” for “if”) for clarity:

6.2. *Update the Corrective Action Plan action(s) and timetable(s), with justification, and submit a Corrective Action Plan extension request to the Compliance Enforcement Authority (CEA) for approval if where the timetable(s) for completing selected actions are projected to exceed the timelines in Part 6.1. The submitted Corrective Action Plan extension request shall include the following;*

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

The NPCC RSC agrees with the simplified definition. There seems to be adequate language to request a CAP extension beyond the December 1, 2024, deadline if necessary. Attachment 1 clearly outlines the expectations.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Please consider saying “calendar days” versus simply “days” in Requirement R8 Part 8.1

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

1. RF would recommend adding that the CEA will timely review the Constraint declarations for validity and provide the GO notice of its determination.
2. As the CEA we would not be able to challenge early retirement based on financials (Refer to Attachment 1).

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE has some concerns regarding the proposed definition of Generator Cold Weather Constraint, consistency between Requirements R1 and R8, and to whom annual training shall be given in Requirement R5.

Definition

Texas RE is concerned that the definition of Generator Cold Weather Constraint proposed under the terms is inconsistent with the description of Generator Cold Weather Constraint in Attachment 1. The definition states that a Generator Cold Weather Constraint is “Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.” The description in Attachment 1, however, says “A Generator Cold Weather Constraint is any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the following criteria:” and lists out pre-approved Generator Cold Weather Constraints and case-by-case Generator Cold Weather Constraints. The proposed definition cannot be read without the additional information in Attachment 1, yet the proposed definition does not reference Attachment 1.

Texas RE proposes that either the proposed NERC Glossary definition include all of the information in Attachment 1, an explicit reference to Attachment 1, or eliminate the proposed NERC Glossary definition altogether and simply use the term as part of the requirements that is described in Attachment 1 and noted as such in the requirement language.

Consistency between Requirements R1 and R8

For verbiage consistency in Requirement R1, Texas RE recommends adding the word ‘calendar’ to Requirement 1.1.1 for developing new corrective actions after recalculation (in bold):

1.1.1 If the re-calculated Extreme Cold Weather Temperature (ECWT) is lower than the previous Extreme Cold Weather Temperature, the entity shall review and update its cold weather preparedness plan(s) under Requirement R4 within six (6) **calendar** months of the recalculation. If new corrective actions are needed to provide the required operational capability under Requirement R2 or R3, the entity shall develop a Corrective Action Plan within six (6) **calendar** months of the recalculation.

Although Requirement R8 requires shorter timeframe for timely review and evaluation of declared Generator Cold Weather Constraints, the calculation timeframe used in Requirement R1 for identifying Extreme Cold Weather Temperature to review and identify new corrective actions to provide the required operational capability remains five calendar years. Texas RE suggests revising Requirement R1 for Generator Owner to perform the ECWT calculations every 24 calendar months instead of every five calendar years, to be consistent with Requirement R8 and to ensure that most recent information is used to prepare unit’s cold weather preparedness plan. Performing the ECWT calculations biennially could also help to include any ‘Lessons Learned’ from the latest weather event and reviewing/updating any operating limitations in the Generator Cold Weather Constraint declaration under Requirement R8. Texas RE recommends the following revision (in bold):

R1. At least once every **24 calendar months five calendar years**, each Generator Owner shall, for each of its applicable generating unit(s): [Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]

Requirement R5

Current language for Requirement R5 states that annual training shall be provided to maintenance or operations personnel responsible for implementing the cold weather preparedness plan(s). In many cases maintenance personnel implementing the plans and operational personnel responsible for implementing the plans in real-time could be different individuals. Therefore, it is important to provide training for both maintenance and operations personnel responsible for implementing the cold weather preparedness plan(s). Texas RE recommends the following revision (in bold):

R5. Each Generator Owner in conjunction with its Generator Operator shall identify the entity responsible for providing the generating unit-specific training, and that identified entity shall provide annual training to its maintenance **or and** operations personnel responsible for implementing the cold weather preparedness plan(s) developed pursuant to Requirement R4.

Likes 1	JEA, 1, McClung Joseph
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Dislikes 0	
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Response

Kimberly Turco - Constellation - 6

Answer	
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Document Name	
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Comment	
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Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0	
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Dislikes 0	
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Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - NA - Not Applicable - MRO,WECC

Answer	
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Document Name	
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Comment	
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SPP agrees with the comments of The ISO/RTO Council (IRC) Standards Review Committee (SRC)

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support BC Hydro's comments.

Likes 0

Dislikes 0

Response

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

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

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

Answer

No

Document Name

[EOP-012-3 Constraint and CAP Process 10172024 - NAGF comments final.pdf](#)

Comment

The NAGF notes that the timelines for the CAPs may create a significant burden since the GO cannot simply take outages to address these issues. It is unclear if these outages will take priority over other outages due to the very short timelines required for compliance or if other outages, many of which are probably more important for reliability all year long, will take priority. As an example of this concern, in PJM planned outages are not allowed from the 24th week to the 36th week of each calendar year. In 2024, this means that an outage cannot be scheduled from June 10th to September 9th. The NAGF's experience with project planning and execution shows that a CAP for Cold Weather Reliability Events is unlikely to be developed, equipment purchased and delivered and labor lined up to perform the installation between the date of the event, say mid-January and June 10th, particularly if widespread failures due to extreme winter weather create such demand for retrofit equipment and installation services that supply chains simply cannot keep up. This means the GO will have 11 weeks between September 9 and December 1 to schedule an outage to perform the needed tasks. (And determine within the first 17 days of these 11 weeks if an extension may be needed under the proposed 60-day filing requirement in the process document.) The fall season is often filled to the maximum with planned outage work, and the resources needed to add massive new tasks at the last minute do not exist. Has NERC or FERC or any Balancing Authorities performed any review to see how many additional outages can be scheduled in these 11 weeks? Or is it possible that NERC and FERC (and the RTO/ISO Council that submitted the comments FERC based their order on) are going to create an unreasonable expectation?

Regardless of this concern, the Process document has many areas that raise concerns to the NAGF. The NAGF has provided a copy of the process document with comments to help the SDT understand the concerns. Some areas of concern raised by the process document includes a deadline to submit a request for CAP extension that does not take into account issues beyond the GO's control, a statement that the GO must first work with the CEA before filing the request, which effectively moves the deadline back even further, the statement requiring "due diligence in ordering" without defining exactly what the CEA may consider due diligence,

Another issue of concern is the requirement to file a constraint declaration for the same recurring event types. As an example, if a wind farm has blade icing occur in the winter of 2025, it must create a CAP, make a declaration, file the declaration and then every other year review that declaration. If the same wind farm (or different wind farm owned by the same entity) has a blade icing event in 2026, the same CAP, declaration and review will be required again. In the course of 10 years, this owner is likely to have 10 declarations for the same thing, reviewing 5 of them each year. This is not a mere theoretical concern; ice storms are quite common in the southern US, and having to make new filings for each one would constitute mere regulatory churn. This process will not improve reliability and will take time away from entities' ability to actually provide more reliable service to the grid. This process should be revised to address the need to process duplicative reports by generators.

Finally, it is unclear how the timelines proposed in the process document posted with the standard may impact compliance. As an example, if a Generator Owner files for a CAP extension 30 days before the CAP deadline, does this cause a violation? Or does the request get immediately denied

without review because it does not meet the timeline specified in the document and therefore the Generator Owner will be deemed to have violated the standard when they cannot complete the CAP by the deadline?

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

No

Document Name

Comment

OPG supports HQ comments: 'The Generator Cold Weather CAP Extension and Constraint Process document should be updated to reflect Canadian-specific language regarding applicable governmental authorities, for example, similar to the language used in the footnote 11.'

OPG supports Manitoba Hydro's comment recommending that for non-US Registered Entities: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

OPG supports BC Hydro's comment (freezing precipitation in Québec can and has occurred in March and April months) regarding Requirement "R6: Similar to previously submitted comments, in Québec, Canada, Generator Cold Weather Reliability Events such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a CAP within 150-days of the Event is reasonable. However, the first day of July deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, HQ recommends deleting "the first day of July" language. "

Likes 0

Dislikes 0

Response

Natalie Johnson - Enel Green Power - 5

Answer

No

Document Name

Comment

Enel North America agrees with NAGF's comments on this question and that the revised timelines on CAPS could create a significant burden on GOs.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer No

Document Name

Comment

If the expectation is that Generator Owners are to monitor for Generator Cold Weather Reliability Events throughout the year, rather than only during the winter season, then please consider the following revisions:

1. Strike "before the first day of July" from Requirement R6 and simply require that Corrective Action Plans be developed no more than 150 days after the Generator Cold Weather Reliability Event. This ensures that each event receives the same amount of time, regardless of when it occurs.

2. Consider revising Requirement R6.1.5 to read, "A timetable specifying that implementation of the Corrective Action Plan shall be completed prior to the first day of December of the next calendar year following the Generator Cold Weather Reliability Event; and"

These revisions would provide greater flexibility to the Generator Owner to schedule any needed maintenance outages in a manner that better supports reliability and keeps generators online.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer

No

Document Name

Comment

If the expectation is that Generator Owners are to monitor for Generator Cold Weather Reliability Events throughout the year, rather than only during the winter season, then please consider the following revisions:

1. Strike "before the first day of July" from Requirement R6 and simply require that Corrective Action Plans be developed no more than 150 days after the Generator Cold Weather Reliability Event. This ensures that each event receives the same amount of time, regardless of when it occurs.
2. Consider revising Requirement R6.1.5 to read, "A timetable specifying that implementation of the Corrective Action Plan shall be completed prior to the first day of December of the next calendar year following the Generator Cold Weather Reliability Event; and"

These revisions would provide greater flexibility to the Generator Owner to schedule any needed maintenance outages in a manner that better supports reliability and keeps generators online.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

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

From the perspective of ACES, the proposed modifications to Requirement R6, while a good start, would benefit from further refinement. We believe that, as written, the timelines identified in Requirement R6 are too elastic and unduly discriminate against the GO based solely upon the date the generating unit(s) experienced a Generator Cold Weather Reliability event.

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

- Generating Unit 1 belonging to Entity A experiences a Generator Cold Weather reliability event on November 1st, 2024. Per the currently proposed version of Requirement R6, Entity A has until April 1st, 2025, to develop a CAP (150 days after).
- Generating Unit 2 belonging to Entity B experiences a Generator Cold Weather reliability event on March 17th, 2025. Per the currently proposed version of Requirement R6, Entity B has until June 30th, 2025, to develop a CAP (before the first day of July).
- In the above examples, Entity A is allowed 150 days after their event to develop a CAP whereas, Entity B is only allowed 90 days after the same event type to do the same.
 - This results in an unequal application of the Reliability Standard by granting Entity A an additional 60 calendar days to complete the same compliance activities as Entity B.
 - Assuming both entities develop a CAP within 100 calendar days of the event date:
 - Entity A would be compliant with Requirement R6.
 - Conversely, Entity B would be in violation of Requirement R6 and would potentially be subject to a compliance Penalty.

It is the viewpoint of ACES that entities should be provided with the **same** length of time to complete compliance activities required by a Reliability Standard. We recommend that the timeline be modified to 120 calendar days regardless of when the Generator Cold Weather Event occurs.

By examining NOAA Annual/Seasonal Climate Normals data, we were able to determine that almost all areas of the lower 48 US states experience the last spring freeze on or before May 28th (90% probability) and the first fall freeze on or after September 18th (90% probability). As there are 113 days between these two dates, we believe that a strict 120 calendar day metric is a reasonable alternative.

Additionally, it is our opinion that the timeline to address similar potential issues across a fleet for those units that have not experienced issues is too short. We are concerned that a GO with either a large generating fleet (large IOU) or limited resources (small electric cooperative), may not be able to complete all corrective actions on all applicable units within 24 calendar months. We believe that 36 calendar months is more appropriate to allow for variability between GOs across the industry.

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

R6 Each Generator Owner shall, for each generating unit that has a calculated Extreme Cold Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius) as determined in Requirement R1 and that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius), develop and implement a Corrective Action Plan when the generating unit experiences a Generator Cold Weather Reliability Event. The Corrective Action Plan shall be developed no more than 120 calendar days after the Generator Cold Weather Reliability Event. The Generator Owner shall:

6.1.5. A timetable specifying that implementation of the Corrective Action Plan shall be completed within 12 calendar months of the Generator Cold Weather Reliability Event; and

6.1.6. A review of applicability to similar equipment freeze protection measures at generating units owned by the Generator Owner, with a specified timetable for corrective actions to be completed within 36 calendar months of the Generator Cold Weather Reliability Event.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5**Answer** No**Document Name****Comment**

See EEI Comments

Likes 0

Dislikes 0

Response**Michael Bowman - City Utilities of Springfield, Missouri - 1****Answer** No**Document Name****Comment**

Recent changes to Southwest Power Pool (SPP) policy require all planned outages for the summer season to be submitted by February 15th. With the proposed shortened timeline to implement and complete a Corrective Action Plan and the associated freeze protection measures, a late season Generator Cold Weather Reliability Event could require scheduling an outage that has not been authorized by SPP to implement required corrective actions by the proposed December 1st deadline. This would negatively impact an entity's Performance Based Accreditation (PBA)

SPRM recommends an exception or preapproved extension for instances when implementing corrective actions would require an outage not authorized by an entity's Balancing Authority.

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer** No**Document Name****Comment**

Reclamation does not agree. Shortening time frames does not alleviate the burden of lack of material, contracting resources or other schedulable items. Cost and timeframe are always intertwined. For example, government bid processes are often time consuming and shortening corrective action timeframe requirements could cause the entity to become non-compliant.

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer No

Document Name

Comment

Vistra agrees with comments made by Duke Energy.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EEl does not object to the proposed shortened deadlines except for the language in Requirement R6, subpart 6.1.6. We understand 6.1.6 to mean that a GO is to complete freeze protection CAPs on similar equipment vulnerabilities within 24 months, however, we disagree that this is what the Commission directed in Paragraph 68 of the order. What they directed was that corrective actions needed to be taken on “similar equipment on all of its fleet within 24 months of becoming **aware of the freeze issue.**” In other words, the clock should start after the GO has confirmed similar vulnerabilities on similar equipment on other generating resources. To address this issue, EEl suggests adding the following clarifying language to 6.1.6 as suggested below in boldface:

6.1.6. A review of applicability of similar freeze protection equipment installed on similar generating units within 12 calendar months of the of the Generator Cold Weather Reliability event by the Generator Owner, with a specified timetable for corrective actions to be completed within 24 calendar months of confirming a generating unit has similar equipment vulnerabilities;

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer No

Document Name

Comment

We do not object to the proposed shortened deadlines except for the language in Requirement R6, subpart 6.1.6. We understand 6.1.6 to mean that a GO is to complete freeze protection CAPs on similar equipment vulnerabilities within 24 months, however, we disagree that this is what the Commission directed in Paragraph 68 of the order. What they directed was that corrective actions needed to be taken on “similar equipment on all of its fleet within 24 months of becoming **aware of the freeze issue.**” In other words, the clock should start after the GO has confirmed similar vulnerabilities on similar equipment on other generating resources. To address this issue, we suggest adding the following clarifying language to 6.1.6 as suggested below in boldface:

6.1.6. A review of applicability to of similar freeze protection equipment installed on similar generating units within 12 calendar months of the of the Generator Cold Weather Reliability event by the Generator Owner, with a specified timetable for corrective actions to be completed within 24 calendar months of **confirming a generating unit has similar equipment vulnerabilities;**

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

No

Document Name

Comment

The Generator Cold Weather CAP Extension and Constraint Process document should be updated to reflect Canadian-specific language regarding applicable governmental authorities, for example, similar to the language used in the footnote 11.

Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

NB Power supports BC Hydro’s comment (freezing precipitation in Québec can and has occurred in March and April months) regarding Requirement “R6: Similar to previously submitted comments, in Québec, Canada, Generator Cold Weather Reliability Events such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a CAP within 150-days of the Event is reasonable. However, the first day of July deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, HQ recommends deleting “the first day of July” language. “

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer No

Document Name

Comment

Ameren agrees with NAGF's comments.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

Avista does not object to the proposed shortened deadlines except for the language in Requirement R6, subpart 6.1.6. We understand 6.1.6 to mean that a GO is to complete freeze protection CAPs on similar equipment vulnerabilities within 24 months, however, we disagree that this is what the Commission directed in Paragraph 68 of the order. What they directed was that corrective actions needed to be taken on “similar equipment on all of its fleet within 24 months of becoming **aware of the freeze issue.**” In other words, the clock should start after the GO has confirmed similar vulnerabilities on similar equipment on other generating resources. To address this issue, EEI suggests adding the following clarifying language to 6.1.6 as suggested below in boldface:

6.1.6. A review of applicability to of similar freeze protection equipment installed on similar generating units within 12 calendar months of the of the Generator Cold Weather Reliability event by the Generator Owner, with a specified timetable for corrective actions to be completed within 24 calendar months of confirming a generating unit has similar equipment vulnerabilities;

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

AES US Renewables are in agreement that any corrective actions needed to mitigate root cause(s) resulting from a Generator Cold Weather Reliability Event should be completed as expeditiously as possible. However, we have real concerns about the ability to complete the CAP by December 1 if the

Generator Cold Weather Reliability Event (GCWRE) occurred in the same year. For example, winter storms in the northeast can still occur as late as in March. With that in mind, it will be difficult to develop a CAP, implement the CAP and complete the CAP within 7-8 months if a generating facility located in northeast is impacted by the GCWRE. This time constraint will be reduced even further if there is extension request involved since it requires submittal of the extension at least 60 days in advance of the due date (December 1).

Additionally, we have concerns that corrective actions need to be completed within 24 months of the GCWRE at other sites owned by the Generator Owner for same equipment or freeze protection measures implicated in the root cause analysis for a site that experienced a GCWRE. This proposal may work for GOs that don't own a lot of sites. However, for IPPs that have generating assets in multiple regions, 24 months is not a realistic timeframe to complete the corrective actions. It will require time to send out RFPs to multiple contractors and then for internal review of the contractor proposals as well as negotiations involved. This could take up several months in best case scenario. And depending on the work that needs to be done, it will

require coordination with site-level personnel and outage coordination with other entities (eg: BAs, TOPs). So, we strongly suggest modifying the 24 calendar months to at least 36 calendar months.

Current proposed R6 requirement language does not specify when the extension requests need to be made. However, a companion document (*EOP-012-3 Constraint and CAP Process 10172024.pdf*) indicated that "*Entities are encouraged to submit the extension request as soon as they are aware they will not meet the CAP completion date but no later than 60 days before the original required completion date.*" We would like to understand if the 60 days timeline is enforceable if it is not used within the R6 language. Furthermore, R6 language does not state what happens when the extension request is denied. Only the companion document specifies that (*If an extension request is denied, the selected actions in the Corrective Action Plan need to be completed in accordance with the original timetables.*). Again, we would like to understand if the language in the companion document is enforceable.

It is stated in the companion document that if the extension request is denied, the CAP will need to be completed in accordance to its original timetable. This will not be feasible if the CAP extension request is submitted close to the December 1 deadline. The CEA is allowed minimum of 60 days for the whole extension approval process (15 days to acknowledge receipt and verify all information has been provided + 45 days of review before providing notification to registered entity on whether their request is approved or denied). There is potentially the need for the CEA to extend beyond the 45 days to perform their review. That will further reduce the length of time for the GO to complete the CAP based on original timeline if the CAP extension is denied. So, for a registered entity to implement the CAP prior to December 1, the time for CEA to review will eat into the time that registered entities have to investigate the GCWRE, develop CAP and implement CAP. Using the example for a GCWRE that occurs in March, this extension review process can reduce the time registered entity has from 7-8 months down to 5-6 months (which can be further reduced if certain ISO/RTO regions do not allow planned outages during certain times of the year like peak summer time). We request the drafting team to look into all possible scenarios to ensure that reasonable amount of time is allocated for developing CAP, implementing CAP and requesting CAP extension (if applicable). Currently, the timeline listed in R6 is not reasonable.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

No

Document Name

Comment

Under the proposed 6.1.5, there may be cases where remedies to correct results from an Extreme Cold Weather Reliability event may not be feasible to be completed by December due to vendor or supply chain issues. There should be some flexibility to allow for mitigation activities with longer lead times for complete resolution without going through a formal corrective action plan extension.

The additional approval process needed for an extension is very inefficient and builds in potential delays that, if an extension is not approved, can set back the timing of a plan, creating a potential violation itself. Approval decisions would need to be mandated to be made in a short timeframe if they are still included in the standard.

Finally, within the section, footnote 10 speaks to freeze events occurring outside a winter period, such as October and November. Please clarify what is the designated winter period as it relates to this standard.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

No

Document Name

Comment

Under the proposed 6.1.5, there may be cases where remedies to correct results from an Extreme Cold Weather Reliability event may not be feasible to be completed by December due to vendor or supply chain issues. There should be some flexibility to allow for mitigation activities with longer lead times for complete resolution without going through a formal corrective action plan extension. In addition, the additional approval process needed for an extension is very inefficient and builds in potential delays that, if an extension is not approved, can set back the timing of a plan. Approval decisions would need to have a short mandate timeframe if they are still included in the standard. Finally, within the section, footnote 10 speaks to freeze events occurring outside a winter period, such as October and November. Please clarify what is the designated winter period as it relates to this standard.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

No

Document Name

Comment

PG&E supports both the NAGF and EEI concerns regarding outage scheduling and timeframe to address CAPs, as well as the process document concerns.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

No

Document Name

Comment

The Generator Cold Weather CAP Extension and Constraint Process document should be updated to reflect Canadian-specific language regarding applicable governmental authorities, for example, similar to the language used in the footnote 11.”

HQ supports Manitoba Hydro’s comment recommending that for non-US Registered Entities: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

HQ supports BC Hydro’s comment (freezing precipitation in Québec can and has occurred in March and April months) regarding Requirement “R6: Similar to previously submitted comments, in Québec, Canada, Generator Cold Weather Reliability Events such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a CAP within 150-days of the Event is reasonable. However, the first day of July deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, HQ recommends deleting “the first day of July” language. “

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

No

Document Name

Comment

Dominion Energy supports EEI comments and further stipulates that the SDT has gone beyond the language and intent of the FERC Order. For larger generation entities with a diverse fleet, time for reviewing the specs for its fleet and identifying potential cold weather issues should not be included in the 24 calendar month timeframe. Once the issue has been identified in a specific unit the clock should begin.

Likes 0

Dislikes 0

Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the comments of EEI.	
Likes 0	
Dislikes 0	
Response	
Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
<p>The 3 types of items required to complete a Corrective Action Plan (CAP) under R1, R2 and R3 are the same 3 types of items required to complete a Corrective Action Plan under R6, qualified personnel, proper materials, and the required plant conditions. Any repair or modification that can reasonably be completed before December 1st in fact should be completed, however any repair or modification that needs an outage or if qualified materials and people are not available CAP completion may have to wait until the next planned outage. Planned outages are scheduled to maintain reliability. Adding unplanned outages either postpones scheduled outages or forces outages into periods of time when demand is high therefore reducing the reliability to satisfy load requirements. The expertise for making decisions regarding the timing repairs is best left with the GOs, GOPs, and BAs.</p> <p>Any event after February 2nd will be due by July 1st. If the CEA takes 60 days to make a decision on an extension it is now August 30th. If that decision is NO, there are only 93 days until December 1st. Forcing completion of a CAP needing an extension will require either unqualified personnel, improper materials, or and Unplanned Outage. All of which impact BES reliability.</p> <p>Instead of requiring CEA approval, require the entity to keep evidence justifying the decision to make the repair later than December 1st. This is appropriate for audit during a subsequent audit.</p>	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	No

Document Name	
Comment	
TEPC agrees with EEI's comments for section 6.1.6: <i>corrective actions needed to be taken on "similar equipment on all of its fleet within 24 months of becoming aware of the freeze issue."</i> In other words, the clock should start after the GO has confirmed similar vulnerabilities on similar equipment on other generating resources.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	No
Document Name	
Comment	
AZPS agrees with comments submitted by EEI on behalf of its members to add a 12-calendar month assessment period in the timeline criteria prior to having 24 calendar months to implement corrective actions to similar equipment.	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	No
Document Name	
Comment	
Black Hills Corporation supports the comments submitted by NAGF and EEI.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	No

Document Name	
Comment	
Evegy 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	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy does not support the language used in requirement R6.1.5 which requires the resolution of all winter event corrective actions by December 1st of the following year. This interval is too restrictive to allow for evaluation and correction on many freeze protection repairs or for the installation of new freeze protection measures. The inadequacies of this time interval are compounded when the effects of a major winter storm are considered. Large storms, like Elliott or a Polar Vortex, impact multiple units across multiple utilities. It would be difficult for a GO to address multiple events in this timeframe with available vendor support, and competing against other utilities for these vendors will only make this situation worse. Maintaining R6.1.5 as proposed will also result in higher levels of extension approvals for CEAs to process. Duke Energy recommends the requirement be modified to a period of 24 calendar months.	
Likes	0
Dislikes	0
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Manitoba Hydro recommends that for non-US Registered Entities: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.	

Manitoba Hydro supports Hydro Quebec's comment: "The Generator Cold Weather CAP Extension and Constraint Process document should be updated to reflect Canadian-specific language regarding applicable governmental authorities, for example, similar to the language used in the footnote 11."

Manitoba Hydro supports BC Hydro's comment (freezing precipitation in Manitoba can and has occurred in March and April months): "Requirement R6: Similar to previously submitted comments, in British Columbia, Canada, Generator Cold Weather Reliability Events such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a CAP within 150-days of the Event is reasonable. However, the first day of July deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, BC Hydro recommends deleting "the first day of July" language. "

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Taking unplanned maintenance outages to meet a CAP deadline or pivot from a rejected CAP extension could be overburdensome to the GO. Clarity around timeliness expectations and exceptions could help alleviate pressure. Additionally, maintenance outages are typically planned during off-peak times. This limits availability to schedule last minute changes prior to the winter period.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer

No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
<ol style="list-style-type: none"> Requirement R6: Similar to previously submitted comments, in British Columbia, Canada, Generator Cold Weather Reliability Events (Events) such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a Corrective Action Plan (CAP) within 150 days of the Event is reasonable. However, the July 1 deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, BC Hydro recommends deleting “the first day of July” language. Requirement R6 Part 6.1.6 requires corrective actions be implemented to similar equipment freeze protection measures (FPMs) within 24 calendar months of a GCWRE. BC Hydro interprets “similar equipment freeze protection measures” as existing FPMs, and therefore the Part 6.1.6 timeline of 24 calendar months only applies to existing FPMs. Any identified need for new FPMs will follow a similar timeline to R7.1.2 which is up to 48 calendar months. Given the BC Hydro fleet size and possible differing design solutions for the same cause at different locations throughout the fleet, a longer implementation timeline (36 calendar months to 48 calendar months) may be required for new FPMs. BC Hydro requests that the DT confirm this understanding or clarify the timeline expectation for new FPMs implementation. BC Hydro recommends that R6 Part 6.2.1 be revised to replace “how” with “why” for which better explains the rationale for circumstances beyond an entity’s control. Requirement R6 Part 6.1. “Ensure the Corrective Action Plan contains at a minimum:”. BC Hydro notes that this wording does not align with other Standard Requirements that list what must be in a Procedure, Plan, etc. BC Hydro recommends revising the wording in R6 as appropriate so Part 6.1 would be: “6.1 The Corrective Action Plan shall include:” 	
Likes	0
Dislikes	0

Response	
Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	Yes
Document Name	
Comment	
<p>PNM agrees with the comments of EEI:</p> <p><i>EEI does not object to the proposed shortened deadlines except for the language in Requirement R6, subpart 6.1.6. We understand 6.1.6 to mean that a GO is to complete freeze protection CAPs on similar equipment vulnerabilities within 24 months, however, we disagree that this is what the Commission directed in Paragraph 68 of the order. What they directed was that corrective actions needed to be taken on “similar equipment on all of its fleet within 24 months of becoming aware of the freeze issue.” In other words, the clock should start after the GO has confirmed similar vulnerabilities on similar equipment on other generating resources. To address this issue, EEI suggests adding the following clarifying language to 6.1.6 as suggested below in boldface:</i></p>	

6.1.6. A review of applicability to of similar freeze protection equipment installed on similar generating units within 12 calendar months of the of the Generator Cold Weather Reliability event freeze protection measures at generating units owned by the Generator Owner, with a specified timetable for corrective actions to be completed within 24 calendar months of the Generator Cold Weather Reliability Event confirming a generating unit has similar equipment vulnerabilities;

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

NV Energy does not object to the proposed shortened deadline to implement corrective actions for generating units experiencing a Generator Cold Weather Reliability Event.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

MP feels that 24 months may be a short timeline in some cases but believes that the extension process should address any extenuating circumstances.

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

Section 6.2 adequately addresses this situation, and Section 7.3 provides clarity on what needs to be submitted. From a Generator Owner (GO) perspective, here is some background on the likely reasoning for CAP extension requests and what the GO should be briefed on regarding expected deliverables:

If an engineering study or similar activity is required to assess the balance of freeze protection measures, the GO may need to request a CAP extension. This is because such activities can take considerable time, depending on non-recurring O&M budgeting and implementation policies. The GO should be prepared to file a CAP extension request with a plan and timeline as soon as practicable, based on the known implementation timeline for assessing similar freeze protection measures.

Likes 0

Dislikes 0

Response**Carver Powers - Utility Services, Inc. - 4**

Answer

Yes

Document Name

Comment

NERC needs to provide more clarity about where the CAP Extension and Constraint Process documents will be posted on NERC's website to make them easy to access. Also, if these processes are to be done through NERC's ERO Portal, and Registered Entities must file these through a Regional Entity, a contact for each Region should be established and published so Registered Entities will have a contact to address any process or access issues with the ERO Portal.

Likes 0

Dislikes 0

Response**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

Answer

Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Texas RE agrees with the timeline proposed in Requirement R6. For clarity, Texas RE recommends the following revision to Requirement Part 6.1.2 (in bold):

6.1.2. A list of actions to add new **freeze protection measures** or remedy issues with existing freeze protection measures;"

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

While AEP agrees with the overall substance of R6, we recommend that it be revised to indicate what it means to properly "implement" a Corrective Action Plan. Does it perhaps mean to complete what is later specified and required in R6.1, or something else entirely? If so, the phrase "complete the obligations of R6.1" may be preferable to "implement the Corrective Action Plan." AEP requests this clarity be provided in the obligation.

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

R6 states, “develop and implement” a Corrective Action Plan...”, with “and implement” being added in this version. For the situation where a CAP is not being developed but a Generator Cold Weather Constraint is being submitted, the “and implement” does not seem to fit this scenario.

Also, Southern believes the intent for R6 is to require 6.1 and 6.2, **or** 6.3 and not to require all items in R6.1. For example, a timetable as mentioned in R6.1.5. If a Generator Cold Weather Constraint is declared, then a timetable obviously should not be required.

In addition, then requirement in R6.1.5 could be a very aggressive goal especially if outages, manpower, or material limitations arise. Assuming these types of problems are deemed valid, then an extension would have to be approved.

In addition, Southern agrees with the comments from NAGF related to the short timelines and potential difficulty scheduling outages for CAPS that involve taking a unit off for the necessary work.

Southern does not agree that a Compliance Enforcement Authority's (CEA) approval of a CAP is consistent with a risk-based action that improves reliability. The insertion of the CEA into a registered entity's process of mitigating a reliability concern adds unneeded and burdensome administrative layers. The NERC standard should solely focus on identifying the problem and implementation of mitigating actions, both of which are in the registered entity's purview. The provision of an entity's mitigation plan to the CEA should be required, but only for compliance enforcement purposes. Actions that allow the CEA to go beyond an audit of the implementation plan are out of scope of the standard.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

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

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

Answer No

Document Name

Comment

MRO NSRF recommends that dates for which a registered entity is to be held to must be in the Requirement.

MRO NSRF recommends there be an “approval by default” if the CEA does not respond within a given period, for example 30 days after submittal to CEA.

MRO NSRF recommends that the existing 60-day corrective action plan extension request have caveats for scenarios when it is not determined until within in the 60 day period that an extension is required. There are various obvious scenarios where this is a real and realized risk, with causes outside of the control of the entity, and must be addressed.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
Timeliness expectations would be a significant burden on the GO and could cause unplanned outages.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
EOP-012-3 R6.2 notes footnote 11: <i>"Extension requests will be received and evaluated in accordance with the NERC process. The extension requests for a non-US Registered Entity should be implemented in a manner that is consistent with, or under the direction of, the applicable governmental authority or its agency in the non-US jurisdiction."</i>	
Manitoba Hydro interprets footnote 11 & 12 to exclude Canadian entities from having to request CAP extensions. Is this interpretation correct? Please advise.	
Manitoba Hydro recommends that for non-US Registered Entities, this additional language/guidance be added to footnote 11 and 12: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy does do not agree with the pre-approval process for corrective action extension. Criteria for extensions should be captured in the standard and acceptance of the extension should be evaluated as part of the audit process. Like our response for question 1, Duke Energy believes it is inappropriate for the CEA to have roles on both the enforcement and performance sides of the standard implementation.	
Additionally, we support the NAGF's comments on a lack of an appeals process for corrective action plan denial.	

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI), the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF), and the North American Generator Forum (NAGF) on question 3

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Black Hills Corporation supports the comments submitted by NAGF and EEI.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer No

Document Name

Comment

AZPS agrees with comments submitted by EEI on behalf of its members that consideration should be given to add an appeals process for a denial of a Corrective Action Plan extension request.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC agrees with EEI's comments: *there needs to be more detail defining the timelines associated with the CEA reviews and determinations.*

As for Footnotes 11 and 12: These are for non US-Registered entities and should be removed.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports the EEI comments. In addition, Dominion Energy has a concern that the appeal process is not formally outlined or appear even exist for denial of constraints by NERC staff. Also, the entire constraint review process should be formalized in a public document in either the

standard itself or in the Rules of Procedure. While the draft internal NERC procedure is a good start, a formal documented and public process should be created and maintained.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

No

Document Name

Comment

Does the R6.2 footnote 11 exclude Canadian entities from having to request CAP extensions. Is this interpretation correct? Please advise.

R6 and R7 requirements regarding pre-approval of CAPs by NERC use language that is similar to the TPL-007 standard. TPL-007 has a Canadian Variance where implementation of Corrective Action Plan(s) that require capital investment must be approved by the applicable provincial regulatory authority. This project should consider whether Canadian-specific language is needed in Requirements R6, R7 and R8 to align with the regulatory practices/processes in Canada for approving Corrective Action Plan(s) requiring capital investments.

HQ supports Manitoba Hydro's comment "Manitoba Hydro recommends that for non-US Registered Entities, this additional language/guidance be added to footnote 11 and 12: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

No

Document Name

Comment

PG&E supports NAGF and EEI concerns regarding the timeline for CAPs (referenced above), as well as their suggested revisions to R7 language.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer No

Document Name

Comment

This approach does not take into account potential for excess outages. In addition, as explained in Response to Q2, the additional approval process needed for an extension is very inefficient and builds in potential delays that, if an extension is not approved, can set back the timing of a plan. NRG recommends that approval decisions would need to have a short mandate timeframe if they are still included in the standard.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer No

Document Name

Comment

This approach does not take into account potential for excess outages. In addition, as explained in Response to Q2, the additional approval process needed for an extension is very inefficient and builds in potential delays that, if an extension is not approved, can set back the timing of a plan. NRG recommends that approval decisions would need to be mandated to be made within a short timeframe if they are still included in the standard.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Tri-State supports MRO NSRF Comment.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

Similar to the comment on proposed R6, current proposed R7.3 requirement language does not specify when the extension requests need to be made. However, a companion document (*EOP-012-3 Constraint and CAP Process 10172024.pdf*) indicated that “Entities are encouraged to submit the extension request as soon as they are aware they will not meet the CAP completion date but no later than **60 days** before the original required completion date.” We would like to understand if the 60 days timeline is enforceable if it is not used within the R7 language. Furthermore, R7 language does not state what happens when the extension request is denied. Only the companion document specifies that (*If an extension request is denied, the selected actions in the Corrective Action Plan need to be completed in accordance with the original timetables.*). Again, we would like to understand if the language in the companion document is enforceable.

Additionally, the reference to R2 in R7’s language needs to be more specific. R2 is split into two parts – R2.1 and R2.2. Only R2.1 is allowed to have CAP. Recommend modifying the R7 language as following:

*Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, **R2 Part 2.1**, or R3 shall, as applicable:*

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

Although the changes made to Requirements R6 and R7 comply with the intent of the FERC Order, there needs to be more detail defining the timelines associated with the CEA reviews and determinations. We further ask that consideration be given to including an appeals process for a denial of a Corrective Action Plan extension. While we understand that NERC is not bound to Requirements contained in Reliability Standards, determinations that represent the denial of a CAP extension may be caused by a misunderstanding or missing information that can be resolved through an appeals process.

EI additionally questions the value of Footnotes 11 and 12, which state that extension requests will be evaluated in accordance with NERC processes and extension requests for non US-Registered entities should be implemented in a manner consistent with the responsible government authority. Given NERC or applicable governmental authorities or agencies in non-US jurisdiction are not subject to Requirements within NERC Reliability Standards, these footnotes have no utility and should be removed.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

As stated above, the timelines for the CAPs may create a significant burden since the GO cannot simply take outages to address these issues or may face other barriers. It would be highly counterproductive regarding reliability assurance for NERC to insist that these outages must take priority over other outage work that has long been planned and is critically needed. This issue needs clarification to ensure the standard is clear and unambiguous.

The NAGF also recommends that the R7 language be modified to only refer to R2, Part 2.1 since CAP is not allowed under 2.2.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer No

Document Name

Comment

Ameren agrees with NAGF's comments.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer No

Document Name

Comment

Does the R6.2 footnote 11 exclude Canadian entities from having to request CAP extensions. Is this interpretation correct? Please advise.

R6 and R7 requirements regarding pre-approval of CAPs by NERC use language that is similar to the TPL-007 standard. TPL-007 has a Canadian Variance where implementation of Corrective Action Plan(s) that require capital investment must be approved by the applicable provincial regulatory

authority. This project should consider whether Canadian-specific language is needed in Requirements R6, R7 and R8 to align with the regulatory practices/processes in Canada for approving Corrective Action Plan(s) requiring capital investments.

NB Power supports Manitoba Hydro's comment "Manitoba Hydro recommends that for non-US Registered Entities, this additional language/guidance be added to footnote 11 and 12: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

No

Document Name

Comment

Although the changes made to Requirements R6 and R7 comply with the intent of the FERC Order, there needs to be more detail defining the timelines associated with the CEA reviews and determinations. We further ask that consideration be given to including an appeals process for a denial of a Corrective Action Plan extension. While we understand that NERC is not bound to Requirements contained in Reliability Standards, determinations that represent the denial of a CAP extension may be caused by a misunderstanding or missing information that can be resolved through an appeals process.

We additionally question the value of Footnotes 11 and 12, which state that extension requests will be evaluated in accordance with NERC processes and extension requests for non US-Registered entities should be implemented in a manner consistent with the responsible government authority. Given NERC or applicable governmental authorities or agencies in non-US jurisdiction are not subject to Requirements within NERC Reliability Standards, these footnotes have no utility and should be removed.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Although the changes made to Requirements R6 and R7 comply with the intent of the FERC Order, there needs to be more detail defining the timelines associated with the CEA reviews and determinations. We further ask that consideration be given to including an appeals process for a denial of a Corrective Action Plan extension. While we understand that NERC is not bound to Requirements contained in Reliability Standards, determinations that

represent the denial of a CAP extension may be caused by a misunderstanding or missing information that can be resolved through an appeals process.

EI additionally questions the value of Footnotes 11 and 12, which state that extension requests will be evaluated in accordance with NERC processes and extension requests for non US-Registered entities should be implemented in a manner consistent with the responsible government authority. Given NERC or applicable governmental authorities or agencies in non-US jurisdiction are not subject to Requirements within NERC Reliability Standards, these footnotes have no utility and should be removed.

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer No

Document Name

Comment

Vistra agrees with comments made by Duke Energy.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Recommend that any corrective action plan approval and extension that is requested be handled by a single senior management official with overall authority and responsibility for leading and managing implementation of and continuing adherence to the requirements within the NERC EOP-012 cold weather standards and not at the Compliance Enforcement Authority (CEA). The CEA will then be able to audit the process as required.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
MP agrees with EEI that defining timelines associated with CEA reviews and determination and an appeals process to support denials is needed.	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	No
Document Name	
Comment	
RF would recommend adding that the CEA will timely review the corrective action plan extensions for validity and provide the GO notice of its determination.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>Although the changes made to Requirements R6 and R7 comply with the intent of the FERC Order, there needs to be more detail defining the timelines associated with the CEA reviews and determinations. We further ask that consideration be given to including an appeals process for a denial of a Corrective Action Plan extension. While we understand that NERC is not bound to Requirements contained in Reliability Standards, determinations that represent the denial of a CAP extension may be caused by a misunderstanding or missing information that can be resolved through an appeals process.</p> <p>NV Energy additionally questions the value of Footnotes 11 and 12, which state that extension requests will be evaluated in accordance with NERC processes and extension requests for non-US-Registered entities should be implemented in a manner consistent with the responsible government authority. Given NERC or applicable governmental authorities or agencies in non-US jurisdiction are not subject to Requirements within NERC Reliability Standards, these footnotes have no utility and should be removed.</p>	

Additionally, NV Energy recommends that dates for which a registered entity is to be held to must be in the Requirement.

NV Energy also recommends there be an “approval by default” if the CEA does not respond within a given period, for example 30 days after submittal to CEA.

Lastly, NV Energy recommends that the existing 60-day corrective action plan extension request have caveats for scenarios when it is not determined until within in the 60-day period that an extension is required. There are various obvious scenarios where this is a real and realized risk, with causes outside of the control of the entity, and must be addressed.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

No

Document Name

Comment

PNM agrees with the comments of Texas RE:

In Requirement Part 6.1.6, Texas RE recommends the SDT take a similar approach to PRC-004-6 Requirement R5 to ensure that applicable entities will conduct an evaluation of all similar equipment, document which equipment needs a CAP to be completed within 24 hours and which equipment does not need a CAP. Texas RE recommends the following revision:

6.1.6 An evaluation of applicability to similar equipment freeze protection measures at generating units owned by the Generator Owner:

Develop a Corrective Action Plan (CAP) for the identified similar equipment freeze protection measures to be completed within 24 calendar months of the Generator Cold Weather Reliability Event; or

Explain in a declaration why corrective actions are beyond the entity's control or would not improve BES reliability, and that no further corrective actions will be taken.

M6 Each Generator Owner will have documented evidence that it developed and implemented a Corrective Action Plan following a Cold Weather Reliability Event at an applicable unit in accordance with Requirement R6. Acceptable evidence may include, but is not limited to, the following dated documentation (electronic or hardcopy format): Corrective Action Plan(s), Generator Cold Weather Constraint(s), completed work orders, copies of any Corrective Action Plan extension requests and supporting documentation, and updated cold weather preparedness plan(s) where indicated as needed by the Corrective Action Plan. Each Generator owner shall have dated evidence that demonstrates it developed a CAP and an evaluation of the CAP's applicability to other equipment freeze protection measures, or a declaration in accordance with Requirement Part 6.1.6.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

It appears that R7.4 should be listed as "or", or state "Document in a declaration if applicable."

Southern further agrees with the EEI and NAGF comments concerning the timing and scheduling of outages to implement CAPS.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer

No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Natalie Johnson - Enel Green Power - 5

Answer No

Document Name

Comment

Enel North America agrees with the MRO NSRF's recommendation that the existing 60-day corrective action plan extension request should allow caveats for scenarios when it is not determined until within in the 60-day period that an extension is required. There are various obvious scenarios where this is a real and realized risk, with causes outside of the control of the entity, and must be addressed.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy has no concerns

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

The revised language is clear and acceptable as written.

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 generally agrees with the drafting team's proposed language, and recommends the following additional revisions.

First, the SRC recommends that the deadline for developing a CAP in Requirement R6 be revised from "before the first day of July" to "before the first day of **the following** July" to help minimize potential ambiguity regarding the CAP development deadline.

Second, the SRC recommends that Part 6.2 of Requirement R6 be revised to clarify that CEA review and approval is not needed in scenarios in which the actions in the CAP need to be updated, but the updates will not require extension of the timelines in Part 6.1. The SRC therefore recommends that the beginning of Part 6.2 be revised to read as follows: "If it determines that it may need to exceed a timeline in Part 6.1, update the Corrective Action Plan . . ."

Third, the SRC recommends including a timeline for submitting extension requests (for example, 60 days before the first deadline that would be impacted by the extension request). This would help reduce last-minute extension requests and ensure the CEA has adequate time to review and process extension requests.

Finally, the SRC recommends that the beginning of Part 6.2.1 be revised to read "an explanation of the circumstances . . ." to better fit the overall structure of the list of elements of Part 6.2.

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Rhonda Jones - Invenergy LLC - 5****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Rachel Coyne - Texas Reliability Entity, Inc. - 10****Answer****Document Name****Comment**

In Requirement Part 6.1.6, Texas RE recommends the SDT take a similar approach to PRC-004-6 Requirement R5 to ensure that applicable entities will conduct an evaluation of all similar equipment, document which equipment needs a CAP to be completed within 24 hours and which equipment does not need a CAP. Texas RE recommends the following revision:

6.1.6 An evaluation of applicability to similar equipment freeze protection measures at generating units owned by the Generator Owner:

- **Develop a Corrective Action Plan (CAP) for the identified similar equipment freeze protection measures to be completed within 24 calendar months of the Generator Cold Weather Reliability Event; or**
- **Explain in a declaration why corrective actions are beyond the entity's control or would not improve BES reliability, and that no further corrective actions will be taken.**

M6 Each Generator Owner will have documented evidence that it developed and implemented a Corrective Action Plan following a Cold Weather Reliability Event at an applicable unit in accordance with Requirement R6. Acceptable evidence may include, but is not limited to, the following dated documentation (electronic or hardcopy format): Corrective Action Plan(s), Generator Cold Weather Constraint(s), completed work orders, copies of any

Corrective Action Plan extension requests and supporting documentation, and updated cold weather preparedness plan(s) where indicated as needed by the Corrective Action Plan. **Each Generator owner shall have dated evidence that demonstrates it developed a CAP and an evaluation of the CAP's applicability to other equipment freeze protection measures, or a declaration in accordance with Requirement Part 6.1.6.**

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - NA - Not Applicable - MRO,WECC

Answer

Document Name

Comment

SPP agrees with the comments of The ISO/RTO Council (IRC) Standards Review Committee (SRC)

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports HQ comments: "The Generator Cold Weather CAP Extension and Constraint Process document should be updated to reflect Canadian-specific language regarding applicable governmental authorities, for example, similar to the language used in the footnote 11."

OPG supports Manitoba Hydro's comment recommending that for non-US Registered Entities: Prior to the implementation of any element of a Corrective Action Plan developed in accordance with this Requirement all applicable corporate, regulatory, provincial, and federal evaluations and approvals must be completed and obtained. The applicable timeline for implementation of a Corrective Action Plan shall be determined by the Registered Entities Generator Owner.

OPG supports BC Hydro's comment (freezing precipitation in Québec can and has occurred in March and April months) regarding Requirement "R6: Similar to previously submitted comments, in Québec, Canada, Generator Cold Weather Reliability Events such as freezing precipitation, can and have happened well into the Spring calendar months (including April and May). The requirement to develop a CAP within 150-days of the Event is reasonable. However, the first day of July deadline will considerably reduce the CAP development timeline for late Spring Events. Worst case scenario, for a May Event, identification of common failure causes, solution identification and CAP development would need to be done in less than 45 days, which may result in an inadequate CAP. The addition of the December 1 deadline to implement a CAP (R6 Part 6.1.5) would ensure that adequate CAPs are developed and implemented before the next Winter season. With the addition of the December 1 deadline, HQ recommends deleting "the first day of July" language. "

Likes 0

Dislikes 0

Response

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

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

Natalie Johnson - Enel Green Power - 5

Answer No

Document Name

Comment

Enel North America agrees with EEI's response to question 4 that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval date of this Standard.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

No

Document Name

Comment

Invenergy disagrees that the revisions to Requirement 2 address the FERC directive. If the intent is for corrective action plans to be completed prior to the generating unit's commercial operation date and for the entity to have the capability to operate at the unit's ECWT for at least 12 hours, then it is unnecessary to divide this requirement into separate tracks based on the approval date of the ECWT definition. As such, we recommend returning to the language of EOP-012-2 and replacing the CAP language with constraint declaration language.

If two tracks are to be pursued, then we disagree that February 16, 2023, is the most reasonable date of demarcation to address the issue of units in different stages of design and construction and instead proposes October 1, 2024.

The effective date of EOP-012-2 presents as a more reasonable alternative by which industry would have received sufficient notice of the approval of the ECWT definition and had an opportunity to calculate that value for incorporation in the design criteria of new generating units.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer

No

Document Name

Comment

Invenergy disagrees that the revisions to Requirement 2 address the FERC directive. If the intent is for corrective action plans to be completed prior to the generating unit's commercial operation date and for the entity to have the capability to operate at the unit's ECWT for at least 12 hours, then it is unnecessary to divide this requirement into separate tracks based on the approval date of the ECWT definition. As such, we recommend returning to the language of EOP-012-2 and replacing the CAP language with constraint declaration language.

If two tracks are to be pursued, then we disagree that February 16, 2023, is the most reasonable date of demarcation to address the issue of units in different stages of design and construction and instead proposes October 1, 2024.

The effective date of EOP-012-2 presents as a more reasonable alternative by which industry would have received sufficient notice of the approval of the ECWT definition and had an opportunity to calculate that value for incorporation in the design criteria of new generating units.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

PNM agrees with the comments of EEI:

While EEI appreciates the intent of the February 16, 2023, date, we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint. For this reason, we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

While NV Energy appreciates the intent of the February 16, 2023, date, we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint. For this reason, we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Reclamation agrees that revisions to Requirement R2 Part 2.1 addresses the FERC directive for units under construction. However, Reclamation does not agree with including the 20 MPH as a criterion unless an analysis/justification for the 20 MPH windspeed that would affect equipment in a negative way can be provided.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

While EEI appreciates the intent of the February 16, 2023, date, we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint. For this reason, we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer No

Document Name

Comment

While we appreciate the intent of the February 16, 2023, date, we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint. For this reason, we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer No

Document Name

Comment

There is no reason to split the language into two parts around February 16, 2023. Requirement R2 will only apply once the unit is in commercial operation, and a corrective action plan for freeze protection measures that is required to be completed prior to commercial operation is not really different from simply requiring the freeze protection measures to be in place as of the date of commercial operation.

The language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.”

NB Power supports BC Hydro’s comments: “Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording “date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction.” This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.”

The date of February 16, 2023, when the definition of Extreme Cold Weather Temperature was approved by FERC it is not equivalent with a compliance requirement, unless accompanied by an applicable effective standard.

The recommendation is to use instead the effective date for the new EOP-012-3 to be enforceable for non-US entities, as applicability criteria for the Generator Owner first contractual commitment to design criteria.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer No

Document Name

Comment

Ameren agrees with EEI's comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

As drafted, it is unclear if a unit constructed after 2027 would be in violation of R2 if it experiences a Generator Cold Weather Reliability Event. As an example, if the new unit is built with the design specified to be to -10 deg F and a 20-mph wind where the ECWT is 0, is there a violation if a GCWRE occurs and the cause is determined to be an error in the calculation made by the construction engineer? Or is the fact that you have a document that says the design should meet the ECWT plus 20 mph wind sufficient for compliance with R2, regardless of performance?

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

While Avista appreciates the intent of the February 16, 2023, date, we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint. For this reason, we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

AES US Renewables believe the February 16, 2023 date should not be used as demarcation. Typically, once FERC approves a standard, there is a period prior to the standard becoming enforceable. Using the FERC approval date does not follow the typical implementation process and is unreasonable. Instead it should follow the [EOP-012-1 Implementation Plan](#) that was part of the package that was approved by FERC on 2/16/2023. Per the Implementation Plan, EOP-012-1 along with the definitions of three new terms were supposed to become effective on 10/1/2024. We strongly recommend using 10/1/2024 as the demarcation date.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer No

Document Name

Comment

HQ support NB Power’s comment: “There is no reason to split the language into two parts around February 16, 2023. Requirement R2 will only apply once the unit is in commercial operation, and a corrective action plan for freeze protection measures that is required to be completed prior to commercial operation is not really different from simply requiring the freeze protection measures to be in place as of the date of commercial operation. As an aside, the language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.”

HQ offers the following comment: “Under Requirement R2, we recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording “date on which ECWT definition becomes effective in the relevant jurisdiction.” This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.”

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer	No
Document Name	
Comment	
<p>Dominion Energy supports EEI comments but would like to clarify that an effective date dependent on a term pending stakeholder approval is not tenable. Effective dates should occur after stakeholders are aware of the requirements and what defined terms mean.</p>	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
<p>WEC Energy Group supports the comments of EEI.</p>	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	No
Document Name	
Comment	
<p>TEPC agrees with EEI's comments: <i>we ask that the date used for Requirement R2, subparts 2.1 and 2.2 for new resources should be the approval of this Standard. NERC Reliability Standards should be forward looking and should not be aligned to compliance measures or dates from previous versions of Reliability Standards or approval dates of Glossary Terms.</i></p>	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	

Answer	No
Document Name	
Comment	
AZPS agrees with EEI's comments submitted on behalf of its members that the effective date of this Standard would be a more suitable choice as the date of demarcation. AZPS agrees with EEI that NERC Reliability Standards should be forward looking and not be aligned to dates in the past.	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	No
Document Name	
Comment	
Black Hills Corporation supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 4	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	

Answer	No
Document Name	
Comment	
<p>Manitoba Hydro support Hydro Quebec's comment: "There is no reason to split the language into two parts around February 16, 2023. Requirement R2 will only apply once the unit is in commercial operation, and a corrective action plan for freeze protection measures that is required to be completed prior to commercial operation is not really different from simply requiring the freeze protection measures to be in place as of the date of commercial operation. As an aside, the language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph."</p> <p>Manitoba Hydro supports BC Hydro's comments: "Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction." This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada."</p>	
Likes	0
Dislikes	0
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	
<p>Eversource supports the comments of EEI.</p>	
Likes	0
Dislikes	0
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
<p>Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction." This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.</p>	

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

The date used should be the NERC effective date of the ECWT.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

It is the opinion of ACES that the second bullet point of Requirement 2, Part 2.1 would be clearer if the phrase “upon beginning commercial operation” were changed to “prior to beginning commercial operation”.

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

The revised language is clear and acceptable as written.

Likes 0

Dislikes 0

Response	
Martin Sidor - NRG - NRG Energy, Inc. - 6	
Answer	Yes
Document Name	
Comment	
NRG does not have any concern with the designation of Feb 16, 2023 as the date of demarcation for when the corrective actions would be required for units that achieve commercial operation after Oct 1, 2027. NRG believes that the sub bullet for documenting a declaration with justification for a Generator Cold Weather Constraint should be applicable to R2.1 as well as R2.2.	
Likes	0
Dislikes	0
Response	
Patricia Lynch - NRG - NRG Energy, Inc. - 5	
Answer	Yes
Document Name	
Comment	
NRG does not have any concern with the designation of Feb 16, 2023 as the date of demarcation for when the corrective actions would be required for units that achieve commercial operation after Oct 1, 2027. NRG believes that the sub bullet for documenting a declaration with justification for a Generator Cold Weather Constraint should be applicable to R2.1 as well as R2.2.	
Likes	0
Dislikes	0
Response	
Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle	
Answer	Yes
Document Name	
Comment	
PG&E agrees that this DT draft clarifies 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.	
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

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Diana Torres - Imperial Irrigation District - 6****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer****Document Name****Comment**

OPG support NB Power’s comment: “There is no reason to split the language into two parts around February 16, 2023. Requirement R2 will only apply once the unit is in commercial operation, and a corrective action plan for freeze protection measures that is required to be completed prior to commercial operation is not really different from simply requiring the freeze protection measures to be in place as of the date of commercial operation. As an aside, the language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.”

OPG support HQ comment: “Under Requirement R2, we recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording “date on which ECWT definition becomes effective in the relevant jurisdiction.” This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.”

OPG has the following alternative comment:

The date of February 16, 2023, when the definition of Extreme Cold Weather Temperature was approved by FERC it is not equivalent with a compliance requirement, unless accompanied by an applicable effective standard.

The recommendation is to use instead the effective date for the new EOP-012-3 to be enforceable for non-US entities, as applicability criteria for the Generator Owner first contractual commitment to design criteria.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 6****Answer****Document Name****Comment**

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE has the following comments on Requirement R2:

Texas RE suggests a grammatical review be conducted for the second bullet in Requirement Part 2.1. It looks like there either a misplaced parenthetical or it needs a closing parenthetical, or it needs an “or” or an “and” after the first comma.

Texas RE is concerned that the measures do not require dated evidence for demonstrating contractual design criteria commitment before February 16, 2023. Texas RE recommends the following revision to the measure (in bold):

M2. Each Generator Owner will have dated evidence that demonstrates it has freeze protection measures for its unit(s) in accordance with R2, or it has developed a Corrective Action Plan or declared a Generator Cold Weather Constraint for the identified issues. **Each GO shall have dated evidence that demonstrates the signed contractual design criteria commitments in accordance with 2.1 and/or 2.2.** Acceptable evidence may include the following (electronic or hardcopy format): Identification of generating unit(s) minimum temperature under Requirement R1 Part 1.2.2 which is equal to or less than the unit’s Extreme Cold Weather Temperature, documentation of freeze protection measures, Corrective Action Plan(s) (if applicable), and Generator Cold Weather Constraints (if applicable).

Likes 1

JEA, 1, McClung Joseph

Dislikes 0

Response

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

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

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

Answer No

Document Name

Comment

Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction." This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Manitoba Hydro supports BC Hydro's comments: "Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction." This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada."

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 5

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Black Hills Corporation supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

No

Document Name	
Comment	
AZPS does not agree per the same comment as question number 4	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	No
Document Name	
Comment	
TEPC agrees with EEI's comments: <i>we do not agree that compliance date should be aligned to when a glossary term is approved. We also note that there are other changes within the proposed standard that could impact what an entity includes in the design of their resource beyond the definition of Extreme Cold Weather Temperature, including the proposed definition of Generator Cold Weather Constraint.</i>	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the comments of EEI as stated in response to Question 4.	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	No
Document Name	

Comment

See comments to Q4 please.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

No

Document Name

Comment

HQ supports BC Hydro’s comments: “Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording “date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction.” This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.”

HQ supports NB Power’s comment: “The second option in Part 2.2 opens the possibility of a Generator Cold Weather Constraint, including a pre-approving constraints based on criteria in Attachment 1 that may not be appropriate in the future. Future units should simply be engineered to provide the required freeze protection measures. If there is any need for exceptions, they should be handled on a case-by-case basis. As an aside, the language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.”

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer

No

Document Name

Comment

AES US Renewables agree with the proposed revision. However, we do not agree with the demarcation date. Please refer to our response to Question 4.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

Avista does not support the February 16, 2023, date for the reasons given to our response in Question 4.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Same comment as for question 4 above.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer No

Document Name

Comment

Ameren agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer	No
Document Name	
Comment	
<p>NB Power supports BC Hydro's comments: "Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction." This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada."</p> <p>The second option in Part 2.2 opens the possibility of a Generator Cold Weather Constraint, including a pre-approving constraints based on criteria in Attachment 1 that may not be appropriate in the future. Future units should simply be engineered to provide the required freeze protection measures. If there is any need for exceptions, they should be handled on a case-by-case basis.</p> <p>The language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.</p>	
Likes 0	
Dislikes 0	
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	No
Document Name	
Comment	
<p>We do not support the February 16, 2023, date for the reasons given to our response in Question 4.</p>	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
<p>EI does not support the February 16, 2023, date for the reasons given to our response in Question 4.</p>	
Likes 0	
Dislikes 0	

Response

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

Answer No

Document Name

Comment

Reclamation does not agree and refers back to the answer in #2 and #4 above.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

NV Energy does not support the February 16, 2023, date for the reasons given to our response in Question 4.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

Response given to question 4

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer No

Document Name

Comment

Invenergy disagrees that the revisions to Requirement 2 address the FERC directive. If the intent is for corrective action plans to be completed prior to the generating unit's commercial operation date and for the entity to have the capability to operate at the unit's ECWT for at least 12 hours, then it is unnecessary to divide this requirement into separate tracks based on the approval date of the ECWT definition. As such, we recommend returning to the language of EOP-012-2 and replacing the CAP language with constraint declaration language.

If two tracks are to be pursued, then we disagree that February 16, 2023, is the most reasonable date of demarcation to address the issue of units in different stages of design and construction and instead proposes October 1, 2024.

The effective date of EOP-012-2 presents as a more reasonable alternative by which industry would have received sufficient notice of the approval of the ECWT definition and had an opportunity to calculate that value for incorporation in the design criteria of new generating units.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer No

Document Name

Comment

Invenergy disagrees that the revisions to Requirement 2 address the FERC directive. If the intent is for corrective action plans to be completed prior to the generating unit's commercial operation date and for the entity to have the capability to operate at the unit's ECWT for at least 12 hours, then it is

unnecessary to divide this requirement into separate tracks based on the approval date of the ECWT definition. As such, we recommend returning to the language of EOP-012-2 and replacing the CAP language with constraint declaration language.

If two tracks are to be pursued, then we disagree that February 16, 2023, is the most reasonable date of demarcation to address the issue of units in different stages of design and construction and instead proposes October 1, 2024.

The effective date of EOP-012-2 presents as a more reasonable alternative by which industry would have received sufficient notice of the approval of the ECWT definition and had an opportunity to calculate that value for incorporation in the design criteria of new generating units.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer

No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer

No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Natalie Johnson - Enel Green Power - 5

Answer

No

Document Name

Comment

Enel North America agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

FirstEnergy has no concerns.

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

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Yes

Document Name

Comment

PG&E agrees that this DT draft clarifies 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.

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

The revised language is clear and acceptable as written.

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 recommends that the upcoming technical conference include discussion of the extent to which it is appropriate to allow constraints under Part 2.2 of Requirement R2, as the units described in Part 2.2 should generally be designed and constructed to achieve the necessary level of extreme cold weather performance, and the standard should incentivize the development of more effective freeze protection measures over the course of time. If the discussion indicates that there is a technical basis for allowing constraints for this category of units, it should also address whether these units should qualify for all of the constraint criteria listed in Attachment 1 or only a subset of the criteria.

Subject to any additional information that may become available at the technical conference, the SRC recommends that if constraints are allowed for the units described in Part 2.2 of Requirement R2, these units should only be eligible to declare constraints under item 5 of the case-by-case constraint list. In light of the goal of incentivizing development of more effective freeze protection measures, the SRC believes the accelerated review process used for the accelerated approval constraint list is not appropriate for the units described in Part 2.2. Any constraint declared by a Part 2.2 unit should be reviewed under item 5 of the case-by-case constraint list, even if the constraint might otherwise fall under the accelerated approval constraint list.

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE recommends clarifying some of the footnotes:

- Footnote 1 - Repword to remove “this designation”. Texas RE suggests the following verbiage: “COD means that the facility has received all approvals necessary for operation after completion of initial start-up testing.”
- Footnotes 3 and 5 - Include the word “dated”. Texas RE suggests the following verbiage: “Such commitments would be demonstrated by dated and signed contractual commitments, **dated** emailed correspondence agreeing to thermal design criteria, or other similar dated documented evidence.”
- In Footnotes 4 and 6, Texas RE recommends the date be clearer. As it is currently written, it is referring to the date of the governmental authority’s order. Is this the intent? If the intent is to refer to the effective date of the definitions, it should state that and reference the implementation plan.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The date used should be the NERC effective date of the ECWT.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - NA - Not Applicable - MRO,WECC

Answer

Document Name

Comment

SPP agrees with the comments of The ISO/RTO Council (IRC) Standards Review Committee (SRC)

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports BC Hydro’s comments: “Under Requirement R2, BC Hydro recommends that instead of referencing the February 16, 2023 date in the Requirement and having a footnote, remove the date in the Requirement and add the wording “date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction.” This will help with the process of standard adoption in non-FERC regulated jurisdictions, such as Canada.”

OPG supports NB Power’s comment: “The second option in Part 2.2 opens the possibility of a Generator Cold Weather Constraint, including a pre-approving constraints based on criteria in Attachment 1 that may not be appropriate in the future. Future units should simply be engineered to provide

the required freeze protection measures. If there is any need for exceptions, they should be handled on a case-by-case basis. As an aside, the language in R2 should be updated to provide 32 km/hr as an equivalent wind speed to 20 mph.”

OPG has the following alternative comment: The date of February 16, 2023, when the definition of Extreme Cold Weather Temperature was approved by FERC it is not equivalent with a compliance requirement, unless accompanied by an applicable effective standard.

The recommendation is to use instead the effective date for the new EOP-012-3 to be enforceable for non-US entities, as applicability criteria for the Generator Owner first contractual commitment to design criteria.

Likes	0
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Dislikes	0
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Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support BC Hydro's comments.

Likes	0
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Dislikes	0
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Response

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

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

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

Answer No

Document Name

Comment

We at ACES understand the difficulty faced by the drafting team in complying with this FERC directive. We especially appreciate the effort taken by the drafting team to limit the scope of the changes while also complying with the FERC directive. However, we feel as though the addition to the language of part 7.1.1 creates more confusion than it remedies. We recommend that the drafting team consider other alternatives such as adding an additional sub-part to both Part 7.1.1 and Part 7.1.2.

We recommend modifying Requirement R7, Part 7.1 as follows:

R7. Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, or R3 shall, as applicable:

7.1 Include a timetable for implementing the applicable type(s) of corrective action(s) that shall:

7.1.1. List modification(s) to existing (or previously planned pursuant to Requirement 2, Part 2.1) freeze protection measures, if any;

7.1.1.1. Any item listed in accordance with Part 7.1.1 shall be completed within 24 calendar months of completing development of the Corrective Action Plan.

7.1.2. List new freeze protection measures, if any, and

7.1.2.1 Any item listed in accordance with Part 7.1.2 shall be completed within 48 calendar months of completing development of the Corrective Action Plan.

7.1.3. Describe the updates to the cold weather preparedness plan required under Requirement R4 to identify the updates or additions to the Generator Cold Weather Critical Components and their freeze protection measures.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer**

No

Document Name**Comment**

Reclamation agrees that this addresses FERC's directive, but does not agree that this is the appropriate avenue. It places undue administrative burden on both facilities and CEA's without providing adequate solutions to the underlying issues of effective freeze prevention equipment.

Likes 0

Dislikes 0

Response**Jeffrey Streifling - NB Power Corporation - 1****Answer**

No

Document Name**Comment**

It might have been clearer to keep the standard, including R7, focussed on new units and freeze control measures and put requirements for retrofitting existing units in the implementation plan.

Likes 0

Dislikes 0

Response**Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper****Answer**

No

Document Name**Comment**

The 3 types of items required to complete a Corrective Action Plan (CAP) under R1, R2 and R3 are the same 3 types of items required to complete a Corrective Action Plan under R6, qualified personnel, proper materials, and the required plant conditions. A Cold Weather Reliability Event does not change the circumstances required to correct the cause. Evidence to support implementation timelines should be retained for following audits of the Standard.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Requirement R7: in Parts 7.1.1 and 7.1.2 the current wording "list the action(s) ... to be completed" can be seen as ambiguous as to which actions need to be listed, i.e. whether all actions need to be planned for completion within in the specified timeframe, or whether only those actions planned to be completed in the timeframe would need to be listed.

As well, in Part 7.1.1 adding the "regardless of any longer timelines in ... associated with new freeze protection measures;" may add ambiguity, i.e. 7.1.2 is for new FPM so adding this to existing FPM could cause confusion on expectations. As well, in Part 7.1.2, the wording "List the action(s) which require(s) new freeze protection measures ..." is ambiguous and could be interpreted as listing items such as, Needing a CAP due to a recalculated Temperature per Part 1.1.1, as opposed to actions to implement such as, Select vendor to supply new FPM.

BC Hydro recommends revising R7 and Parts 7.1 with its subparts 7.1.1 through 7.1.3 for clarity. Please see suggested wording below:

R7. Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, or R3, shall:

7.1. Include a timetable for implementing the Corrective Action Plan that:

7.1.1. For remediating issues with existing freeze protection measures, if any, the corrective actions shall be completed within 24 calendar months of completing development of the Corrective Action Plan; and

7.1.2. For adding new freeze protection measures, if any, the corrective actions shall be completed within 48 calendar months of completing development of the Corrective Action Plan; and

7.2. Contain a description of the updates to the cold weather preparedness plan required under Requirement R4 to identify updates or additions to the Generator Cold Weather Critical Components and their freeze protection measures, if required.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO**Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Natalie Johnson - Enel Green Power - 5****Answer** Yes**Document Name****Comment**

Enel North America agrees with EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response**Stephanie Kenny - Edison International - Southern California Edison Company - 6****Answer** Yes**Document Name****Comment**

See EEI comments

Likes 0

Dislikes 0

Response**Robert Blackney - Edison International - Southern California Edison Company - 1****Answer** Yes**Document Name**

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response**Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer**

Yes

Document Name**Comment**

Perhaps, the standard drafting team creates a form to be included and completed in the attachments as the formatting of a corrective action plan.

Likes 0

Dislikes 0

Response**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5****Answer**

Yes

Document Name**Comment**

NV Energy supports the proposed changes to Requirement R7, and we agree that these changes address the directive to differentiate between the existing and new freeze protection measures.

Likes 0

Dislikes 0

Response**Hillary Creurer - Allete - Minnesota Power, Inc. - 1****Answer**

Yes

Document Name**Comment**

MP supports the proposed changes to Requirement R7, and we agree that these changes address the directive to differentiate between the existing and new freeze protection measures.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EI supports the proposed changes to Requirement R7, and we agree that these changes address the directive to differentiate between the existing and new freeze protection measures.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

We support the proposed changes to Requirement R7, and we agree that these changes address the directive to differentiate between the existing and new freeze protection measures.

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

The revised language is clear and acceptable as written.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer

Yes

Document Name

Comment

Ameren agrees with EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

Yes

Document Name

Comment

Avista supports the proposed changes to Requirement R7, and we agree that these changes address the directive to differentiate between the existing and new freeze protection measures.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

Yes

Document Name

Comment

NRG believes the language used here is clear.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

Yes

Document Name

Comment

NRG believes the language used here is clear.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Yes

Document Name

Comment

PG&E agrees that revisions to Requirement R7 address the directive to differentiate between the existing and new freeze protection measures.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

Yes

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

AZPS agrees with these changes.

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

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mohamad Elhuseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

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

Answer No

Document Name

Comment

The current implementation plan would require a resubmission of any declaration under EOP-012-2. This would create redundant work and confusion around tracking. Suggest adding language a “grandfathering” process for existing units.

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 supports the NAGF's response to question 7.

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer No

Document Name

Comment

Energy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the North American Generator Forum (NAGF) on question 7

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Black Hills Corporation supports the comments submitted by NAGF.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

No

Document Name

Comment

TEPC agrees with EEI's response: *EEI does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.*

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

No

Document Name

Comment

Dominion Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

No

Document Name

Comment

PG&E supports NAGF concerns regarding providing clarification for how existing declarations under EOP-012-2 are to be transitioned under EOP-012-3.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

No

Document Name

Comment

NRG is in agreement with NAGF as the potential confusion related to declaration made under EOP-012-2 and how these will be addressed under EOP-012-3. More information is needed related to the process to be used to address these declarations made under the current standard, including the expectations for these existing declarations, timelines related to rejected declarations and any other obligations related to these declarations.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

No

Document Name

Comment

NRG is in agreement with NAGF as the potential confusion related to declaration made under EOP-012-2 and how these will be addressed under EOP-012-3. More information is needed related to the process to be used to address these declarations made under the current standard, including the expectations for these existing declarations, timelines related to rejected declarations and any other obligations related to these declarations.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer

No

Document Name

Comment

AES US Renewables support NAGF comments for this question NAGF comments:

The NAGF is concerned with the potential confusion related to declaration made under EOP-012-2 and how these will be addressed under EOP-012-3. More information is needed related to the process to be used to address these declarations made under the current standard, including the expectations for these existing declarations, timelines related to rejected declarations and any other obligations related to these declarations. Additional support for this position is provided under question 9.

Next, the NAGF believes that the requirement to create duplicative CAPs and declarations over the years and have them approved for an approved event is extremely inefficient for both the registered entities and NERC and the regions. This issue should be addressed through modifications to R6 or the definition of Generator Cold Weather Reliability Event. Prior to the requirement to request approval for these declarations, the repetition was likely manageable. But with the additional requirements related to both the filing process and the requirements, this is likely to become a documentation issue that detracts from the reliable operation of the grid.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

Avista does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.

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 is concerned with the potential confusion related to declaration made under EOP-012-2 and how these will be addressed under EOP-012-3. More information is needed related to the process to be used to address these declarations made under the current standard, including the expectations for these existing declarations, timelines related to rejected declarations and any other obligations related to these declarations. Additional support for this position is provided under question 9.

In addition, the NAGF believes that the requirement to create duplicative CAPs and declarations over the years and have them approved for an approved event is extremely inefficient for both the registered entities and NERC and the regions. This issue should be addressed through modifications to R6 or the definition of Generator Cold Weather Reliability Event. Prior to the requirement to request approval for these declarations, the repetition was likely manageable. But with the additional requirements related to both the filing process and the requirements, this is likely to become a documentation issue that detracts from the reliable operation of the grid.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer No

Document Name

Comment

Ameren agrees with NAGF's comments.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

No

Document Name

Comment

We do not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEl does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers

Answer

No

Document Name

Comment

Vistra supports NAGF Comments

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation does not agree, and notes that the revision of this standard increases undue administrative burden on industry and CEA's without effectively addressing freeze protection technology and requirements.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

MP feels more clarity is needed on items in Question #1 and #3, therefore is unable to support the Implementation Plan at this time. Additionally, MP supports NAGF comments on Question #7 response related to the requirements to complete duplicative CAPs and declarations over the years and have them approved is extremely inefficient for registered entities and NERC. The addition of the approvals process greatly increases the inefficiencies related to minor refinements that may be needed to the Generator Cold Weather Reliability Event definition.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

NV Energy does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

PNM agrees with the comments of EEI.

EEI does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Natalie Johnson - Enel Green Power - 5

Answer No

Document Name

Comment

Enel North America supports EEI's response and does not agree with the current proposed changes to EOP-012, therefore, Enel North America is unable to support the Implementation Plan.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

AZPS does not disagree with the proposed implementation plan.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

NERC should clarify how the constraint declaration process for EOP-012-2 (currently in effect) will be handled and addressed by the Regional Entities for the 2024-2025 winter season since EOP-012-3 will not be approved until a future date, possibly in 2025.

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rhonda Jones - Invenenergy LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation supports NAGF Comments	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	

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

Natalie Johnson - Enel Green Power - 5

Answer No

Document Name

Comment

Enel North America agrees with NAGF's comments that additional information is required regarding the process for handling these declarations made under the current standard. This includes expectations for existing declarations, timelines for rejected declarations, and any other related obligations.

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See EEI comments

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1

Answer No

Document Name

Comment

See comments submitted by EEI.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer No

Document Name

Comment

Invenergy needs more clarity regarding the revisions to the standard before it can comment on the Implementation plan.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer No

Document Name

Comment

Invenergy needs more clarity regarding the revisions to the standard before it can comment on the Implementation plan.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

PNM agrees with the comments of EEI:

While EEI does not object to the proposed Implementation Plan, we do not support the proposed changes to EOP-012 and therefore cannot support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

: It is the opinion of ACES that the effective date language for Requirements R2, R6, R7, and R8 is overly verbose and ambiguous. We recommend modifying the Implementation Plan as follows:

Effective Date and Phased-In Compliance Dates

Compliance Date for EOP-012-3 Requirement R2 – New Generating Units

Entities beginning commercial operation after the effective date of EOP-012-3 shall become compliant with Requirement R3 no later than the commercial operations date for the applicable unit. Any Generator Cold Weather Constraint shall be submitted in accordance with the timeline provided in Requirement R8.

Compliance Date for EOP-012-3 Requirement R6

Entities shall comply with Requirement R6 by the effective date of the Standard.

Compliance Date for EOP-012-3 Requirement R7

Entities shall comply with Requirement R7 by the effective date of the Standard.

Compliance Date for EOP-012-3 Requirement R8

Entities shall comply with Requirement R8 by the effective date of the Standard.

Any entity that previously declared one or more Generator Cold Weather Constraint(s) under Reliability Standard EOP-012-2 shall perform a review of any such declaration(s) for compliance with Reliability Standard EOP-012-3 Attachment 1 by the effective date. The entity shall submit any previously declared Generator Cold Weather Constraint(s) no later than 45 days following the effective date of Reliability Standard EOP-012-3.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response**Hillary Creurer - Allele - Minnesota Power, Inc. - 1****Answer**

No

Document Name**Comment**

Until the final version of the standard is complete, MP is unable to provide a position on the implementation plan.

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer**

No

Document Name**Comment**

Reclamation does not agree. We recommend that more input be requested from GO/GOP's in industry prior to issuing a draft for comment allowing for a more effective and complete standard.

Likes 0

Dislikes 0

Response**David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers****Answer**

No

Document Name**Comment**

Vistra Agrees with comments made by Duke Energy.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

While EEI does not object to the proposed Implementation Plan, we do not support the proposed changes to EOP-012 and therefore cannot support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

No

Document Name

Comment

While we do not object to the proposed Implementation Plan, we do not support the proposed changes to EOP-012 and therefore cannot support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer

No

Document Name

Comment

Ameren agrees with EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Until the final version of the standard is completed, the NAGF is unable to provide a position on the implementation plan.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

No

Document Name

Comment

While Avista does not object to the proposed Implementation Plan, we do not support the proposed changes to EOP-012 and therefore cannot support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer

No

Document Name

Comment

AES US Renewables is concerned with the current implementation plan which requires an entity to submit previously declared constraint under EOP-012-2 for compliance with EOP-012-3 no later than 45 days following the effective date of EOP-012-3. While the 45-day timeline is not a major concern, we have questions for the drafting team to consider:

- Cost constraints that are allowed in EOP-012-2 are no longer allowed in EOP-012-3. If this constraint is denied by the CEA under EOP-012-3, what is the process and associated timelines that entities need to follow for recourse?
- Is there a possibility for entities to make changes to the constraint declared under EOP-012-2 before submittal to CEA under EOP-012-3 to conform to the Attachment 1 criteria?

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

No

Document Name

Comment

Until the final version of the standard is completed, PG&E is unable to provide a position on the implementation plan.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports the comments of EEI.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

No

Document Name	
Comment	
TEPC agrees with EEI's response: <i>EEI does not agree with the current proposed changes to EOP-012, therefore, we are unable to support the Implementation Plan at this time.</i>	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	No
Document Name	
Comment	
Black Hills Corporation does not agree with the proposed changes to EOP-012, therefore, will not comment on the Implementation Plan at this time.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	No
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 8	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No

Document Name	
Comment	
Duke Energy does not agree with the implementation plan for EOP-012-3. Due to the major changes to requirements R6, R7, and R8, a clear implementation date is required to allow the GOs to determine which standard criteria are required. Duke Energy recommends an implementation date of October 1, 2025.	
Likes 0	
Dislikes 0	
Response	
Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	No
Document Name	
Comment	
Standard language should be fixed prior to implementation review.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Based on our comments associated with these ballots, BC Hydro is unable to support the standard implementation plan at this time.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer Yes

Document Name

Comment

AZPS does not disagree with the proposed implementation plan.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy has no concerns.

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

While NV Energy does not object to the proposed Implementation Plan, we do not support the proposed changes to EOP-012 and therefore cannot support the Implementation Plan at this time.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

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

Answer No

Document Name

Comment

Accelerated timelines and redundant reporting criteria create inefficiencies in work processes for the GO. This includes potential unplanned maintenance outages to meet CAP implementation expectations.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Duke Energy's focus is on the reliable operation of the BES and will not submit comments on the cost effectiveness of the proposed changes to EOP-012-3.

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the North American Generator Forum (NAGF) on question 9

Likes 0

Dislikes 0

Response

Carey Salisbury - Santee Cooper - 5, Group Name Santee Cooper

Answer No

Document Name

Comment

Timelines to complete CAPs shorter than those specified in R7 are not cost effective if qualified personnel, proper materials and required plant conditions are not available. Unplanned outages reduce reliability of the BES by causing units to be started and stopped outside of planned outage periods.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group does not have specific comments with respect improvements to cost effectiveness.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer No

Document Name

Comment

As identified above, as proposed, the modifications requiring multiple filings for what is likely to be annual events is unreasonable and extremely inefficient while not providing any improvement to reliability. NRG is in alignment with NAGF who asks for the SDT to address with the CEA how cost will be considered when the generation of documentation is excessive

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer No

Document Name

Comment

As identified above, as proposed, the modifications requiring multiple filings for what are likely to be annual events is unreasonable and extremely inefficient while not providing any improvement to reliability. NRG is in alignment with NAGF who asks for the SDT to address with the CEA how cost will be considered when the generation of documentation is excessive.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

AES US Renewables support NAGF comments for this question.

NAGF comments:

As identified above, as proposed, the modifications requiring multiple filings for what is likely to be annual events is unreasonable and extremely inefficient while not providing any improvement to reliability. Ultimately, this is a documentation requirement that falls under paragraph 81. Efforts should be made to minimize the time and effort required to address the FERC order while trying to minimize the burden to industry. This can be done by modifying R6, to allow for the identification of the event being the same as a previous event and therefore the event falls under the already approved declaration. As one way to address this, Section 6.1.1 could have language added to allow the GO to state, once a review of the event is completed, that this event is similar or the same as the event addressed under the CAP dated XX/XX/XX that addresses the event that occurred on XX/XX/XXXX. This would end the process at that point and no further actions would be required, including creation of a new CAP, new constraint and a new filing to NERC to have them tell the GO they are correct.

The NAGF recognizes that FERC has ordered that all reference to cost be removed. In discussions with OEM providers related to doing an engineering study the cost of the study to determine what it would take to improve the capability of generators is more than reasonable. In other words, the cost to do the study to determine the cost is very expensive, before any effort to improve the capability is made. The NAGF asks for the SDT to address with the CEA how cost will be considered when the generation of documentation is excessive.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name

Comment

With the removal of the cost component in the Definition of the “Generator Cold Weather Constraint” it is very difficult to evaluate the cost effectiveness of the standard. Please retain the cost component in the definition of the “Generator Cold Weather Constraint” to ensure the Generation Owner has the ability to evaluate cold weather protections against reliability and availability impacts.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

As identified above, as proposed, the modifications requiring multiple filings for what is likely to be annual events is unreasonable and extremely inefficient while providing no improvement to reliability. Ultimately, this is a documentation requirement that falls under paragraph 81. Efforts should be made to minimize the time and effort required to address the FERC order while trying to minimize the burden to industry. This can be done by modifying R6, to allow for the identification of the event being the same as a previous event and therefore the event falls under the already approved declaration. As one way to address this, Section 6.1.1 could have language added to allow the GO to state, once a review of the event is completed, that this event is similar or the same as the event addressed under the CAP dated XX/XX/XX that addresses the event that occurred on XX/XX/XXXX. This would end the process at that point and no further actions would be required, including creation of a new CAP, new constraint and a new filing to NERC to have them tell the GO they are correct.

The NAGF recognizes that FERC has ordered that all reference to cost be removed. In discussions with OEM providers related to doing an engineering study, especially for increasing the tower strength of wind turbines, the cost of the study to determine what it would take to improve the capability of generators is such that they are unwilling to offer the service. In other words, the cost to do the study to determine the cost is very expensive, before any effort to improve the capability is made. The NAGF asks for the SDT to address with the CEA how cost will be considered when the generation of documentation is excessive.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers**Answer** No**Document Name****Comment**

Ameren agrees with NAGF's comments.

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer** No**Document Name****Comment**

With the removal of the cost component in the Definition of the "Generator Cold Weather Constraint" it is very difficult to evaluate the cost effectiveness of the standard. Please retain the cost component in the definition of the "Generator Cold Weather Constraint" to ensure the Generation Owner has the ability to evaluate cold weather protections against reliability and availability impacts.

Likes 0

Dislikes 0

Response**David Vickers - David Vickers On Behalf of: Daniel Roethemeyer, Vistra Energy, 5; - David Vickers****Answer** No**Document Name****Comment**

Vistra Agrees with comments made by TVA.

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1**

Answer	No
Document Name	
Comment	
Reclamation does not agree. As stated above, there is too much administrative burden that does not provide adequate empirical data over the lifetime of generating equipment in industry.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allele - Minnesota Power, Inc. - 1	
Answer	No
Document Name	
Comment	
MP supports NAGF comments that multiple filings for repeated events such as icing on units where technology does not exist for a region to support freeze protection down to ECWT is extremely inefficient, unreasonable and provides no value to improvement of reliability.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
It is the opinion of ACES that as written, the proposed modifications to EOP-012 are not the most cost-effective approach. We recommend consideration of the modifications we proposed in our previous responses, specifically questions 2 and 8. It is our belief that implementing the proposed modifications will add clarity and therefore reduce the compliance burden for responsible entities.	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	

Answer	No
Document Name	
Comment	
Accelerated timelines and redundant reporting criteria create inefficiencies in work processes for the GO. This includes potential unplanned maintenance outages to meet CAP implementation expectations.	
Likes 0	
Dislikes 0	
Response	
Colin Chilcoat - Invenergy LLC - 6	
Answer	No
Document Name	
Comment	
Invenergy is not able to comment on the cost effectiveness of the revisions to the proposed standard.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
The reduced timelines of completing CAPS required by R6 may result in extra costs to accelerate outages, material delivery and potentially availability costs to take unplanned outages to fast-track implementation.	
Further, Southern agrees with NAGF's comments.	
Likes 0	
Dislikes 0	
Response	

Rhonda Jones - Invenergy LLC - 5**Answer** No**Document Name****Comment**

Invenergy is not able to comment on the cost effectiveness of the revisions to the proposed standard.

Likes 0

Dislikes 0

Response**Natalie Johnson - Enel Green Power - 5****Answer** No**Document Name****Comment**

Enel North America is concerned that timelines for completing CAPs that are shorter than those outlined in R7 are not cost-effective unless qualified personnel, appropriate materials, and necessary plant conditions are available. Additionally, the shorter timelines could cause an increase in unplanned outages that compromise the reliability of the BES by occurring outside scheduled outage periods.

Likes 0

Dislikes 0

Response**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

Answer	Yes
Document Name	
Comment	
FirstEnergy has no concerns.	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Black Hills Corporation will not comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Document Name

Comment

PG&E does not have any comments on the cost effectiveness of the drafted standard.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

NV Energy will not provide a response to the cost effectiveness of the proposed changes to EOP-012-2.

Likes 0

Dislikes 0

Response

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

Natalie Johnson - Enel Green Power - 5

Answer

Document Name

Comment

Enel North America agrees with the MRO NSRF recommendation that the standard drafting team ensure that any performance timelines for which a registered entity is to be held accountable by the CEA be explicitly defined in the requirement language and not a document that exists outside the structure of NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports HQ comments: "R2 High and Severe VSL: The Lower VSL and Moderate VSL's text "The Generator Owner did not have freeze protection measure(s) for its applicable unit(s)" Is not reflected in the R2 High and Severe VSL. For consistency throughout the R2 VSLs, we suggest adding "for its applicable unit(s)" before "meeting the criteria in R2 ..."

E2 Lower VSL: we suggest removing "to implement appropriate freeze protection measures" from the E2 Lower VSL to ensure consistency with the wording of the Moderate, High and Severe VSLs."

OPG supports Manitoba's comment regarding the wording around extremely low ECWTs: "Some of our ECWT is below -40 degree C. In discussions with our design team, many components only have a rating down to -40 degrees C. There should be some wording around extremely low ECWTs where it is not readily available (or economically possible to pursue) the purchase of equipment with that low of a temperature rating. (To clarify: we are talking about ECWTs around -43 degrees C and ratings of -40 degrees C. We are not suggesting equipment ratings of -15 degrees C vs -43 degree ECWT)."

OPG supports Manitoba Hydro's comment : "For R3 Manitoba Hydro recommends instead of referencing the October 1, 2027 date in the Requirement remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction."

OPG has the following comments:

NERC definition uses the concept of apparent cause(s), which is different from the Root Cause.

OPG suggest that SDT be consistent with other standards terminology (PRC-004-6 and PRC-010-2, where they are using the term “Root Cause”)

Please clarify, in the case of the Canadian entities that routinely and for extensive durations are operating at temperatures close to their respective ECWT (i.e. -40°C), through what meteorological phenomenon it is possible to have freezing precipitation (e.g., sleet, snow, ice, and freezing rain) at that ECWT (i.e. -40°C) that could impact equipment within the Generator Owner’s control. If rain will find it’s way to an equipment operating at -40°C will actually warm-up that equipment. Basically, there could be only a very low probability of exacerbating cooling effect, involving the latent heat related to energy involved in water phase changes. Water vapors would release latent heat of fusion in the atmosphere long before reaching the BES Generation Units equipment, and unless they aggregate into falling chunks of ice it would most likely not be the root cause of “Generator Cold Weather Reliability Event”

We propose that impacts of freezing precipitation (e.g., sleet, snow, ice, and freezing rain) on equipment within the Generator Owner’s control, should be excluded for equipment with ECWT of -10°C or below.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

Document Name

Comment

Invenergy recommends using consistent language in R1.1.1. regarding updates to the cold weather preparedness plan and CAPs following a re-calculation of the ECWT. The requirement should use 6 months or 6 calendar months, but not both.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer

Document Name

Comment

Invenergy recommends using consistent language in R1.1.1. regarding updates to the cold weather preparedness plan and CAPs following a re-calculation of the ECWT. The requirement should use 6 months or 6 calendar months, but not both.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Document Name

Comment

PNM recommends that the standard drafting team ensure that any dates for which a registered entity is to be held to be in the requirement language and not a document that exists outside the structure of NERC Reliability Standards.

Standard Drafting team may consider creating an attached corrective action plan guideline to be filled out -

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

We at ACES appreciate the effort put forth by the SDT to modify EOP-012 under such an abbreviated timeline. It is our understanding that the specific intent of this project is to consider and implement the directives in the FERC Order; however, we believe that one additional modification should be considered by the SDT. Requirement 1, Part 1.1.1 contains an overlapping timeline for updating the entities' cold weather preparedness plan(s) and developing a Corrective Action Plan (CAP). As written, both actions require completion within six (6) calendar months of the recalculation of the Extreme Cold Weather Temperature (ECWT).

It is our contention that corrective actions will likely not be identified until after a cold weather preparedness plan is reviewed/updated. Thus, we believe that requiring both actions to be completed concurrently effectively shortens the time allowed for a cold weather preparedness plan to be reviewed and updated. Therefore, we contend that nine (9) calendar months is a more appropriate deadline for developing a CAP.

We recommend the following modification to Requirement R1 Part 1.1.1:

R1. At least once every five calendar years, each Generator Owner shall, for each of its applicable generating unit(s):

1.1. Calculate the Extreme Cold Weather Temperature for each of its applicable unit(s) and identify the calculation date and source of temperature data; and

1.1.1. If the re-calculated Extreme Cold Weather Temperature is lower than the previous Extreme Cold Weather Temperature, the entity shall:

1.1.1.1. Review and update its cold weather preparedness plan(s) under Requirement R4 within six (6) calendar months of the recalculation.

1.1.1.2. Develop a Corrective Action Plan for any new corrective actions needed to provide the required operational capability under Requirement R2 or R3 within nine (9) calendar months of the recalculation.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

NV Energy recommends that the standard drafting team ensure that any dates for which a registered entity is to be held to be in the requirement language and not a document that exists outside the structure of NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

Document Name

Comment

MRO recommends that any performance timelines for which a registered entity will be held accountable by the CEA be explicitly defined in the requirement language.

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 recommends that the CAP extension and Constraint processes each be revised to include a Step 5 – NERC Reporting to Industry. Under this step 5, NERC would publish an annual report to provide industry insight into the types of constraints CEAs have approved and disapproved during the year, discuss lessons learned from the review and approval process, and provide Reliability Coordinators and Balancing Authorities insight into the cumulative impact of constraint approvals across fleets of resource types. This report would not include any confidential unit-specific information, and could coincide with or otherwise leverage NERC’s annual report to FERC on Generator Cold Weather Constraint declarations.

Additionally, the SRC recommends that the [Generator Cold Weather CAP Extension and Constraint Process](#) be referenced in EOP-012-3, Section E, Associated Documents, since footnote 11 appears to reference this process.

The SRC also recommends that Requirement R7 be revised as follows to include a new Part 7.5 that clarifies that the existence of a CAP does not excuse a Generator Owner from taking such technically feasible steps as it can to improve the extreme cold weather performance of a unit while the CAP is being implemented:

7.5. Continue to otherwise prepare its applicable generating unit(s) to meet the requirements of EOP-012-3.

Likes	0
Dislikes	0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - NA - Not Applicable - MRO,WECC

Answer	
Document Name	

Comment

SPP agrees with the comments of The ISO/RTO Council (IRC) Standards Review Committee (SRC)

Likes	0
Dislikes	0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer	
Document Name	EEI Near Final Revised Draft Comments _ Project 2024-03 _ Draft 1 _ Rev 0d _ 10_31_2024.docx

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

In Requirement R1 Part 1.1.1- Consider adding “calendar” in later part of language to be consistent with added language. Consider “If new corrective actions are needed to provide the required operational capability under Requirement R2 or R3, the entity shall develop a Corrective Action Plan within six (6) **calendar** months of the recalculation.”

Measure M3 : The phrase “Identification of generating unit(s) minimum temperature per Part 1.2.2 which is equal to or less than the unit’s Extreme Cold Weather Temperature” needs to drop the latter part “which is equal to or less than the unit’s Extreme Cold Weather Temperature” as that statement could be incorrect. A unit’s minimum temperature might be above an ECWT due to a Generator Cold Weather Constraint or simply the geographical location of the unit.

Requirement R7 could be sharpened by removing “as applicable” to read as “Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, or R3 shall:, as applicable”. Requirement R7 requires a Corrective Action Plan condition to be evident and “as applicable” is not needed to differentiate if it is a R1, R2, or R3 Corrective Action Plan.

Suggest that language in Requirement R6 Part 6.2 and Requirement R7 Part 7.3 should be mirrored:

Requirement R6 Part 6.2 states: “6.2 Update the Corrective Action Plan action(s) and timetable(s), with justification, and submit a Corrective Action Plan extension request to the Compliance Enforcement Authority (CEA) for approval where the timetable(s) for completing selected actions are projected to exceed the timelines in Part 6.1. The submitted Corrective Action Plan extension request shall include the following:

6.2.1. Circumstances causing the delay and how those circumstances are beyond the control of the Generator Owner;

6.2.2. Revisions to the selected actions in Part 6.1, if any, including utilization of Operating Procedures, if applicable; and

6.2.3. Updated timetable for implementing the selected actions in Part 6.1.”

Requirement R7 Part 7.3 states: “7.3 Submit a Corrective Action Plan extension request, for the approval of the CEA, where the timetable(s) for completing selected actions are projected to exceed the timelines in Part 7.1. The submitted request shall:

7.3.1 Explain the circumstances causing the delay and how those circumstances are beyond the control of the Generator Owner;

7.3.2 Include, as applicable, revisions to the selected actions in Part 7.1, including utilization of Operating Procedures; and

7.3.3 Include an updated timetable for implementing the selected actions in Part 7.1”

Suggest changing Requirement R7 Part 7.3 to mirror 6.2 and read as :

“7.3 Update the Corrective Action Plan action(s) and timetable(s), with justification, and submit a Corrective Action Plan extension request to the Compliance Enforcement Authority (CEA) for approval where the timetable(s) for completing selected actions are projected to exceed the timelines in Part 7.1. The submitted Corrective Action Plan extension request shall include the following:

7.3.1. Circumstances causing the delay and how those circumstances are beyond the control of the Generator Owner;

7.3.2. Revisions to the selected actions in Part 7.1, if any, including utilization of Operating Procedures, if applicable; and

7.3.3. Updated timetable for implementing the selected actions in Part 7.1.”

Need to mirror language in Requirement 6 Part 6.3 and Requirement R7 Part 7.4. Requirement R6 Part 6.3 contains “if applicable” after “Requirement R8”. If the DT believes “if applicable” is appropriate it should be added (with appropriate punctuation) to Requirement R7 Part 7.4 to read “Document in a declaration, with justification, any Generator Cold Weather Constraint in accordance with Requirement R8, **if applicable**, that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan.”

In Attachment 1, the phrase “Heat tracing or other de-icing technologies for wind turbine blades that are not available in the Generator Owner’s location” may need some clarification. Is the DT’s thought the blades are “not available to the Generator Owner for the Generators Owner’s location” or simply “not available for the Generator Owner’s location.”?

For “Case-by-Case” criteria 3a- What does the DT consider as “premature” and does it vary based on generator type (e.g., wind versus natural gas unit)? Is “replacement” meant to reference the unit being retired? To be auditable a timetable such as “3 or more years” should be incorporated into the language. While conditions may vary for consideration of retirement there can not be a consideration for a replacement unit without the unit signaling to a TP/PC/BA that it was retiring

Consider updating the “Case-by-Case” criteria 3b to state: “The freeze protection measures would be applied to a generating unit that has a previously published retirement date **slated to occur** within three years of the Generator Cold Weather Constraint declaration; “

The definition provided in the Standard (to be included in the Glossary of Terms) for Generator Cold Weather Constraint and the definition language in the Technical Rationale for same term needs updated. The Standard states the definition as “Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.” but the Technical Rationale states “A Generator Cold Weather Constraint is any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components using the following criteria.” Suggest changing the Technical Rationale to “A Generator Cold Weather Constraint is defined as “Any condition that would preclude a Generator Owner from implementing freeze protection measures on one or more Generator Cold Weather Critical Components.” The following criteria should be used in the development of Generator Cold Weather Constraints:”

The NERC process should add some clarifying language to line up with SGAS FAQ regarding use of Corrective Action Plans to cover multiple entities and locations within a single Corrective Action Plan even in cases where the entities are not in Coordinated Oversight.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Please see comments in questions above.

Likes 0

Dislikes 0

Response**Richard Jackson - U.S. Bureau of Reclamation - 1****Answer****Document Name****Comment**

Reclamation recommends removing requirement R1.1 as the calculations being required by NERC/FERC do not provide a proper long-term analysis of the temperature conditions for industry. An “average” over 24 years does not properly reflect the extreme weather conditions that have been recorded in history.

Reclamation strongly recommends revising R1.2.2 in its entirety to:

- Ensure bullets are in an “OR” statement. It is misleading now which bullets are required to be met.
- Remove concurrent wind speed and precipitation, as this data is not tracked as detailed as weather temperatures and also does not affect equipment the same across industry, thus is subjective to interpretation. See previous comment on wind speed.
- Reword or provide guidance on “historical operating temperature at least one hour in duration”. Temperature tracking is performed hourly or daily, and not recorded by the minute, thus “at least one hour in duration” is misleading.
- Remove the bullet containing engineering analysis. This is not feasible to meet this requirement for existing sites as contracting an engineering firm for an analysis could take years. An engineering analysis could be performed on certain industries, but would be a no value added on others (hydropower).

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer****Document Name****Comment**

R8, new text includes an abbreviation “CEA”. Please spell out what the CEA is, we are assuming this is the Compliance Enforcement Agency, however it is not clear if this is indeed the intent of the language in the standard.

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer

Document Name

Comment

Ameren agrees with NAGF's comments.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

Document Name

Comment

R2 High and Severe VSL: The Lower VSL and Moderate VSL’s text “The Generator Owner did not have freeze protection measure(s) for its applicable unit(s)” Is not reflected in the R2 High and Severe VSL. For consistency throughout the R2 VSLs, we suggest adding “for its applicable unit(s)” before “meeting the criteria in R2 ...”

E2 Lower VSL: we suggest removing “to implement appropriate freeze protection measures” from the E2 Lower VSL to ensure consistency with the wording of the Moderate, High and Severe VSLs.

NB Power supports Manitoba’s comment regarding the wording around extremely low ECWTs: “Some of our ECWT is below -40 degree C. In discussions with our design team, many components only have a rating down to -40 degrees C. There should be some wording around extremely low ECWTs where it is not readily available (or economically possible to pursue) the purchase of equipment with that low of a temperature rating. (To clarify: we are talking about ECWTs around -43 degrees C and ratings of -40 degrees C. We are not suggesting equipment ratings of -15 degrees C vs -43 degree ECWT).”

NB Power supports Manitoba Hydro’s comment : “For R3 Manitoba Hydro recommends instead of referencing the October 1, 2027 date in the Requirement remove the date in the Requirement and add the wording “date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction.”

NERC definition uses the concept of apparent cause(s), which is different from the Root Cause. Unless there is an obvious situation, the CAP resulting from the apparent cause(s) related to Generator Cold Weather Reliability Event, may require a longer time for implementation, however we can avoid rework and use instead the Root Cause Analysis, which is better suited for the CAP determination

Please clarify, in the case of the Canadian entities that routinely and for extensive durations are operating at temperatures close to their respective ECWT (i.e. -40°C), through what meteorological phenomenon it is possible to have freezing precipitation (e.g., sleet, snow, ice, and freezing rain) at that ECWT (i.e. -40°C) that could impact equipment within the Generator Owner's control. If rain will find it's way to an equipment operating at -40°C will actually warm-up that equipment. Basically, there could be only a very low probability of exacerbating cooling effect, involving the latent heat related to energy involved in water phase changes. Water vapors would release latent heat of fusion in the atmosphere long before reaching the BES Generation Units equipment, and unless they aggregate into falling chunks of ice it would most likely not be the root cause of "Generator Cold Weather Reliability Event"

We propose that impacts of freezing precipitation (e.g., sleet, snow, ice, and freezing rain) on equipment within the Generator Owner's control, should be excluded for equipment with ECWT of -10°C or below.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The NAGF identified two issues that the SDT must address based on implementation issues seen with EOP-012-2. The first was related to freeze protection measures not associated with Generator Cold Weather Critical Components. The SDT addresses this issue in the revised standard and the NAGF thanks the SDT for that modification.

The second issue is related to the individual regions looking at the ECWT calculations differently, with different expectations related to the data used for determining the ECWT for a plant. While the SDT has significantly modified the document related to calculating the ECWT, and while the NAGF supports these modifications, nothing in this document addresses the unreasonable position that some regions are taking to require a temperature reading for every hour in order to make an ECWT valid. In the vast majority of cases, the GO is not in a position to have over 54,000 data points for any location, let alone every location. The GO in most cases must gather data from third party providers, and none of the data is perfect. This issue must be addressed through either Requirement R1 or modification to the ECWT definition. The NAGF looks forward to working with the SDT to address this identified concern.

Since the NAGF members likely have a great deal more experience making these calculations, determining issues with the data and addressing these issues, the NAGF recommends that time be spent by the SDT to first understand the issues and the impact to entities before rushing this standard through the process without addressing this concern.

Under R2, there is a great deal of confusion related to incorporating the 20 MPH wind speed into the ECWT calculation process. The NAGF is requesting that the SDT add language to the technical reference document explaining how Generator Owners should accommodate the wind speed into their design criteria.

The NAGF has several concerns with language in Attachment 1. These are identified below:

1. In the second bullet under pre-approved constraints, the NAGF recommends adding “or unlikely to provide sufficient impact on blade icing events”
2. Under section 3 of Case-by-case Determination, the majority of the identified issues will come down to cost. As currently structured, it is unclear how the CEA will ensure consistency between regions or even within a single region. More details must be provided in the attachment or proposed process document to allow the Generator Owners to understand what is expected of them.
3. Under Bullet 3.a, the word dispatchable should be removed. Based on the evaluations from NERC, the unplanned retirement of any generator will likely reduce the reliability of the grid since a new generator will not be available to replace it for several years.
4. The NAGF would like the SDT to provide justification for the three years used in bullet 3.b. Based on current industry trends; it is more likely that a new unit to replace generators retiring early will not be available for 5 to 7 years. The NAGF believes that three-year period is much shorter than reasonable.
5. Bullet 3.e. is duplicative of bullet 3.d.
6. The pre-approved cold weather constraints in Attachment 1 should be re-worded for consistency. Item 1 for example is, “Wind turbine towers that have structural limitations...,” so the last one should be, “Combustion turbine inlet air filters that are vulnerable to the buildup of frozen precipitation, such that applying heat upstream of inlet air filters would be required.”
7. The last of the pre-approved GCWCs should be expanded to cover CTGs that do have inlet air heating but would require upsizing to ride through worst-possible snowstorms without tripping or derating.
8. A pre-approved GCWC should be added for derates or being forced offline due to freezing of items not under the GO’s control, e.g. having to reduce load at a combined cycle plant under adverse wind direction conditions so that the cooling tower plume does not create hazardous icing on adjacent roadways.

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

Document Name

Comment

R8, new text includes an abbreviation “CEA”. Please spell out what the CEA is, we are assuming this is the Compliance Enforcement Agency, however it is not clear if this is indeed the intent of the language in the standard.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer

Document Name**Comment**

AES US Renewables strongly recommend the drafting team to develop further guidance on how to account both ECWT and 20mph wind speed for new generators (specifically for IBRs) as required in R2. Currently, the technical rationale does not provide much guidance on how determination can be made and our OEMs do not provide information concerning equipment's minimum operating temperature at certain wind speeds. Using wind chill temperature formula to determine what the minimum design temperature can be misleading. In fact, on the [National Weather Service webpage](#), it specifically states that "wind chill temperature is how cold people and animals feel when outside".

Additionally, we request that the drafting team provide guidance in the Technical Rationale concerning the need for Solar facilities to meet ECWT since the lowest temperatures normally occur during night time when Solar facilities are not generating. Should ECWT be calculated differently for Solar generators?

We also recommend adding the flow chart that was provided during the 10/24/2024 webinar in the Technical Rationale. It is a good reference to include in the Technical Rationale.

Likes 0

Dislikes 0

Response**Donna Wood - Tri-State G and T Association, Inc. - 1****Answer****Document Name****Comment**

Tri-State supports MRO NSRF Comments.

Likes 0

Dislikes 0

Response**Carver Powers - Utility Services, Inc. - 4****Answer****Document Name****Comment**

1. There should be a process for Registered Entities to be able to submit consideration of additional constraints to be added to the EOP-012-3 Attachment 1 Pre-Approved Generator Cold Weather Constraints in the future after EOP-012-3 is approved by FERC.

2. What documentation will NERC require for submitting a constraint declaration? Suggest NERC develop a form and required evidence (e.g., photos, narrative, OEM pre-existing limitations, engineering analysis, etc.).

3. If the Regional Entities do not have the technical expertise to evaluate constraint declarations, and rely on third-party 'experts' this needs to be made transparent to the Registered Entities.

4. If a Registered Entity has previously received an approval of a Pre-Approved Generator Cold Weather Constraint (per Attachment 1 of EOP-012-3) due to one cold weather event, do they need to resubmit the constraint declaration for every similar cold weather event during that particular winter season that causes the same constraint? Suggest requiring constraint declarations of a similar nature just once per winter season.

5. Regarding the ECWT calculation, suggest adding guidance regarding combining data from different weather data resources, so that the frequency sampling is the same. For example, if one weather data source gathers temperature data three times per hour and another weather data source gathers weather data one time per hour, this will skew the 0.2 percentile in favor of the more frequent weather data source. Suggest adding guidance with a threshold such as at least 66% of the hours for each year from each weather data source must have hourly data.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

Document Name

Comment

As suggested by NAGF, Under R2, there is a great deal of confusion related to incorporating the 20 MPH wind speed into the ECWT calculation process. The NAGF is requesting that the SDT add language to the technical reference document explaining how Generator Owners should accommodate the wind speed into their design criteria. Also, under section 3 of Case-by-case Determination, the majority of the identified issues will come down to cost. As currently structured, it is unclear how the CEA will ensure consistency between regions or even within a single region. More details must be provided in the attachment or proposed process document to allow the Generator Owners to understand what is expected of them.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

Document Name

Comment

As suggested by NAGF, Under R2, there is a great deal of confusion related to incorporating the 20 MPH wind speed into the ECWT calculation process. The NAGF is requesting that the SDT add language to the technical reference document explaining how Generator Owners should accommodate the wind speed into their design criteria. Also, Under section 3 of Case-by-case Determination, the majority of the identified issues will come down to cost. As currently structured, it is unclear how the CEA will ensure consistency between regions or even within a single region. More details must be provided in the attachment or proposed process document to allow the Generator Owners to understand what is expected of them.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Document Name

Comment

PG&E supports NAGF concerns regarding ECWT calculation and the recommendation to provide clarification in incorporating wind speed into calculations in the technical reference document.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

Document Name

Comment

R2 High and Severe VSL: The Lower VSL and Moderate VSL's text "The Generator Owner did not have freeze protection measure(s) for its applicable unit(s)" Is not reflected in the R2 High and Severe VSL. For consistency throughout the R2 VSLs, we suggest adding "for its applicable unit(s)" before "meeting the criteria in R2 ..."

E2 Lower VSL: we suggest removing "to implement appropriate freeze protection measures" from the E2 Lower VSL to ensure consistency with the wording of the Moderate, High and Severe VSLs.

HQ supports Manitoba's comment regarding the wording around extremely low ECWTs: "Some of our ECWT is below -40 degree C. In discussions with our design team, many components only have a rating down to -40 degrees C. There should be some wording around extremely low ECWTs where it is not readily available (or economically possible to pursue) the purchase of equipment with that low of a temperature rating. (To clarify: we are talking about ECWTs around -43 degrees C and ratings of -40 degrees C. We are not suggesting equipment ratings of -15 degrees C vs -43 degree ECWT)."

HQ supports Manitoba Hydro's comment : "For R3 Manitoba Hydro recommends instead of referencing the October 1, 2027 date in the Requirement remove the date in the Requirement and add the wording "date on which the definition of Extreme Cold Weather Temperature was approved in the relevant jurisdiction."

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation supports NAGF Comments

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Black Hills Corporation supports the comments submitted by NAGF.

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

Document Name**Comment**

Eergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) and the North American Generator Forum (NAGF) on question 10

Likes 0

Dislikes 0

Response**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF****Answer****Document Name****Comment**

Duke Energy believes guidance should be provided on the process to retire declarations that have a resolution and declarations that are no longer required. EOP-012-3 as currently written provides no details on the method of retirement and does not provide a timeframe for the implementation of actions to address the declaration. In Attachment 1, item 3, Duke Energy suggest additional criteria be provided.

Duke Energy suggest the SDT clarify if declarations created under EOP-012-2 need to be transitioned to meet the requirements of EOP-012-3. If a transition is required, please provide expectations on performing the transitions and the timetable for performing these activities.

Likes 0

Dislikes 0

Response**Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO****Answer****Document Name****Comment**

Some of our ECWT is below -40 degree C. In discussions with our design team, some components only have a rating down to -40 degrees C. There should be some wording around extremely low ECWTs where it is not readily available (or economically possible to pursue) the purchase of equipment with that low of a temperature rating. (To clarify: we are talking about ECWTs around -43 degrees C and ratings of -40 degrees C. We are not suggesting equipment ratings of -15 degrees C vs -43 degree ECWT).

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

TVA committed to an implementation date for EOP-012-2 on 10/01/2024. This commitment required site procedure revisions, updated training, and numerous stakeholder reviews. It is recommended to go through at least one, suggest two, cold weather periods to address lessons learned prior to revising EOP-012-2. Implementation should be pushed to March 2026.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

No additional comments

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

1. BC Hydro requests that the Technical Rationale documented by the 2021-07 Drafting Team be consolidated with the Technical Rationale developed under this 2024-03 project under a single document for consistency and easy reference.
2. BC Hydro recommend that the draft standard be reviewed for consistent use of timelines, e.g. days/months vs. calendar days/months.
3. The Requirement R8 Part 8.4 wording is ambiguous "If the CEA determines the declared Generator Cold Weather Constraint is invalid, update its Corrective Action Plan(s) to require corrective actions be completed in accordance with the timetables in Requirement R6 Part 6.1 or Requirement R7 Part 7.1, to begin from the date the Generator Owner is notified that the Generator Cold Weather Constraint is invalid". Would an entity interpret this as the Corrective Action Plan(s) need to be updated within six months for R7 (per R1.1.1) or be updated within 150 days for R6 (per R6) as applicable?
4. The Generator Cold Weather CAP Extension and Constraint Process is a standalone document, which therefore may not be enforceable. As this document sets timeline expectations for CAP extensions, including for CEA, that are either not in the Requirements and/or impact the

Requirements, there could be situations where if the CEA exceeds the 45-day expectation to approve an extension, the submitting GO would be in potential noncompliance to EOP-012-3. Examples include requiring an entity to submit extension requests within 60 days prior to the original CAP completion date. The actual Requirements R6 and R7 don't include timelines for submitting extension requests. Therefore, an entity could submit the extension request at any time up to the completion date and still be in compliance. BC Hydro recommends revising the process and Requirements and including any timelines in the Requirements if the entity will be expected to meet them. As well, in Step 3 of the process, the CEA could take up to 45 days to approve (or more) and therefore the entity could be past the originally proposed completion date with no approved extension request. Step 3 also says "If an extension request is denied, the selected actions in the Corrective Action Plan need to be completed in accordance with the original timetables". However, the entity may be well beyond the original timelines if the review takes more than 45 days and therefore not able to meet the original timetables. As there is no maximum time for the CEA to review and this may lead to very long review times, this will be challenging for an entity. BC Hydro recommends there be an "approval by default" if the CEA does not respond within a given period after entity's submittal to CEA.

5. BC Hydro suggests that, similar to the pre-approved Generator Cold Weather Constraints in Attachment 1, it would be helpful to also include pre-approved circumstances deemed acceptable as beyond the Generator Owner control for CAP extensions.
6. Requirements R2, R6 and R7 reference "documentation of a declaration" of an identified Generator Cold Weather Constraint in accordance with R8. Should these requirements reference the Attachment 1 instead?

Likes 0

Dislikes 0

Response

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

Answer

Document Name

[2024-03_Unofficial_Comment_Form_EOP-012-3_NSRF_20241030.docx](#)

Comment

MRO NSRF recommends that the standard drafting team ensure that any dates for which a registered entity is to be held to be in the requirement language and not a document that exists outside the structure of NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer

Document Name

Comment

The values for wind speed and duration of ECWT that are used in R2 could be more tailored to each GO location. The guidance provided by NERC on how to calculate the ECWT (2021-07 Calculating Extreme Cold Weather Temperature_082022.pdf) was very helpful, and the fact that it used statistical analysis of real-world data seem to be a good compromise between reliability and cost.

The same approach should be used to calculate the wind speed and duration of ECWT that should be used as the design criteria for new units. Otherwise, new units could be designed with overly conservative ECWT, which could lead to increased cost of construction, and ongoing O&M costs. Additionally, if a GO is in a windier than average area of the U.S., the 20-mph wind speed may not be an accurate representation of the winds they may experience during the ECWT event.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Document Name

Comment

The obligation in R6.1.6 states the CAP needs to include a timetable for implementing freeze protection measure to “similar” generating units owned by the Generator Owner. It is unclear how the term “similar” is to be applied, as some Generator Operators operate in a large footprint. Does the term “similar” refer to the generating unit design, the generating unit’s geographical location, or perhaps even both? Likewise, “similar equipment freeze protection measures” is problematic, because the word “similar” could be understood as being tied to either the equipment or the measures. Rather than stating “A review of applicability to similar equipment freeze protection measures”, AEP recommends instead using “A review of the freeze protection measures used for similar critical components.”

The R6.1.6 obligation to perform “A review of applicability to similar equipment freeze protection measures at generating units owned by the Generator Owner” needs further clarification. A Generator Cold Weather Reliability Event may be the result of either a failed equipment freeze protection measure or due to inadequate freeze protection measures. The obligation to perform an applicability review should only be required due to a Generator Cold Weather Reliability Event resulting from inadequate freeze protection measures.

Likes 0

Dislikes 0

Response