### **Natalie Johnson**



Natalie Johnson has over 20 years' experience in the energy industry and regulatory affairs, particularly in the renewable energy environment. Natalie's regulatory experience includes working with regulatory agencies such as NERC, FERC, and a variety of ISOs across North America, including ERCOT.

Natalie began her energy career as a consultant, contributing to ISO Market Procedures for the Ontario Independent Electricity Market Operator and the Korean Power Exchange in Seoul. She later held roles as a Market Policy Specialist and Senior Operations Analyst, working across a variety of North American ISO markets. For the past decade, she has focused on regulatory compliance in renewable energy, particularly wind, solar, and battery storage.

Natalie joined Enel Green Power in the fall of 2014 and led their NERC compliance program before moving into a Compliance Officer role in 2022, overseeing operational compliance for large renewable generation assets.

Natalie holds an undergraduate degree from McGill University and a graduate degree from the London School of Economics.





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# Agenda

01

02

Key elements of Enel's Seasonal Preparedness Program

Weather Critical Failure Points Checklist

03

04

Key Tips in Preparing for an Inspection

Continuous Improvement

### **Introductions**

- Enel Seasonal Preparedness Program



Natalie Johnson Head of EGP Compliance

Paul Landers
Substation Senior Electrical Control Specialist

Kenneth Peacock BESS Service Manager

Adam Sotirakopoulos
Head of Ops & Maintenance Solar Zone 1

# Our Presence in the U.S. and Canada



### **Demand Response**

4.8 GW



### **Storage**

1.4 GW



### Solar

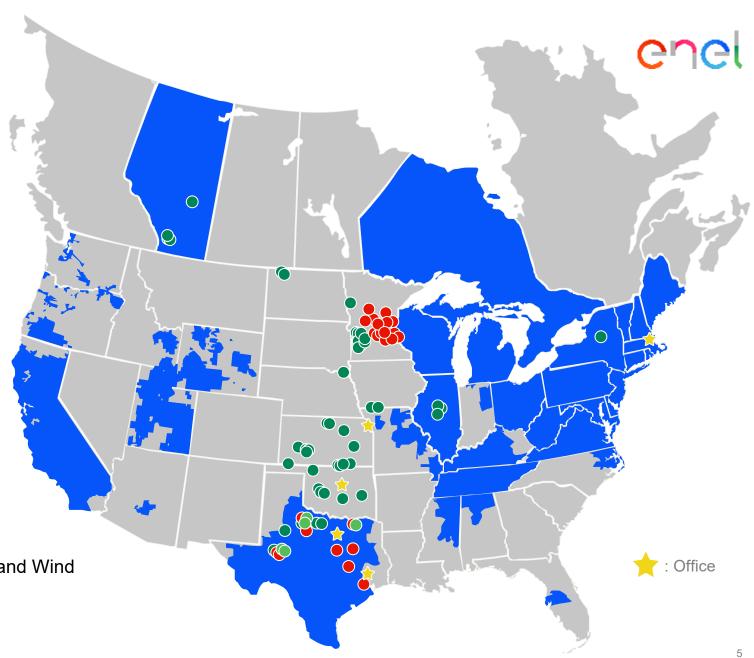
3.8 GW



### Wind

7.5 GW

Enel operates over 4,500 MWs of Solar, BESS and Wind within the ERCOT region specifically.





- Key Elements of Enel's Program

- Critical Task: Conducting In-Field Inspections.
- Support Mechanisms: Established to ensure the effective and successful execution of in-field inspections.

### **Training**

eDucation training platform delivers seasonal preparedness training to all site personnel.

Separate modules for substation and balance of plant.

111 site personnel and technology specialists completed weatherization training last spring.

### In-field Inspections

Survey 123 software enables field personnel to conduct an inspection using their device and submit it to Technology Specialists for review.

Survey 123 inspection form ensures key information is included (dates, signatures, reviews).

SAP work order system to track repairs.

### Weatherization Technical Lead Review

Assigned Weatherization Technical Leads for each technology (Solar, Wind and Battery Energy Storage System (BESS)).

Review inspections for completeness and to ensure any unsats have scheduled follow-up and resolution.

### **Compliance Review**

Final review to ensure a complete set of inspections are uploaded for all required sites.

Final review of the training to ensure 100% completion.



- In-Field Inspection Schedule

- Application of PUCT §25.55 Rules
- §25.55(b)(11): Weather Critical Component.....likely
  to lead to a trip, derate of more than five percent of
  the capacity represented in the resource's seasonal
  net maximum sustainable rating or of the
  transmission facility's rating, or failure to start.
- §25.55(c)(1): A generation entity must maintain these measures throughout the winter season and complete any ongoing or monthly requirements at the appropriate time.
- §25.55(c)(1)(A): Implement weather emergency preparation measures that could reasonably be expected to ensure the sustained operation of all cold weather critical components during winter weather conditions.

	Seasonal Preparedness Inspection Schedule					
Technology	Start of th (Summe		During the Season			
	HV/MV Substation	Inverters/BESS Containers	HV/MV Substation	Inverters/BESS Containers		
Wind	April/October	OEM Maintenance Schedule	Monthly	OEM Maintenance Schedule		
Solar	April/October	April/October	Monthly	OEM Maintenance Schedule		
BESS (note for hybrid sites the substation checks are done by the technology)	April/October	April/October	Monthly	Monthly		

Solar Substation Critical Failure Points Overview





Outdoor Gas-Insulated Circuit Breakers & Circuit Switchers (weather critical component >5% resource output)

- Heater functionality
- Animal/water intrusion
- Confirm insulating gas pressure is within operating range



Outdoor Vacuum-Insulated Circuit Breakers (weather critical components >5% resource output)

- Heater functionality
- Animal/water intrusion





### Motor-Operated Disconnects (weather critical components >5% resource output)

- Heater functionality
- Animal/water intrusion



### Main Power Transformers (weather critical component >5% resource output)

- Main control cabinet animal/water intrusion
- Control cabinet heater functionality
- Cooling fans
- Tap changer control cabinet animal/water intrusion
- Tap changer cabinet heater functionality
- Breather desiccant, Insulating oil level, Hydran meter



Transformer High Voltage Breaker (weather critical component >5% resource output)

- Heater functionality
- Animal/water intrusion
- SF6 Pressure



### Control & SCADA Building (weather critical component >5% resource output)

- Ensure door seals are intact and functional.
- Verify HVAC systems operate correctly.
- Confirm annual professional inspection/maintenance per manufacturer or industry standards
- Fan set to "Auto" year-round.

89-F12-1 (52-F12 Disconnect)	
	6-6-6
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52F12 (PV Feeder B & E)	
Animal/Water Intrusion	Sadsfactory
Heater Functionality	Settlementary
89-P13-1 (52-P13 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52F13 (PV Feeder A & F)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
89-F14-1 (52-F14 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52F14 (BESS Feeder A & B)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
70. No. 1 (70. DOL DI	
89-R11-1 (52-R11 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
ESDAS ATTACABLE DATABLE DATABLE ATTACABLE ATTA	
52R11 (Capacitor Bank Breaker)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	

Solar Substation Critical Failure Points Overview





#### CTs, VTs, CVTs, CCVTs

- Inspect heating elements (if present) in termination cabinets per manufacturer's instructions.
- · Verify oil levels are within acceptable range.



#### **MV/HV Feeder Breakers**

- Heater functionality
- Animal/water intrusion



#### Cap Banks (Breakers, Enclosure)

- Heater functionality
- Animal/water intrusion



#### **Technical Supplies**

- · Maintain cold-weather supplies (e.g., SF6 gas).
- If SF6 switchgear is serviceable, ensure fill kit with correct fittings is available for qualified personnel.

- In addition to weather critical components that could cause a trip or derate of more than 5% of capacity, some items included on our list could prevent a return to service.
- Part of continuous improvement efforts is to align our list more with ERCOT's recommendations.



89-F12-1 (52-F12 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52F12 (PV Feeder B & E)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
89-P13-1 (52-P13 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
S2F13 (PV Feeder A & F)	
Animal/Water Intrusion	Sathfactory
Heater Functionality	Satisfactory
89-F14-1 (52-F14 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52F14 (BESS Feeder A & B)	
Animal/Water Intrusion	Settefactory
Heater functionality	Satisfactory
89-R11-1 (52-R11 Disconnect)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory
52R11 (Capacitor Bank Breaker)	
Animal/Water Intrusion	Satisfactory
Heater Functionality	Satisfactory

- BESS Seasonal Preparedness Overview





#### **BESS Container: Battery and Control Container**

- Conduit sealing, Door seals
- Air filters
- Conduit piping and insulation
- Condensation trays
- Cooling fans
- No standing water



### **BESS Container: Battery Temperature Control System**

- · Conduit sealing, Air filters, Door seals
- Thermostat functionality, Conduit piping insulation
- Condensation port is free
- Heater clean and functional
- Pipes and hoses no cracks or signs of damage
- Glycol levels (ratio of glycol to water)



#### **BESS Container: Fire suppression**

- Ensure water does not freeze
- Ensure tanks are properly filled
- Verify valves and pumps are operational



#### Inverter

- Conduit sealing
- Door seals
- Air filters
- Inverter fans are operating correctly
- · Liquid cooled hydraulic circuit functional
- Heating elements are functional



#### **Inverter: Transformers**

Door seals



Unit Ø	Conduit smaling is intact or otherwise still smintaining its functionality	Air filters are class and properly installed. If filters are clagged or dirty, they shall be classed or replaced	Conduct/piping insulation in intract and shows no signs of demage, if applicable	Seer smile are intact or otherwise still maintaining their functionali ty	Condensatio a traps are class and capty, if applicable	All reachable surfaces are free of dust/pollen	All cooling fans are operational and show no signs of desage or excessive mor	lio frac- standing unter enystere inside container
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- BESS Seasonal Preparedness Overview





#### **Inverter: Auxiliary Transformer**

- Door seals
- Pressure, temperature and oil level gauges are functional and within specifications.



#### **Inverter: Gas Insulated Switchgear**

- Pressure verified to be in proper range
- ATS operation shall be verified



### Sectionalizing, Control, Communication & Circuit Breaker Cabinets

- Conduit sealing
- Door seals
- No standing water



#### **Backup Power**

- Standard maintenance is performed per manufacturer recommendations
- Fuel tank shall be full.



Unit	Conduit scaling is intact or otherwise still scintaining its functionality	Air filters are class and properly installed. If filters are clagged or dirty, they shall be classed or replaced	Conduct/piping insulation in instact and shows no cigus of demaps, if applicable	Deer smile are intact or otherwise still minterining their functionali ty	Condensation traps are class and capty, if applicable	All reschable surfaces are free of dust/pollen	All cooling fone are operational and show no signs of design or excessive user	No frac- standing unter emplore incide container
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Preparing for the Declaration and Inspections

### **Enel Supporting Package**

- Executive Summary mapping compliance activities to each applicable PUCT §25.55 rules.
- Seasonal preparedness training completion rosters.
- Pre-season inspection checklists (critical failure points).

### **Inspection Preparations**

- Review and keep Executive Summary accessible to address PUCT §25.55 questions.
- Do not forget the staffing plans!
- In our experience, ERCOT inspectors have been very respectful and place strong emphasis on industry collaboration to ensure reliability during extreme weather events.



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- Continuous Improvement

Transition From Paper to Electronic Format for Inspections

- Enables more control of content.
- Ensures consistency across different field personnel.
- Update to larger handhelds in response to feedback from field staff.

Review of Weather Critical Components:

- Better alignment with ERCOT guidance.



