

Individual or group. (43 Responses)
Name (32 Responses)
Organization (32 Responses)
Group Name (11 Responses)
Lead Contact (11 Responses)
Question 1 (43 Responses)
Question 1 Comments (43 Responses)

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Group
Arizona Public Service Company
Jana Van Ness
Yes
Individual
Don Gilbert
JEA
No
The requirement in general is acceptable; however, there needs to be an added "such as" clause to the referenced "...in an open and transparent stakeholder processes." I suggest adding "...in an open and transparent stakeholder processes such as the FERC approved regional 890 process that includes the load serving entity affected".
Group
Northeast Power Coordinating Council
Guy Zito
No
1. The introductory paragraph discourages the Interruption of any Demand, implying that no Demand directly connected should be interrupted. However, it is an acceptable practice to allow for some Interruption of Demand that is directly connected to the element that is removed from service. Recommend that the drafting team revise the wording to eliminate this implication, and soften the expectation such that it is recognized that some Interruption of Demand is unavoidable by system configuration, but that each entity should establish a reasonable limit on how much demand can be interrupted due to the loss of an element. 2. The Statement that "However, Demand may need to be interrupted in limited circumstances to address BES performance requirements" in the introductory paragraph contradicts bullet 3 "Demand that does not adversely affect BES ..." 3. The third Bullet is confusing. Suggest revising the wording to clarify the adverse impact to the BES system, documentation expectations, and to answer fundamental questions such as who has the authority to decide the use if the stakeholder process is "accepting", and the necessity of having a stakeholder process. It is unlikely that the interruption of Demand will adversely impact the BES system. This constraint is too broad. The language in this bullet also allows that non-consequential Demand interruption could be used to mitigate reliability violations arising from the NERC Category B contingency events (i.e., single element contingencies). 4. In the second paragraph, the conditions when interruption of Firm Transfers may be used are not specified. 5. In the last sentence of the second paragraph, "would" should be replaced by "must". Alternatively, possible rewording of footnote "b" to be considered: b) An objective of the planning process should be to minimize the likelihood of interrupting Demand and measures to mitigate such interruption should be pursued within the planning process. However, Demand may need to be interrupted in limited circumstances to address BES performance requirements or other local reasons which have no adverse impact on overall BES reliability or the interconnected BES. When interruption of Demand is utilized within the planning process, such interruption is limited to: o Demand that is directly served by the elements that are removed from service as a result of the Contingency o Demand that does not adversely impact overall reliability of the BES or the interconnected BES and where the circumstances describing the use of such Demand interruption are documented, including alternatives evaluated; and where the application is subject to review and acceptance in an open and transparent stakeholder process. Curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of available resources, 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. The Drafting Team should reconsider the use of "Load" as opposed to "Demand". By definition (NERC Glossary dated April 20, 2010) Demand is: "1. The rate at which electric energy is delivered to or by a system or part of a system, generally expressed in kilowatts or megawatts, at a given instant or averaged over any designated interval of time. 2. The rate at which energy is being used by the customer." Load is defined as: "An end-use device or customer that receives power from the electric system." This terminology is more appropriate to the application used in the Table.
Group

SERC Planning Standards Subcommittee
Philip R. Kleckley
No
The revised text relating to the planning process exceeds what is appropriate for a reliability standard. Existing open and transparent stakeholder processes focus on larger system issues and not on local load serving. We suggest the following: Demand may need to be interrupted in limited circumstances to address BES performance requirements. When interruption of Demand is utilized within the planning process, such interruption is limited to: o Demand that is directly served by the elements that are removed from service as a result of the Contingency o Interruptible Demand or Demand-Side Management o Demand that does not adversely impact overall BES reliability and is made temporarily radial as a result of the Contingency, where that Demand must be interrupted to meet performance requirements. 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. "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
RoLynda Shumpert
South Carolina Electric and Gas
No
SCE&G believes the first sentence "An object of the planning process is to avoid interruption of Demand." goes beyond what is appropriate for a reliability standard and therefore should be deleted. Also, the part of the sentence that states "and where the application is subject to review and acceptance in an open and transparent stakeholder process" goes beyond what is appropriate for a reliability standard and should be deleted.
Individual
Laura Zotter
ERCOT ISO
Yes
Group
PacifiCorp
Sandra Shaffer
No
PacifiCorp believes that the current version of footnote "b" is an improvement over the language that currently exists in the standard, except for one component of the revised footnote. The third bullet in the draft standard currently limits the interruption of Demand if it does not adversely impact overall BES reliability, where the circumstances describing the use of the interruption are documented (including alternatives evaluated) and the application is subject to review and acceptance in "an open and transparent stakeholder process." PacifiCorp believes that the language requiring review and acceptance of an application of demand interruption through any sort of stakeholder process should be removed. It is not practical or effective to prescribe that either this standard or any other standard requires stakeholder approval in order to maintain compliance. As presently drafted, this requirement for stakeholder review and acceptance appears to be inconclusive and indeterminate as to what is required for registered entities to comply. Instead, this third bullet should require the documentation, by the Planning Authority and Transmission Planner, of the circumstances describing the use of Demand interruption – including methodologies used, assumptions relied upon, and alternatives evaluated – as part of the Planning Authorities' and/or Transmission Planners' documentation of results in their annual Reliability Assessments. These annual assessments are already submitted to the appropriate Regional Reliability Organization pursuant to TPL-002-1b Requirement R3. This annual assessment can be provided by the ERO to other appropriate third parties upon their request.
Individual
Greg Rowland
Duke Energy
Yes
Duke Energy strongly supports this revised footnote 'b'. We believe that it provides for appropriate consideration of stakeholder input in decision-making for local reliability issues, while maintaining the reliability of the Bulk Electric System.
Individual
Steve Stafford
Georgia Transmission Corporation
Yes

Group
PPL Corp
John Cummings
Yes
PPL believes that Footnote b as described in TPL-002-1b, Draft 2, August 30, 2010 is fine provided an accompanying Requirement (with appropriate VRF and VSL) and Measure is added to the TPL standard(s) to require and document notification of the affected Demand parties and the involvement of the affected Demand parties in an open process as described by Footnote b, third bullet.
Individual
John Canavan
NorthWestern Energy
No
In addition to the three bullet items, add a fourth bullet item to the list of limitations under the body of footnote b: "In no case will a total loss of load that is less than 50 MW be considered a violation of this standard."
Individual
Tim Ponseti
TVA Transmission Planning & Compliance
No
TVA supports FERC's actions on improving reliability of the BES; however, TVA believes that the new proposal is focusing more on reliability of local loads than on the overall reliability of the BES. Footnote b should focus only 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. Also existing stakeholder processes (referred to in the SDT proposal) typically focus on larger system issues and not on local load serving. Thus TVA believes that some local load should be allowed to be dropped in order to maintain BES reliability. However TVA does believe that there should be a limit of how much load can be dropped in order to maintain BES reliability. TVA believes that 50 MW is a reasonable number for this limit. Based on the above, TVA proposes substituting the following for the revised footnote b: Demand may need to be interrupted in limited circumstances to address BES performance requirements. When interruption of Demand is utilized within the planning process, such interruption is limited to: Demand that is directly served by the elements that are removed from service as a result of the Contingency Interruptible Demand or Demand-Side Management Demand that does not adversely impact overall BES reliability, where that Demand (not to exceed 50 MW) must be interrupted to meet performance requirements. 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.
Individual
Gordon Rawlings
BC Hydro
No
The SDT is to be commended for their efforts to develop clear, unambiguous language for Footnote "b". From the discussions that have taken place it seems that there are many different perspectives and to get agreement on specific language will be very difficult. We believe that it would be useful to identify the main issues that Footnote "b" needs to address and we consider those main issues to be: • Definitions of (a) Consequential Load Loss, (b) Firm Demand, (c) Firm Transmission Capability (as distinct from the OATT term, "Firm Transmission Service"), (d) Firm Transfer (this could be defined as transfers using the OATT's Firm Transmission Service, (e) Manual System Adjustments (capitalized in the Category C section of TPL-001, but not defined in the NERC Glossary) and (f) the Bulk Electric System (BES). • Identifying permissible Demand/Transfer curtailment actions for (a) the planning studies simulating the Category B event itself and (b) the planning studies associated with determining acceptable actions for preparing for the next set of contingencies should the initial single contingency be prolonged (ie, last several weeks). This would define the acceptable (pre-emptive) "Manual System Adjustments" of Category C events. • Define separate acceptable curtailment actions for (a) curtailment of Demand (ie, end-user load) and (b) curtailment of market to market transfers, that very rarely, if ever, result in the loss of any end-user load. • Define the planning studies required to determine the acceptability of the impacts on the BES resulting from curtailments in a "remote" part of the system that have been accepted by those directly affected by those curtailments. At this point we don't have specific language to suggest, but we do have the following comments that we hope will help: A. Interruption of Demand: A.1. Consider improving the definition of "Firm Demand" in the NERC Glossary that now reads, "That portion of the Demand that a power supplier is obligated to provide except when system reliability is threatened or during emergency conditions". Perhaps it could be changed to something like, "That portion of the Demand that the planned transmission system must be able to supply without interruption for Category B events. A.2. Consider stating in Footnote "b" that curtailment of Firm Demand is (a)

not permitted in the simulation of the N-1 event itself and (b) it is not permitted as part of the (pre-emptive) "Manual System Adjustments" needed to prepare for the next set of contingencies should the initial single contingency be prolonged (ie, last several weeks). B. Interruption of Firm Transfers: B.1. "Firm Transfers" could be defined as transfers using the OATT's Firm Transmission Service, but consider developing a system reliability-based term for "Firm Transmission Capability" instead of referring to the tariff-based NERC definition of "Firm Transmission Service". This would recognize the difference between planning standards and commercial/tariff rules. The NERC definition of "Firm Transmission Service" is now, "The highest quality (priority) service offered to customers under a filed rate schedule that anticipates no planned interruption". Transmission tariffs address the priority of curtailments when the loading on a transmission path needs to be reduced for whatever reason (single- or multiple-contingencies). The NERC transmission planning standards need a system reliability definition like, "Firm Transmission Capability" is the transmission capability across a cut-plane, on a defined transmission path or across a defined flowgate that is available, before any manual corrective actions are taken, following the worst Category B event under the most onerous normal system conditions considering all plausible generation dispatch patterns and the full range of expected load levels." B.2. Consider stating in Footnote "b" that curtailment of Firm Transfers is only permitted to the extent that redispatch of generation can be implemented so that delivery to the Firm Transfer recipient is not interrupted (a) in the planning studies of the Category B event itself and (b) as part of the (pre-emptive) "Manual System Adjustments" needed to prepare for the next set of contingencies should the initial single contingency be prolonged (ie, last several weeks). C. General Comments: C.1. Consider replacing the first bullet of the proposed Footnote "b" with simply "Consequential Load Loss" since the NERC Project 2006 02 (TPL 001) Standard Drafting Team is introducing the following definition: Consequential Load Loss: All Load that is no longer served by the Transmission system as a result of Transmission Facilities being removed from service by a Protection System operation designed to isolate the fault C.2. Consider removing "Demand-Side Management" (DSM) from the second bullet because that term is too general. The present definition of DSM in the NERC Glossary is: "The term for all activities or programs undertaken by Load-Serving Entity or its customers to influence the amount or timing of electricity they use". C.3. Consider being more specific on what constitutes acceptable "Interruptible Demand", like: "Interruptible Demand that is part of an automatic real-time Direct Control Load Management (DCLM) system that is activated by the contingencies that require it and that is a completely "dual-redundant" scheme including all communications equipment. The DCLM system must result in automatic curtailment of Demand that is fast enough to maintain all BES system performance standards (eg, voltage stability, voltage dip, etc)". C.4. Consider eliminating the description of how interrupting Demand that does not adversely impact overall BES reliability was accepted (ie, the stakeholder process, etc). If such a process were undertaken and it resulted in acceptance that the Demand could be curtailed for Category B events, wouldn't that simply mean that the Demand was "Interruptible Demand". It really doesn't matter what process resulted in it being accepted. The key considerations are that (a) if the interruption of that Demand is necessary to maintain BES reliability, then it must be interrupted in a very reliable manner (ie, dual redundant scheme, etc) and (b) if the interruption of that Demand is not necessary to maintain the reliable performance of the BES, then that should be confirmed by the planning studies (ie, it doesn't need to have an expensive, sophisticated, dual-redundant DCLM scheme since the impact on the BES is acceptable even if the scheme doesn't work). D. Additional Questions related to Curtailment of Firm Transfers: In the past, the latter part of Footnote B read: "To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted Firm (non-recallable reserved) electric power Transfers." The last part of the proposed Footnote B now reads: "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." We would like to understand the implications of the proposed Footnote B as it relates to curtailment of Firm Transfers (as per definition proposed earlier) for the following questions: 1) In the most recent draft of Footnote B, why was the NERC defined term 'Firm Transmission Service' replaced with the non-defined term 'firm transfers'? 2) In the most recent draft of Footnote B, why was the tone softened from "No curtailment of Firm Transmission Service is allowed, except..." to "Curtailment of firm transfers is allowed when..."? 3) Assuming an outage of a single transmission line (N-1 Category B event) has occurred and assuming that no "resources [are] obligated to redispatch" for this outage, would a transmission provider be allowed to curtail Firm Transmission Service (NERC defined term) that it has sold in order to prepare to withstand the next worst credible contingency? 4) Would transmission providers be allowed to sell Firm Transmission Service on a path above what could be delivered with any one element of that path out of service and a range of operating conditions? 5) If the proposed Footnote B is approved, would utilities have to reinforce their system (within 60 months) to ensure that Firm Transmission Service for particular paths would not be curtailed can be delivered when any one element of that path is out of service? 6) If a transmission provider employs Generation Dropping for single contingencies in order to support Firm Transmission Service between regions, and assuming there are no provisions for obligated re-dispatch, would the proposed Footnote B force a recalculation of firm vs non-firm transfer capability? 7) Path 66 (PACI) and Path 65 (PDCI) can both see significant derates in their firm transfer capability for single contingencies. How would the proposed Footnote B impact Firm Transmission on these paths?

Group
MRO's NERC Standards Review Subcommittee
Carol Gerou
No

The revised draft is a significant improvement over the first draft. However, we suggest the following minor changes: 1. The criterion of "adversely affect overall BES reliability" is undefined and maybe subject to a wide range of interpretation by Transmission Planners, Planning Authorities, and auditors. So, we suggest adding the words "as defined by each Transmission Planner or Planning Authority". 2. The term of "firm transfers" is undefined and maybe subject to a wide range of interpretation by Transmission Planners, Planning Authorities, and auditors. So, we suggest establishing a definition for the term, reverting to the "Firm Transmission Service" term, or using another appropriate defined term.

Individual

Jon Kapitz

Xcel Energy

Yes

Xcel Energy supports the new interpretation that would allow curtailment of firm transfers or demand for limited conditions where the integrity of bulk electric system is not compromised. However Xcel Energy seeks some clarification regarding the following: The 3rd bullet point in footnote b will need to clarify whether the demand interruption can be done after the contingency, or before the contingency. If it is allowed after the contingency, then the standard would allow violation of voltage or thermal loading criteria for a brief period, after contingency and, before demand curtailment happens. Is this acceptable based on the new interpretation? Since TPL-002 standard deals with NERC Category B contingencies, and footnote b states that curtailment of firm transfers is allowed, it should be clarified if this curtailment is allowed before or after the contingency. If the curtailment is allowed only after the contingency, then the system would be in violation of the thermal or voltage criteria for a brief period till the generation is re-dispatched. Is this allowed by the new interpretation? If curtailment is only allowed in preparation of the contingency, then the firm transfers would be curtailed during system intact conditions, in preparation for the first contingency, resulting in violation of TPL-001 standard. Is this allowed by the new interpretation?

Individual

John Sullivan

Ameren

No

The revised text to footnote b relating to the planning process exceeds what is appropriate for a reliability standard. Existing open and transparent stakeholder processes focus on larger system issues rather than on local load serving issues. We suggest the following text for footnote b: Demand may need to be interrupted in limited circumstances to address BES performance requirements. When interruption of Demand is utilized within the planning process, such interruption is limited to: o Demand that is directly served by the elements that are removed from service as a result of the Contingency o Interruptible Demand or Demand-Side Management o Demand that does not adversely impact overall BES reliability and is made temporarily radial as a result of the Contingency, where that Demand must be interrupted to meet performance requirements. 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.

Individual

Darcy O'Connell

California ISO

Yes

1) Regarding the 2nd bullet provision, we suggest: Interruptible Demand or Demand-Side Management that has been reviewed and approved by the Planning Authority. 2) Regarding the 3rd bullet provision, we suggest: Demand interruption that does not adversely impact overall BES reliability.... 3) Also regarding the 3rd bullet provision, we suggest replacing acceptance with clarification to read "where the application is subject to review and clarification in an open and transparent stakeholder process."

Individual

Doug Hohlbaugh

FirstEnergy

No

FirstEnergy appreciates the efforts of the Assess Transmission Future Needs SDT in reaching a reasonable proposal for clarifying Table 1 footnote B presented in the TPL-001 through TPL-004 standards. We also commend NERC staff for convening an industry technical conference to discuss the topic and FERC staff for their participation in the technical conference as the industry carefully considered various perspectives. The proposed footnote B is much improved from the prior draft proposals. One change that FirstEnergy proposes is to strike the text following the semicolon in the third bullet item which states "and where the application is subject to review and acceptance in an open and transparent stakeholder process." This text may be intended as explanatory but has the appearance of mandating an approval process that will be auditable through the TPL reliability standards. The statement is not

needed within the framework of mandatory reliability requirements as FERC Order 890 already mandates an open and transparent process related to the planning of the bulk electric system. FERC via the 890 Final Rule modified the pro forma Open-Access Transmission Tariff to require open and transparent stakeholder process to better ensure no undue discrimination and access to the transmission system. The Final Rule beginning at paragraph 418 discusses reform to the Coordinated, Open and Transparent Planning of the transmission system. The Commission direction included eight planning principles required to be within the open process – one of which is dispute resolution. It should be well understood that the transmission planner and planning coordinator share and disseminate all of their planning study results and proposed corrective actions – including the proposed use of Demand interruption – as part of their adherence to Order 890. We appreciate the SDT’s careful consideration of our comments.

Individual

Orlando A Ciniglio

Idaho Power

Yes

footnote 'b' is silent with respect to planned removal from service of certain generators. I believe there are many conditions out there where a single contingency can initiate a planned (RAS-initiated) removal of generation. The fact that this is mentioned in footnote 'c', under multiple contingencies, begs the need for further elaboration/discussion of this option under single contingencies in footnote 'b'.

Individual

Michael Lombardi

Northeast Utilities

No

NU agrees with the language of the proposed revision to Footnote b EXCEPT FOR bullet #3 which suggests that non-consequential demand interruption could be used to mitigate reliability violations arising from the NERC Category B contingency events (i.e., single element contingencies).

Individual

Thad Ness

American Electric Power

Yes

Individual

JC Culberson

ERCOT

No

The introductory paragraph of footnote b includes policy language. Since this is a reliability standard—and not a policy directive—the general narrative setting forth the desired policy goal of minimizing load-shedding is misplaced. Including policy language can cloud the specific issues the standard attempts to address, and ERCOT recommends deleting the first two sentences in the introductory paragraph. The next sentence in the introductory paragraph goes on to state, generally, that demand may be interrupted to "address BES performance requirements." This phrase is vague. To which performance requirements does this refer? The intent is not clear. If the intent is to generally recognize the need to shed load to respect NERC standards and to allow flexibility for an entity to exercise discretion relative to meeting BES performance requirements, then that intent should be clearly reflected in the language. Furthermore, the last sentence of the introductory paragraph and the subsequent bullet points are arguably inconsistent with this approach, because they could be viewed as removing an entity’s flexibility/discretion by limiting the circumstances when load can be shed. The second bullet point is unnecessary, because it is already apparent that interruptible demand/demand side management programs can be used according to their terms. This could create confusion in that it could be implied that, absent the need to use these to meet BES performance requirements, using them otherwise is inconsistent with/not allowed under footnote b. Simply put, those products are not load shedding as contemplated by this footnote. Therefore they should not be listed here. With respect to the third bullet point, the phrase "demand that does not adversely impact overall BES reliability" is not adequately defined, and provides opportunity for confusion. This is an ambiguous phrase and can't be linked back to objective NERC standards/requirements. The bullet points should avoid ambiguity to mitigate ambiguity risk in audits. In addition, the last part of the language in this bullet imposing an open and transparent stakeholder process is unclear. What is the intent behind requiring review in a stakeholder process? If it is to establish the ability of the entity to develop load shedding procedures beyond those explicitly contemplated in footnote b, ERCOT questions if it is reasonable for the responsible entity to be required to get "permission" from stakeholders to implement reliability measures related to its obligation as the functional entity. Again, the language simply is not clear. Accordingly, ERCOT recommends this bullet point be removed. If it is retained, it should be revised consistent with these comments to remove ambiguous language to mitigate potential confusion around the meaning/scope of the footnote in the administration of the CMEP. In addition, ERCOT recommends revising the draft footnote b to allow for planned Demand interruption as a means of mitigation during interim periods when a unanticipated (such as unexpected demand growth or unit retirements) or temporary change on the system occurs in a

timeframe that is shorter than the time necessary to plan and implement the system upgrades necessary to avoid the Demand interruption. Finally, in the last paragraph of footnote b, it isn't clear why "Transmission Service" was changed to "transfers." Firm transmission service is a service provided in some regions, and it provides relative value to other types of services—e.g., non-firm and network. The mention of transmission service may also be irrelevant in this footnote, since the allowance of its interruption doesn't also allow for load shedding. Therefore, ERCOT recommends eliminating the last paragraph of footnote b.

Group

Bonneville Power Administration

Denise Koehn

Yes

Individual

Kasia Mihalchuk

Manitoba Hydro

Yes

The changes to Table 1 Note b proposed by the SDT for this second posting are a reasonable approach to the issue of interrupting of "Firm Demand". The requirement to evaluate alternatives to dropping of Firm Demand in a transparent stakeholder process should provide the verification of cost over benefit on a case by case basis. I propose the following editorial changes: 1. The change of "Firm Transmission Services" made in Table 1 should be also be made in each TPL standard as R1 refers to "projected Firm (non-recallable reserved) Transmission Services. 2. Since "Firm Demand" is a defined term, ensure it is capitalized throughout the standard. There is one instance where it is not.

Individual

Charles Lawrence

American Transmission Company

No

The revised draft is a significant improvement over the first draft. However, we suggest the following minor changes: 1. The criterion of "adversely affect overall BES reliability" is undefined and may subject to a wide range of interpretation by Transmission Planners, Planning Authorities, and auditors. So, we suggest adding the words "as defined by each Transmission Planner or Planning Authority". 2. The term of "firm transfers" is undefined and may subject to a wide range of interpretation by Transmission Planners, Planning Authorities, and auditors. So, we suggest establishing a definition for the term of "firm transfers", reverting to the "Firm Transmission Service" term, or using another appropriate NERC defined term.

Individual

Kathleen Goodman

ISO New England Inc.

No

ISO New England does not allow non-consequential load loss for first contingencies in Planning Analysis, and as an overall matter, ISO-NE believes that the appropriate step is for NERC to modify the footnote in line with the original FERC Order. However, ISO-NE offers the following recommendation to improve the proposed language for footnote b if it is to be retained similar to what has been proposed. In short, ISO-NE proposes changing the third sub-bullet, because the provision is both unnecessary and inappropriate for a NERC Standard. First, the sub-bullet is redundant, because the Commission has ordered that companies add to their Open Access Transmission Tariffs an open and transparent planning process. If Transmission Planners establish their system planning assessments through those processes, then there should be no question that the Planner's assessments have been effectively communicated to the region. Second, the passive nature of the language (i.e., "where the application is subject to review and acceptance...") is unclear as it suggests that someone other than the Planning Coordinator/Transmission Planner is responsible for determining what belongs in a long-term system assessment. Including Demand-Side Management in the standard also appears redundant as Demand Response is used as an asset in the same manner as generation resources. b) When interruption of Demand is utilized within the planning process, such interruption is limited to: 1) Demand that is directly served by the elements that are removed from service as a result of the Contingency. 2) Interruptible Demand or Demand-Side Management 3) Instances where the planned or controlled interruption of Demand results in System performance which meets the requirements of Table 1 for Category B contingencies. When such Demand interruption is utilized in an assessment, the use of such actions must be limited to small portions of the system, be operationally achievable, be of limited duration, and be documented therein.

Individual

Dan Rochester

Independent Electricity System Operator

Yes

Individual
Ed Davis
Entergy Services
No
Entergy disagrees with the proposed language in the third bullet for two reasons. 1. While Entergy supports the idea of "an open and transparent stakeholder process" regarding the use of non-consequential load loss. It is unclear how such a process could be fairly implemented as competing stakeholder interests could prevent resolution. Stakeholders should be defined as those stakeholders whose load could be shed per footnote b, not any and all stakeholders. 2. The "is subject to review and acceptance" implies that some formal voting process would be required by stakeholders. Is this the SDT's intent? If so would such a process be developed as part of the standard or would it be left up to TO's? If non-consequential load loss was deemed an acceptable solution across a SEAM, would the TO's jointly serving the load need to agree?
Group
Dominion
Louis Slade, Jr.
Yes
Individual
Terry Harbour
MidAmerican Energy
No
While the TPL note "b" approach has improved, MidAmerican has concerns that including the wording "review and acceptance" goes beyond the FERC Order 890 order, process, and intent of including the open review process. Therefore, to align with FERC Order 890, the "review and acceptance" should be replaced with "subject to comment". Anything more exceeds FERC Order 890 and the reason why the review process was included. In the end, Transmission Owning and Operating entities must have final say in the operation of the grid. Entities can comment, but cannot obstruct Transmission Owning and Operating entities from properly operating the grid or reliability could be reduced.
Group
Southern Company
Andy Tillery
No
The revised text relating to the planning process exceeds what is appropriate for a reliability standard. Existing open and transparent stakeholder processes focus on larger system issues and not on local load serving. We suggest that the drafting team go back to the concept of local load being the load that is made temporarily radial by the contingency. That was a much better approach.
Individual
Patrick Farrell
Southern California Edison Company
Yes
SCE appreciates the efforts of the NERC Standards Drafting Team and believes that the team has admirably worked to meet FERC's expectations. SCE would suggest that Footnote "b" be revised to include a semi-colon(;) after the first sub-paragraph and a semi-colon(;) followed by an "and" after the second sub-paragraph, to convey that the three sub-paragraphs are alternative, rather than additive methods for satisfying the requirements for "interruptions."
Individual
Jonathan Appelbaum
United Illuminating Co
No
United Illuminating believes that for TPL Category B contingencies no planned or controlled (non-consequential) interruption of firm demand should occur as a general philosophy for planning the Bulk Electric System (BES). Recognizing there are certain areas of the BES that have unique circumstances that may warrant an exception to this, UI suggests the addition of language that recognizes the limited application of non-consequential load interruption with a process that requires a case-by-case acceptance of such application by the Regional Entity or NERC.
Individual
Michael Moltane
ITC
Yes

The proposed language for the new TPL-001-1 Table 1 footnote b is acceptable to ITC.
Individual
Gregory Campoli
New York Independent System Operator
Yes
The NYISO agrees in principle with the proposed changes, but recommends the following modifications: 1. The introductory paragraph discourages the Interruption of any Demand, implying that no Demand directly connected should be interrupted. However, it is an acceptable practice to allow for some Interruption of Demand that is directly connected to the element that is removed from service. The introductory paragraph is immaterial to the requirement, and therefore unnecessary with the exception of the last sentence which starts the bulleted list. 2. Interruptible demand is an operation tool and not a transmission planning tool, while Demand-Side Management is typically embedded in the load forecast used in the planning process. The second bullet therefore may not be necessary or applicable here, though it is helpful in making clear those are acceptable forms of interruption. 3. The third bullet is confusing. Suggest revising the wording to clarify the adverse impact to the BES system and documentation expectations. Recommend removing reference to the application being subject to review and acceptance in an open and transparent stakeholder process; this is inherent to all documentation and does not need to be emphasized in a footnote. 4. In the last sentence of the last paragraph, "would" should be replaced by "must". 5. The Drafting Team should reconsider the use of "Load" as opposed to "Demand". By definition (NERC Glossary dated April 20, 2010) Demand is: 1. The rate at which electric energy is delivered to or by a system or part of a system, generally expressed in kilowatts or megawatts, at a given instant or averaged over any designated interval of time. 2. The rate at which energy is being used by the customer." Load is defined as: "An end-use device or customer that receives power from the electric system." This terminology is more appropriate to the application used in the Table. Possible rewording of footnote "b" to be considered: b) Under the limited circumstances when interruption of Load is utilized within the planning process to address BES performance requirements, such interruption is limited to: o Load that is directly served by the elements that are removed from service as a result of the Contingency o Interruptible Load or Demand-Side Management o Demand that does not adversely impact overall BES reliability where the circumstances for the use of such Load interruption and alternatives evaluated are documented. Curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of available resources, 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 must also be respected.
Individual
David Kiguel
Hydro One Networks Inc.
No
1. The introductory paragraph discourages the Interruption of any Demand, implying that no Demand directly connected should be interrupted. However, it is an acceptable practice to allow for some Interruption of Demand that is directly connected to the element that is removed from service. Recommend that the drafting team revise the wording to eliminate this implication, and soften the expectation such that it is recognized that some Interruption of Demand is unavoidable by system configuration, but that each entity should establish a reasonable limit on how much demand can be interrupted due to the loss of an element. 2. The Statement that "However, Demand may need to be interrupted in limited circumstances to address BES performance requirements" in the introductory paragraph contradicts bullet 3 "Demand that does not adversely affect BES ..." 3. The third Bullet is confusing. Suggest revising the wording to clarify the adverse impact to the BES system, documentation expectations, and to answer fundamental questions such as who has the authority to decide the use if the stakeholder process is "accepting", and the necessity of having a stakeholder process. It is unlikely that the interruption of Demand will adversely impact the BES system. This constraint is too broad. The language in this bullet also allows that non-consequential Demand interruption could be used to mitigate reliability violations arising from the NERC Category B contingency events (i.e., single element contingencies). 4. In the second paragraph, the conditions when interruption of Firm Transfers may be used are not specified. 5. In the last sentence of the second paragraph, "would" should be replaced by "must". Alternatively, possible rewording of footnote "b" to be considered: b) An objective of the planning process should be to minimize the likelihood of interrupting Demand and measures to mitigate such interruption should be pursued within the planning process. However, Demand may need to be interrupted in limited circumstances to address BES performance requirements or other local reasons which have no adverse impact on overall BES reliability or the interconnected BES. When interruption of Demand is utilized within the planning process, such interruption is limited to: o Demand that is directly served by the elements that are removed from service as a result of the Contingency o Demand that does not adversely impact overall reliability of the BES or the interconnected BES and where the circumstances describing the use of such Demand interruption are documented, including alternatives evaluated; and where the application is subject to review and acceptance in an open and transparent stakeholder process. Curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of available resources, 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. The Drafting Team should reconsider the use of "Load" as opposed to "Demand". By definition (NERC Glossary dated April 20, 2010) Demand is: "1. The rate at which electric energy is

delivered to or by a system or part of a system, generally expressed in kilowatts or megawatts, at a given instant or averaged over any designated interval of time. 2. The rate at which energy is being used by the customer.” Load is defined as: “An end-use device or customer that receives power from the electric system.” This terminology is more appropriate to the application used in the Table.
Individual
Jason Marshall
Midwest ISO
No
Overall, we believe the changes are reasonable. However, we propose to strike "and where the application is subject to review and acceptance in an open and transparent stakeholder process." Stakeholder review processes should not be mandated through enforceable standards as they do not provide a clear benefit to reliability. Further, FERC Order 890 already mandates an open and transparent process related to the planning of the bulk electric system.
Individual
Claudiu Cadar
GDS Associates Inc.
No
We appreciate all the work conducted by SDT to adjust current footnote “b” however, we disagree with the current approach as follows below: - The definition does not go far enough with recognition that interruption of Demand should be mitigated if at all possible. The previous language may have been inadequate, but the current language does not encourage the TP to develop mitigation plans that could be implemented as an alternative to Demand interruption. - Use of Interruptible Demand should only be implemented if the Transmission Planner can point to a contract between the Transmission Provider and Transmission Customer that permits load curtailment. - Under FERC Order 890, Conditional Firm transmission service can be granted for entities who voluntarily acknowledge the right of the Transmission Provider to curtail their transaction or provide re-dispatch. This should be the only transfer which can be utilized in the Planning Horizon for interruption of Demand for Note b. Suggested language to find the balance point in the tone of this note is below: “An objective of the planning process is to develop mitigation plans that do not call for the curtailment of Demand, as interruption of Demand places specific customer groups at a reliability risk that varies from their counterparts in other areas of the BES. There may be rare instances, however, where interruption of Demand can be considered a short-term bridge to a mitigation plan which does not rely on negatively impacting certain customer segments. When interruption of Demand is utilized within the planning process, such interruption is limited to: o Demand that is directly served by the elements that are removed from service as a result of the Contingency, o Interruptible Demand or Demand-Side Management, where the Customer has given explicit rights to the Transmission Provider for curtailment of their Demand, o Demand, other than Interruptible Demand or Demand-Side Management, that does not adversely impact overall BES reliability where the circumstances describing the use of such Demand are documented, including alternatives evaluated; where the Load-Serving Entity who has responsibility for serving such Demand has agreed to the curtailment, and where the application is subject to review and acceptance 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 per the terms and conditions of the confirmed transmission service request between the Transmission Customer and Transmission Provider, where it can be demonstrated that Facilities remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of and firm Demand. Where Facilities external to the Transmission Planner’s planning region are relied upon, Facility Ratings in those regions would also be respected. In addition, any Conditional Firm transfers may be curtailed, in accordance with the terms and conditions of the confirmed transmission service request between the Transmission Customer and Transmission Provider.”
Individual
Chifong Thomas
Pacific Gas and Electric Co.
Yes
Group
IRS Standards Review Committee
Ben Li
Yes
Individual
Catherine Koch
Puget Sound Energy
Yes
PSE agrees with the foot note b as stated. As it states for any category B outage there wouldn't be any non-

consequential load loss allowed unless a full study is performed with evaluation of alternatives and is approved by stakeholders. Also, one could curtail firm transfers if re-dispatch of resource is possible. However, there is still some ambiguity in when approval from stakeholders (time-line) should be sought and who the stakeholders could be (customers, effected utilities etc.). Hence, PSE would like to revise the footnote by adding the following to the end of the footnote, "... at least 2 years prior to the implementation. All the affected parties must review and agree upon the loss of demand proposal."

Group

IRC Standards Review Committee

Ben Li

Yes

Individual

Harold Wyble

Kansas City Power & Light

No

KCPL appreciates the efforts of the Assess Transmission Future Needs SDT in reaching a reasonable proposal for clarifying Table 1 footnote B presented in the TPL-001 through TPL-004 standards. We also commend NERC staff for convening an industry technical conference to discuss the topic and FERC staff for their participation in the technical conference as the industry carefully considered various perspectives. Although the proposed footnote B is much improved from the prior draft proposals, KCPL proposes is to strike the text following the semicolon in the third bullet item which states "and where the application is subject to review and acceptance in an open and transparent stakeholder process." This text may be intended as explanatory but has the appearance of mandating an approval process that will be auditable through the TPL reliability standards. The statement is not needed within the framework of mandatory reliability requirements as FERC Order 890 already mandates an open and transparent process related to the planning of the bulk electric system. FERC via the 890 Final Rule modified the pro forma Open-Access Transmission Tariff to require open and transparent stakeholder process to better ensure no undue discrimination and access to the transmission system. The Final Rule beginning at paragraph 418 discusses reform to the Coordinated, Open and Transparent Planning of the transmission system. The Commission direction included eight planning principles required to be within the open process – one of which is dispute resolution. It should be well understood that the transmission planner and planning coordinator share and disseminate all of their planning study results and proposed corrective actions – including the proposed use of Demand interruption – as part of their adherence to Order 890.