

## Consideration of Comments on TPL Table 1 Order — Project 2010-11

The TPL Table 1 Order Drafting Team thanks all commenters who submitted comments on the 3<sup>rd</sup> posting for Project 2010-11: TPL Table 1 Order. These standards were posted for a 45-day public comment period from November 19, 2010 through January 5, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 27 sets of comments, including comments from more than 67 different people from approximately 30 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Project2010-11\\_TPL\\_Table-1\\_Order.html](http://www.nerc.com/filez/standards/Project2010-11_TPL_Table-1_Order.html)

The SDT reviewed all of the comments received and has made a clarifying change to the structure of the footnote to address industry concerns as to the intent of the SDT. No contextual changes have been made to the footnote. Therefore, the SDT is recommending that this project be moved to a recirculation ballot.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

Interruptible Demand or Demand-Side Management

circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.

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. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions would also be respected.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

**Index to Questions, Comments, and Responses**

- 1. The SDT is proposing a revision to footnote 'b' in the TPL tables to comply with a FERC directive which required the ERO to clarify TPL-002-0, Table 1 - footnote 'b', regarding the planned or controlled interruption of electric supply where a single contingency occurs on a transmission system. Do you agree with the proposed changes and if not, please provide specific reasons for your disagreement..... Error! Bookmark not defined.**

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Guy Zito	Northeast Power Coordinating Council											X
Additional Member	Additional Organization	Region	Segment Selection											
1.	Al Adamson	New York State Reliability Council, LLC	NPCC	10										
2.	Greg Campoli	New York Independent System Operator	NPCC	2										
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2										
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1										
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1										
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10										
7.	Dean Ellis	Dynegy Generation	NPCC	5										
8.	Brian Evans-Mongeon	Utility Services	NPCC	8										
9.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5										
10.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5										
11.	Kathleen Goodman	ISO - New England	NPCC	2										
12.	Chantel Haswell	FPL Group, Inc.	NPCC	5										
13.	David Kiguel	Hydro One Networks Inc.	NPCC	1										

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment																		
			1	2	3	4	5	6	7	8	9	10									
14.	Michael R. Lombardi	Northeast Utilities	NPCC	1																	
15.	Randy MacDonald	New Brunswick System Operator	NPCC	2																	
16.	Bruce Metruck	New York Power Authority	NPCC	6																	
17.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
18.	Robert Pellegrini	The United Illuminating Company	NPCC	1																	
19.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																	
20.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																	
2.	Group	Charles W. Long	SERC Planning Standards Subcommittee	X																X	
<b>Additional Member Additional Organization Region Segment Selection</b>																					
1.	Pat Huntley	SERC Reliability Corporation	SERC	10																	
2.	Bob Jones	Southern Company Services	SERC	1																	
3.	Darrin Church	Tennessee Valley Authority	SERC	1																	
4.	Jim Kelley	PowerSouth Energy Cooperative	SERC	1																	
5.	John Sullivan	Ameren Services Company	SERC	1																	
6.	Phil Kleckley	South Carolina Electric & Gas Co.	SERC	1																	
3.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee																		X
<b>Additional Member Additional Organization Region Segment Selection</b>																					
1.	Mahmood Safi	Omaha Public Utility District	MRO	1, 3, 5, 6																	
2.	Chuck Lawrence	American Transmission Company	MRO	1																	
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6																	
4.	Jason Marshall	Midwest ISO Inc.	MRO	2																	
5.	Jodi Jenson	Western Area Power Administration	MRO	1, 6																	
6.	Ken Goldsmith	Alliant Energy	MRO	4																	
7.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6																	
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																	

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6																
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6																
11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																
12.	Scott Nickels	Rochester Public Utilities	MRO	4																
13.	Terry Harbour	MidAmerican Energy Company	MRO	1, 3, 5, 6																
14.	Richard Burt	Minnkota Power Cooperative, Inc.	MRO	1, 3, 5, 6																
4.	Individual	Janet Smith	Arizona Public Service Company		X		X		X	X										
5.	Individual	Sandra Shaffer	PacifiCorp		X		X		X	X										
6.	Individual	Andy Tillery	Southern Company		X		X													
7.	Individual	Aaron Staley	Orlando Utilities Commission		X				X											
8.	Individual	Greg Rowland	Duke Energy		X		X		X	X										
9.	Individual	Si Truc PHAN	Hydro-Quebec TransÉnergie		X															
10.	Individual	Tim Ponseti, VP	TVA Trasnmission Plannning & Compliance		X		X		X										X	
11.	Individual	Alex Rost	New Brunswick System Operator			X														
12.	Individual	Joe Petaski	Manitoba Hydro		X		X		X	X										
13.	Individual	Bernie Pasternack	Transmission Strategies, LLC																X	
14.	Individual	Michael A. Curtis, General Counsel	Mohave Electric Cooperative				X													
15.	Individual	David Thorne	Pepco Holding Inc		X															

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
16.	Individual	John Sullivan	Ameren	X		X		X	X					
17.	Individual	Thad Ness	American Electric Power	X		X		X	X					
18.	Individual	Bob Casey	Georgia Transmission Corporation	X										
19.	Individual	Alice Ireland	Xcel Energy	X		X		X	X					
20.	Individual	Saurabh Saksena	National Grid	X		X								
21.	Individual	Andrew Z. Puztai	American Transmission Company	X										
22.	Individual	Jason L. Marshall	Midwest ISO		X									
23.	Individual	Michael Lombardi	Northeast Utilities	X		X		X						
24.	Individual	Dan Rochester	Independent Electricity System Operator		X									
25.	Individual	Gregory Campoli	New York Independent System Operator		X									
26.	Individual	Kathleen Goodman	ISO New England Inc		X									
27.	Individual	Harold Wyble	Kansas City Power & Light	X		X		X	X					

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1. The SDT is proposing a revision to footnote 'b' in the TPL tables to comply with a FERC directive which required the ERO to clarify TPL-002-0, Table 1 - footnote 'b', regarding the planned or controlled interruption of electric supply where a single contingency occurs on a transmission system. Do you agree with the proposed changes and if not, please provide specific reasons for your disagreement.

**Summary Consideration:** The SDT reviewed all of the comments received and has made a clarifying change to the structure of the footnote to address industry concerns as to the intent of the SDT. No contextual changes have been made to the footnote.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

~~Interruptible Demand or Demand-Side Management~~

~~Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.~~

~~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. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions would also be respected.~~

**Comment [Iih1]:** Same comment as in ballot report – we should replace the actual “track changes” redline with a formatted version of the same, so that we can clean up the margin line indicating track changes.

Organization	Yes or No	Question 1 Comment
SERC Planning Standards Subcommittee	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

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Organization	Yes or No	Question 1 Comment
		<p>act on their behalf.</p> <p>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.</p>
<p><b>Response:</b> The stakeholder process needs to be open and transparent but it is up to the entity to establish the process and whom it may include. No change made.</p> <p>As drafted, footnote 'b' clarifies that re-dispatch is allowable to "remain within" ratings, not to bring the Facilities within ratings. The draft language recognizes that System adjustments may be required after a single Contingency, since entities may utilize ratings in the planning horizon that can only be utilized for a limited time, such as a 2 hour emergency rating. It further clarifies that if an entity is obligated to re-dispatch its generation resources, the Transmission Planner can plan to re-dispatch those resources for a single Contingency. However, if the resources that impact the affected Facilities are not obligated to re-dispatch, the firm transfers cannot be curtailed. Therefore, the SDT does not believe that it is necessary to add the words "To prepare for the next Contingency" to the footnote. No change made.</p>		
Xcel Energy	No	<p>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.</p>
<p><b>Response:</b> The stakeholder process needs to be open and transparent but it is up to the entity to establish the process and whom it may include. No change made.</p>		
New York Independent System Operator	No	<p>1. 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</p>

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Organization	Yes or No	Question 1 Comment
		<p>remain within applicable Facility Ratings and the re-dispatch does not result in the interruption of any firm Demand.</p> <ol style="list-style-type: none"> <li>2. 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.</li> <li>3. 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.</li> <li>4. 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.</li> <li>5. 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.</li> <li>6. 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.</li> <li>7. 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.</li> <li>8. 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.</li> </ol>

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Organization	Yes or No	Question 1 Comment
		<p>9. 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.</p>
		<p><b>Response:</b> 1. See response to National Grid #1 in ballot comment responses.</p> <p>2. See response to National Grid #1 in ballot comment responses.</p> <p>3. See response to National Grid #6 in ballot comment responses.</p> <p>4. The SDT has reorganized the footnote to clarify its intent and address the issues raised.</p> <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand.</u> However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><u>Interruptible Demand or Demand-Side Management</u></p> <p><del>circumstances</del> where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</p> <p><del>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. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions would also be respected.</del></p> <p>5. See response to National Grid #2 in ballot comment responses.</p> <p>6. See response to National Grid #4 in ballot comment responses.</p> <p>7. The SDT has reorganized the footnote to clarify its intent and address the issues raised.</p> <p>8. The SDT has reorganized the footnote to clarify its intent and address the issues raised.</p>

**Comment [11h2]:** Same comment as in the ballot comment report – I think we should replace the “track changes” redlining with font changes that indicate the same, to clean up document for stakeholders.

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Organization	Yes or No	Question 1 Comment
9. See response to National Grid #7 in ballot comment responses.		
ISO New England Inc	No	<ol style="list-style-type: none"> <li>1. 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 measureable requirement.</li> <li>2. 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.</li> <li>3. 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.</li> <li>4. 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.</li> <li>5. 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)."</li> <li>6. 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.</li> <li>7. The final comment is that the last sentence of footnote B is unnecessary and should be deleted. It is</li> </ol>

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Organization	Yes or No	Question 1 Comment
		<p>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.</p> <p>8. 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. 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).</p>

**Response:** 1. The SDT believes that the first part of the footnote is necessary to provide context for the items that follow and has crafted the language to provide a balance between flexibility and consistency across NERC. No change made.

2. See ballot response to NPCC #1.

3. See ballot response to NPCC #2.

4. The SDT believes that in situations where an entity's planning studies require the interruption of firm load to remain within BES Facility ratings that the entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be adversely impacted by those decisions have the ability to review and comment on those plans. No change made.

5. See ballot response to NPCC #5.

6. The SDT has corrected the indicated errors.

7. See ballot response to NPCC #6.

8. The SDT has reorganized the text in the footnote to address this concern.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited

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		<p>circumstances <b>Firm Demand</b> may need to be interrupted to address BES performance requirements. When interruption of <b>Firm Demand</b> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><del>Interruptible Demand or Demand-Side Management</del></p> <p><del>circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</del></p> <p><del>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. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions would also be respected.</del></p>
Northeast Power Coordinating Council	No	<p>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.</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>o 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.</li> </ul> <p>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</p>

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		<p>interrupted is an operational decision.</p> <p>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.</p>
<p><b>Response:</b> This comment is identical to the one made by NPCC in the ballot and the SDT has answered the comment in that forum.</p>		
Arizona Public Service Company	No	<p>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.</p>
<p><b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.</p>		
Southern Company	No	<p>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</p>

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Organization	Yes or No	Question 1 Comment
		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".
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
Orlando Utilities Commission	No	<p>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.</p> <p>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.</p>
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
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.
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
Hydro-Quebec Transenergie	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.
<b>Response:</b> The SDT believes that the changes indicated in your proposed footnote do not add any additional clarity. However, the SDT has reorganized the footnote to clarify its intent.		

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Organization	Yes or No	Question 1 Comment
		<p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand.</u> However, it is recognized that <u>Firm Demand</u> will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) <u>Interruptible Demand or Demand-Side Management Load</u>. Furthermore, in limited circumstances <u>Firm Demand</u> may need to be interrupted to address BES performance requirements. When interruption of <u>Firm Demand</u> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <ul style="list-style-type: none"> <li><u>Interruptible Demand or Demand-Side Management</u></li> <li><u>circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</u></li> </ul> <p><del>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. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions would also be respected.</del></p>
TVA Transmission Planning & Compliance	No	<p>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.</p>
<p><b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.</p>		
New Brunswick System Operator	No	<p>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</p>

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Organization	Yes or No	Question 1 Comment
		<p>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.</p>
<p><b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.</p>		
Manitoba Hydro	No	<p>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."</p>

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Organization	Yes or No	Question 1 Comment
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
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.
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
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: '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).' 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

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Organization	Yes or No	Question 1 Comment
		NERC standards if it were added here, otherwise it would infer that such actions are acceptable in all other standards.
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
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.
<b>Response:</b> This comment is identical to one made in the ballot and the SDT has answered the comment in that forum.		
Kansas City Power & Light	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
PacifiCorp	Yes	appreciates the efforts of the SDT and supports revision of TLP-002-0 Table 1 footnote "b" as stated in this draft.
Transmission Strategies, LLC	Yes	
Mohave Electric Cooperative	Yes	
Pepco Holding Inc	Yes	
American Electric Power	Yes	
Georgia Transmission Corporation	Yes	
American Transmission Company	Yes	

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Organization	Yes or No	Question 1 Comment
Midwest ISO	Yes	
Independent Electricity System Operator	Yes	
<b>Response:</b> Thank you for your support.		