Name (14 Responses)
Organization (14 Responses)
Group Name (7 Responses)
Lead Contact (7 Responses)
Comments (21 Responses)

Individual
Luther Fair
Gainesville Regional Utilities
GRU (GVL)does not use Non-Consequential Load Loss as a planning action to help the BES performance requirements after a single contingency.
Group
Tennessee Valley Authority
Tim Ponseti, VP
TVA appreciates the opportunity to offer comments on the data request. TVA suggests that specific time periods be identifed in the data request for when footnote b was used in the past (such as last 2 years) as well as planned to be used in the future. TVA recommends that a form be developed with this data request to help clarify and summarize the needed information - such as MW level impacted, contingency, case used in analysis, etc.
Individual
Thad Ness
American Electric Power
AEP has no objections overall to the questions posed in the current draft of the proposed data request. However, should the structure, questions, or effort required to respond to the data request change significantly in future drafts of the proposed request, AEP suggests that the draft include the anticipated time to respond to the actual data request.
Group
Bonneville Power Administration
Chris Higgins
Individual
Patti Metro
NRECA
The last sentence of the of Introduction and Survey Scope should be modified for consistency with resulting questions to collect the data. Remove “how frequently” and replace with “how many instances”. Modified sentence provided for clarity: “The purpose of this data request is to solicit data and information from each registered Transmission Planner and Planning Coordinator in the United States and Canada in order to provide information identifying the specific instances of any planned interruptions of Firm Demand under footnote b and how many instances the provision has been used.” In addition, NRECA suggests adding an explanation of why the data is being collected from 2007 – 2011. In the Data Request Question 3 e-g, NRECA does not understand the need for “average” if the other data in Question 3 is being collected. The data request should include a timeline for response by the applicable entities. In addition, since the draft data request is applicable to entities registered as Planning Coordinators and Transmission Planners, the data request should include an explanation of how NERC will validate that the data received does not double count “specific instances of any planned interruptions of Firm Demand under footnote b and how frequently the provision has been used” since there may be overlap of the portions of the BES areas for which planning data is provided.
Group
MRO NSRG
WILL SMITH
The following comments are on behalf of the MRO NSRF. 1) The data request should be clarified in a

few areas, to ensure that planners are consistent in their responses, and provide the data that the team is looking for. Specifically: a) Please clarify if the drafting team is looking for instances of planned load interruption in response to the first contingency, or the load interruption implemented as system adjustment in preparation for the next contingency. Recommend that the SDT ask entities if they are using foot B in response, in preparation or both? b) In FERC's April 23, 2010 order approving interpretation of R1.3.12 of TPL-002-0 and TPL-003-0, it was clarified that maintenance-related outages should be included in planned outages. Please clarify if this data request will also include maintenance-related outages. If so, the request should be limited and only go back to the date of the order, as this was not a common understanding across the industry until then. 2) It is unclear how long entities will have to respond to the data request, once issued. If possible, we recommend 60 days would be practical and realistic. 3) We believe the data request should not go back beyond 2009, since many if not all planners have been audited and may not have records back to 2007. This will allow 3 full years of data. 4) The data request could be stream-lined by simply asking for a list of all instances where footnote b was used. Then for each instance, just ask whether a capital project was planned to address it along with the MW of planned interruption, the cost of the project, and the actual/expected duration of the exception. If no capital project was/is planned to eliminate the exception, then request an explanation. This will also provide clarity on whether the deficiency was/is transitory or permanent. This should provide the team with all the data they need. If the data request is not stream-lined, and question 3 subparts are retained, we suggest the following revisions: a) 3.e. Requesting an average is not appropriate and will not likely yield any valuable information. Recommend removal of this question, or at a minimum clarify what period of time the average should be taken? (e.g. each calendar year) b) 3.f. Again, asking for costs on an average number is not appropriate and not likely to yield any valuable information. Instead, the team should be asking for specific costs for each instance. Sometimes the smallest MW upgrade costs much more than a large or new project. So, this would skew the results. c) 3.g. This question should be struck as the results would be arbitrary and not likely to yield any valuable information. Instead, should ask for specifics on each instance.
Group
Southwest Power Pool Reliability Standards Development Team
Jonathan Hayes
What are the time frames for getting this data request together once approved? We understand that this is an expedited issue but would like to have a time frame around the data request.
Group
Northeast Power Coordinating Council
Guy Zito
Planned interruptions of Firm Demand in response to a Single Contingency (as directed in Footnote b of TPL-002 Table 1, is not an acceptable corrective action to mitigate reliability issues on the BES system. The Interconnected System should be designed and operated with enough transfer capacity to be able to withstand, at a minimum, a single contingency event without service interruptions to customer load. Systems must be designed and operated so that the impact of any single contingency can be mitigated by re-dispatching available system resources without the need to implement load shedding.
Individual
Milorad Papic
Idaho Power Company
The IPC transmission planning has identified a single instance of planned interruption of Non-Consequential Firm Load to address BES performance requirements following a single contingency as described in footnote "b" of the TPL-002-0b Reliability standard.
Individual
Michael Falvo
Independent Electricity System Operator
Individual
Curtis Crews

Texas Reliability Entity
Question 2- What is the relative timeframe associated with the phrase “Do the plans”? In essense, is the question just backward looking? Or is the intent to capture the forward looking plans existing now? Question 3- Part c-- Is reinforcements intended to equate to transmission solutions only? Or is it inclusive of generation needs that may satisfy issues? Question 3- Part d-- If you have a 1 MW Firm Demand interruption in plans for Year 3 and Year 4, what is the appropriate answer? Question 3- Part e, f and g-- Average values seem to provide limited information and is ambiguous to request. Since Firm Demand interruptions may occur over a multi-year span, the average “year” values provide little insight to the issue. The average cost could also be misleading if the cost of reinforcements for 1 MW of Firm Demand interruption in a heavily transmission congested area (like a city) far outweigh the cost of reinforcements for 1 MW of Firm Demand interruption in west Texas. Question 4, 6, 8, 10, 12- If multiple single contingencies result in the planned interruption the same MW of Firm Demand, is that one instance or multiple instances? What is the intent of the question if more than one single contingency (ran as N-1) results in the same MW of Firm Demand interruption?
Individual
Martyn Turner
LCRA Transmission Services Corporation
To more efficiently manage the amount of data that is associated with this data request while not compromising the value in meeting the objective, the data request should be limited to an entity’s application of Footnote b as follows: With the exception of Load connected to the Transmission Facilities being removed from service by a Protection System operation designed to isolate the fault, do the plans for the interconnected transmission system for which you have planning responsibility currently include any instances of planned interruption of Load to address BES performance requirements following a single contingency (i.e., any use of “planned or controlled interruption of supply”) as described in footnote “b” of the TPL-002-0b Reliability Standard?
Individual
Brian J Murphy
NextEra Energy, Inc
The introduction and survey scope sections provide an overview of Federal Energy Regulatory Commission (FERC) orders on TPL-002-0b, footnote b, and references a FERC directive to gather data, but do not provide a clear understanding of why NERC is requesting the specific information in the proposed data request. In other words, there is no clear articulation of the purpose of the data request, what NERC intends to do with the data, or how it helps NERC address FERC’s concerns. Thus, it is recommended that the data request be re-issued with a clearer articulation of why the data is needed, and what NERC intends to accomplish by collecting the data. Also, as drafted, it is estimated it will take considerable resources to review past TPL-002 assessments and provide the requested information. Thus, NERC should limit the data request to a single, sample year such as 2011. If a single year would not provide sufficient information then NERC should explain why and provide a specific justification for the period of time requested.
Individual
Larry Watt
Lakeland Electric
The data request should not include data pertaining to consequential loss of load. Please clarify if the information request is to include data concerning consequential load loss scenarios. It could be construed that a radial native load loss due to removal of a faulted element is "planned interuption of firm demand."
Individual
Kirit Shah
Ameren
Group
ACES Power Marketing Standards Collaborators
Jason Marshall
(1) We do not believe section 1602.2.1 in the Rules of Procedure has been fully satisfied. Section

1606 contains the rules for an expedited data request and they still compel that the information identified in section 1602.2.1 should be included in the request. The requirements of section 1602.2.1 that we believe have not been fully satisfied include the requirements for the data request to explain how the data will be used, how the data will be collected and validated, the schedule for data collection and the relative burden of collecting the data in the data request. It is clear that NERC submitted the request to satisfy a directive from Order 762 “to identify the specific instances of any planned interruptions of Firm Demand under TPL-002-0b footnote ‘b’ and how frequently the provision has been used”. The data request we believe is much broader than the data needed to satisfy the directive. For instance, the estimated cost of reinforcements to eliminate the need to shed Firm Demand and the year of reinforcements is requested in 3.c, 3.d, 3.f, 3g, 3.i and 3.j. While this information may be useful, the data request simply does not explain how it will be used, and it was not required by the FERC directive. We also do not think the data request explains the need to answer the same questions for each planning year dating back to 2007 in questions 4 through 11. Since the Planning Coordinator and Transmission Planner are both targeted for the data request, the data request should explain how NERC will validate that they are not receiving duplicate data and over counting instances of using Firm Demand interruption in planning. We think it is obvious that no estimate of burden has been provided. Furthermore, we did not see any schedule for how long the entities have to respond. (2) The data request should be targeted at the Planning Coordinator or Transmission Planner to avoid receiving duplicate data. Because the Planning Coordinator already has a process in place to gather the necessary planning data and there will be fewer responses, it will be more efficient for everyone (i.e. Transmission Planner, Regional Entities, NERC and Planning Coordinator) if the data request is directed to only the Planning Coordinator. (3) Since the data request is associated with the FERC remand of TPL-002-0b, footnote ‘b’, the data request should be limited to the Bulk Electric System (BES). As written the data request does not specify any limitation. NERC has enforcement authority over the Bulk Power System (BPS) but has recently clarified (at the April Standards Committee meeting) that reliability standards generally apply to the BES unless specifically identified with broader application in the standard. TPL-002-0b does not specify broader application within the standard. Thus, to avoid confusion and to avoid Transmission Planner and Planning Coordinator submitting data for parts of the BPS that are not the BES, NERC should make this clarification in the data request. (4) Section 3.b, 3.e, and 3.h are redundant with 3.a. Section 3.a already requires the Transmission Planner and Planning Coordiantor to identify each unique instance of planned interruption of Firm Demand and to include the MW size. Thus, the smallest (3.b) and largest (3.h) will already be included and NERC will have the data to determine the average size (3.e). (5) Section 3.k should be revised to clarify it is to be provided if it is known. It is entirely possible that a decision was made to plan to interrupt Firm Demand long before NERC standards became enforceable. Thus, this information may no longer be retained due to a myriad of reasons (i.e. employee retirements, data retention policies).

Group

Western Area Power Administration

Brandy A. Dunn

Western Area Power Administration would like to offer the following comments/questions: First, what is the relevance of questions 3.b through l? We believe you can get the answer through response to 3.a. If the intent is to try and set bookends for the amount of load shedding, that is again, case-specific and circumstantial and a one-size-fits-all approach is not workable. Also, we suggest condensing questions 4-13 into one: "How many instances of planned load shed were in your plans developed in the last 5 years?". Western Area Power Administration suggests that Questions 3-13 be consolidated and provided in a simple tabular form with each unique Cat B/footnote (b) instance as a line item and columns to include the following data: "Contingency description, Voltage (kV); Firm demand interrupted (MW); Firm transfer interrupted (MW); Does this contingency jeopardize performance of the larger BES? (yes,no), If so, on what basis? (thermal, voltage, stability), If so, describe any current mitigation (UVLS, RAS, etc.); Year this footnote (b) instance originated; Estimated cost to reinforce BES to prevent interruption of firm demand or transfer ($); Is reinforcement planned? (yes,no); Planned reinforcement year (if applicable)". A simple tabular form, such as this, should adequately provide the statistical data being requested, which appears all inclusive for the current state of the BES along with requesting insight as to when those instances originated, their progression within the BES, smallest/largest/average MW interruption, etc. Due to a large portion of Western's BES being located and dispersed within vast rural settings, footnote (b) is

applicable to much of Western's BES and was designed as such prior to the era of NERC compliance, particularly at the 115 kV level. The single most frequent occurrence is a non-breakered transmission tap (serving load and/or generation). Western's Upper Great Plains Region alone has over 50 transmission taps at 115 kV and up to 10 at 230 KV. Western is pleased to see that conceptual costing information is requested and believes that cost/benefit information is pertinent to the design of the BES, customer reliability expectations and justification of footnote (b) exclusions. Western recommends that footnote (c) be utilized for Cat B and Cat C events. Planned or controlled interruption versus reinforcement to prevent interruption should be a customer based economic decision via standard transparent planning dissemination of information, e.g. 890 studies, etc. Lastly, a minimum of 90 days should be allowed for this data request.
Individual
Alice Ireland
Xcel Energy
1) The data request should be clarified in a few areas, to ensure that planners are consistent in their responses, and provide the data that the team is looking for. Specifically: a) Please clarify if the drafting team is looking for instances of planned load interruption in response to the first contingency, or the load interruption implemented as system adjustment in preparation for the next contingency. The confusion arises because any “manual system adjustment” after the first contingency appears to be within the scope of Category C.3 event. b) In FERC’s April 23, 2010 order approving interpretation of R1.3.12 of TPL-002-0 and TPL-003-0, it was clarified that maintenance-related outages should be included in planned outages. Please clarify if this data request will also include maintenance-related outages. If so, the request should be limited and only go back to the date of the order, as this was not a common understanding across the industry until then. 2) It is unclear how long entities will have to respond to the data request, once issued. If possible, we think 60 days would be adequate. 3) We believe the data request should not go back beyond 2009, since many if not all planners have been audited and may not have records back to 2007. 4) The data request could be stream-lined by simply asking for a list of all instances where footnote b was used. Then, for each instance, ask if have/had a capital project to address it along with the details such as MW, specific costs, duration until deficiency resolved, etc. If no project is in the works to resolve the deficiency, then request an explanation. This will also provide clarity on whether the deficiency was/is transitory or permanent. This should provide the team with all the data they need. If the data request is not stream-lined, and question 3 subparts are retained, we suggest the following revisions: a) 3.e. Requesting an average is not appropriate and will not likely yield any valuable information. Recommend removal of this question, or at a minimum clarify what period of time the average should be taken? (e.g. each calendar year) b) 3.f. Again, asking for costs on an average number is not appropriate and not likely to yield any valuable information. Instead, the team should be asking for specific costs for each instance. Sometimes the smallest MW upgrade costs much more than a large or new project. So, this would skew the results. c) 3.g. This question should be struck as the results would be arbitrary and not likely to yield any valuable information. Instead, should ask for specifics on each instance.
Individual
Laura Lee
Duke Energy
The survey only asks for the contingencies, the amount of MW and the voltage level for each instance of planned interruption of Firm Demand to address BES performance requirements following a single contingency. This may not be enough information to comprehensively characterize the use of non-consequential load loss to address BES performance requirements. Information on the estimated frequency of use of each plan, the types of customer loads possibly being interrupted and the estimated duration of load loss would provide a more comprehensive analysis. Clarification is needed on the questions phrased “How many instances of planned interruption of Firm Demand following a single contingency were included in your plans developed in 2011?” Does this mean how many instances in the next 10 years for the plans developed in 2011? Or does it mean for how many distinct contingencies in the plans developed in 2011, regardless of how many years it is used for those particular contingenies?
Individual
Michael Gammon
Kansas City Power & Light

Data Request questions e, f, and g are regarding information for “average” instances or planned interruption of Firm Demand. It will be confusing to registered entities in how to respond to questions f and g considering each application of interruption of Firm Load will be very specific in each circumstance and will not yield itself to an “average” response regarding cost and elimination. Assuming the goal of the data request is to determine the extent of the application of the instances of planned interruption of Firm Demand, suggest using question “e” as is as this will provide some vision into the breadth of the application of interruption of Firm Demand planned but replacing questions f and g with, “The number of instances where interruption of Firm Demand is utilized, the latest year where reinforcements to eliminate the need for planned interruption of Firm Demand are expected, and the number of instances where there are no plans to provide reinforcements to eliminate the need for planned interruption of Firm Demand.
Individual
Richard Vine
California Independent System Operator
This proposed draft data request is rather extensive (five planning cycles for plans developed in years 2007 through 2011, size (in MW) of smallest, average, largest instance of planned interruption and estimated cost (if known) of reinforcements needed to eliminate the need for the smallest, average, largest instance of planned interruption. Wouldn’t providing the largest instance of planned interruption and estimated cost (if known) of reinforcements needed to eliminate the need for the largest instance of planned interruption for the last one or two planning cycles suffice?