

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted:	October 15, 2009
Date accepted:	November 30, 2009
Contact information for person requesting the interpretation:	
Name:	Thomas E Washburn
Organization:	Florida Municipal Power Pool
Telephone:	407-384-4066
E-mail:	twashburn@ouc.com
Identify the standard that needs clarification:	
Standard Number (include version number):	TOP-002-2a
Standard Title:	Normal Operations Planning
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement:	
R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).	
Clarification needed:	
Requirement 10 is proposed to be eliminated in Project 2007-03 because it is redundant with TOP-004-0 R1, which only applies to TOP not to BA. However, that will not be effective for more than two years. In the meantime, in Requirement 10 is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?	
Identify the material impact associated with this interpretation:	
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.	
Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.	

Project 2009-27: Response to Request for an Interpretation of TOP-002-2a, Requirement R10, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R10, was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).

Question

In Requirement 10, is the requirement of the BA to plan to maintain load-interchange-generation balance under the direction of the TOPs meeting all SOLs and IROLs?

Response

Yes. As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority is responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. The Balancing Authority does not possess the Bulk Electric System information necessary to manage transmission flows. Therefore, the Balancing Authority must communicate with and follow the directions of the Transmission Operator to meet all SOLs and IROLs.