

Request for an Interpretation of a Reliability Standard

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Contact information for person requesting the interpretation:

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Identify the standard that needs clarification:

Standard Number: TOP-002-2 Normal Operations Planning

Identify specifically what needs clarification:

Requirement Number and Text of Requirement:

Requirement R11: The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.

1. Is the Transmission Operator required to conduct a "unique" study for each operating day, even when the actual or expected system conditions are identical to other days already studied? In other words, can a study be used for more than one day?
2. Are there specific actions required to implement a "study"? In other words, what constitutes a study?
3. Does the term, "to determine SOLs" as used in the first sentence of Requirement R11 mean the "determination of system operating limits" or does it mean the "identification of potential SOL violations?"

Identify the material impact associated with this interpretation:

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.

The uncertainty in the definitions of these terms and inconsistency in their application can

result in either to little or unnecessary study work being performed. Unnecessary, redundant work with no benefit to reliability performed for the purpose of meeting an overly literal interpretation of the requirement will result in higher operating costs to the end users of the transmission system and the loss of opportunities to use those resources for more important reliability-related tasks. Clarification of these two terms (Study & SOL) will aide in focusing the proper resources on the proper work, maximizing both the reliability of the system and the investment of the end user.

Project 2008-13: Response to Request for an Interpretation of TOP-002-2, Requirement R11 for Orlando Utilities Commission	
The following interpretation of TOP-002-2 – Normal Operations Planning, Requirement R11 was developed by a subset of the Real-time Operations Standards Drafting Team on September 15, 2008.	
Requirement Number and Text of Requirement	
Requirement R11: The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.	
Question #1	
Is the Transmission Operator required to conduct a “unique” study for each operating day, even when the actual or expected system conditions are identical to other days already studied? In other words, can a study be used for more than one day?	
Response to Question #1	
Requirement R11 mandates that each Transmission Operator review (i.e., study) the state of its Transmission Operator area both in advance of each day and during each day. Each day must have “a” study that can be applied to it, but it is not necessary to generate a “unique” study for each day. Therefore, it is acceptable for a Transmission Operator to use a particular study for more than one day.	
Question #2	
Are there specific actions required to implement a “study”? In other words, what constitutes a study?	
Response to Question #2	
The requirement does not mandate a particular type of review or study. The review or study may be based on complex computer studies or a manual reasonability review of previously existing study results. The requirement is designed to ensure the Transmission Operator maintains sensitivity to what is happening or what is about to happen.	
Question #3	
Does the term, “to determine SOLs” as used in the first sentence of Requirement R11 mean the “determination of system operating limits” or does it mean the “identification of potential SOL violations?”	
Response to Question #3	
TOP-002-2 covers real-time and near-real-time studies. Requirement R11 is meant to include	

both determining new limits and identifying potential “exceedances” of 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 not expected to be exceeded. 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.