Unofficial Comment Form

Project 2023-07 Transmission Planning Performance Requirements for Extreme Weather

**Do not** use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on draft two of **TPL-008-1 – Transmission System Planning Performance Requirements for Extreme Temperature Events** by **8 p.m. Eastern, Thursday, August 22, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-07-Mod-to-TPL00151.aspx). If you have questions, contact Senior Standards Developer, Jordan Mallory (via email), or at 470-479-7538.

## Background Information

On June 15, 2023, FERC issued FERC Order No. 896 that acknowledges the “challenges associated with planning for extreme heat and cold weather events, particularly those that occur during periods when the Bulk-Power System must meet unexpectedly high demand. Extreme heat and cold weather events have occurred with greater frequency in recent years, and are projected to occur with even greater frequency in the future. These events have shown that load shed during extreme temperature result in unacceptable risk to life and have extreme economic impact. As such, the impact of concurrent failures of Bulk-Power System generation and transmission equipment and the potential for cascading outages that may be caused by extreme heat and cold weather events should be studied and corrective actions should be identified and implemented.”[[1]](#footnote-1)

Therefore, the Commission directed in FERC Order No. 896 to develop a new or modified Reliability Standard to address a lack of long-term planning requirement(s) for extreme heat and cold weather events. Specifically, FERC directed NERC to develop modifications to Reliability Standard TPL-001-5.1 or a new Reliability Standard, to require the following: (1) development of benchmark planning cases based on major prior extreme heat and cold weather events and/or meteorological projections; (2) planning for extreme heat and cold weather events using steady state and transient stability analyses expanded to cover a range of extreme weather scenarios including the expected resource mix's availability during extreme heat and cold weather conditions, and including the wide-area impacts of extreme heat and cold weather; and (3) development of corrective action plans that mitigate any instances where performance requirements for extreme heat and cold weather events are not met.

## Questions

1. The drafting team (DT) updated the Requirements in chronological order. Do you agree with the proposed TPL-008-1 Reliability Standard Requirement layout? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT updated Requirements R1 – R2 based on comments received. Do you agree with the updated proposed TPL-008-1 Reliability Standard Requirements R1-R2? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT updated Requirements R3 – R5 based on comments received. Do you agree with the updated proposed TPL-008-1 Reliability Standard Requirements R3-R5? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT updated Requirements R6 – R8 based on comments received. Do you agree with the updated proposed TPL-008-1 Reliability Standard Requirements R6-R8? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT updated Requirement R9 based on comments received. Do you agree with the updated proposed TPL-008-1 Reliability Standard Requirement R9? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT updated Requirement R10 based on comments received. Do you agree with the updated proposed TPL-008-1 Reliability Standard Requirement R10? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT split out Table 1 into parts for better readability. Do you agree with the updated layout of Table 1? If you do not agree, please provide your recommendation and technical justification.

[ ]  Yes

[ ]  No

Comments:

1. The DT believes proposed modifications in TPL-008-1 provide entities with flexibility to meet the reliability objectives in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments:

1. N. Am. Elec. Reliability Corp., 183 FERC ¶ 61,191 (2023) (FERC Order), Final Rule. [eLibrary | File List (ferc.gov)](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230615-3100&optimized=false) [↑](#footnote-ref-1)