Supporting Statement for
FERC-725S (Mandatory Reliability Standards: Emergency Preparedness and Operations (EOP) Reliability Standards)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve modifications to the FERC-725S (Mandatory Reliability Standards: Emergency Preparedness and Operations (EOP) Reliability Standards) under OMB Control No. 1902-0270. The FERC-725S collection was modified in Docket No. RD25-7-000 (Order Approving Extreme Cold Weather Reliability Standards EOP-012-3).

EOP-012-2 is being replaced with version EOP-012-3 that will supersede requirements in EOP-012-2. On April 10, 2025, the North American Electric Reliability Corporation (NERC), the Commission-certified Electric Reliability Organization (ERO), submitted a petition seeking approval of proposed Reliability Standard EOP-012-3 (Extreme Cold Weather Preparedness and Operations). As discussed in this order, we approve proposed Reliability Standard EOP-012-3, its associated violation risk factors and violation severity levels, the revised defined term Generator Cold Weather Constraint declaration, and the proposed retirement of Reliability Standard EOP-012-2 immediately prior to the effective date of proposed Reliability Standard EOP-012-3.[1]

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Background. On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005[2] (EPAct 2005), was enacted into law. EPAct 2005 added a new section 215 to the Federal Power Act (FPA),[3] which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. Once approved by the Commission, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.

In 2006, the Commission certified North American Electric Reliability Corporation (NERC) as the ERO pursuant to section 215 of the FPA.

Pursuant to section 215 of the Federal Power Act (FPA),[4] the Commission has approved Emergency Preparedness and Operations (EOP) Reliability Standards EOP-004-4 (Event

1 16 U.S.C. § 824o(d)(2).

2 16 U.S.C. § 824d(a).

3 16 U.S.C. § 824o. The approved Reliability Standards are available on the NERC website, www.nerc.com.

Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3 (System Restoration Coordination), EOP-008-2 (Loss of Control Center Functionality), EOP-010-1 (Geomagnetic Disturbance Operations), and EOP-011-2 (Emergency Operations) submitted by the North American Electric Reliability Corporation (NERC), the Commission-certified Electric Reliability Organization (ERO). The Commission also approved the associated violation risk factors, violation severity levels, implementation plans, and effective dates of the Reliability Standards EOP-004-4, EOP-005-3, EOP-006-3 and EOP-008-2, EOP-010-1, and EOP-011-1.

On April 10, 2025, in response to the Commission's June 2024 Order, NERC filed a petition seeking approval of proposed Reliability Standard EOP-012-3,[5] its associated violation risk factors and violation severity levels, the revised defined term Generator Cold Weather Constraint declaration, and the proposed retirement of Standard EOP-012-2 immediately prior to the effective date of proposed EOP-012-3.[6] NERC explains that proposed Reliability Standard EOP-012-3 further improves on the approved generator cold weather preparedness in EOP-012-2 through enhanced and expanded requirements that would ensure that entities are implementing corrective actions to address known issues affecting their ability to operate reliably in cold weather in a timely manner.[7] NERC states that proposed Reliability Standard EOP-012-3 is consistent with the Commission's June 2024 Order and provides an improved framework for the identification, validation, and periodic review of Generator Cold Weather Constraint declarations.[8]

The proposed Reliability Standard contains nine requirements and one attachment; proposed Requirements R1 through R8 are carried over and modified from the prior version of the Standard, and Requirement R9 and Attachment 1 are new.[9] NERC explains that the modifications and additions clarify and improve the Reliability Standard for generator cold weather preparedness that would advance the reliability of the Bulk-Power System during future winter seasons.[10]

NERC proposes a revised definition of the term Generator Cold Weather Constraint for inclusion in the NERC Glossary. Under prior versions of the Reliability Standard, generator owners were able to decline implementing one or more actions in a corrective action plan to address freeze protection issues or measures on existing or new equipment. While generator owners are still able to do so in proposed Reliability Standard EOP-012-3, NERC explains its proposed modifications add clarity and remove references to "cost,"

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4 16 U.S.C. § 824o.

5 The proposed Reliability Standard is not attached to this order. The proposed Reliability Standard is available on the Commission's eLibrary document retrieval system in Docket No. RD25-7-000 and on the NERC website, www.nerc.com.

6 NERC Petition at 1-4.

7 *Id.* at 2.

8 *Id.*

9 *Id.* at 23-24.

10 *Id.* at 24.

"reasonable cost," "unreasonable cost," and "good business practices."[11]

NERC asserts that proposed Reliability Standard EOP-012-3, Requirement R1 clarifies the calculation of the Extreme Cold Weather Temperature for an applicable generating unit.[12] Proposed Requirement R1, Part 1.1 clarifies that generator owners have the flexibility to exercise judgement in how they address missing or invalid values in their data sets when calculating the Extreme Cold Weather Temperature.[13] NERC notes that generator owners would be expected to document how they accounted for any gaps in weather data, and this documentation would be reviewed during compliance monitoring activities.[14] NERC proposes a compliance abeyance period for Requirement R1 during which NERC would monitor the implementation of this requirement and identify, as appropriate, any revisions to the Extreme Cold Weather Temperature formula.[15]

Proposed Reliability Standard EOP-012-3, Requirement R2 revises the cold weather operational capability requirements for new bulk electric system generating units to remove the option to develop a corrective action plan to address operational capability issues. In response to the Commission's June 2024 Order, NERC revised Requirement R2 to state that new generating units entering commercial operation on or after October 1, 2027, would either need to meet more stringent freeze protection measures called for new generation or declare a Generator Cold Weather Constraint that prevents them from doing so in accordance with Requirement R8.[16] NERC states that this modification is consistent with the Commission's directive because new generating units entering commercial operation on or after October 1, 2027 would have to either complete any corrective measures that are needed prior to the commercial operation date or delay the commercial operation date until those corrective measures are completed.[17]

Proposed Reliability Standard EOP-012-3, Requirement R3 contains several non-substantive, stylistic, and clarifying revisions, such as adding the word "generating" before the word "unit(s)" in each instance for clarity and consistency, consistent with revisions made throughout the proposed Standard.[18]

Proposed Reliability Standard EOP-012-3, modifies Requirement R6 by adding Parts 6.1 and 6.3.5.1 to clarify the timeline in which generator owners must develop and implement a corrective action plan for a generating unit that experienced a Generator Cold Weather Reliability Event.[19] NERC notes that this revision is consistent with the Commission's suggestion that NERC require generator owners to implement corrective actions prior to the next winter season.[20] Part 6.2 adds clarification as to the extent of review that is required when generator owners conduct a review of other generating units

11 *Id.* at 26-27.
12 *Id.* at 27.
13 *Id.* at 30 (noting that weather data sets spanning multiple years will likely contain gaps in hourly values).
14 *Id.*
15 *Id.* at 30-31.
16 *Id.* at 33 (clarifying that generator owners would not be required to develop or complete a corrective action plan ahead of entering commercial operation).
17 *Id.*
18 *Id.* at 34.
19 *Id.* at 39 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 68).
20 *Id.* at 40 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 68).

in their fleets to determine susceptibility to the same freezing issues.[21] Part 6.3 specifies the required contents of a corrective action plan developed in connection with Requirement R6.[22] Part 6.3.5 is a new requirement part that establishes clear timelines for the implementation of corrective action plans for Generator Cold Weather Reliability Events.[23] For corrective action plans addressing other generating units in a generator owner's fleet that may be susceptible to freezing issues, the generator owner would be required to implement corrective actions within 24 months of their review or no later than 36 calendar months following the Generator Cold Weather Reliability Event.[24] Part 6.4 is a new requirement that requires a generator owner to seek approval by the compliance enforcement authority (CEA) for any corrective action plan extensions.[25] Part 6.5 is a new requirement that allows generators to declare a Generator Cold Weather Constraint that prevents them from implementing freeze protection measures in accordance with Requirement R8.

Proposed Reliability Standard EOP-012-3, Requirement R7, Part 7.1 specifies the minimum contents of a corrective action plan and clarifies the implementation timeline that would apply for implementing new freeze protection measures (48 months) and remedying issues with existing freeze protection measures (24 months).[26] Parts 7.1.2 and 7.1.4 would require the generator owner to identify any operating limitations on the generating unit or impacts to the cold weather preparedness plan that would apply until implementation of the corrective actions identified in the corrective action plan is completed.[27] Part 7.2 specifies that if a generator owner determines that it is unable to complete one or more actions in its corrective action plan in the allotted timeframe, then it must submit a corrective action plan extension request to the CEA for approval; however, it does not require the generator owner to inform applicable reliability entities such as the reliability coordinator and the balancing authority of generation limitations during the corrective action plan extension period.[28]

NERC explains that proposed Reliability Standard EOP-012-3, Requirement R8 addresses prior ambiguities regarding the defined term Generator Cold Weather Constraint and its associated criteria. NERC provides a framework for ERO oversight to receive, review, evaluate, and approve the declared Generator Cold Weather Constraints, and includes a new Attachment 1 to address and guide generator owners in the identification of Generator Cold Weather Constraints.[29] In addition, the framework for ERO oversight includes review of a generating unit's constraint declaration when experiencing a Generator Cold Weather Reliability Event with the same cause of a

21 *Id.*
22 *Id.* at 40-41.
23 *Id*. at 41 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 68).
24 *Id.* at 41-42.
25 *Id.* at 42-43 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 70). The CEA is typically, but not exclusively, a Regional Entity.
26 *Id.* at 48 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 76).
27 *Id.* at 49 (stating that this requirement is currently included in Reliability Standard EOP-012-2, Requirement R6 but only for corrective action plans developed in response to Generator Cold Weather Reliability Events).
28 *Id.* at 50.
29 *Id.* at 51.

previous Generator Cold Weather Reliability Event.

Proposed Attachment 1 expressly defines, in a list, the types of circumstances that would qualify as a Generator Cold Weather Constraint.[30] One specific known limitation is the low temperature operability of wind turbine towers manufactured prior to October 1, 2029, and entered commercial operation prior to October 1, 2031.[31] Attachment 1 also lists possible case-by-case Generator Cold Weather Constraint declarations; NERC states that providing this list provides additional guidance and clarification to entities on the type of circumstances that may preclude the implementation of freeze protection measures on their generating unit. One example is instances in which the cost of retrofitting a generating unit would be unduly burdensome such that it would retire prematurely or cancel plans to finish the development of a new generating unit.[32] NERC clarifies that in all instances, the CEA would be responsible for reviewing the Generator Cold Weather Constraint to confirm its validity.[33] If the CEA determines that a Generator Cold Weather Constraint is not valid, the generator owner would be provided with a timely response so that it may take the appropriate measures to provide the necessary operational capability for its generating unit.[34]

Proposed Reliability Standard EOP-012-3, Requirement R9 addresses the periodic review of Generator Cold Weather Constraint declarations.[35] The provision requires generator owners to review all validated Generator Cold Weather Constraints at least once every 36 calendar months to ensure the constraint remains valid.[36]

NERC proposes an effective date for Reliability Standard EOP-012-3 of October 1, 2025, the first day of the first calendar quarter that is three months following regulatory approval, or as otherwise determined by the applicable government authority, whichever is later.[37]

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

FERC-725S consists of Emergency Preparedness and Operations (EOP) Reliability Standards, EOP-004-4 (Event Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3 (System Restoration Coordination), and EOP-008-2 (Loss of Control Center Functionality), EOP-010-1 (Geomagnetic Disturbance Operations), EOP-011-4 (Emergency Operations), and EOP-012-3 (Extreme Cold

30 *Id.* at 52 (stating that the Standard also provides for circumstances which could constitute a Generator Cold Weather Constraint, depending on specific facts and circumstances).
31 *Id.* at 54 (noting that this limitation should not serve as the basis for a Generator Cold Weather Constraint indefinitely).
32 *Id.* at 58.
33 *Id.* at 53.
34 *Id.* at 59.
35 *Id.* at 62.
36 *Id.* at 62-63 (citing June 2024 Order, 187 FERC ¶ 61,204 at P 94).
37 *Id.* at 64-65, Ex. B.

Weather Preparedness and Operations). These Reliability Standards enhance reliability by:

(1) develop and submit modifications to proposed Reliability Standard EOP-012-2 to address concerns related to the ambiguity of the newly defined term Generator Cold Weather Constraint to ensure that the Generator Cold Weather Constraint declaration criteria included within the proposed Standard are objective and sufficiently detailed so that applicable entities understand what is required of them and to remove all references to "reasonable cost," "unreasonable cost," "cost," and "good business practices" and replace them with objective, unambiguous, and auditable terms;

(2) develop and submit modifications to proposed Reliability Standard EOP-012-2 for NERC to receive, review, evaluate, and confirm the validity of each Generator Cold Weather Constraint invoked by a generator owner, in a timely fashion, to ensure that such declaration cannot be used to avoid mandatory compliance with the proposed Reliability Standard or obligations in a corrective action plan;

(3) develop and submit modifications to proposed Reliability Standard EOP-012-2 to shorten and clarify the corrective action plan implementation timelines and deadlines in Requirement R7, as further directed below;

(4) develop and submit modifications to Requirement R7 of proposed 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 Standard is pre-approved by NERC and to ensure that the generator owner informs relevant registered entities of operating limitations in extreme cold weather during the period of the extension; and

(5) develop and submit modifications to Requirement R8, part 8.1 of proposed Reliability Standard EOP-012-2 to implement more frequent reviews of Generator Cold Weather Constraint declarations to verify that the constraint declaration remains valid.

EOP-004-4 Requirements and Measures

R1. Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-4 Attachment 1 that includes the protocol(s) for reporting to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or governmental authority).
M1. Each Responsible Entity will have a dated event reporting Operating Plan that includes protocol(s) and each organization identified to receive an event report for event

types specified in EOP-004-4 Attachment 1 and in accordance with the entity responsible for reporting.
R2. Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).
M2. Each Responsible Entity will have as evidence of reporting an event to the entities specified per their event reporting Operating Plan either a copy of the completed EOP-004-4 Attachment 2 form or a DOE-OE-417 form; and some evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating that the event report was submitted by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).

EOP-004-4 Evidence Retention

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- Each Responsible Entity shall retain the current Operating Plan plus each version issued since the last audit for Requirement R1, and Measure M1.
- Each Responsible Entity shall retain evidence of compliance since the last audit for Requirement R2 and Measure M2.

If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the duration specified above, whichever is longer.
The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

EOP-005-3 Requirements and Measures

R1. Each Transmission Operator shall develop and implement a restoration plan approved by its Reliability Coordinator. The restoration plan shall be implemented to restore the Transmission Operator's System following a Disturbance in which one or more areas of the Bulk Electric System (BES) shuts down and the use of Blackstart Resources is required to restore the shutdown area to a state whereby the choice of the

next Load to be restored is not driven by the need to control frequency or voltage regardless of whether the Blackstart Resource is located within the Transmission Operator's System.

M1. Each Transmission Operator shall have a dated, documented System restoration plan developed in accordance with Requirement R1 that has been approved by its Reliability Coordinator as shown with the documented approval from its Reliability Coordinator and will have evidence, such as operator logs, voice recordings or other operating documentation, voice recordings or other communication documentation to show that its restoration plan was implemented for times when a Disturbance has occurred, in accordance with Requirement R1.

R2. Each Transmission Operator shall provide the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan.

M2. Each Transmission Operator shall have evidence such as dated electronic receipts or registered mail receipts that it provided the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan in accordance with Requirement R2.

R3. Each Transmission Operator shall review its restoration plan and submit it to its Reliability Coordinator annually on a mutually-agreed, predetermined schedule.

M3. Each Transmission Operator shall have documentation such as a dated review signature sheet, revision histories, dated electronic receipts, or registered mail receipts, that it has annually reviewed and submitted the Transmission Operator's restoration plan to its Reliability Coordinator in accordance with Requirement R3.

R4. Each Transmission Operator shall submit its revised restoration plan to its Reliability Coordinator for approval, when the revision would change its ability to implement its restoration plan.

M4. Each Transmission Operator shall have documentation such as dated review signature sheets, revision histories, dated electronic receipts, or registered mail receipts, that it has submitted the revised restoration plan to its Reliability Coordinator in accordance with Requirement R4.

R5. Each Transmission Operator shall have a copy of its latest Reliability Coordinator approved restoration plan within its primary and backup control rooms so that it is available to all of its System Operators prior to its effective date.

M5. Each Transmission Operator shall have documentation that it has made the latest Reliability Coordinator approved copy of its restoration plan, in electronic or hardcopy format, in its primary and backup control rooms and available to its System Operators prior to its effective date in accordance with Requirement R5.

R6. Each Transmission Operator shall verify through analysis of actual events, a combination of steady state and dynamic simulations, or testing that its restoration plan accomplishes its intended function. This shall be completed at least once every five years.

M6. Each Transmission Operator shall have documentation, such as power flow outputs, that it has verified that its latest restoration plan will accomplish its intended function in accordance with Requirement R6.

R7. Each Transmission Operator shall have Blackstart Resource testing requirements to verify that each Blackstart Resource is capable of meeting the requirements of its restoration plan.
M7. Each Transmission Operator shall have documented Blackstart Resource testing requirements in accordance with Requirement R7.
R8. Each Transmission Operator shall include within its operations training program, annual System restoration training for its System Operators. This training program shall include training on the following:

8.1. System restoration plan including coordination with its Reliability Coordinator and Generator Operators included in the restoration plan
8.2. Restoration priorities.
8.3. Building of cranking paths.
8.4. Synchronizing (reenergized sections of the System).
8.5. Transition of Demand and resource balance within its area to the Balancing Authority.

M8. Each Transmission Operator shall have an electronic or hard copy of the training program material provided for its System Operators for System restoration training in accordance with Requirement R8.
R9. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator's restoration plan that are outside of their normal tasks.
M9. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall have an electronic or hard copy of the training program material provided to their field switching personnel for System restoration training and the corresponding training records including training dates and duration in accordance with Requirement R9
R10. Each Transmission Operator shall participate in its Reliability Coordinator's restoration drills, exercises, or simulations as requested by its Reliability Coordinator.
M10. Each Transmission Operator shall have evidence that it participated in its Reliability Coordinator's restoration drills, exercises, or simulations as requested in accordance with Requirement R10.
R11. Each Transmission Operator and each Generator Operator with a Blackstart Resource shall have written Blackstart Resource Agreements or mutually agreed upon procedures or protocols, specifying the terms and conditions of their arrangement. Such Agreements shall include references to the Blackstart Resource testing requirements.
M11. Each Transmission Operator and Generator Operator with a Blackstart Resource shall have the dated Blackstart Resource Agreements or mutually agreed upon procedures or protocols in accordance with Requirement R11.
R12. Each Generator Operator with a Blackstart Resource shall have documented procedures for starting each Blackstart Resource and energizing a bus.

M12. Each Generator Operator with a Blackstart Resource shall have dated documented procedures on file for starting each unit and energizing a bus in accordance with Requirement R12.
R13. Each Generator Operator with a Blackstart Resource shall notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator's restoration plan within 24 hours following such change.
M13. Each Generator Operator with a Blackstart Resource shall provide evidence, such as dated electronic receipts or registered mail receipts, showing that it notified its Transmission Operator of any known changes to its Blackstart Resource capabilities within 24 hours of such changes in accordance with Requirement R13.
R14. Each Generator Operator with a Blackstart Resource shall perform Blackstart Resource tests, and maintain records of such testing, in accordance with the testing requirements set by the Transmission Operator to verify that the Blackstart Resource can perform as specified in the restoration plan.
M14. Each Generator Operator with a Blackstart Resource shall maintain dated documentation of its Blackstart Resource test results and shall have evidence such as e-mails with receipts or registered mail receipts, that it provided these records to its Reliability Coordinator and Transmission Operator when requested in accordance with Requirement R14.
R15. Each Generator Operator with a Blackstart Resource shall provide a minimum of two hours of training every two calendar years to each of its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. The training program shall include training on the following.
M15. Each Generator Operator with a Blackstart Resource shall have an electronic or hard copy of the training program material provided to its operating personnel responsible for the startup, energizing a bus and synchronization of its Blackstart Resource generation units and a copy of its dated training records including training dates and durations showing that it has provided training in accordance with Requirement R15.
R16. Each Generator Operator shall participate in its Reliability Coordinator's restoration drills, exercises, or simulations as requested by its Reliability Coordinator.
M16. Each Generator Operator shall have evidence that it participated in its Reliability Coordinator's restoration drills, exercises, or simulations if requested to do so in accordance with Requirement R16.

EOP-005-3 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
The Transmission Operator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
• Approved restoration plan and any restoration plans in effect since the last compliance audit for Requirement R1, Measure M1.
• Provided the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan for the current calendar year and three prior calendar years for Requirement R2, Measure M2.
• Submission of the Transmission Operator's annually-reviewed restoration plan to its Reliability Coordinator for the current calendar year and three prior calendar years for Requirement R3, Measure M3.
• Submission of a revised restoration plan to its Reliability Coordinator for all versions for the current calendar year and the prior three calendar years for Requirement R4, Measure M4.
• The current restoration plan approved by its Reliability Coordinator and any restoration plans for the last three calendar years that was made available in its control rooms for Requirement R5, Measure M5.
• The verification results for the current, approved restoration plan and the previous approved restoration plan for Requirement R6, Measure M6.
• The verification process and results for the current Blackstart Resource testing requirements and the last previous Blackstart Resource testing requirements for Requirement R7, Measure M7.
• Training program materials or descriptions for three calendar years for Requirement R8, Measure M8.
• Records of participation in all requested Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit, as well as one previous compliance audit period for Requirement R10, Measure M10.
If a Transmission Operator is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer. The Transmission Operator, applicable Transmission Owner, and applicable Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
• Training program materials or descriptions and training records for three calendar years for Requirement R9, Measure M9.
If a Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

The Transmission Operator and Generator Operator with a Blackstart Resource shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
• Current Blackstart Resource Agreements and any Blackstart Resource Agreements or mutually agreed upon procedures or protocols in effect since its last compliance audit for Requirement R11, Measure M11.
The Generator Operator with a Blackstart Resource shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
• Current documentation and any documentation in effect since its last compliance audit on procedures to start each Blackstart Resource and for energizing a bus for Requirement R12, Measure M12.
• Notification to its Transmission Operator of any known changes to its Blackstart Resource capabilities over the last three calendar years for Requirement R13, Measure M13.
• The verification test results for the current set of requirements and one previous set for its Blackstart Resources for Requirement R14, Measure M14.
• Training program materials and training records for three calendar years for Requirement R15, Measure M15.
If a Generation Operator with a Blackstart Resource is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.
The Generator Operator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:
• Records of participation in all requested Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit for Requirement R16, Measure M1
If a Generation Operator is found non-compliant for any requirement, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last compliance audit records and all requested and submitted subsequent compliance audit records.

EOP-006-3 Requirements and Measures

R1. Each Reliability Coordinator shall develop and implement a Reliability Coordinator Area restoration plan. The scope of the Reliability Coordinator's restoration plan starts when Blackstart Resources are utilized to re-energize a shutdown area of the Bulk Electric System (BES), or separation has occurred between neighboring Reliability Coordinators, or an energized island has been formed on the BES within the Reliability Coordinator Area. The scope of the Reliability Coordinator's restoration plan ends when

all of its Transmission Operators are interconnected and its Reliability Coordinator Area is connected to all of its neighboring Reliability Coordinator Areas. The restoration plan shall include:

M1. Each Reliability Coordinator shall have available a dated copy of its restoration plan and will have evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its restoration plan was implemented in accordance with Requirement R1.

R2. The Reliability Coordinator shall distribute its most recent Reliability Coordinator Area restoration plan to each of its Transmission Operators and neighboring Reliability Coordinators within 30 calendar days of creation or revision.

M2. Each Reliability Coordinator shall provide evidence such as electronic receipts, posting to a secure website with notification to affected entities, or registered mail receipts, that its most recent restoration plan has been distributed in accordance with Requirement R2.

R3. Each Reliability Coordinator shall review its restoration plan within 13 calendar months of the last review.

M3. Each Reliability Coordinator shall provide evidence such as a review signature sheet, or revision histories, that it has reviewed its restoration plan within 13 calendar months of the last review in accordance with Requirement R3.

R4. Each Reliability Coordinator shall review its neighboring Reliability Coordinator's restoration plans and provide written notification of any conflicts discovered during that review within 60 calendar days of receipt.

M4. Each Reliability Coordinator shall provide evidence such as dated review signature sheets or electronic receipt that it has reviewed its neighboring Reliability Coordinator's restoration plans and resolved any conflicts within the timing requirements of Requirement R4 and Requirement R4, Part 4.1.

R5. Each Reliability Coordinator shall review the restoration plans required by EOP-005 of the Transmission Operators within its Reliability Coordinator Area.

M5. Each Reliability Coordinator shall provide evidence such as a dated review signature sheet or electronic receipt that it has reviewed, approved or disapproved, and notified its Transmission Operators within 30 calendar days following the receipt of the restoration plan from the Transmission Operator in accordance with Requirement R5.

R6. Each Reliability Coordinator shall have a copy of its latest restoration plan and copies of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area within its primary and backup control rooms so that it is available to all of its System Operators prior to the effective date.

M6. Each Reliability Coordinator shall have documentation such as electronic receipts that it has made the latest copy of its restoration plan and copies of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area available in its primary and backup control rooms and to each of its System Operators prior to the effective date in accordance with Requirement R6.

R7. Each Reliability Coordinator shall include within its operations training program, annual System restoration training for its System Operators. This training program shall address the following:

7.1. The coordination role of the Reliability Coordinator; and

7.2. Re-establishing the Interconnection.

M7. Each Reliability Coordinator shall have an electronic copy or hard copy of its training records available showing that it has provided training in accordance with Requirement R7.

R8. Each Reliability Coordinator shall conduct two System restoration drills, exercises, or simulations per calendar year, which shall include the Transmission Operators and Generator Operators as dictated by the particular scope of the drill, exercise, or simulation that is being conducted.

M8. Each Reliability Coordinator shall have evidence, such as dated electronic documents, that it conducted two System restoration drills, exercises, or simulations per calendar year in accordance with Requirement R8. And each Reliability Coordinator shall have evidence that the Reliability Coordinator requested each applicable Transmission Operator and Generator Operator to participate per Requirement R8 and Requirement R8.

EOP-006-3 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

• The current restoration plan and any restoration plans in effect since the last compliance audit for Requirement R1, Measure M1.

• Distribution of its most recent restoration plan and any restoration plans in effect for the current calendar year and three prior calendar years for Requirement R2, Measure M2.

• Its reviewed restoration plan for the current review period and the last three prior review periods for Requirement R3, Measure M3.

• Reviewed copies of neighboring Reliability Coordinator restoration plans for the current calendar year and the three prior calendar years for Requirement R4, Measure M4.

• The reviewed restoration plans for the current calendar year and the last three prior calendar years for Requirement R5, Measure M5.

• The current, approved restoration plan and any restoration plans in effect for the last three calendar years was made available in its control rooms for Requirement R6, Measure M6.

• Actual training program materials or descriptions for three calendar years for Requirements R7, Measure M7.

• Records of all Reliability Coordinator restoration drills, exercises, or simulations since its last compliance audit, as well as one previous compliance audit period for Requirement R8, Measure M8.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

EOP-008-2 Requirements and Measures

R1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include:

1.1. The location and method of implementation for providing backup functionality.

1.2. A summary description of the elements required to support the backup functionality. These elements shall include:

1.2.1. Tools and applications to ensure that System Operators have situational awareness of the BES.

1.2.2. Data exchange capabilities.

1.2.3. Interpersonal Communications.

1.2.4. Power source(s).

1.2.5. Physical and cyber security.

1.3. An Operating Process for keeping the backup functionality consistent with the primary control center.

1.4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.

1.5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.

1.6. An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include:

1.6.1. A list of all entities to notify when there is a change in operating locations.

1.6.2. Actions to manage the risk to the BES during the transition from primary to backup functionality, as well as during outages of the primary or backup functionality.

1.6.3. Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality

M1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format.

R2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality.

M2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, available at its primary control center and at the location providing backup functionality.

R3. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards are applicable to the primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:

• Planned outages of the primary or backup facilities of two weeks or less
• Unplanned outages of the primary or backup facilities

M3. Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Requirement R3.

R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's primary control center functionality. To avoid requiring tertiary functionality, backup functionality is not required during:

• Planned outages of the primary or backup functionality of two weeks or less
• Unplanned outages of the primary or backup functionality

M4. Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's or Transmission Operator's primary control center functionality in accordance with Requirement R4.

R5. Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annually review and approve its Operating Plan for backup functionality.
M5. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have evidence that its dated, current, and in effect Operating Plan for backup functionality, in electronic or hardcopy format, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Requirement R5.
R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards.
M6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Requirement R6.
R7. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conduct and document results of an annual test of its Operating Plan that demonstrates:
M7. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual test of its Operating Plan for backup functionality, in accordance with Requirement R7.
R8. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.
M8. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide evidence that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Requirement R8.

EOP-008-2 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.
The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in effect Operating Plan for backup functionality plus all

issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain a dated, current, in effect copy of its Operating Plan for backup functionality, with evidence of its last issue, available at its primary control center and at the location providing backup functionality, for the current year, in accordance with Measurement M2.
• Each Reliability Coordinator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) in accordance with Requirement R3 that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Measurement M3.
• Each Balancing Authority and Transmission Operator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it's backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) in accordance with Requirement R4 includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's primary control center functionality in accordance with Measurement M4.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the time period since its last compliance audit, that its dated, current, in effect Operating Plan for backup functionality, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Measurement M5.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain dated evidence for the current year and for any Operating Plan for backup functionality in effect since its last compliance audit, that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Measurement M6.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the current calendar year and the previous calendar years, such as dated records, that it has tested its Operating Plan for backup functionality, in accordance with Measurement M7.
• Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality would last for more than six calendar months shall retain evidence for the current in effect document and any such documents in effect since its last compliance audit that a plan has been submitted to its Regional Entity within

six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Measurement M8

EOP-010-1 Requirements and Measures

R1. Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include:

1.1 A description of activities designed to mitigate the effects of GMD events on the reliable operation of the interconnected transmission system within the Reliability Coordinator Area.

1.2 A process for the Reliability Coordinator to review the GMD Operating Procedures or Operating Processes of Transmission Operators within its Reliability Coordinator Area

M1. Each Reliability Coordinator shall have a current GMD Operating Plan meeting all the provisions of Requirement R1; evidence such as a review or revision history to indicate that the GMD Operating Plan has been maintained; and evidence to show that the plan was implemented as called for in its GMD Operating Plan, such as dated operator logs, voice recordings, or voice transcripts.

R2. Each Reliability Coordinator shall disseminate forecasted and current space weather information to functional entities identified as recipients in the Reliability Coordinator's GMD Operating Plan.

M2. Each Reliability Coordinator shall have evidence such as dated operator logs, voice recordings, transcripts, or electronic communications to indicate that forecasted and current space weather information was disseminated as stated in its GMD Operating Plan.

R3. Each Transmission Operator shall develop, maintain, and implement a GMD Operating Procedure or Operating Process to mitigate the effects of GMD events on the reliable operation of its respective system. At a minimum, the Operating Procedure or Operating Process shall include:

3.1. Steps or tasks to receive space weather information.

3.2. System Operator actions to be initiated based on predetermined conditions.

3.3. The conditions for terminating the Operating Procedure or Operating Process.

M3. Each Transmission Operator shall have a GMD Operating Procedure or Operating Process meeting all the provisions of Requirement R3; evidence such as a review or revision history to indicate that the GMD Operating Procedure or Operating Process has been maintained; and evidence to show that the Operating Procedure or Operating Process was implemented as called for in its GMD Operating Procedure or Operating Process, such as dated operator logs, voice recordings, or voice transcripts.

EOP-010-1 Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.
The Reliability Coordinator and Transmission Operator shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:
The responsible entities shall retain documentation as evidence for three years.
If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

EOP-011-4 Requirements and Measures

R1. Each Transmission Operator shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include the following, as applicable.

1.1. Roles and responsibilities for activating the Operating Plan(s);

1.2. Processes to prepare for and mitigate Emergencies including:

1.2.1. Notification to its Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency;

1.2.2. Cancellation or recall of Transmission and generation outages;

1.2.3. Transmission system reconfiguration;

1.2.4. Redispatch of generation request;

1.2.5. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and

1.2.5.1. Provisions for manual Load shedding capable of being implemented in a timeframe adequate for mitigating the Emergency;

1.2.5.2. Provisions to minimize the overlap of circuits that are designated for manual Load shed, UVLS, or UFLS and circuits that serve designated critical loads which are essential to the reliability of the BES;

1.2.5.3. Provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that are utilized for UFLS or UVLS;

1.2.5.4. Provisions for limiting the utilization of UFLS or UVLS circuits for manual Load shed to situations where warranted by system conditions;

1.2.5.5. Provisions for the identification and prioritization of designated critical natural gas infrastructure loads which are essential to the reliability of the BES as defined by the Applicable Entity; and

1.2.6. Reliability impacts of extreme weather conditions.

1.2.6.1 Cold weather conditions

1.2.6.2 Extreme weather conditions

M1. Each Transmission Operator will have a dated Operating Plan(s) developed in accordance with Requirement R1 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R1.

R2. Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable:

2.1. Roles and responsibilities for activating the Operating Plan(s);

2.2. Processes to prepare for and mitigate Emergencies including:

2.2.1. Notification to its Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency;

2.2.2. Requesting an Energy Emergency Alert, per Attachment 1;

2.2.3. Managing generating resources in its Balancing Authority Area to address:

2.2.3.1. capability and availability;

2.2.3.2. fuel supply and inventory concerns;

2.2.3.3. fuel switching capabilities; and

2.2.3.4. environmental constraints.

2.2.4. Public appeals for voluntary Load reductions;

2.2.5. Requests to government agencies to implement their programs to achieve necessary energy reductions;

2.2.6. Reduction of internal utility energy use;

2.2.7. Use of Interruptible Load, curtailable Load and demand response;

2.2.8. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and

2.2.9. Reliability impacts of extreme weather conditions

2.2.10. Provisions to determine reliability impacts of:

2.2.10.1. Cold weather conditions; and

2.2.10.2. Extreme weather conditions.

M2. Each Balancing Authority will have a dated Operating Plan(s) developed in accordance with Requirement R2 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R2.

R3. The Reliability Coordinator shall review the Operating Plan(s) to mitigate operating Emergencies submitted by a Transmission Operator or a Balancing Authority regarding any reliability risks that are identified between Operating Plans.

3.1. Within 30 calendar days of receipt, the Reliability Coordinator shall:

3.1.1. Review each submitted Operating Plan(s) on the basis of compatibility 6 and inter-dependency with other Balancing Authorities' and Transmission Operators' Operating Plans;

3.1.2. Review each submitted Operating Plan(s) for coordination to avoid risk to Wide Area reliability; and

3.1.3. Notify each Balancing Authority and Transmission Operator of the results of its review, specifying any time frame for resubmittal of its Operating Plan(s) if revisions are identified

M3. The Reliability Coordinator will have documentation, such as dated e-mails or other correspondences that it reviewed Transmission Operator and Balancing Authority Operating Plans within 30 calendar days of submittal in accordance with Requirement R3.

R4. Each Transmission Operator and Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R3 and resubmit its Operating Plan(s) to its Reliability Coordinator within a time period specified by its Reliability Coordinator.

M4. The Transmission Operator and Balancing Authority will have documentation, such as dated emails or other correspondence, with an Operating Plan(s) version history showing that it responded and updated the Operating Plan(s) within the timeframe identified by its Reliability Coordinator in accordance with Requirement R4.

R5. Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority within its Reliability Coordinator Area shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators.

M5. Each Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator within its Reliability Coordinator Area will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that will be used to determine if the Reliability Coordinator communicated, in accordance with Requirement R5, with other Balancing

Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators .

R6. Each Reliability Coordinator that has a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area shall declare an Energy Emergency Alert, as detailed in Attachment 1.

M6. Each Reliability Coordinator, with a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that it declared an Energy Emergency Alert, as detailed in Attachment 1, in accordance with Requirement R6

R7 Each Transmission Operators shall annually identify and notify Distribution Providers, UFLS-Only Distribution Providers and Transmission Owners that are required to assist with the mitigation of operating Emergencies in its Transmission Operator Area through operator-controlled manual Load shedding, undervoltage Load shedding, or underfrequency Load shedding. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning, Long-term Planning]

M7. Each Transmission Operator will have documentation, such as dated emails or other correspondences that it identified and notified Distribution Providers, UFLS-Only Distribution Providers and Transmission Owners annually in accordance with Requirement R7.

R8. Each Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner notified by a Transmission Operator per R7 to assist with the mitigation of operating Emergencies in its Transmission Operator Area shall develop, maintain, and implement a Load shedding plan. The Load shedding plan shall include the following, as applicable: [Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning]

8.1. Operator-controlled manual Load shedding, undervoltage Load shedding, or underfrequency Load shedding during an Emergency that accounts for each of the following:

8.1.1. Provisions for manual Load shedding capable of being implemented in a timeframe adequate for mitigating the Emergency;

8.1.2. Provisions to minimize the overlap of circuits that are designated for manual, undervoltage, or underfrequency Load shed and circuits that serve designated critical loads which are essential to the reliability of the BES;

8.1.3. Provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that are utilized for UFLS or UVLS;

8.1.4. Provisions for limiting the utilization of UFLS or UVLS circuits for manual Load shed to situations where warranted by system conditions; and

8.1.5. Provisions for the identification and prioritization of designated critical natural gas infrastructure loads which are essential to the reliability of the BES as defined by the Applicable Entity.

8.2. Provisions to provide the Load shedding plan to the Transmission Operator for review

M8. Each Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner notified by a Transmission Operator per R7 to assist with the mitigation of operating Emergencies in its Transmission Operator Area will have a dated Load shedding plan(s) developed in accordance with Requirement R8 and evidence that the Load 9 shedding plan(s) was provided to its Transmission Operator; evidence such as a review or revision history to indicate that the Load shedding plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings or other communication documentation to show that its Load shedding plan(s) was implemented f

EOP-011-4 Evidence Retention

Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit. The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation

- The Transmission Operator shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R1 and R4.
- The Balancing Authority shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R2 and R4.
- The Reliability Coordinator shall maintain evidence of compliance since the last audit for Requirements R3, R5, and R6. • The Transmission Operator shall maintain evidence of compliance since the last audit for Requirement R7.
- The Distribution Provider, UFLS-Only Distribution Provider, and Transmission Owner shall retain the current Load shedding plan, evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R8.

EOP-12-3 (effective date [upon regulatory approval])

EOP-12-3 Requirements and Measures

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 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.

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 the self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),1 shall:

• 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

1 Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit

(zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity

Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),

are exempt from this requirement.

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).

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),2 shall:

• 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, but is not limited to, the following (electronic or hardcopy format): 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, documentation of freeze protection measures, and Corrective Action Plan(s).

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]

2 Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit

(zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity

Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),

are exempt from this requirement.

4.1. The lowest calculated Extreme Cold Weather Temperature for each unit, as determined in Requirement R1;3

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.

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.

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

3 Generator Owners shall include the lowest calculated Extreme Cold Weather Temperature for the unit, even where

subsequent periodic re-calculations under Requirement R1 Part 1.1 cause an increase in the Extreme Cold Weather Temperature or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius),4 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;

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.

R7. Each Generator Owner, for each Corrective Action Plan developed pursuant to Requirements R1, R2, R3, or R6.

7.1. Include a timetable for implementing the selected corrective action(s) that shall:

7.1.1. 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;

7.1.2. 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

7.1.3. 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;

7.2. Implement the Corrective Action Plan in accordance with the specified timetables in Requirement R7 Part 7.1;

4 Generating unit(s) that do not self-commit or are not required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius), but may be called upon to operate in order to assist in the mitigation of BES Emergencies, Capacity Emergencies, or Energy Emergencies during periods at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius), are exempt from this requirement.

7.3. 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

7.4. 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.

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

8.1. 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

8.2. 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.

R9. The Generator Owner shall review each Generator Cold Weather Constraint declaration validated by the CEA at least once every 36 calendar months to determine if it remains valid in accordance with Attachment 1. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

9.1 If a Generator Cold Weather Constraint is determined to be no longer valid, then within six (6) calendar months of such determination, the Generator Owner shall develop or update a Corrective Action Plan pursuant to Requirement R7.

M9. Each Generator Owner shall have dated evidence that demonstrates it reviewed Generator Cold Weather Constraints in accordance with Requirement R9. 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 within the required timeframe, records that demonstrate that a Corrective Action Plan was developed or updated within the required timeframe (if applicable).

EOP-012-3 Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a

longer period of time as part of an investigation.

• The Generator Owner shall retain data or evidence to support its current Extreme Cold Weather Temperature calculation and generating unit cold weather data, plus each calculation or revision since the last audit, for Requirement R1 and Measure M1.

• The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan under Requirement R2 or R3 is complete, whichever timeframe is greater, for Requirements R2 and R3 and Measures M2 and M3.

• The Generator Owner shall retain the current cold weather preparedness plan(s), as evidence of review or revision history, plus each version issued since the last audit and evidence of compliance since the last audit for Requirement R4 and Measure M4.

• The Generator Owner or Generator Operator shall keep data or evidence to show compliance for three years for Requirement R5 and Measure M5.

• The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan under Requirement R6 is complete, whichever timeframe is greater, for Requirement R6 and Measure M6.

• The Generator Owner shall keep data or evidence to show compliance for three years, or until any Corrective Action Plan is complete, whichever time frame is greater, for Requirement R7 and Measure M7.

• The Generator Owner shall maintain data or evidence to support its current Generator Cold Weather Constraint declaration, plus each revision since the last audit, for Requirement R8 and Measure M8.

• The Generator Owner shall maintain data or evidence to support that it reviewed each Generator Cold Weather Constraint declaration validated by the CEA at least once every 36 calendar months since the last audit, for Requirement R9 and Measure M9 .

Bulk-Power System to 'ensure enough generating units will be available during the next cold weather event.'"[38] When extreme cold weather events such as Winter Storms Uri or Elliott occur, the Bulk-Power System cannot operate reliably without adequate generation availability. Proposed Reliability Standard EOP-012-3 improves upon the mandatory and effective Standard EOP-012-2 by enhancing the requirements for generator cold weather preparedness and Generator Cold Weather Constraint declarations and by making other improvements consistent with the Commission's directives in its June 2024 Order to help ensure that adequate generation is available during extreme cold weather.[39] Accordingly, we find that proposed Reliability Standard EOP-012-3 is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

FERC also will modify Reliability Standard EOP-012-3's implementation effective date so that the proposed Reliability Standard goes into effect on October 1, 2025. Other than the implementation effective date of the proposed Reliability Standard, we approve the remainder of NERC's proposed implementation plan.

FERC also finds it necessary that NERC confirm that Reliability Standard EOP-012-3 adequately addresses reliability concerns related to the generator owner constraint declarations, generator owner constraint declaration timetable notifications, and the Extreme Cold Weather Temperature definition, as discussed in more detail below. The Commission previously directed NERC to collect data associated with an earlier version of this Reliability Standard.[40] However, additional data is needed to determine whether the proposed Reliability Standard addresses the reliability concerns noted above. As such, we direct NERC, pursuant to section 39.2(d) of the Commission's regulations,[41] to submit comprehensive biennial informational filings for a limited period of time as explained in more detail below.

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38 *N. Am. Elec. Reliability Corp.*, 187 FERC ¶ 61,204, at P 2 (2024) (June 2024 Order) (citing FERC, NERC, and Regional Entity Staff, *The February 2021 Cold Weather Outages in Texas and the South Central United States* 189 (Nov. 16, 2021), https://www.ferc.gov/media/february-2021-cold-weather-outages-texas-and-south-central-united-states-ferc-nerc-and (November 2021 Report)).

39 *See, e.g.*, *N. Am. Elec. Reliability Corp.*, 182 FERC ¶ 61,094, at PP 3-11 (February 2023 Order), *reh'g denied*, 183 FERC ¶ 62,034, *order on reh'g*, 183 FERC ¶ 61,222 (2023).

40 *See id.* P 11.

41 18 C.F.R. § 39.2(d) (2025) ("The [ERO] . . . shall provide the Commission such information as is necessary to implement section 215 of the [FPA].").

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED TECHNOLOGY TO REDUCE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

The use of current or improved technology and the medium are not covered in Reliability Standards and are therefore left to the discretion of each respondent. We think that nearly all the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password-protected user interface.

These collections do not require industry to file the information with the Commission. However, they do contain information collection and record retention requirements for which using current technology is an option.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. EOP Reliability Standards do not duplicate any filing requirements.

5. METHODS USED TO MINIMIZE THE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden.

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

If the requirements of these standards were performed less frequently, NERC would not be provided any information to allow assessment of the compliance. Adequate planning for operating emergencies and responding to those emergencies is critical for the reliable operation of the bulk power system. The frequency of reporting is conducted once per year for all entities.

- Reliability Standard EOP-004-4 requires reporting of events by responsible entities. The reportable events under the proposed Reliability Standard are collected and used to examine the underlying causes of events, track subsequent corrective action to prevent recurrence of such events, and develop lessons learned for industry.
- Reliability Standard EOP-005-3 ensures plans, facilities, and personnel are prepared to enable system restoration from blackstart (the ability to restart generation following a blackout) resources to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection. Failure to follow this Reliability Standard could result in delays in restoration efforts.
- Reliability Standard EOP-006-3 establishes how personnel should prepare, execute, and coordinate system restoration processes to maintain reliability and to restore the Interconnection. Failure to follow this Reliability Standard could result in delay in restoration efforts.
- Reliability Standard EOP-008-2 ensures continued reliable operations of the bulk electric system if a control center becomes inoperable. Failure to follow this Reliability Standard could result in a control center not being able to perform operations of the BES in an effective manner.
- Reliability Standard EOP-010-1 mitigates the effects of geomagnetic disturbance (GMD) events by implementing Operating Plans, Processes, and Procedures. Failure to follow this Reliability Standard may results in an entity not being able to respond to a GMD Event.
- Reliability Standard EOP-011-4 addresses the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed Operating Plan(s) to mitigate operating Emergencies, and that those plans are coordinated within a Reliability Coordinator Area. Failure to follow this Reliability Standard may result in an entity not being able to effectively mitigate operating Emergencies to preserve the BES.
- Reliability Standard EOP-012-3 addresses the effects of operating in extreme cold weather by ensuring each Generator Owner has developed and implemented plan(s) to mitigate the reliability impacts of extreme cold weather on its generating units. Failure to follow the EOP-012-2 may result in Generator Owner not being able to provide power to customers during extreme cold weather events as the generating units have been adversely affected.

7. **EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION**

The Emergency Preparedness and Operation (EOP) family of Reliability Standards represent Requirements that may need to occur in near real-time operations which if not done could place the operations of the electric system into an unknown state or lead to possible cascading, voltage instability, or uncontrolled separation. For the 30-day

timeframes, those were set by industry to assign responsibility to entities to communicate with others that need to plan and operate the BES in a reliable manner.

8. **DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS**

The FERC Order on Reliability Standards was published in the Federal Register thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collections of data.

The modifications to FERC 725S in RD25-7-000 are a result of the ongoing effort by the Commission to enhance the reliability of the bulk-power system. Specifically, RD25-7-000 approves additional standards (than what is included in the current FERC 725S) for extreme cold weather events. The Commission solicited comments for 60 days upon the approval of the reliability standards which were published in the Federal Register on September 23, 2025 (90 FR 45761). The Commission received no comments.

FERC also published a 30-day public notice and invited public comment to OMB on January 26, 2026 (91 FR 3187).

9. **EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS**

No payments or gifts have been made to respondents.

10. **DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

According to the NERC Rules of Procedure, "…a Receiving Entity shall keep in confidence and not copy, disclose, or distribute any Confidential Information or any part thereof without the permission of the Submitting Entity, except as otherwise legally required." This serves to protect confidential information submitted to NERC or Regional Entities.

Responding entities do not submit the information collected due to the Reliability Standards to FERC. Rather, they submit the information to NERC, the regional entities, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

11. **PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES,**

RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE

These collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The EOP Reliability Standards are currently located in the FERC-725S (OMB Control No. 1902-0270) collection.[42] In Docket No. RD25-7-000, the Commission proposes to replace the current OMB approved Reliability Standard EOP-012-2 with proposed Standard EOP-012-3 (Table 1). Proposed Requirements R1 through R8 are carried over and modified from the prior version of the Standard, and Requirement R9 and Attachment 1 are new. The proposed Reliability Standard creates a mechanism for NERC to receive, review, evaluate, and confirm validity of each Generator Cold Weather Constraint as well as corrective action extension requests from generator owners beyond the maximum timeframe. In addition, the proposed Standard implements more frequent reviews of the Generator Cold Weather Constraint declarations to verify they remain valid. The proposed Standard also adds Attachment 1 and modifies the Generator Cold Weather Constraint definition to address concerns related to ambiguity of the defined terms.

The number of respondents below are based on an estimate of the NERC compliance registry for generator owners and generator operators. Proposed Reliability Standard EOP-012-3 applies to generator owners and generator operators. The Commission based its paperwork burden estimates on the NERC compliance registry as of July 11, 2025. According to the registry for U.S. unique entities, there are 1,314 generator owners. The revisions to proposed Reliability Standard EOP-012-3 should not present any additional burden to the generator operators compared to the previously approved EOP-012-2 but will present additional burden to generator owners. Thus, the estimates in the tables below are based on the change in generator owner burden borne from the Reliability Standard approved in this order.[43] The Commission based the burden estimates in the tables below on staff experience, knowledge, and expertise.

The estimated costs and burden for the revisions in Docket No. RD25-7-000 are shown in the table below:

Table 1: Changes Due to Final Rule in Docket No. RD25-7-000 for EOP-012-3					
Reliability Standard & Requirement	**Type and Number of Entity** (1)	**Number of Annual Responses Per**	**Total Number of Responses**	**Average Number of Burden Hours per**	**Total Burden Hours (3)*(4)=(5)**

42 The FERC-725S collection includes the EOP family of Reliability Standards: EOP-004-4, EOP 005-3, EOP-006-3, EOP-008-2, EOP-010-1, EOP-011-4, and EOP-012-3.

43 The overall burden associated with Reliability Standard EOP-012 will be the sum of the burden (responses) from Reliability Standard EOP-012-1 (under Docket No. RD23-1-000), Reliability Standard EOP-012-2 (under Docket No. RD24-5-000), and proposed Reliability Standard EOP-012-3 (under Docket No. RD25-7-000).

		Entity (2)	**(1)*(2)=(3)**	**Response[44] (4)**	
FERC-725S					
Annual Collection EOP-012-3					
EOP-012-3	1,314(GO)	1	1,314	4 hrs. $63.52/hr	5,256 hrs. $333,861.12
Total for EOP-012-3			1,314	4 hrs. $63.52/hr	5,256 hrs. $333,861.12

Changes to FERC 725S by RD25-7-000			
FERC-725S Modification	**Current Inventory (hours)**	**Current Inventory (responses)**	**Total Change Due to RD25-7-000**
Addition of EOP-012-3	-	-	+**5,256** hrs. +1,314 responses

13. **ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS**

There are no start-up or other non-labor costs.

Total Capital and Start-up cost: $0
Total Operation, Maintenance, and Purchase of Services: $0

All of the costs in the RD25-7-000 are associated with burden hours (labor) and described in Questions #12 and #15 in this supporting statement.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0255).

The Commission does incur the costs associated with obtaining OMB clearance for the collections under the Paperwork Reduction Act (PRA). The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other

44 The estimated hourly cost (salary plus benefits) is a combination of the following categories from the Bureau of Labor Statistics (BLS) website, http://www.bls.gov/oes/current/naics2_22.htm: 75% of the average of an Electrical Engineer (17-2071) $71.19/hr., x .75 = 53.3925 ($53.39-rounded) ($53.39/hour); and 25% of an Information and Record Clerk (43-4199) $40.51/hr., $40.51 x .25 = 10.1275 ($10.13 rounded) ($10.13/hour), for a total ($53.39+ $10.13 = $63.52/hour).

vehicle used to create, modify, extend, or discontinue an information collection. FERC estimates the annual cost for this effort to be $**8,396** for each of the collections.

FERC-725S	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings	0	$0
Paperwork Reduction Act Administrative Cost[45]		$7,978
TOTAL		$7,978

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

In FERC-725S (OMB Control No. 1902-0270).[46] As shown in question #12 above, in RD25-7-000, only EOP-012-2 is being updated to be EOP-012-3, which will increase the total burden of the FERC 725S information collection.

In Docket No. RD25-7-000, NERC petitioned the Commission for approval of revisions to the EOP standards from EOP-012-2 to EOP-012-3. Due to the revision, the Commission is removing its estimates for EOP-012-2 and replacing them with our estimates for EOP-012-3. Thus, the removal includes all of the one-time costs associated with EOP-012-2. This results in a total reduction of -1210 responses and -6,050 hours which were the onetime costs. Further, the addition of +1,314 responses and +5,256 burden hrs. associated with EOP-012-3 caused a decrease in the total Program change by Agency discretion of -300 responses and -1,602 hours.

The update resulted in an decrease in responses and reduction in burden hours as shown in the table below:

FERC-725S	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,423	2,723	0	-300

45 The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection.

46 The table reflects the ROCIS entry, which includes rounding adjustments from the totals reflected in question 12.

Annual Time Burden	94,818	96,420	0	-1,602
Annual Cost Burden ($)	$0	$0	$0	$0

16. **TIME SCHEDULE FOR THE PUBLICATION OF DATA**

There is no publication of data associated with FERC-725S collections of information.

17. **DISPLAY OF THE EXPIRATION DATE**

The expiration dates are posted on ferc.gov at https://www.ferc.gov/media/information-collections.

18.**EXCEPTIONS TO THE CERTIFICATION STATEMENT**

There are no exceptions for FERC-725S.