

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# EOP-012-2 – Extreme Cold Weather Preparedness and Operations

***This section to be completed by the Compliance Enforcement Authority.***

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| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:** | Registered name of entity being audited |
| **NCR Number:** | NCRnnnnn |
| **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:** | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:** | Supplied by CEA |

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **IA** | **LSE** | **PA** | **PSE** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R2** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R3** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R4** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R5** |  |  | X | X |  |  |  |  |  |  |  |  |  |  |  |
| **R6** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R7** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |
| **R8** |  |  | X |  |  |  |  |  |  |  |  |  |  |  |  |

**Legend:**

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| Text with blue background: | Fixed text – do not edit |
| Text entry area with green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

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| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |
| **R4** |  |  |  |
| **R5** |  |  |  |
| **R6** |  |  |  |
| **R7** |  |  |  |
| **R8** |  |  |  |

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| **Req.** | **Areas of Concern** |
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| **Req.** | **Recommendations** |
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| **Req.** | **Positive Observations** |
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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

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| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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R1 Supporting Evidence and Documentation

**R1.** At least once every five calendar years, each Generator Owner shall, for each of its

applicable generating unit(s): [Violation Risk Factor: Lower] [Time Horizon: Long-term

Planning]

* 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 review and

update its cold weather preparedness plan(s) under Requirement R4

within six (6) 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

6 months of the recalculation.

**1.2.** Identify generating unit(s) cold weather data, to include:

**1.2.1.** Generating unit(s) operating limitations in cold weather to include:

**1.2.1.1.** Capability and availability;

**1.2.1.2.** Fuel supply and inventory concerns;

**1.2.1.3.** Start-up issues;

**1.2.1.4.** Fuel switching capabilities; and

**1.2.1.5.** Environmental constraints.

**1.2.2.** Generating unit(s) minimum:

• Design temperature, and if available, the concurrent wind speed and precipitation;

• Historical operating temperature at least one hour in duration, and if available, the concurrent

wind speed and precipitation; or

• Current cold weather performance temperature determined by an engineering analysis, which

includes the concurrent wind speed and precipitation.

**M1.** Each Generator Owner will have evidence documenting its Extreme Cold Weather Temperature calculation and design information, operating data, or engineering analysis that supports its generating unit minimum temperature.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested[[3]](#endnote-1):

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Entity’s Extreme Cold Weather Temperature (ECWT) for each of its applicable generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| ECWT calculation date and source of temperature data for each of its applicable generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| Process documentation reflecting timing requirements and actions associated with Requirement R1. |
| Correction Action Plan development and implementation timelines for any Corrective Action Plan required per Requirement R1 Part 1.1.1. |
| Cold weather data and generating unit(s) minimum(s) for each of its applicable generating unit(s). (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| Updated cold weather preparedness plan if the re-calculated Extreme Cold Weather Temperature (ECWT) is lower than the previous ECWT, per Requirement R1 Part 1.1.1. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R1

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify an ECWT has been calculated and includes calculation date(s) and temperature source(s). |
|  | Verify an ECWT is calculated at least once every five calendar years for applicable generating unit(s). |
|  | Verify identification of all items under Requirement 1 Part 1.2 for applicable generating unit(s). |
|  | Review processes that ensure ECWT is reviewed and recalculated at least once every five calendar years for applicable generating unit(s). |
| **Note to Auditor:** If Requirement R1 Part 1.1.1 is evident, the previous and updated cold weather preparedness plan(s) or the Corrective Action Plan (and any revisions) should be provided. CMEP staff should focus on the development, application, and provision of the ECWT. | |

**Auditor Notes:**

R2 Supporting Evidence and Documentation

**R2.** Applicable to generating units with a commercial operation date on or after October 1, 2027: Each Generator Owner, 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) shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]

* 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 with sustained concurrent twenty (20) mph wind speed for (i) a period of not less than twelve (12) continuous hours, or (ii) the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours; or
* Develop a Corrective Action Plan(s) to add new or modify existing or previously planned freeze protection measures to provide the capability to operate at the unit(s)’ Extreme Cold Weather Temperature with a sustained concurrent twenty (20) mph wind speed for (i) a period of not less than twelve (12) continuous hours, or (ii) the maximum operational duration for intermittent energy resources if less than twelve (12) continuous hours

**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 for the identified issues. 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, and Corrective Action Plan(s)

Registered Entity Response (Required):

**Question: Do you have any generating units with a commercial operation date on or after October 1, 2027 and a calculated ECWT at or below 32 degrees Fahrenheit (zero degrees Celsius) and that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit?** If Yes, provide a listing of the generating unit(s).

Yes  No

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| List of entity’s applicable generating unit(s) (with a commercial operation date on or after October 1, 2027) Extreme Cold Weather Temperature (ECWT) determined to be at or below 32 degrees Fahrenheit (zero degrees Celsius) that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius.) |
| List of implemented freeze protection measures for applicable generating unit(s) meeting the criteria of Requirement R1 (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| Process documentation reflecting timing requirements and actions associated with Requirement R2. |
| List of any Corrective Action Plans developed to provide the capability as described in Requirement R2. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R2

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify implementation of freeze protection measures for list of applicable generating unit(s) Generator Cold Weather Critical Components (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
|  | If no freeze protections to protect Generator Cold Weather Critical Components are implemented, verify Corrective Action Plan milestones are provided and scheduled for completion (or completion dates for those already completed). |
|  | Review any documented assessment of the R2 criteria to which the freeze protection measures are protecting Generator Cold Weather Critical Components (e.g., How did the entity determine the freeze protection measure would withstand the R2 criteria?) |
| **Note to Auditor:** Individual generator commercial operations date determination may vary depending upon the approval process for generators. Often a commercial operations date will equate to the NCR date for a stand-alone generator (e.g., Generator 1 is the only generator for Generator Owner 1 that has an NCR date of 10/1/2024). Be sure to review footnote for applicability. | |

**Auditor Notes:**

R3 Supporting Evidence and Documentation

**R3.** Applicable to generating unit(s) in commercial operation prior to October 1, 2027: Each Generator Owner, 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), shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]

* 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; or
* Develop a Corrective Action Plan to add new or modify existing freeze protection measures to provide the capability to operate at the unit(s)' Extreme Cold Weather Temperature.

**M3.** Each Generator Owner will have dated evidence that demonstrates it has freeze protection measures for its unit(s) in accordance with R3, or it has developed a Corrective Action Plan for the identified issues. 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, and Corrective Action Plan(s)

**Registered Entity Response (Required):**

**Question: Do you have any generating units with a commercial operation date prior to October 1, 2027 and a calculated ECWT at or below 32 degrees Fahrenheit (zero degrees Celsius) and that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit?** If Yes, provide a listing of the generating unit(s).

Yes  No

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| List of entity’s applicable generating unit(s) Extreme Cold Weather Temperature (ECWT) determined to be at or below 32 degrees Fahrenheit (zero degrees Celsius) that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius.) |
| List of implemented freeze protection measures for applicable generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| Process documentation reflecting timing requirements and actions associated with Requirement R3. |
| List of any Corrective Action Plans developed to provide the capability as described in Requirement R3. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R3

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify implementation of freeze protection measures for list of applicable generating unit(s). |
|  | If no freeze protections to protect Generator Cold Weather Critical Components are implemented, verify Corrective Action Plan milestones are provided and scheduled for completion (or completion dates for those already completed). |
|  | Review any documented assessment of the selected freeze protection measures and the resulting capability to operate the unit at ECWT (e.g., How did the entity determine the freeze protection measure would result in the unit being able to operate at ECWT) |
| **Note to Auditor:** Individual generator commercial operations date (COD) determination may vary depending upon the approval process for generators. Often a commercial operations date will equate to the NCR date for a stand-alone generator (e.g., Generator 1 is the only generator for Generator Owner 1 that has an NCR date of 10/1/2024 which is same date as COD). Be sure to review footnote for applicability. | |

**Auditor Notes:**

R4 Supporting Evidence and Documentation

**R4.** Each Generator Owner shall implement and maintain one or more cold weather preparedness plan(s) for its generating units. The cold weather preparedness plan(s) shall include the following, at a minimum: [Violation Risk Factor: High] [Time Horizon: Operations Planning and Real-time Operations]

**4.1** The lowest calculated Extreme Cold Weather Temperature for each unit, as determined in Requirement R1;

**4.2.** The generating unit cold weather data, as determined in Requirement R1.2;

**4.3.** Documentation identifying Generator Cold Weather Critical Components;

**4**.**4**. Documentation of freeze protection measures implemented on Generator Cold Weather Critical Components which includes measures used to reduce the cooling effects of wind determined necessary by the Generator Owner to protect against heat loss, and where applicable, the effects of freezing precipitation (e.g., sleet, snow, ice, and freezing rain); and

**4.5.** Annual inspection and maintenance of generating unit(s) freeze protection measures.

**M4.** Each Generator Owner will have evidence documenting that its cold weather preparedness plan(s) was implemented and maintained in accordance with Requirement R4. Examples of documentation to demonstrate a cold weather preparedness plan may include existing operating procedures, plans, checklists, or processes. Examples of documentation to demonstrate inspections and maintenance have been completed may include, but are not limited to, completed work order(s) from the Generator Owner’s work management system and/or freeze protection checklists identifying the measures inspected and maintained.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Evidence of implementation and maintenance of its cold weather preparedness plan(s) for its generating unit(s), including: updates to ECWT where recalculated ECWT, per R1, is lower than previous (Part 4.1), update of cold weather data (Part 4.2), identification of cold weather critical components (Part 4.3), implementation of freeze protection measures (Part 4.4), and annual inspection and maintenance of freeze protection measures (Part 4.5). |
| Entity’s cold weather preparedness plans for its generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R4

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify cold weather preparedness plans are implemented and maintained for the entity’s generating units (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
|  | Verify identification of all items under R4 are included in cold weather preparedness plans for applicable generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
|  | Verify identification of Generator Cold Weather Critical Components and the identified freeze protection measures for the Generator Cold Weather Critical Components. |
| **Note to Auditor:** Previous and updated cold weather preparedness plan(s) should be provided. CMEP staff should focus on the implementation and maintenance of freeze protection measures on Generator Cold Weather Critical Components especially if new generating units have been added or existing units had recent cold weather-related issues. Be sure to review footnote for applicability. Although not explicitly stated, compliance efforts for Part 4.5 should be on freeze protection measures applied to Generator Cold Weather Critical Components. There may be other freeze protection measures applied by a GO for a unit that are maintained for ensuring reliable operations that are not applied to Generator Cold Weather Critical Components that are not subject to compliance. | |

**Auditor Notes:**

R5 Supporting Evidence and Documentation

**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 operations personnel responsible for implementing the cold weather preparedness plan(s) developed pursuant to Requirement R4. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]

**M5.** Each Generator Operator or Generator Owner will have documented evidence that the applicable personnel completed annual training of the Generator Owner’s cold weather preparedness plan(s). This evidence may include, but is not limited to, documents such as personnel training records, training materials, date of training, agendas or learning objectives, attendance at pre-work briefings, review of work order tasks, tailboards, attendance logs for classroom training, and completion records for computer-based training in fulfillment of Requirement R5.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Documentation of entity responsible for training, list of personnel to be trained, employment dates for personnel to be trained, training dates, training completion status, personnel attendance records for training sessions, entity’s applicable generating unit-specific training materials, and process documents illustrating annual training has been provided. |
| Cold weather preparedness plan(s) implemented pursuant to Requirement R4. |
| Process documentation reflecting requirements and actions for new hires associated with Requirement R5 required training. |
| Training on the cold weather preparedness plan including the annual inspection and maintenance of generating unit(s) freeze protection measures applied on Generator Cold Weather Critical Components. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R5

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify identification of entity responsible for training, personnel to be trained, and unit-specific training materials. |
|  | Verify training content includes information relevant to personnel responsible for the implementation of the cold weather preparedness plan(s) for their specific unit. |
|  | Verify annual training requirement for personnel responsible for implementation of the cold weather preparedness plan(s). |
| **Note to Auditor:** If a Generator Owner or Generator Operator indicates that responsibility for training is another party, materials should still be requested and provided for those personnel responsible for implementing the cold weather preparedness plans for the applicable generating unit(s) in question. | |

**Auditor Notes:**

R6 Supporting Evidence and Documentation

**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 a Corrective Action Plan when the generating unit experiences a Generator Cold Weather Reliability Event. The Corrective Action Plan shall be developed within 150 days or by July 1, whichever is earlier, and contain at a minimum: [Violation Risk Factor: High] [Time Horizon: Long-term Planning]

**6.1** A summary of the identified cause(s) for the Generator Cold Weather Reliability Event, where applicable, and any relevant associated data;

**6.2.** A review of applicability to similar equipment at generating units owned by the Generator Owner; and

**6.3.** An identification of operating limitations or impacts to the cold weather preparedness plan that would apply until execution of the corrective action(s) identified in the Corrective Action Plan.

**M6.** Each Generator Owner will have documented evidence that it developed 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) and updated cold weather preparedness plan(s) where indicated as needed by the Corrective Action Plan.

**Registered Entity Response (Required):**

**Question: Have any units meeting the criteria in Requirement R6 experienced a Generator Cold Weather Reliability Event?** If Yes, provide a summary of the Generator Cold Weather Reliability Event and the applicable generating unit(s). If No, describe how this was determined in the narrative section below.

Yes  No

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Entity’s documented process for calculating the Extreme Cold Weather Temperature for applicable generating unit(s) meeting the criteria of Requirement R6. |
| Entity’s Extreme Cold Weather Temperature for applicable generating unit(s) (subject to sampling as determined by the Compliance Enforcement Authority (CEA).) |
| If a Generator Cold Weather Reliability Event was experienced by an applicable generating unit(s) provide the details pursuant to Requirement R6 Part 6.1, Part 6.2, and Part 6.3. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R6

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify ECWT of applicable generating unit(s) that experienced a Generator Cold Weather Reliability Event. |
|  | Review process for development and implementation of Corrective Action Plans developed under R6. |
|  | If a Corrective Action Plan was developed, verify review of applicability to similar equipment and identification (if applicable) of any operating limitation or impacts to the cold weather preparedness plans during execution of corrective actions. |
|  | Verify development of Corrective Action Plan(s), if applicable, was developed within 150 days or by July 1, whichever is earlier, for the applicable generating unit(s). |
| **Note to Auditor:** Some Generator Owners may not own any applicable generating unit(s) with a calculated Extreme Cold Weather Temperature at or below 32 degrees Fahrenheit (zero degrees Celsius). If an entity does not have any applicable generating units meeting the criteria of Requirement R6 for the development of a Corrective Action Plan, understanding how an entity would develop Corrective Action Plans is beneficial. Be sure to review footnote for applicability. | |

**Auditor Notes:**

R7 Supporting Evidence and Documentation

**R7.** Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, R3, or R6, shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

* 1. Include a timetable for implementing the selected corrective action(s) that shall:
     1. If List the action(s) which address(es) existing equipment or freeze protection measures, if any, to be completed within 24 calendar months of completing development of the Corrective Action Plan;
     2. List the action(s) which require(s) new equipment or freeze protection measures, if any, to be completed within 48 calendar months of completing development of the Corrective Action Plan; and
     3. List 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;
  2. Implement the Corrective Action Plan in accordance with the specified timetables in Requirement R7 Part 7.1;
  3. Update the Corrective Action Plan action(s) and timetable(s), with justification, if corrective action(s) change or timetable(s) exceed the timelines in Requirement R7 Part 7.1; and,
  4. Document in a declaration, with justification, any Generator Cold Weather Constraint that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan.

**M7.** Each Generator Owner shall have dated evidence that demonstrates it implemented each Corrective Action Plan, including updating actions or timetables, or has explained in a declaration why corrective actions are not being implemented in accordance with Requirement R8. Acceptable evidence may include, but is not limited to, the following dated documentation (electronic or hardcopy format): records that document the implementation of each Corrective Action Plan and the completion of actions for each Corrective Action Plan including revision history of each Corrective Action Plan and, if applicable, justification to support any changes to corrective action(s) identified in the Corrective Action Plan or timetables exceeding the timelines in Requirement R7 Part 7.1. For each Corrective Action Plan applying to multiple generating units, the timetable shall reflect implementation at each unit addressed in the Corrective Action Plan. Evidence may also include work management program records, work orders, and maintenance records. Any declaration shall contain dated documentation to support constraints identified by the Generator Owner.

**Registered Entity Response (Required):**

**Question: Have any Corrective Action Plans been developed pursuant to Requirements R1, R2, R3, or R6?** If Yes, provide a summary of the Corrective Action Plan(s) and the applicable generating unit(s).

Yes  No

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Entity’s documented process for development of Corrective Action Plans and the applicable Corrective Action Plan(s) (including revisions) with any associated data for thisincluding the timetables, as specified by Requirement R7 Part 7.1 (i.e., any Corrective Action Plans developed pursuant to Requirements R1, R2, R3 or R6.) |
| Entity’s process for ensuring implementation of Corrective Action Plan action(s) with dated implementation documentation for Corrective Action Plans in accordance with Requirement R7 Part 7.2. |
| Entity’s justification (and associated documentation) for Corrective Action Plan(s) where the corrective action(s) change or timetable(s) exceed the timeline in Requirement R7 Part 7.1. |
| Entity’s declaration, and justifications for the declaration, of any Generator Cold Weather Constraint that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan. |
| Updates to any declaration of Generator Cold Weather Constraints that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R7

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify Corrective Action Plan(s) meet the criteria in the respective Requirements (R1, R2, R3, or R6) and the timetable criteria in Requirement R7 Part 7.1. |
|  | Verify date of Corrective Action Plan(s) development and implementation (if applicable) of corrective actions. |
|  | Verify updated Corrective Action Plan(s) have justifications for corrective action change(s) or timetable(s) exceeding the timelines in Requirement R7 Part 7.1. |
|  | Verify declaration, with justification, documentation for any Generator Cold Weather Constraint that precludes implementation of actions within a Corrective Action Plan. |
|  | Verify a Corrective Action Plan has been updated to reflect any Generator Cold Weather Constraint(s). |
| **Note to Auditor:** Per the SDT, Generator Owners Corrective Action Plans are not to exceed the timelines listed in Requirement R7 Part 7.1 without justification. Reasonable justification should be provided and considered when reviewing updates to Corrective Action Plans or declarations regarding a Generator Cold Weather Constraint. If declarations are provided, an in-depth review should be done to determine why the entity made the declaration and how an entity can help ensure deferment of reliability risks does not continue by correcting, if reasonable~~,~~ reasons for the declaration. As part of its cold weather data collection plan, NERC may need to review those declarations to inform its analysis (see [FERC Order](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230216-3062&optimized=false)) and those declarations should be available to auditor for additional confirmation. | |

**Auditor Notes:**

R8 Supporting Evidence and Documentation

**R8.** Each Generator Owner that creates a Generator Cold Weather Constraint declaration shall: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

* 1. Review the Generator Cold Weather Constraint declaration at least every five calendar years or as needed when a change of status to the Generator Cold Weather Constraint occurs; and:
  2. Update the operating limitations associated with capability and availability under Requirement R1 Part R1.2 if applicable.

**M8.** Each Generator Owner shall have dated evidence that demonstrates it performed the review and updated operating limitations as needed. Acceptable evidence may include, but is not limited to the following dated documentation (electronic or hardcopy format): records that document the performance of the review and update to the operating limitations, as needed.

**Registered Entity Response (Required):**

**Question: Have any Generator Cold Weather Constraints been declared pursuant to Requirements R7 Part 7.4?** If Yes, provide a summary of the Generator Cold Weather Constraint(s) and the applicable generating unit(s).

Yes  No

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Entity’s documented process for development of Generator Cold Weather Constraint declarations and the dated declarations (if applicable) for the Entity’s applicable generating unit(s). |
| Entity’s process for reviewing the status of Generator Cold Weather Constraint declarations. |
| Entity’s updates to capability and availability under Requirement R1 Part R1.2 resulting from a declaration (if applicable.) |
| Entity’s declaration, and justifications for the declaration, of any Generator Cold Weather Constraint that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan. |
| Updates to any declaration of Generator Cold Weather Constraints that precludes the Generator Owner from implementing selected action(s) contained within the Corrective Action Plan. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-012-2, R8

***This section to be completed by the Compliance Enforcement Authority***

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|  | Verify Generator Cold Weather Constraint declarations are reviewed at least every five calendar years or as needed when a change of status to the Generator Cold Weather Constraint occurs. |
|  | Verify date of Corrective Action Plan(s) reflects any review of a Generator Cold Weather Constraint and subsequent change because of the review (if applicable.) |
| **Note to Auditor:** Per the SDT, Generator Owners declarations are considered to be rare. Reasonable justification should be provided and considered when reviewing updates to declarations regarding a Generator Cold Weather Constraint. If declarations are provided, an in-depth review should be done to determine why the entity made the declaration and how an entity can help ensure deferment of reliability risks does not continue by correcting, if reasonable. As part of its cold weather data collection plan, NERC may need to review those declarations to inform its analysis (see [FERC Order](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230216-3062&optimized=false)) and those declarations should be available to auditor for additional confirmation.  Updates to availability and capability should be provided to the appropriate entities and should be reviewed. | |

**Auditor Notes:**

Additional Information:

Reliability Standard



The full text of EOP-012-2 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

EOP-012-2 was approved in the following FERC Order: *Order Approving Extreme Cold Weather Reliability Standard EOP-012-2 and Directing Modification*, 187 FERC ¶ 61,204 (2024).

Revision History for RSAW

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 9/1/2024 | NERC Compliance Assurance, Operations and Planning Compliance Task Force | New Document |

1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The RSAW may provide a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserve the right to request additional evidence from the registered entity that is not included in this RSAW. This RSAW may include excerpts from FERC Orders and other regulatory references which are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)