

## Meeting Notes

# Project 2015-09 Establish and Communicate System Operating Limits

August 20, 2020 | 10:00 a.m. – 12:00 p.m. Eastern

Conference Call

### Administrative

#### 1. Introductions

D. LaForest (Chair) thanked everyone for attending. The following standard drafting team (SDT) members attended:

	Name	Entity	Present Yes/No
<b>Chair</b>	Dean LaForest	ISO New England	Y
<b>Vice Chair</b>	Hari Singh	Xcel Energy	Y
<b>Members</b>	Samuel Jager	Independent Electricity System Operator	N
	Thomas Leslie	Georgia Transmission Corp	Y
	Stephen Solis	Electric Reliability Council of Texas	Y
	Aaron Staley	Orlando Utilities Commission	Y
	Dede Subakti	California ISO	N

#### 2. Determination of Quorum

The rule for NERC standard drafting team (SDT or team) states that a quorum requires two-thirds of the voting members of the SDT. Quorum was achieved as five of seven members were present.

#### 3. NERC Antitrust Compliance Guidelines and Public Announcement

L. Harkness reviewed NERC Antitrust Compliance Guidelines and public announcement. There were no questions raised.

## Agenda

1. The SDT provided an overview of the themes and trends in from the industry comment. Overviews were provided for all questions except questions 3 and 4.

M. Djukanovic posed the follow questions about the SOL White Paper and industry comments to the SDT:

- If the System is in an N-50 state to start, how should entities operate based on normal and emergency ratings verses what is in the SOL White Paper for N-1?

*D. LaForest stated that the entity should have a plan to transition for normal to emergency operating conditions.*

- A comment from Texas RE:  
“Requirement R25, as well as the measure, capitalizes “Real-time Monitoring”. Real-time Monitoring is not a defined term in the NERC Glossary and monitoring should not be capitalized. It is also capitalized in the VSL/VRF matrix and the Evidence Retention sections of the standard.”

*Dean said the language would be corrected. L. Harkness shared it is not a defined term.*

- A comment from Lincoln Electric:

“In consideration of past confusion related to whether an SOL exceedance is a regulatory violation, LES suggests the following changes to better clarify R6:

R6.2.1 Steady State post-Contingency flow through Facilities within applicable Emergency Ratings. [Remove: Steady state post-Contingency flow through a Facility must not be above the Facility’s highest Emergency Rating.]

R6.2.3 Predetermined stability limits are not exceeded. [Remove: The stability performance criteria defined in the Reliability Coordinator’s SOL methodology are met.]”

- A comment from ReliabilityFirst:

“ReliabilityFirst offers the following comments on FAC-011-4 for the SDT’s consideration. In the clean version of FAC-011-4, in the “New or Modified Term(s) Used in NERC Reliability Standards” section of the Standard, it states: “None.” The term “System Operating Limit” has been modified and “System Voltage Limit” is newly defined.

Requirement R6 part 6.1.4, part 6.2.4, and part 6.3 references: “Instability, Cascading or uncontrolled separation that adversely impact the reliability of the Bulk Electric System does not occur.” What is the meaning of “that adversely impact the reliability of the Bulk Electric System does not occur?” Is it possible for instability, Cascading, or uncontrolled separation to NOT adversely impact the reliability of the BES? What is the criteria for determining if instability, Cascading, or uncontrolled separation do or do not adversely impact the reliability of the BES? These parts of Requirement R6 are open to interpretation, and therefore does not

promote the reliability of the BES. Note that the NERC approved definition of IROL also uses the term “... that adversely impact the reliability of the Bulk Electric System.”

*In summary, Dean said the SDT would discuss the comments.*

- A comment from ATC:

“ATC believes the existing language of R7 may be adequate. However, we think some additional clarity on two specific requirements (R7.1.4 and R7.2.1) would benefit the industry. Both items relate back to how FAC-011-4 Requirement 7 does or does not tie back to the language of Requirement 6. In these two requirements, the clarification requested is, which Facility Ratings are in view as explained below.

New Requirement R7.1.4 states, “Pre-contingency SOL exceedances of Facility Ratings”. Based on our reading of the draft standard, we believe the SDT is referring to the thermal Facility Ratings described in requirement R6.1.1 (i.e. Normal and Emergency Ratings). R6.1.1 reads, “Steady state flow through Facilities are within Normal Ratings; however, Emergency Ratings may be used when System adjustments to return the flow within its Normal Rating could be executed and completed within the specified time duration of those Emergency Ratings.”

Similarly, requirement R7.2.1 reads, “Post-contingency SOL exceedances of Facility Ratings and emergency System Voltage limits”. We believe the SDT intends for “Facility Ratings” to correspond to the Facility Ratings described in R6.2.1 (“Steady State post-Contingency flow through Facilities are within applicable Emergency Ratings., provided that System adjustments could be executed and completed within the specified time duration of those Emergency Ratings. Steady state post-Contingency flow through a Facility must not be above the Facility’s highest Emergency Rating.”)

Regardless as to whether or not ATC’s interpretation is correct, we believe the industry will benefit in the future from greater clarity. For example, if ATC’s interpretation is correct, the SDT could add wording such as, “Facility Ratings as described in R6.1.1” for R7.1.4 and “Facility Ratings as described in R6.2.1” for R7.2.1.

ATC also has one minor comment on the formatting of R7.1 and R7.2 requirements. The word “and” appears in different sub-requirements, as shown below. We request the SDT review if “and” is correct wording to use, since a reader may interpret that all these items may need to be simultaneously true before the threshold is reached for communicating. The clearest example is R7.2.1. ATC believes that removing “and” and splitting up R7.2.1 as follows may be beneficial:

7.1.4. Pre-contingency SOL exceedances of Facility Ratings; and

7.1.5. Pre-contingency SOL exceedances of normal low System Voltage Limits.

7.2.1. Post-contingency SOL exceedances of Facility Ratings and

7.2.2 Post-contingency SOL exceedances of emergency System Voltage limits, and

7.2.3. Pre-contingency SOL exceedances of normal high System Voltage Limits.”

*In summary, Dean said the SDT would discuss the comment.*

2. A future meeting is scheduled for August 26, 2020.
3. The meeting adjourned at 11:30 a.m. on August 20, 2020 Eastern.