



TEXAS RE

**EOP-011-2 R7:
Cold Weather
Preparedness Plan**

**Blake Ianni
O&P Compliance Engineer III**

February 22, 2024

EOP-011-2 R7 Background

Background

- The *2019 FERC and NERC Staff Report on The South-Central United States Cold Weather Bulk Electric System Event of January 17, 2018*, recommended to update Reliability Standards to require proactive “winterization activities on generation units”
- Preparedness is critical for reliability, as we’ve seen more recently in 2021 with Winter Storm Uri

Project 2019-06 Cold Weather

Related Files

Status

Board Adopted: June 11, 2021

Filed with FERC: June 17, 2021

On March 22, 2021, the Board took action without a meeting to direct the completion of proposed Reliability Standards under Project 2019-06 Cold Weather by June 2021.

In accordance with Section 8.0 of the Standards Committee (SC) Charter, an email ballot was sent to the SC on March 29, 2021, requesting action by April 1, 2021, to consider the waiver request. The SC was asked to approve the following:

Approve waiver of Section 4.12 of the Standard Processes Manual (SPM) for Project 2019-06 Cold Weather, to reduce the length of the additional formal comment and ballot period(s) from 45 days to as few as 25 days, with ballot(s) conducted during the last 10 days of the comment period.

The SC voting concluded and the motion to approve the waiver passed.

Background

In July 2019, the FERC and NERC staff report titled *The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018* (Report) was released. Following the report, Southwest Power Pool, Inc. (SPP) submitted a SAR proposing a



EOP-011-2 R7 Overview

Requirement R7: GOs to implement & maintain a cold weather preparedness plan for generation units to include:

- Freeze protection measures based on specific geographical location & plant configuration
- Annual inspection & maintenance
- Generating unit(s) cold weather data
- Minimum temperature(s) for units



Best Practices-Inspections & Contract Workers

☐ Inspections should be done prior to beginning of winter

- Documentation is key
- Ample time to address any issues

☐ Seasonal contract workers

- GOs should establish clear process to review and verify the contractors' work
- Example: winterization checklist

Accuracy + Consistency →
Properly Prepared for
Cold Weather

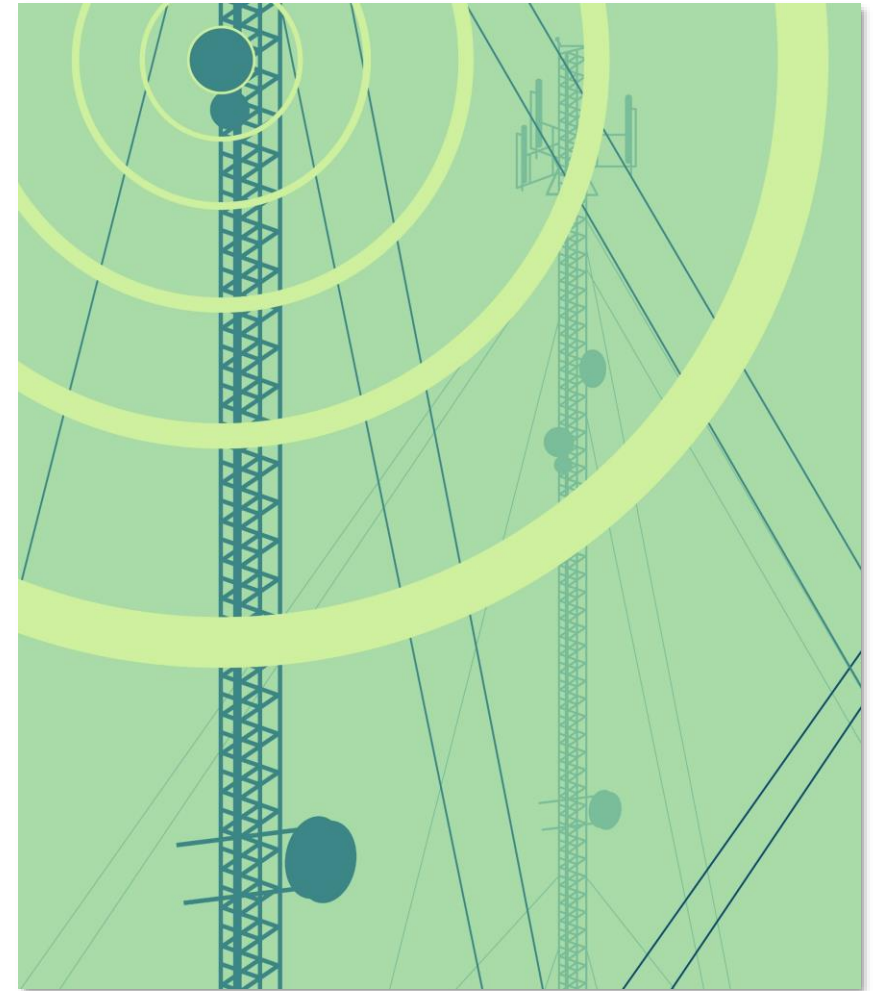


Best Practices-Communication to Reliability Coordinator

Qualified Scheduling Entity's Role

- Communicating the Capability & Availability to the Reliability Coordinator (RC)
- Entity should verify that QSE updates the generation unit's rating during cold weather event
- Email documentation → better able to demonstrate plan (R7.3)

Overall Objective: To communicate correct ratings to RC during cold weather or other circumstances. This enables the RC to accurately plan and dispatch generation during events.



Best Practices-Explaining Minimum Temperature

Generating unit(s) Minimum Temperature (R7.3.2.1 through R7.3.2.3)

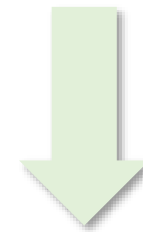
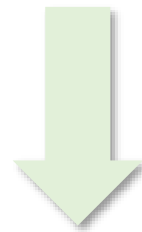
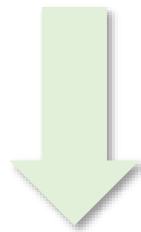
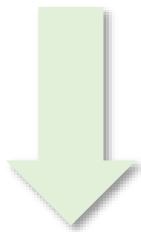
- Design temperature, historical operating temperature, or temperature determined by engineering analysis of cold weather performance?
- Does minimum temperature in plan match data provided to ERCOT?
- Supporting evidence for this temperature?

Ratings should accurately reflect cold weather performance to enable Operations and RC to correctly respond during cold weather events.



Potential Recommendation

Ensure that pertinent details are captured when conducting monthly and annual inspections of cold weather critical components, such as the generating units, to include completion dates and who performed the inspection activities. Doing so will ensure that the personnel responsible for implementing the cold weather preparedness plan(s) can track and confirm the completion of these tasks.



Goal: Thorough freeze protection measures, completed in a timely manner



Internal Controls

Periodically review the plan and data

- Consistency is key
- Does generating unit minimum temperature in plan match what's provided to ERCOT? Operations?
- Opportunity to review training on plan per R8

Conduct a “Lessons Learned” discussion post-winter season

- Key takeaways, what worked well, areas of improvement
- Better, more reliable operations in cold weather going forward



The background of the slide features a blurred Texas state flag on the left and a target with several darts on the right. The darts are clustered in the center of the target. A dark blue rounded rectangle with a white border is centered over the target area.

Questions?



TEXAS RE

Ensuring electric reliability for Texans