

Thursday, January 31, 2008

Mr. G. Adamski
Vice President and Director of Standards
North American Electric Reliability Corporation
116-390 Village Blvd.
Princeton, New Jersey 08540-5721

RE: Brookfield Power
Request for Interpretation of NERC Standard EOP-002-2 Requirements 6.3 and 7.1

Dear Mr. Adamski

Brookfield Power is seeking interpretation of Requirements 6.3 and 7.1 of the NERC Reliability Standard EOP-002-2. These requirements are critical to Brookfield Power and other Purchasing Selling Entities (PSEs) in arranging Interconnection Transactions to provide firm and reliable supply to a receiving Balancing Authority area. Brookfield Power is submitting this request for interpretation under the guideline set out in "Interpretations of Standards" under the "Special Procedures" Section of Version 6.0 of NERC's Reliability Standards Development Procedure.

Requirement 6 and Requirement 7 of EOP-002-1 read as follows:

- R6.** If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:
- R6.1.** Loading all available generating capacity.
 - R6.2.** Deploying all available operating reserve.
 - R6.3.** Interrupting interruptible load and exports.
 - R6.4.** Requesting emergency assistance from other Balancing Authorities.
 - R6.5.** Declaring an Energy Emergency through its Reliability Coordinator; and
 - R6.6.** Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.
- R7.** Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:
- R7.1.** Manually shed firm load without delay to return its ACE to zero; and
 - R7.2.** Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."

Specifically, Brookfield Power seeks the interpretation of R6.3 and R7.1 with respect to the type of export to be curtailed in conjunction with curtailment of interruptible load and firm load, respectively, to address a Balancing Authority area's control performance and disturbance control issues.

Brookfield Power interprets that, to assist in complying with the Control Performance and Disturbance Control Standards, R6.3 requires that only non-firm export shall be curtailed when interruptible load is curtailed whereas R7.1 requires that firm export shall be curtailed when firm load is curtailed.

Brookfield Power's interpretation is drawn with reference to a parallel requirement in NERC Standard IRO-006-4, whereby in a TLR Level 5a or 5b when Interchange Transactions with a firm transmission



service must be interrupted, loading on the constrained transmission facility due to service to Network Customers and Native Load must be reduced on a pro-rata basis. For TLR Levels that do not require interrupting Interchange Transactions with a firm transmission service, service to Network Customers and Native Load does not need to be reduced.

We thank you for the opportunity to seek clarification through established interpretation process. If you have any questions regarding this request, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Tracy Brason".

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