

# TPL-002 Table 1 (Footnote 'b')

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## Background

- In Order 693 - FERC directed the ERO to clarify footnote 'b' with regards to planning for loss of non-consequential load for single contingencies.
- FERC order issued March 18, 2010 - FERC directed ERO to submit footnote 'b' modification by June 30, 2010.
- FERC order issued June 11, 2010 denying request for rehearing, but granting extension of deadline to March 31, 2011.



## BPA Grid Definitions

- BPA defines the Main Grid as providing primary connections among major load centers, large generating plants, major interties, and some intermediate load centers. Above 300 kV.
- The secondary grid connects the main grid to points-of-delivery and points-of-interconnection.
- Radial grid and improved radial grid provides service to and connections among specific points-of-delivery or points-of-interconnection from the secondary grid.



## NERC Question 1

- Existing footnote 'b' allows planned or controlled interruption of non-consequential load for 'some local Network customers' supplied by the faulted element or the area affected by the faulted element.
- As referenced above BPA defines improved radial grid as any substation on a transmission loop, and the lines in the loop, where only one of the sides of the loop serving the improved radial substation has sufficient line capacity to serve the entire normal peak load.
- BPA believes the existing Footnote 'b' allows an entity to plan to shed non-consequential load for a single contingency when the load is served by either radial grid or improved radial grid.



## NERC Question 2

- BPA believe the 'fringes' of the system applies to radial grid or improved radial grid as discussed above.
- It is appropriate to limit planned or controlled interruption of demand for single contingencies to 'fringes' of the system so the allowed interruption of demand does not impact the main grid.



## NERC Question 2 (cont.)

- Other specific criteria could include:
  - Amount of demand in the area in question.
  - Demonstration of impact rather than topographical definition.
- In the West, there are points-of-delivery and load areas spread out and served by long lines. A one size fits all approach may not work since weighing costs and benefits is also dependent on location.
- A rigorous demonstration approach does not provide reliability benefits commensurate with the effort required.



## NERC Question 3

- Is it assumed 'planned loss of non-consequential firm load' is defined as merely a violation of applicable criteria?
- Generally, BPA is a bulk transmission provider and does not have areas where 'an event resulting in the loss of a single element' results in loss of non-consequential load. However, this could result in increased requirements and costs to end use customers.
- General examples of required system additions include:
  - Conversion of 69 kV to 115 kV.
  - Circuit breakers to further sectionalize the system.
  - Additional voltage support equipment near point's-of-delivery.



## NERC Question 4

- Handling exceptions on a case-by-case basis would be difficult to implement.
- Process could require such elements as:
  - A criteria for allowable impacts.
  - Some demonstration of impacts to the system.
  - An exceptions logging process.
- We favor a simpler approach as is done today. Other approaches are more subjective, and the additional efforts and cost do not provide a commensurate improvement in system reliability.

