**1. RECOMMENDED ACTION: EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Accept as requested |  | Change to Existing Practice |
|  | Accept as modified below | X | Status Quo |
| X | Decline |  |  |

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

|  |  |
| --- | --- |
| **Per Request:** | **Per Recommendation:** |
| X | Initiation |  | Initiation |
|  | Modification |  | Modification |
|  | Interpretation |  | Interpretation |
|  | Withdrawal |  | Withdrawal |
|  |  |  |  |
|  | Principle |  | Principle |
|  | Definition |  | Definition |
| X | Business Practice Standard |  | Business Practice Standard |
|  | Document |  | Document |
|  | Data Element |  | Data Element |
|  | Code Value |  | Code Value |
|  | X12 Implementation Guide |  | X12 Implementation Guide |
|  | Business Process Documentation |  | Business Process Documentation |

**3. RECOMMENDATION**

**SUMMARY:**

2024 WEQ Annual Plan Item 1.c – Review NERC Reliability Standards EOP-011, EOP-012, and TOP-002 and develop and/or modify any necessary business practice standards to support reliability requirements developed by NERC to address the FERC-NERC-Regional Entity Staff Report: February 2021 Cold Weather Outages in Texas and the South Central United States

**Recommended Standards:**

The subcommittee recommends no action at this time.

**4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

2024 WEQ Annual Plan Item 1.c – Review NERC Reliability Standards EOP-011, EOP-012, and TOP-002 and develop and/or modify any necessary business practice standards to support reliability requirements developed by NERC to address the FERC-NERC-Regional Entity Staff Report: February 2021 Cold Weather Outages in Texas and the South Central United States

**b. Description of Recommendation:**

The subcommittee recommends no action at this time.

**c. Business Purpose:**

The WEQ BPS reviewed the new and revised reliability requirements included by NERC and approved by FERC in EOP-011-4 – Emergency Operations, EOP-012-2 – Extreme Cold Weather Preparedness and Operations, and TOP-002-5 – Operations Planning and determined that there is no need for complementary WEQ Business Practice Standards at this time.

NERC Reliability Standard EOP-011-4 addresses the effects of operating emergencies by ensuring each transmission operator and balancing authority have developed plans to mitigate operating emergencies and that those plans are implemented and coordinated within the reliability coordinator areas as specified. In reviewing each of the requirements, the participants determined that (1) business practices are not needed regarding the development of the plans as transmission operators and balancing authorities have access to the information specified for inclusion in the planning process; (2) a common platform for communicating the plans, such as an OASIS portal, is not needed as reliability coordinators, transmission operators, and balancing authorities have existing practices in place; and (3) additional standardization addressing processes around energy emergencies or the development, maintenance, and implementation of load shedding plans are not necessary, from a commercial perspective.

NERC Reliability Standard EOP-012-2 addresses the effects of operating in extreme cold weather by ensuring each generator owner has developed and implemented plans to mitigate the reliability impacts of extreme cold weather on its applicable generating units. In reviewing each of the requirements, the participants determined that business practices are not needed as the requirements pertain to a generator owner documenting and maintaining its own information, and the reliability standard provides guidance regarding the required documentation that must be maintained. Participants noted that NERC is in the process of revising EOP-012-2 in response to FERC directives and that any revised standards should be reviewed by the WEQ.

NERC Reliability Standard TOP-002-5 ensures that transmission operators and balancing authorities have plans for operating within specified limits. In reviewing each of the requirements, the participants determined that the requirements are reliability-based and that there is no need for complementary commercial business practices.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

See the following WEQ BPS Meeting Minutes:

* [August 27, 2024](https://naesb.org/pdf4/weq_bps082724fm.docx)
* [September 19, 2024](https://naesb.org/pdf4/weq_bps091924fm.docx)
* October 3, 2024