

Individual or group. (27 Responses)
Name (21 Responses)
Organization (21 Responses)
Group Name (6 Responses)
Lead Contact (6 Responses)
Question 1 (27 Responses)
Question 1 Comments (27 Responses)

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Group
Arizona Public Service Company
Janet Smith
No
It is not clear whether both bullets under "footnote b" have to be met or only one of the two have to be met. It is suggested that the standard be very clear about this.
Group
Northeast Power Coordinating Council
Guy Zito
No
There is concern with the use of the term Demand. It is unclear throughout the footnote whether or not the term Demand includes Interruptible Demand or Demand-Side Management. It is suggested that interruption of Demand be clarified to not include Interruptible Demand or Demand-Side Management to more clearly show the permitted use of Load shedding. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet. Language that mitigation of Load and/or Demand interruption should be pursued within the planning process should be reinstated as reinforcement of a Transmission Providers' planning obligations to their load customers, and system operations. Footnote 'b' should be made to read as follows: b) An objective of the planning process is to minimize the likelihood and magnitude of interruption of Load and/or Demand following Contingency events. Interruption of Load and/or Demand is discouraged and all measures to mitigate such interruption should be pursued within the planning process. However, it is recognized that Load and/or Demand will be interrupted if it is directly served by the elements automatically removed from service by the Protection System as a result of a Contingency. Furthermore, in extraordinary circumstances within the planning process Load and/or Demand may need to be interrupted to address BES performance requirements. When interruption of Load and/or Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to: • Circumstances where the use of Load and/or Demand interruption are documented, including alternatives evaluated; and where the Load and/or Demand interruption is made available for review in an open and transparent stakeholder process. If Load and/or Demand interruption is necessary, planning should indicate the amount needed, and not specify how it would be obtained. What Load and/or Demand is interrupted is an operational decision. Additional comments not included in the material listed for footnote 'b' on the Comment Form. In the paragraph below the bullets in footnote 'b', confusion is introduced through the use of the term "firm Demand". It is unclear how this is different than the defined term "Firm Demand" and what the implications of the term "firm Demand" are. This footnote should not discourage such adjustments which actually increase the reliability of service to end users. The last sentence of footnote 'b' is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own.
Individual
Aaron Staley
Orlando Utilities Commission
No
The current language provides a balance between the end goal of reliability (no load loss for B events) and the practical constraint that project cost may outweigh the benefit. Two things are unclear though. Item one: The standard team should clarify if the bullets under note B are intended to be an AND (both conditions met) or an OR (either condition met). As currently written it is not clear. Item #2: The section under firm transfers is in conflict with the section above. If Demand is being curtailed under the first or second bullet and it's served by firm service then service should also be curtailed, however as written any demand served by firm service could not be curtailed.
Individual
Greg Rowland
Duke Energy
Yes
The effective date in the Implementation Plan needs to be changed to match the Effective Date in the standards, in

order to clarify the allowed interruption of Non-consequential load before the new Footnote 'b' takes effect.
Individual
Si Truc PHAN
Hydro-Quebec TransÉnergie
Yes
Paragraph should be more clear as: b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand following Contingency events. However, it is recognized that Demand will be interrupted if it is directly served by the Elements removed from service as a result of the Contingency. Furthermore, in limited circumstances within the planning process, Demand may need to be interrupted to address BES performance requirements. In such case : o Only Interruptible Demand or Demand-Side Management are allowed; o Circumstances where the uses of Demand interruption is needed shall be documented, compared to alternatives, and reviewed in an open and transparent stakeholder process that address stakeholder comments. Curtailment of firm transfers is allowed, when coupled with the appropriate and necessary re-dispatch of resources where it can be demonstrated that this does not result in the shedding of any firm Demand and that Facilities remain within applicable Facility Ratings, including Facilities external to the Transmission Planner's planning region when they are relied upon.
Group
SERC Planning Standards Subcommittee
Charles W. Long
No
The PSS agrees that the proposed language for footnote b provides some additional clarity. While we generally support the concept, we have concerns that the phrase "is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments" remains ambiguous and should be clarified by limiting stakeholder input to those who have load at risk or local regulators obligated to act on their behalf. Revise the first sentence of the last paragraph to read: "To prepare for a second contingency, curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any firm Demand." The comments expressed herein represent a consensus of the views of the above-named members of the SERC EC Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.
Individual
Tim Ponseti, VP
TVA Transmission Planning & Compliance
No
TVA appreciates the SDT's efforts to clarify and improve this complex and challenging area. However, as mentioned in our last comments regarding footnote b, TVA still believes that the SDT's proposal is still focusing more on reliability of local loads than on the overall reliability of the BES. Reliability of local loads should be addressed outside the TPL standards and therefore should not be used/referenced in footnote b. Existing stakeholder processes (referred to in the SDT proposal) typically focus on larger system issues and not on local load serving. TVA believes that some local load should be allowed to be dropped in order to maintain BES reliability. Instead of the proposed footnote b, TVA suggests that the SDT define a "local area" with guidelines detailing the reliability requirements for these local area loads. This would separate the local area load requirements from the BES requirements in the TPL standards.
Individual
Alex Rost
New Brunswick System Operator
No
NBSO agrees with the principles of the current version of the proposed footnote, as far as NBSO's interpretation of the footnote is correct. NBSO has the following detailed comments: 1. The first paragraph contains many general statements that attempts to capture essential planning principles. NBSO feels that such language is not suited for a footnote. NBSO suggests re-wording of the first paragraph to state: Interruption of Demand may be utilized within the planning process to address BES performance requirements. Such cases are limited to: NBSO also suggests turning the phrase that addresses Demand lost that was served by elements removed from service as a result of a Contingency into a bullet item. NBSO feels that this adds clarity since all of the acceptable instances of Demand interruption are now listed as bulleted items. 2. NBSO interprets that the currently proposed footnote allows for the two bulleted options to be used exclusively or in combination. Thus for clarification NBSO suggests adding "or" after each bulleted item, with the exclusion of the final bulleted item. 3. NBSO suggests removing the last sentence of the last paragraph. Likely all industry members understand that causing reliability concerns in other areas is never acceptable. This principle is not limited to the standard in question, and thus such a statement could require the update of other standards. 4. NBSO interprets that the use of the word "Demand" in the second bullet of the proposed footnote is referring to use of Firm Demand since the first bullet covers the other types of Demand (Demand = Firm Demand + Interruptible Demand). As such NBSO suggests replacing "Demand" with "Firm Demand" in the second bullet. 5. NBSO

feels that the statement “that includes addressing stakeholder comments” should be removed from the last phrase of the second bullet. An open and transparent stakeholder process should adequately address stakeholder comments and concerns. Explicitly specifying that all stakeholder comments be addressed may add undue burden if the word “address” is misconstrued. The task of addressing stakeholder comments is more appropriately addressed and defined in each area’s respective process. 6. NBSO suggests replacing the word “shedding” with “interruption” in the last phrase of the last paragraph to remain consistent with the rest of the proposed footnote. NBSO also suggests capitalizing “firm” in the term “Firm Demand” to remain consistent with the NERC glossary of terms. 7. There is no term “transfers” in the NERC glossary of terms. Perhaps some other defined term from the glossary could be used in lieu of “transfers” (e.g. Firm Transmission Service). Taking into account the NBSO comments, the footnote could read as follows: b) Interruption of Demand may be utilized within the planning process to address BES performance requirements. Such cases are limited to: -Demand directly served by Elements removed from service as a result of a Contingency, or -Use of Interruptible Demand or Demand-Side Management, or -Interruption of Firm Demand when acceptable circumstances for such interruptions are documented (including alternatives evaluated), and where the Firm Demand interruption is subject to review in an open and transparent stakeholder process. Curtailment of Firm Transmission Service is allowed when coupled with the appropriate re-dispatch of resources obligated to do so, and it can be demonstrated that Facilities remain within applicable Facility Ratings and there is no additional interruption of Firm Demand.

Individual

Joe Petaski

Manitoba Hydro

No

The last bullet should be made clearer by adding the words “in jurisdictions” before the word “where”. Not all jurisdictions are mandated to have a stakeholder process, so the standard should be clearly written to recognize this situation. "Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and IN JURISDICTIONS where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments."

Group

PacifiCorp

Sandra Shaffer

Yes

appreciates the efforts of the SDT and supports revision of TLP-002-0 Table 1 footnote “b” as stated in this draft.

Individual

Bernie Pasternack

Transmission Strategies, LLC

Yes

Individual

Michael A. Curtis, General Counsel

Mohave Electric Cooperative

Yes

Group

MRO's NERC Standards Review Subcommittee

Carol Gerou

Yes

Individual

David Thorne

Pepco Holding Inc

Yes

Individual

John Sullivan

Ameren

No

We agree with the statement that an objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand following single contingency events. While we appreciate the drafting team’s

efforts in removing the need for acceptance by other parties in the stakeholder process, we still feel that language in the second bullet of the revised footnote b should be modified to remove all references to an open and transparent stakeholder process. Existing RTO stakeholder processes that we are aware of focus on larger system issues, rather than on local load serving issues. Therefore, we believe that the load serving issues following single contingency events are issues between the customer and the utility, and should be addressed in one-on-one forums between those entities.

Individual

Thad Ness

American Electric Power

Yes

Individual

Bob Casey

Georgia Transmission Corporation

Yes

Individual

Alice Ireland

Xcel Energy

No

As this is currently drafted, planners would be required to host a forum with stakeholders to discuss hypothetical actions that may be taken in an emergency. We do not see the value in this, nor is it clear who would be considered stakeholders that should attend this forum. For example, we assume it would be the transmission owner’s meeting with distribution providers to discuss the possibility of load shedding. Would that be adequate? Xcel Energy is both a Transmission Planner and a Distribution Provider. In this case would the stakeholder be the end user? This should be struck or more clearly defined.

Individual

Saurabh Saksena

National Grid

No

National Grid supports the direction the drafting team has taken. However, it has a few concerns with the language of the footnote as amended. 1. Use of the term “Demand”: In the first sentence, it is unclear whether the term Demand includes Interruptible Demand and Demand-Side Management. It is suggested that interruption of Demand be clarified to exclude Interruptible Demand or Demand-Side Management. 2. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet. 3. National Grid also suggests changing “Demand interruption” to “interruption of Demand” in second bullet under “b)” to avoid awkward and incorrect phrasing. 4. ‘Addressing stakeholder comments’ introduces undefined actions which may be required in response to the comments. If ‘Demand interruption is subject to review in an open and transparent stakeholder process’, then stakeholder comments will be addressed without creating an undefined commitment to require it. As a result, “that includes addressing stakeholder comments” should be deleted. 5. The second paragraph seems to be restricting the use of Demand interruption for the sake of Firm Transfer reduction. This can be stated directly without adding the confusion of re-dispatch. By coupling re-dispatch with a constraint of not shedding Demand, the paragraph also creates confusion as to what to do in a situation where the amount of Demand that is allowed to be shed in the first paragraph could be reduced with re-dispatch. Would re-dispatch not be allowed? National Grid suggests that the paragraph be rewritten as follows: ‘Curtailment of firm transfers is allowed to meet BES performance requirements and meet applicable Facility Ratings, where it can be demonstrated it does not result in the interruption of any Demand (other than Interruptible Demand or Demand Side Management).’ 6. National Grid seeks clarification if there is an intended distinction between the use of the term “firm Demand” and the defined term “Firm Demand” or is that just a typo? 7. The last sentence of footnote B is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own. This same thought would have to be added to multiple NERC standards if it were added here, otherwise it would infer that such actions are acceptable in all other standards.

Individual

Andrew Z. Puszta

American Transmission Company

Yes

Individual

Jason L. Marshall

Midwest ISO
Yes
Group
Southern Company
Andy Tillery
No
Southern Company is voting "no" on the footnote b ballot because of concerns that the reliability of firm transfers could be compromised. The existing Table I Transmission System Standards, which have been in place as early as the 1997 NERC Planning Standards, do not allow Loss of Demand or Curtailed Firm Transfers under single (Category B) contingencies. Footnote B addressed two areas: 1) the loss of radial or local network load, which Southern Company agrees that the drafting team has appropriately clarified and 2) preparing for the next contingency, which Southern Company does not agree has been appropriately clarified. Southern Company believes the proposed wording "Curtailed firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch" now allows for the curtailment of firm transfers for single contingencies, whereas Southern Company did not believe this was previously permitted under the standards. Southern Company interprets the new language to allow a planner to curtail firm transfers (generation) to address a single contingency. Southern Company interpreted the original language to not permit the curtailment of firm transfers (generation) for a single contingency, but rather that a planner would develop a suitable transmission reinforcement or other mitigation. Southern Company is concerned that the proposed language could result in a degradation in the dependability of firm transfers impacting the reliability of those customers who rely upon them. Southern Company agrees that a system reconfiguration including the redispatch of generation is appropriate when preparing for a second contingency (Category C). Therefore, a distinction is needed between what is allowed in response to a first contingency and what is allowed to be prepared for a second contingency. The curtailment of firm transfers should not be allowed as a response to the first contingency. This practice would undermine the concept of firm transfers. The curtailment of firm transfers should only be allowed in footnote b as a system adjustment to be prepared for a second contingency. We propose the following to clarify that curtailments are permitted only to prepare for the second contingency. "To prepare for the next contingency, curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch".
Individual
Michael Lombardi
Northeast Utilities
No
The revised language of Footnote b suggests that non-consequential demand interruption (load that is not directly served by the elements removed from service as a result of the contingency) could be used to mitigate reliability concerns arising from NERC Category B contingency events (i.e., single element contingencies). This language seems to encourage operational workarounds and adds burdens for operators of the system. NU believes this is not consistent with planning a highly reliable bulk electric system and thus does not support this weaker language.
Individual
Dan Rochester
Independent Electricity System Operator
Yes
Individual
Gregory Campoli
New York Independent System Operator
No
Proposed revised footnote language: b) It is recognized that Demand will be interrupted if it is directly served by the Elements removed from service as a result of the Contingency. When interruption of Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to: o Interruptible Demand or Demand-Side Management o Circumstances where the uses of firm Demand interruption not directly interrupted by the contingency are documented, including alternatives evaluated; and where the firm Demand interruption is subject to review in an open and transparent stakeholder process. Curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch where it can be demonstrated that Facilities remain within applicable Facility Ratings and the re-dispatch does not result in the interruption of any firm Demand. Comments: There are generic concerns with the footnote as amended that must be addressed. The first is the use of the term "Demand". It is very unclear throughout the footnote whether or not the term Demand includes Interruptible Demand or Demand-Side Management. It is suggested that interruption of Demand be clarified to not include Interruptible Demand or Demand-Side Management to more clearly show the permitted use of that option for load shedding. Further confusion is introduced through the use of the term "firm Demand" in some locations. It is unclear how this is different

than the defined term "Firm Demand" and what the implications of the term "firm Demand" are. The first and third sentences of the first paragraph are unnecessary and should be deleted. However, if they are to be retained, the first sentence is unacceptable in its current state. In some instances, Interruptible Demand or Demand-Side Management are utilized in lieu of transmission additions. These can be considered as acceptable mitigation and there is no justification to minimize their use. Therefore some clarification to the term Demand in the first sentence must be made. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet. The second portion of the second bullet should be deleted as it is unnecessary: "and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments." If this is to be retained, the very last portion should be deleted "that includes addressing stakeholder comments". The term "addressing" is unclear. This can be misconstrued to infer that plans must be changed in response to stakeholder comments. This may be inappropriate and may be impossible if conflicting comments are received. It may also create a new standard that all comments must be "addressed", which may not be a part of the stakeholder process across NERC's footprint. The first sentence of the paragraph under the two bullets seems to prevent a situation where a combination of re-dispatch and the interruption of Demand are utilized. This restriction could prevent a situation where the use of re-dispatch decreases the amount of Demand which must be interrupted. This footnote should not discourage such adjustments which actually increase the reliability of service to end users. This same sentence also uses the term "shedding of firm Demand". This should be replaced with "Demand interruption" such that it is consistent with the second bullet; otherwise an unnecessary new term has been introduced. The last sentence of footnote B is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own. This same thought would have to be added to multiple NERC standards if it was added here, otherwise it would infer that such actions are acceptable in all other standards.

Individual

Kathleen Goodman

ISO New England Inc

No

The following comments are provided in regard to this proposal. The first and third sentences of the first paragraph are unnecessary. While we agree with the concept, it is unclear as to how inclusion of these sentences in a standard creates a measurable requirement. There are generic concerns with the footnote as currently proposed. The first is the use of the term "Demand." It is unclear whether the term Demand includes Interruptible Demand and Demand-Side Management. It is suggested that interruption of Demand be clarified to exclude Interruptible Demand and Demand-Side Management to more clearly show the permitted use of those options. The second concern is that it is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet. The third is that not all areas have stakeholder processes. Documenting the use of Demand Interruption should be sufficient without requiring stakeholder review. Therefore the second portion of the second bullet "including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments" is unnecessary and should be deleted. "Addressing stakeholder comments" introduces undefined actions which may be required in response to the comments. For those areas that already have stakeholder processes, stakeholder comments are by definition addressed. As a result, at a minimum "that includes addressing stakeholder comments" should be deleted. Furthermore, for areas that do not have stakeholder processes, so long as they publish their studies impacted parties are aware of the role of demand response. The fourth is that the second paragraph seems to be restricting the use of Demand interruption for the sake of Firm Transfer reduction. This can be stated directly without adding the confusion of re-dispatch. By coupling re-dispatch with a constraint of not shedding Demand, the paragraph also creates confusion as to what to do in a situation where the amount of Demand that is allowed to be shed in the first paragraph could be reduced with re-dispatch. Would re-dispatch not be allowed? We suggest that the paragraph be rewritten as follows: "Curtailed firm transfers is allowed to meet BES performance requirements and meet applicable Facility Ratings, where it can be demonstrated it does not result in the interruption of any Demand (other than Interruptible Demand or Demand Side Management)." The fifth is if the term 'firm demand' survives the proposed changes; is there an intended distinction between the use of the term "firm Demand" and the defined term "Firm Demand"? If these terms are intended to be differently, it is unclear what the term "firm Demand" represents. The final comment is that the last sentence of footnote B is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own. This same thought would have to be added to multiple NERC standards if it was added here, otherwise it would infer that such actions are acceptable in all other standards. If the first and third sentences must be retained the following wording for the footnote is proposed: b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand, (excluding Interruptible Demand or Demand-Side Management), following Contingency events. However, it is recognized that Demand will be interrupted if it is directly served by the Elements removed from service as a result of the Contingency. Furthermore, in limited circumstances Demand may need to be interrupted to address BES performance requirements. When interruption of Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to: o Interruptible Demand or Demand-Side Management o Circumstances where the uses of Demand interruption not directly interrupted by the contingency are documented. Curtailed firm transfers is allowed to meet BES performance requirements and meet applicable Facility Ratings, where it can be demonstrated it does not result in the interruption of any Demand (other than

Interruptible Demand or Demand Side Management).
Individual
Harold Wyble
Kansas City Power & Light
Yes