

Consideration of Comments on Initial Ballot — TOP-002-2 — Orlando Utilities Commission Request for Interpretation (Project 2008-13)

Summary Consideration:

Several stakeholders questioned if the interpretation added to the existing requirements. The drafting team states that no new requirements are intended. The intent of the interpretation is to clarify the meaning of the term “studies” in Requirement R11 and what should be done regarding SOLs when system conditions change.

Requirement R11 does not require new, detailed studies when system conditions remain essentially unchanged. The requirement does, however, require the TOP to determine whether any new SOLs might occur if conditions have changed. This determination is not just checking to see if the existing known set of SOLs has been newly exceeded, but includes a check to see if SOLs have developed that were not in the existing set.

Voter	Entity	Segment	Vote	Comment
Jason Shaver	American Transmission Company, LLC	1	Abstain	The response to Question Two changes the intent of requirement 11 and has the potential of reducing reliability. We are concerned that the interpretation lowers the bar by stating that a review of a "next-day study" qualifies as a study. We do agree that the requirement does not specify the type of study that needs to be performed but that it has to be a study not a review. ATC suggests that the response to question two be re-worded and the language stating that a review is equal to a study be deleted.
<p>Response: Question 2 asked what constitutes a study. Study is not a defined term and has a wide-ranging meaning to the industry based on the context of its use. Sometimes a study refers to a long-term transmission planning study that involves months of effort, and sometimes a study means simply reviewing the validity of an existing set of results. It does not necessarily mean that new inputs need to be gathered, models updated, and power flows cranked, particularly if the inputs and model have not changed since the last set of results. The TOP has the discretion to determine which type of study is necessary, and this interpretation does not modify, redact, or add to the requirement.</p>				
Donald S. Watkins	Bonneville Power Administration	1	Negative	We believe this request is important and valuable to many and it is our opinion that the responses to questions 1 and 2 provide improved clarity that is consistent with the standard. However, we found response to question 3. to be unsupported by any language in the standard. We believe the term "to determine SOLs" in Requirement R11 means "determination of system operating limits". The current interpretation for question 3 appears to suggest that R11 requires that the TOP also check to see if there are patterns that would result in violations of the applicable SOL. There is no explicit language in the standard which would obligate the TOP to this type of investigation. We believe that "Identification of potential SOL violations" is outside the scope of this requirement. There are tens of thousands (or more) possible events that could cause a flow to exceed an SOL. A study defines what the SOL is. Once a defined SOL is established, it is the operators job to keep flows under that limit or to bring the flows back under the limit within some set maximum
Rebecca Berdahl		3		
Francis J. Halpin		5		
Brenda S. Anderson		6		

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				<p>amount of time should the limit be exceeded. We therefore recommend that the interpretation for question 3 be limited, based on the explicit language in the R.11, to the following: The term, "to determine SOLs" as used in the first sentence of Requirement R11 means the "determination of system operating limits," and does not include "identification of potential SOL violations."</p>
<p>Response: The interpretation clarifies that Requirement R11 requires identification of potential SOLs – just not all potential SOLs. In the case that results of previous studies are invalidated, then the TOP must attempt to identify as many SOLs as possible via its systems and tools. This interpretation clarifies that the TOP is not excused from attempting to re-evaluate its system just because conditions have changed.</p> <p>The request and the interpretation offered here attempts to put more clarity to the meaning of the term “studies” as used in TOP-002. In Requirement R11, the two phrases “studies to determine SOLs” and “update these studies as necessary to reflect current system conditions” could lead to alternative responses.</p> <p>The interpretation attempts to eliminate the idea that any one type of study is required to determine SOLs. That issue is dealt with in Questions 1 & 2. Question 3 deals with the issue of “what if” the previous studies are rendered useless because of changes in system conditions? Requirement R11 unequivocally states that “The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions....” The interpretation is that the TOP must attempt to identify the weak links in the updated system. The idea that the TOP need not attempt to identify new weak links (i.e., new potential SOLs) would put the system at what many would believe is inappropriate risk.</p> <p>Note, the interpretation does not require a complete evaluation. Considering that major system changes can occur at any instant, the interpretation is that Requirement R11 does not require a complete analysis but does require “a” study. The responses to Questions 1 & 2 were meant to clearly state that the type of study is up to the TOP. The interpretation in no way obligates the TOP to identify every possible SOL, but it does not require the TOP to do as complete a study as was done in the Operations Planning environment. The intent of interpretation is to convey that the TOP must exercise due diligence to address changes in the system.</p>				
Michelle Rheault	Manitoba Hydro	1	Affirmative	<p>Each Transmission Owner shall maintain records of operating studies used for each operating day and shall provide evidence that a review was performed to confirm that a previous study is still valid for the operating day.</p>
<p>Response: The team agrees. Study is not a defined term and has a wide-ranging meaning to the industry based on the context of its use. Sometimes a study refers to a long-term transmission planning study that involves months of effort, and sometimes a study means simply reviewing the validity of an existing set of results. It does not necessarily mean that new inputs need to be gathered, models updated, and power flows cranked, particularly if the inputs and model have not changed since the last set of results. The TOP has the discretion to determine which type of study is necessary, and this interpretation does not</p>				

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modify, redact, or add to the requirement.				
Michael J Ranalli	National Grid	1	Negative	National Grid agrees with the interpretation regarding Questions #1 & #2. In regards to Question #3, R11 specifically refers to "studies to determine SOLs". Therefore, it clearly applies only to determining SOLs. The interpretation goes well beyond the words of R11. If the Standard needs to be revised to include evaluating SOLs for possible violations, then it should be revised. National Grid does not oppose the concept that SOLs need to be analyzed for possible violations and in fact indorses the concept. However interpretations should not be used to revise the standard
Michael Schiavone	Niagara Mohawk (National Grid Company)	3		
<p>Response: There is no dispute with National Grid’s statement that “Interpretations should not be used to revise standards.” The team does not intend for this interpretation to impose any new requirements.</p> <p>The request and the interpretation offered here attempts to put more clarity to the meaning of the term “studies” as used in TOP-002. In Requirement R11, the two phrases “studies to determine SOLs” and “update these studies as necessary to reflect current system conditions” could lead to alternative responses.</p> <p>The interpretation attempts to eliminate the idea that any one type of study is required to determine SOLs. That issue is dealt with in Questions 1 & 2. Question 3 deals with the issue of “what if” the previous studies are rendered useless because of changes in system conditions? Requirement R11 unequivocally states that “The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions....” The interpretation is that the TOP must attempt to identify the weak links in the new, changed system. The idea that the TOP need not attempt to identify new weak links (i.e., new potential SOLs) would put the system at what many would believe is inappropriate risk.</p> <p>Note, the interpretation does not require a complete evaluation. Considering that major system changes can occur at any instant, the interpretation is that Requirement R11 does not require a complete analysis but does require “a” study. The responses to Questions 1 & 2 were meant to clearly state that the type of study is up to the TOP. The interpretation in no way obligates the TOP to identify every possible SOL, but it does not require the TOP to do as complete a study as was done in the Operations Planning environment. The intent of interpretation is to convey that the TOP must exercise due diligence to address changes in the system.</p>				

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David H. Boguslawski	Northeast Utilities	1	Negative	<p>Northeast Utilities votes NO and offers the below as an alternate version of the response to Question #3 that provides a more concise answer. Edited Response:</p> <p>***** TOP-002-2 covers real-time and near-real-time studies.</p> <p>Requirement R11 is meant to include both determining new limits and verifying pre-defined SOLs. If system conditions indicate to the Transmission Operator that prior studies and SOLs may be outdated, TOP-002-2 mandates the Transmission Operator to conduct a study to identify SOLs for the new conditions. If the Transmission Operator determines that system conditions do not warrant a new study, the primary purpose of the review is to check that the previously defined (i.e., defined from the current SOLs in use, or the set defined by the planners) SOLs are valid. In the event a potential SOL violation is identified, the TOP must then "plan to meet all [SOLs]" in accordance with Requirement R10 of TOP-002-2. As written, the standard provides the Transmission Operator discretion regarding when to look for new SOLs and when to rely on its current set of SOLs. ***** The idea of "identifying exceedances" would seem to be an additional aspect of the requirement being added through this interpretation.</p>
<p>Response: The issue NEU seems to raise concerns about is whether or not a study is meant to develop a MW (or other quantity) value for use as an SOL(s), or whether a study is meant to identify when those MW or other values are exceeded.</p> <p>Given the set of circumstances, the interpretation would mandate either or both. If the changes are so significant that the MW or other values are no longer meaningful, the TOP would be expected to diligently define or redefine MW or other values for use as SOLs. On the other hand, if the changes are such that the old quantities are still appropriate but there is a need to identify if the flows will effect the same problems (e.g., case 1 shows limit x will have a risk of being exceeded, so the TOP requires generation in area A; the new system environment happens to show parallel flows off-set the flow on limit x but now shows that limit y will be at risk of being exceeded and generation is now needed in Area B), then the TOP must attempt to identify the weak link(s) (i.e., in this example limit y). However, it does not put the TOP in a non-compliance state if its new study happened to miss identifying some other limit (z), or even the limit y.</p> <p>Studies are run to identify areas of concern (i.e., limits that are or may be exceeded). This interpretation neither adds any new requirements nor modifies current requirements.</p>				
Kathleen Goodman	ISO New England, Inc.	2	Affirmative	<p>The Interpretation states "Requirement R.11 is meant to include both determining new limits and identifying potential exceedances of pre-defined SOLs." This could be viewed by some to change the intent of the Requirement and it is believed the SDT meant to say "Requirement R.11 is meant to include both determining new limits and verification of other predefined/predetermined SOLs."</p>
<p>Response: The language of the requirement is meant to determine new SOLs and verify existing SOLs. The interpretation notes that the language is also meant to include identifying potential exceedances of pre-defined SOLs.</p>				

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Ronald Dacombe	Manitoba Hydro	3	Affirmative	Each Transmission Owner shall maintain records of operating studies used for each operating day and shall provide evidence that a review was performed to confirm that a previous study is still valid for the operating day.
Response: The team agrees and thanks you for your support.				
Michael Lupo	New York Power Authority	3	Affirmative	Some members of the RSC are advocating submission of a comment irrespective that the interpretation process will not incorporate it. The comment is as follows: In the response to Question #3 that appears in the Interpretation, it states the following-"Requirement R-11 is meant to include both determining new limits and identifying potential exceedances of pre-defined SOLs". This could be viewed by some to change the intent of the Requirement and it is believed the SDT meant to say "Requirement R-11 is meant to include both determining new limits and verification of other predefined/predetermined SOLs".
Response: The language of the requirement is meant to determine new SOLs and verify existing SOLs. The interpretation notes that the language is also meant to include identifying potential exceedances of pre-defined SOLs.				
Mark Aikens	Manitoba Hydro	5	Affirmative	Each Transmission Owner shall maintain records of operating studies used for each operating day and shall provide evidence that a review was performed to confirm that a previous study is still valid for the operating day.
Response: The team agrees and thanks you for your support.				
Ralph Rufrano	New York Power Authority	1	Affirmative	In the response to Question #3 that appears in the Interpretation, it states the following-"Requirement R-11 is meant to include both determining new limits and identifying potential exceedances of pre-defined SOLs". This could be viewed by some to change the intent of the Requirement and it is believed the SDT meant to say "Requirement R-11 is meant to include both determining new limits and verification of other predefined/predetermined SOLs".
Gerald Mannarino		5		
Response: The language of the requirement is meant to determine new SOLs and verify existing SOLs. The interpretation notes that the language is also meant to include identifying potential exceedances of pre-defined limits.				
Daniel Prowse	Manitoba Hydro	6	Affirmative	Each Transmission Owner shall maintain records of operating studies used for each operating day and shall provide evidence that a review was performed to confirm that a previous study is still valid for the operating day.
Response: The team agrees and thanks you for your support.				
Jerome Murray	Oregon Public Utility Commission	9	Affirmative	Generally the transmission operator has considerable discretion to insure system operating limits meet current and anticipated conditions.
Response: The team agrees and thanks you for your support.				

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Guy Zito	Northeast Power Coordinating Council, Inc.	10	Affirmative	Although NPCC realizes that no changes are allowed per the existing process we would like to include the following comment and request it be included in the NERC Standards issues database for consideration during the next revision of this standard... "In the response to Question #3 that appears in the Interpretation, it states the following-"Requirement R-11 is meant to include both determining new limits and identifying potential exceedances of pre-defined SOLs". This could be viewed by some to change the intent of the Requirement and it is believed the SDT meant to say "Requirement R-11 is meant to include both determining new limits and verification of other predefined/predetermined SOLs"." Thank you
<p>Response: The language of the requirement is meant to determine new SOLs and verify existing SOLs. The interpretation notes that the language is also meant to include identifying potential exceedances of pre-defined limits.</p>				