

Comment Form — SAR to Supplement the SAR for Assess Transmission Future Needs and Develop Transmission Plans

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	James H. Sorrels, Jr.	
Organization:	AEP	
Telephone:	(614) 716-2370	
E-mail:	jhsorrels@aep.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, or Regional Entities

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TPL-005 and TPL-006, which require regional and inter-regional assessments based on the system performance requirements stated in TPL-001 through TPL-004, need to be modified or retired to address the “fill-in-the blank” components and establish requirements within the standards or through a contractual arrangement as to which entity should perform and provide the subject assessment and data. If these requirements are addressed through the delegation agreements each Region has with the Electric Reliability Organization (ERO), TPL-005 and TPL-006 could be retired.

The intent is to comprehensively address all necessary revisions to the entire set of TPL Standards:

- TPL-001 — System Performance under Normal Conditions
- TPL-002 — System Performance Following Loss of a Single BES Element
- TPL-003 — System Performance Following Loss of Two or More BES Elements
- TPL-004 — System Performance Following Extreme BES Events
- TPL-005 — Regional and Interregional Self-Assessment Reliability Reports
- TPL-006 — Data from the Regional Reliability Organization Needed to Assess Reliability

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments:

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: Considering the current scope, the Std DT should be encouraged to consider a major re-write of TPL-001 thru TPL-006, possibly including a restructuring into a single standard rather than the present multiple standards.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
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E-mail:	smyers@ercot.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments: I recommend that you clarify that these lists of items in Appendix B are topics to consider, not topics that must be included. Also, I recommend that any standards requirements that are evident as Good Utility Practice or procedural in nature be retired as requirements, but retained in the form of reference documents, operating guidelines, or some other similar form that will be available to any industry participant that wishes to use them.

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: Please also see my response to Question #1.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Eric Mortenson	
Organization:	Exelon	
Telephone:	(630) 576-6898	
E-mail:	eric.mortenson@exeloncorp.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
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Yes

No

Comments: I believe that most of the additional information contained in the draft 'supplemental' SAR is valuable and will assist the SDT in addressing the various stakeholder concerns. I am concerned with conflicting information addressed below.

I am not familiar with the concept of a supplemental SAR and am not sure if there are going to be two SARs now, or if this new effort supercedes the existing SAR. This is especially a concern when there appear to be differences between them regarding functional applicabilities and principles, as well as the expansion of scope.

I understand the Standards Development Procedure to require the original SAR to be modified, when it states, "If the standard drafting team determines it is necessary to expand the scope of the standard or to modify the scope in a way that is no longer consistent with the scope defined in the SAR, then the drafting team may initiate or recommend another requestor initiate a new SAR (Step 1) to develop the expanded or modified scope. At no time will a drafting team develop a standard that is not within the scope of the SAR that was authorized for development."

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: The approved SAR is of type 'New Standard' while the supplemental SAR type is not, but rather, 'Revision to existing Standards' as well as, 'Withdraw of existing Standard (possible)'.

Regarding the Reliability Function Applicabilities, the supplemental SAR does not include the Reliability Authority or the Planning Authority which were included in the approved SAR, and the supplemental SAR includes the Resource Planner and Generation Owner functions, which are not included in the approved SAR. I believe that the Planning Authority needs to be addressed in terms of the FERC NOPR discussion, summarized on pages B3 and B4 of the supplemental SAR.

The supplemental SAR includes item 7 in the Applicable Reliability Principles, while the approved SAR does not.

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If there are going to be two SARs then I believe that the supplemental SAR should include the previously approved SAR in the 'Related SARs' section on page 7.

The concise summaries of the Version 0 Industry comments are appreciated, but these should be made more clear in that these will probably become key to any actual changes to planning contingencies. For example, it is not clear what, 'Address deliverability of generation to load' means. Also, does, 'Don't include generation runback or redispatch' mean that this shouldn't be addressed or that the standard should be worded to specifically not include them. Other terms such as, 'Don't include planning outage', and 'single terminals are not included' should also be more thoroughly described.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
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Yes

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments: We do not support a long-term planning standards applying to RCs. The NERC functional model is very clear that RCs are operational entities. Is the intent to replace RRO with RC for the fill-in-the-blank standards? That would be an inappropriate solution. A more appropriate solution would be to consider replacing the RRO with the planning coordinator.

We also do not understand how a transmission planning standard could apply to the additional functional entities: Transmission Owner and Generator Owner.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments:

Comment Form — SAR to Supplement the SAR for Assess Transmission Future Needs and Develop Transmission Plans

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC Transmission	
Telephone:	248.374.7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations, or Regional Entities

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- TPL-001 — System Performance under Normal Conditions
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- TPL-004 — System Performance Following Extreme BES Events
- TPL-005 — Regional and Interregional Self-Assessment Reliability Reports
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments: The original SAR did a good job of capturing many of the reliability improvements necessary to the TPL Standards. Now that additional information is available from the various stakeholder groups and drafting teams, it is clear that additional reliability-related improvements to the Standards can be made. It is not clear how to quantify the additional improvement the supplemental SAR will make to the existing Standard Drafting effort, but certainly there are additional reliability improvements to be made to each of the subject Standards.

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: Standard Drafting Teams should not be responding so heavily to comments made by FERC in a NOPR. The NOPR is just that ... "Proposed." There may be additional changes required as a result of the final Rule. The final Rule may even negate some of the proposed changes made in the NOPR. If the drafting team thinks that FERC hit on a good idea for improvement, then it would be appropriate for inclusion in the Standard, but simply to make changes to a Standard because an idea surfaced in a Proposed Rule is premature.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	mike.gammon@kcpl.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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- TPL-004 — System Performance Following Extreme BES Events
- TPL-005 — Regional and Interregional Self-Assessment Reliability Reports
- TPL-006 — Data from the Regional Reliability Organization Needed to Assess Reliability

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Yes

No

Comments:

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments:

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Mazur	
Organization:	Manitoba Hydro	
Telephone:	(204) 474-3113	
E-mail:	rwmazur@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments: Manitoba Hydro believes the planning standards should ensure that complete and consistent assessments are conducted by the responsible entities.

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: Manitoba Hydro agrees in principle with the expanded scope, but believes that this scope should be a part of the Standards Development Procedures manual so all stakeholders have a voice in the requirements in Appendix A. We have some concern that the SAR gives the drafting team the power to add additional improvements beyond the SAR as this provides an opportunity for SDT members to forward specific owner agendas.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments: The SAR should considering adding a requirements to the standards to mandate tests for robustness by doing sensitivity to critical system parameters such as load growth rate, load power factor, etc. to provide insight into the margin between the operating point and unacceptable performance. There should also be a specific requirement to assess reactive power adequacy, voltage stability and system damping.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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Yes

No

Comments: As the standards are written now, all of the requirements apply to both the Transmission Planner and Planning Authority. The NERC Functional Model Version 3 replaced the Planning Authority with the Planning Coordinator. The standards should reflect this change as well as the division of responsibilities between Transmission Planner and Planning Coordinator in the functional model.

Additionally, they should seek to clarify the relationship between Transmission Planner and Planning Coordinator. How many transmission planners can there be per Planning Coordinator. Can there be overlapping Planning Coordinators?

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: We do not support a long-term planning standards applying to RCs. The NERC functional model is very clear that RCs are operational entities. Is the intent to replace RRO with RC for the fill-in-the-blank standards? That would be an inappropriate solution. A more appropriate solution would be to consider replacing the RRO with the planning coordinator.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

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Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization (MRO)
Lead Contact: David Rudolph
Contact Organization: MRO for Group (MidAmerican for Contact)
Contact Segment: 10
Contact Telephone: 701-355-5722
Contact E-mail: drudolph@bepc.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Terry Bilke	MISO	MRO	10
Al Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XCEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Mike Brytowski, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Yes

No

Comments:

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

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No

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Yes

No

Comments:

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Yes

No

Comments:

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments:

Comment Form — SAR to Supplement the SAR for Assess Transmission Future Needs and Develop Transmission Plans

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nyiso.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations, or Regional Entities

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The supplementary SAR would expand the scope of the original SAR to include TPL-005 and TPL-006 and upgrade the entire set of standards (TPL-001 through TPL-006) to conform to the latest version of the Reliability Standards Procedure Development and the ERO Rules of Procedure.

TPL-005 and TPL-006, which require regional and inter-regional assessments based on the system performance requirements stated in TPL-001 through TPL-004, need to be modified or retired to address the “fill-in-the blank” components and establish requirements within the standards or through a contractual arrangement as to which entity should perform and provide the subject assessment and data. If these requirements are addressed through the delegation agreements each Region has with the Electric Reliability Organization (ERO), TPL-005 and TPL-006 could be retired.

The intent is to comprehensively address all necessary revisions to the entire set of TPL Standards:

- TPL-001 — System Performance under Normal Conditions
- TPL-002 — System Performance Following Loss of a Single BES Element
- TPL-003 — System Performance Following Loss of Two or More BES Elements
- TPL-004 — System Performance Following Extreme BES Events
- TPL-005 — Regional and Interregional Self-Assessment Reliability Reports
- TPL-006 — Data from the Regional Reliability Organization Needed to Assess Reliability

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You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments:

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: It is unclear as to what obligations the RC, TO, and GO would have in a long-term planning standard. The NERC functional model is very clear that RCs are operational entities. The RC, TO, GO, should not have a direct obligation in the process, but should be a resource for input into the process.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mark Ringhausen	
Organization:	ODEC	
Telephone:	804-290-2194	
E-mail:	mringhausen@odec.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input checked="" type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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1. Do you believe that there is a reliability-related need to provide additional detail, including specific issues for consideration, to the requirements in this set of standards as proposed in this supplemental SAR?

Yes

No

Comments: The planning of the transmission system is critical to the reliability of the transmission system. Additional details provided to all stakeholders are crucial to ensure that transmission is built in a timely manner to protect the reliability of the system. Also, by making the process and information available to all stakeholders, you ensure that everyone's interest is heard in the process and not just the large transmission owner/operators, but all users of the transmission system. The assumptions used in the evaluation process must be vetted by all stakeholders as they are the critical drivers on what transmission is needed and when it is needed.

2. Do you agree with the expanded scope of the proposed project as set forth in this supplemental SAR? (The scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high-quality, enforceable, and technically sufficient bulk power system reliability standards. Please consider these items as non-mandatory and only for consideration by the drafting team.)

Yes

No

Comments: These are transmission planning standards and as such, should only apply to TPs, not RP, TO and GO entities. Certainly, information must be provided from the TOs and GOs on their facilities to be able to run the planning studies, but the MOd standards should cover this obligation. And RC are operating entities and not planning entities.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments: This should be more than enough to try to get into these transmission planning standards.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Linda Brown	
Organization:	San Diego Gas and Electric	
Telephone:	858-654-6477	
E-mail:	LPBrown@semprautilities.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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Yes

No

Comments:

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Yes

No

Comments:

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments:

SDG&E believes that there are additional revisions that need to be incorporated into this set of standards.

The Supplemental SAR dated January 17, 2007, has an Appendix B that summarizes issues to be resolved in this new set of standards. Those issues are a collection of comments from FERC NOPR, FERC Staff Report, Industrial comments on version 0, Phase III/IV, etc.

In order to develop a set of reliability standards for transmission planners, SDG&E believes there are a few more issues to be addressed and/or clarified in this set of standards.

1. Critical System Conditions

These "Critical System Conditions" are referring to system conditions to be studied for the transmission planning. Typically, entities deem several system conditions as critical on the basis of accumulative institutional knowledge.

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However, in recent FERC NOPR, FERC directs industry to conduct sensitivity studies to identify these critical system conditions and document the sensitivity studies. The sensitivity factors in FERC's direction include load power factors, generation retirements, generation dispatch, transaction patterns, controllable loads, demand side management, transmission outages.

As those will result in extensive scope of study, we would like to see this set of standards clearly answer following questions:

- a. How often do we required to perform such sensitivity studies to identify critical system conditions?
- b. Do we check those sensitivity factors one by one to find the worst, or do we define the worst combination as the critical? Or
- c. Do we continue to leave the "critical system conditions" determination to study performer's discretion?

2. Contingencies

In Appendix B of the latest Supplementary SAR for TPL standards, comments and modification requests were summarized. Contingencies for planning studies is one of critical elements. This can be split into three issues and SDG&E provides following comments for each of them:

a. Study all contingencies

One of the comments suggests to study "all contingencies". Clearly, "All contingencies" need to be clarified. The additional workload incurred due to the dismissal of planners' accumulative institutional knowledge may be unreasonable.

b. Study non-common mode contingencies

The issue regarding reasonable workload also applies to the "non-common mode" contingencies. The non-common mode refers to combination of unrelated elements, say one 230 kV line in CFE (Mexico) and other 230 kV line in Alberta, Canada, as one contingency. This too needs clarification.

c. Study event-based contingencies

Evaluating the impact of "event-based" contingencies makes sense. However, translating an event, such as an earthquake, into a list of elements to be taken out for power flow and stability computer simulation, will need clear guidelines.

3. "Identification of options for reducing the probability or impacts of extreme events that cause cascading"

This is a direct quote of FERC's directed modification in its NOPR.

a. If the impacts only need to be identified with conceptual methods, how do we maintain "consistency" among entities?

b. If FERC intends to request the entities to identify the probability/impacts with quantitative methods, then there is a long list of issues to be addressed before a transmission planner could in reality perform such an analysis:

- How to define "cascading" in system simulation analysis.
- Reasonable and feasible probabilistic variables need to be defined. For instance, in addition to the equipment failure as probabilistic variable, other probabilistic variables need to be considered to meet FERC's direction, such as hurricanes, fires, earthquakes, lightning, flooding, landslides and even an airplane falling into a critical substation, and so on.
- Regional efforts need to be taken to develop a probabilistic methodology and probabilistic database that can be applied uniformly so entities can be treated equally.

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- Regional efforts need to be taken to guide selection and/or development of probabilistic analysis software tools. Such tools have to be ready for transmission planners to use and derive quantified solutions.

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Yes

No

Comments: We do not support a long-term planning standards applying to RCs. The NERC functional model is very clear that RCs are operational entities. Is the intent to replace RRO with RC for the fill-in-the-blank standards? That would be an inappropriate solution. A more appropriate solution would be to consider replacing the RRO with the planning coordinator.

We also do not understand how a transmission planning standard could apply to the additional functional entities: Transmission Owner and Generator Owner.

3. Do you think that there are any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the April 30, 2006 version of the original SAR and this supplemental SAR?

Yes

No

Comments: