

## Meeting Minutes

### Ad Hoc Group for Generator Requirements at the Transmission Interface (“GO TO Team”)

**March 16–17, 2009**

Phoenix, AZ 85004

#### **Attendees:**

Scott Helyer — Tenaska, Chair  
Steve Cobb — Salt River Project  
Keith Daniel — Georgia Transmission Corporation  
Jeff Gillen — American Transmission Company  
Tony Jankowski — We Energies  
Eric Mortenson — Exelon  
Tim Ponseti — Tennessee Valley Authority  
Kent Saathoff — Electric Reliability Council of Texas  
Gerry Adamski — NERC  
Bob Cummings — NERC  
John Seelke — NERC

#### **Introductions**

Mr. Helyer convened the meeting at 7:05 p.m., welcomed the group, and thanked them for supporting this very important effort. The goal of the team is to establish a consensus position and present recommendations that, in the long-term and in the context of NERC Reliability Standards and entity registration, will resolve the assignment of responsibility for owning and operating the assets that connect generating plants to the bulk electric system grid.

#### **NERC Antitrust Guidelines**

Mr. Adamski referred the group to NERC’s Antitrust Guidelines contained in the agenda package and summarized the key aspects for the group.

#### **Project Milestones**

The team briefly discussed the project timeline. NERC’s general expectation is to complete the analysis of generator requirements at the transmission interface and present recommendations by the end of 2009. The team acknowledges some industry sentiment that suggests quicker completion is desired and will assess whether proposals for “quick fixes” best serve the interests of reliability for the industry participants.

#### **Background and Problem Identification**

The team spent the majority of the meeting clearly defining the problem the team is assembled to address. The issue manifested itself through NERC compliance registration process when certain acknowledged

Generator Owners and Generator Operators were also determined to be Transmission Owners and Transmission Operators by virtue of their interconnecting transmission facilities, determinations that were upheld through the NERC and Federal Energy Regulatory Commission (FERC) registration appeals processes. The team believes that only WECC and TRE have registered Generator Owners and Generator Operators as Transmission Owners and/or Transmission Operators by virtue of their interconnection facilities.

The team discussed at length a fundamental question regarding what changed when NERC Reliability Standards became mandatory in June 2007 that affected the clear understanding and delineation of responsibilities for the interconnection facilities between a generating facility and the transmission grid. Importantly, were there reliability gaps created?

Prior to mandatory Reliability Standards taking effect, FERC mandated the development of interconnection agreements as a part of a comprehensive analysis and development process between owners of generators and transmission providers. These agreements clearly identified ownership and operating roles and responsibilities between these parties for the assets including the interconnecting facilities that were specifically defined. With the implementation of mandatory Reliability Standards, definitions and criteria from the NERC Glossary of Terms, Functional Model, and the Statement of Compliance Registry were introduced that do not clearly match with the terms identified in the interconnection agreements.

By virtue of discussion, the team concluded that there are pieces of equipment at 100 kV and above currently owned and operated by generators that may fall under the definition of Bulk Electric System. Therefore, an entity must be identified to be responsible for those facilities at an ownership and operating level. The team also determined that facilities that are networked generally fall under the Transmission Owner and Transmission Operator umbrella already and therefore, radial facilities should be the focus of this effort.

To foster discussion, the team began but did not complete discussion on various configurations at the transmission substation to attempt to identify common agreement on whether Transmission Owner responsibilities should apply to the interconnection facilities with the generators. At the conclusion of this discussion, the team generally agreed that the best approach forward is to start with a blank sheet of paper to identify the basics reliability expectations for those facilities.

Outstanding questions from the discussion include the following:

- Do all transmission facilities  $\geq 100$  kV require an operator?
- Should a Generator Owner and a Transmission Owner that each own identical transmission facilities be treated equally (non-discriminatory) from the perspective of NERC standards?
- What is the relevance of the interconnection agreement with respect to NERC standards?
- Should transmission facilities be defined uniformly relative to the registry criteria?
- How do the regional definitions of Bulk Electric System impact registration and applicability of requirements?

- Should assets that would not be subject of NERC standards if owned by another entity be subject to NERC standards because the owner has other assets that are subject to NERC standards?

### **Conference Call and Meeting Schedule**

The team discussed the schedule and protocols for future meetings. Generally, the team agreed to limit the scope of conference calls to a specific topic, to last no more than two hours. The team decided on the following meeting schedule:

Tuesday, March 31, 2009 from 4–6 p.m. EDT (Conference Call and WebEx)  
Tuesday, April 14, 2009 from 3–5 p.m. EDT (Conference Call and WebEx)  
Tuesday, April 28, 2009 from 3–5 p.m. EDT (Conference Call and WebEx)  
TBD (Week of May 11 or May 18, 2009) — (In Person)

### **Adjourn**

The meeting was adjourned at 9:20 AM on March 17, 2009.

## **Attachment 1**

### **Action Items**

1. Obtain the criteria used by TRE and WECC to register certain generator owners and operators as transmission owners and operators. (Adamski — 3/17/09)

### **Issues “Parking Lot”**

1. Are the functional definitions and criteria clear in the NERC Glossary and NERC Compliance Registry relative to transmission and generation entities?
2. Should we separate the consideration of transmission owner and transmission operator requirements in this discussion?
3. Entity vs. asset registration?