

**Individual or group. (22 Responses)**  
**Name (13 Responses)**  
**Organization (13 Responses)**  
**Question 1 (22 Responses)**  
**Question 1 Comments (22 Responses)**  
**Question 2 (22 Responses)**  
**Question 2 Comments (22 Responses)**

Group
No
The proposed changes do not adequately address FERC's concerns in RM06-16-009. The Commission again references Order 693 and specifically highlights comments by Duke Power Company and Northern Indiana Public Service Company by saying the arguments made to date to allow non-consequential load loss after a single contingency event is "based largely on the matter of economics, not reliability, with the underlying premise that it is not economically feasible to invest in the bulk electric system to the point that it can continue service to all firm load customers under some specific N-1 scenarios." The proposed changes to footnote 'b' indicate "No interruption of firm Load is allowed except:... (2) Planned or controlled interruption of Load supplied by Transmission Facilities made temporarily radial as a result of the Contingency and where that Load must be interrupted to meet performance requirements only on those now radial Transmission Facilities." The exception described appears to still allow non-consequential load loss. FERC describes in RM06-16-009 non-consequential load loss as "the removal, by any means, of any firm load that is not directly served by the elements that are removed from service as a result of the contingency." In referencing Order 693, the Commission reiterated its position that TPL standards "should not allow an entity to plan for the loss of non-consequential load in the event of a single contingency." "Must" should be used instead of "should" in the last sentence of the footnote, making it to read "Facility Ratings in those regions must also be respected."
Yes
Conflicts may arise between individual state commissions, who may have rate recovery authority, and utilities who attempt to abide explicitly with FERC's position on non-consequential load loss. State commissions with rate recovery authority may take the position that considering the economics of proposed investments intended to prevent non-consequential loss of small or remote load is acceptable. This potential conflict between state and federal positions could place utilities in a compromising position.
Individual
Robert Casey
Georgia Transmission Corporation (Bulk System Planning)
No
Georgia Transmission Corporation (GTC) believes that the requirement prohibiting loss of non-consequential load for P1, P2.1 and P3 events is an overreach by the standard into local load quality of service issues. We believe that FERC's directive in (Docket No. RM06-16) to prohibit the loss of non-consequential load in the event of a single contingency appears to extend beyond measures needed for "reliable operation" of the bulk-power system to prevent "instability, uncontrolled separation or cascading failures," none of which occur when utilities implement a planned and orderly loss of non-consequential load. Hence, the Commission's directive to prohibit utilities from incorporating carefully controlled loss of non-consequential load into their planning protocols appears to extend the Commission's reach beyond its review of measures that are needed for "reliable operation" of the bulk-power system as defined under Section 215 of the Federal Power Act. Such directive constitutes an overreaching of the Commission's jurisdiction under Section 215 of the Federal Power Act into the jurisdiction of state commissions which generally have responsibility for overseeing quality of service issues applicable to local load. While the current revised footnote b is an improvement from the prohibition on loss of non-consequential load associated with the recently balloted version of TPL-001-1, it still does not allow Transmission Planners to use appropriate discretion regarding loss of non-consequential load. Transmission Planners, customers, and local regulators should jointly control the decision making when BES reliability is not an issue. Often, the events are extremely improbable and the consequences of these events are local in nature, only requiring minor additional loss of local load to avoid the cost of major projects. In many instances, it may be in the best interest of all involved parties from an overall cost/benefit point of view to allow loss of non-consequential load. We also note that on April 19 NERC filed a request for rehearing with FERC asking that the Commission revise the directive in Paragraph 8 of the March 18 TPL-002 Order to allow NERC the necessary time to incorporate changes to the TPL-002 Reliability Standard through the Reliability Standards Development Process that are necessary to achieve bulk power system reliability. NERC also requested that the Commission grant NERC's Motion for Stay to stay the Order so that a public technical conference with opportunity for comment can be held in order to provide parties an opportunity to meet and discuss the technical considerations of developing a modification to the TPL-002 standard that prohibits the loss of non-consequential firm load in the event of an N-1 contingency. NERC's April 19 filing pointed out that if the Commission's directive to disallow the loss of non-consequential firm load for an N-

1 contingency is implemented, a question is presented regarding whether the Reliability Standard still serves the purpose of ensuring the Reliable Operation of the bulk power system by preventing instability, uncontrolled separation, and cascading failures. That is, the Commission's directive sets forth an expectation that NERC is to implement standards that address all loss of load at costs that may not be commensurate with bulk power system reliability, as statutorily defined, which is fundamentally different from what the Reliability Standards were intended to do.
Yes
See response to Question #1.
Group
Yes
For better clarity delete the phrase "when coupled with" in the second paragraph of footnote 'b.'
No
The comments expressed herein represent a consensus of the views of the above named members of the SERC Engineering Committee Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.
Group
Yes
No
Individual
Thad Ness
American Electric Power
Yes
No
Individual
Kasia Mihalchuk
Manitoba Hydro
Yes
MH agrees with the SDT proposal.
No
Group
No
We propose that the section in double parentheses be deleted. The proposed wording by the drafting team seems to imply that the curtailment of firm transmission service is permitted to address single contingency constraints if coupled with the redispatch of network resources. The original language stated only that curtailments were permitted to prepare for the next contingency, not to address loading related to the initial contingency. The proposed wording could be interpreted to allow redispatch/firm curtailments to address any single contingency constraint. Southern Companies recommend that the original language relating to "preparing for the next contingency" be incorporated into the drafting team's proposal. ((Planned or controlled interruption of electric supply to radial customers or some local Network customers, connected to or supplied by the Faulted element or by the affected area, may occur in certain areas without impacting the overall reliability of the interconnected transmission systems. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted Firm (non-recallable reserved) electric power Transfers.)) No interruption of firm Load is allowed except: (1) Interruption of Load that is directly served by the elements that are removed from service as a result of the Contingency, or (2) Planned or controlled interruption of Load supplied by Transmission Facilities made temporarily radial as a result of the Contingency and where that Load must be interrupted to meet performance requirements only on those now radial Transmission Facilities. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted Firm (non-recallable reserved) electric power transfers No curtailment of Firm Transmission Service is allowed except when coupled with the appropriate re-dispatch of resources obligated to re-dispatch. where it can It must be demonstrated that Facilities remain within applicable Facility Ratings and those adjustments do not result in the shedding of any firm Load. Where Facilities external to the Transmission Planner's planning region are relied upon, Facility Ratings in those regions should also be respected.
No
Individual

Martin Bauer
US Bureau of Reclamation
Yes
No
Group
Yes
On the firm transfer issues, the term "Firm Transmission Service" should be replaced with "Firm Transfers" to be consistent with the fourth column of the existing Table 1 Transmission System Standards - Normal and Emergency Conditions.
No
Individual
Kirit Shah
Ameren
Yes
We were ok with the previous language. Though we do not intend to drop non-consequential load for a single contingency, we understand that other areas may have been following such practice without degrading the reliability of BES. We believe that they can continue this practice if they develop non-firm contracts with these customers.
No
Group
No
For Footnote b, add a third exception to the list, "or (3) end-use load that is either accepted or volunteered by the customer". It is a widely-held understanding that the tripping of non-consequential, end-use load is also allowed, if the tripping of the load is either accepted or volunteered by the customer in lieu of significant transmission system modifications.
No
Individual
Robert W. Roddy
Dairyland Power Cooperative
No
DPC concurs with the MRO comments: For Footnote b, add a third exception to the list, "or (3) end-use load that is either accepted or volunteered by the customer". It is a widely-held understanding that the tripping of non-consequential, end-use load is also allowed, if the tripping of the load is either accepted or volunteered by the customer in lieu of significant transmission system modifications.
No
Individual
Marty Berland
Progress Energy
No
Progress Energy applauds NERC's efforts to improve the footnote (b) language with respect to conditional allowance of curtailing Firm Transmission Service, which is addressed in the second paragraph of the proposed new footnote (b). PE remains concerned, however, that the first paragraph of the proposed new footnote (b) does not allow for curtailment of non-radial non-consequential load. The ability to curtail non-consequential load in the planning horizon can be a useful tool to mitigate local area issues, and has not been detrimental to the Bulk Electric System (BES). Disallowing the curtailment of non-radial non-consequential load essentially prohibits taking action in situations in which the load in question is clearly at a localized self-contained level of the system, i.e. the distribution system(s) served by the Transmission Owner/Operator. Prohibiting the curtailment of local load thus constitutes regulating distribution feeder reliability rather than BES reliability. Events that could be mitigated through the curtailment of local, non-radial non-consequential load are infrequent, and such curtailment has no material effect on the reliability of the BES. PE therefore suggests that the following addition (item (3)) to the first paragraph of the proposed footnote (b) be considered: "No interruption of firm Load is allowed except: (1) Interruption of Load that is directly served by the elements that are removed from service as a result of the Contingency. and/or (2) Planned or controlled interruption of

Load supplied by Transmission Facilities made temporarily radial as a result of the Contingency and where that Load must be interrupted to meet performance requirements only on those now radial Transmission Facilities, and/or (3) Planned or controlled interruption of any additional Load required to mitigate the post-contingency results, provided that the non-consequential load being shed for the event is localized, and provided that the total load shed for the event does not exceed 2% of the Planned system peak demand or 200 MW, whichever value is less."

Yes

There is the potential for conflict between Table 1 – Footnote (b) as currently proposed, which can be considered to regulate local distribution reliability without improving BES reliability, and local service reliability issues which are under the purview of state regulatory agencies. For example, the North Carolina Utilities Commission (NCUC) commented regarding this concern in the ballot which ended March 1 in Project 2006-02. Specifically, NCUC commented that they were "...concerned that the requirement prohibiting loss of non-consequential load for events in Table 1 of TPL-001-1 is an inappropriate overreach into service issues that are more appropriately addressed by state regulatory commissions..." Progress Energy believes that NCUC's concerns are legitimate. BES reliability should address the avoidance and mitigation of cascading outages and BES facility damage, rather than limited, controlled local area loss of load, in order to avoid this conflict and overlap of regulation.

Group

Yes

Yes

This is not an issue for historic PJM members, but as PJM has expanded and as a result of the merger of historic councils into RFC, I am aware that not all regions had standards equal to those of MAAC, and this has been an issue worked out between transmission planners (historic transmission owners) and their local regulators. It is ultimately a cost issue for loss of local load that does not affect the overall reliability of the interconnected BES.

Individual

Michael R. Lombardi

Northeast Utilities

Yes

Yes

Northeast Utilities (NU) believes the language of the proposed revision to footnote 'b' can be better defined as the proposed revision is subject to interpretation by the different entities and regulatory agencies. Future conflicts can be minimized by further clarifying the proposed revision. Also, NU is concerned that this new modification does not specify the amount of permissible load shed nor does it require the planning entity to minimize load shedding under this exception.

Individual

Charles Lawrence

American Transmission Company

No

For Footnote b, add a third exception to the list, "or (3) end-use load that is either accepted or volunteered by the customer". It is a widely-held understanding that the tripping of non-consequential, end-use load is also allowed, if the tripping of the load is either accepted or volunteered by the customer in lieu of significant transmission system modifications.

No

Group

Yes

Yes

It should be noted that conflicts may arise between individual state commissions, who may have rate recovery authority, and utilities who attempt to abide explicitly with FERC's position on non-consequential load loss. In RM-06-16-009, the Commission again references Order 693 and specifically highlights comments by Duke Power Company and Northern Indiana Public Service Company by saying the arguments made to date to allow non-consequential load loss after a single contingency event is "based largely on the matter of economics, not reliability, with the underlying premise that it is not economically feasible to invest in the bulk electric system to the point that it can continue service to all firm load customers under some specific N-1 scenarios." In the US, State commissions with rate recovery authority may take the position that considering the economics of proposed investments intended to prevent non-consequential loss of small or remote load is acceptable. This potential conflict between state and federal positions could place utilities in a compromising position. Similar conflicts may also exist in Canada.

Individual

Greg Rowland
Duke Energy
No
Duke Energy voted "Negative" on the initial and current ballots of TPL-001-1, primarily because Duke believes that the requirement prohibiting loss of non-consequential load for P1, P2.1 and P3 events is an overreach by the standard into local load quality of service issues. We also sought rehearing on the Commission's March 18 Order Setting Deadline for Compliance (Docket No. RM06-16), with respect to this and other issues. We believe that FERC's directive in that Order to prohibit the loss of non-consequential load in the event of a single contingency appears to extend beyond measures needed for "reliable operation" of the bulk-power system to prevent "instability, uncontrolled separation or cascading failures," none of which occur when utilities implement a planned and orderly loss of non-consequential load. Hence, the Commission's directive to prohibit utilities from incorporating carefully controlled loss of non-consequential load into their planning protocols appears to extend the Commission's reach beyond its review of measures that are needed for "reliable operation" of the bulk-power system as defined under Section 215 of the Federal Power Act. Such directive constitutes an overreaching of the Commission's jurisdiction under Section 215 of the Federal Power Act into the jurisdiction of state commissions which generally have responsibility for overseeing quality of service issues applicable to local load. While the current revised footnote b is an improvement from the prohibition on loss of non-consequential load associated with the recently balloted version of TPL-001-1, it still does not allow Transmission Planners to use appropriate discretion regarding loss of non-consequential load. Transmission Planners, customers, and local regulators should jointly control the decision making when BES reliability is not an issue. Often, the events are extremely improbable and the consequences of these events are local in nature, only requiring minor additional loss of local load to avoid the potential impacts (environmental, historical, archaeological, aesthetic...) of major projects. In many instances, it may be in the best interest of all involved parties from an overall cost/benefit point of view to allow loss of non-consequential load. Duke offers the following ideas on alternatives for the SDT to consider that will allow for appropriate discretion and facilitate proper planning while allowing non-consequential load loss (NCLL). The standard should allow for dropping of limited amounts of non-consequential load in situations where it would be reasonable for a bounded time period and under restricted system conditions (e.g. 1-3 years only when load is >90 % of peak conditions). Dropping of non-consequential load would be prudent planning in situations where the near term impact of load projections or implementation of nearby transmission/generation projects will alleviate the necessity of an upgrade to meet N-1 conditions. Also, reliability of service to end-use customer is impacted by the entire system from source to load. Where allowance for NCLL would not greatly impact individual end-use customers' level of reliability the transmission planner should consider its use. Normally transmission system outages are a minor contributor to overall customer outage frequency and duration. Instances where allowance for NCLL can be used to avoid projects without greatly impacting a customer's outage frequency and duration should be acceptable. Use of reliability metrics (e.g. SAIFI/SAIDI/ASAI) should also be considered by the SDT for determination of acceptable use of NCLL.
Yes
See response to question #1.
Individual
Bill Middaugh
Tri-State Generation and Transmission Association, Inc.
No
Tri-State does believe that the new footnote is an improvement, but thinks there are still some changes necessary. We believe that the word "only" should be removed from the phrase "...where that Load must be interrupted to meet performance requirements only on those now radial Transmission Facilities" because that discrimination was not required in FERC Order RM-06-16-009. There may be times when facilities near the temporary radial facilities might also fall outside the limits set in reliability criteria but the situation is mitigated if the load shedding occurs at the radial facility. The meaning of the second paragraph of the new footnote is unclear. Tri-State recommends changing it to "Curtailment of Firm Transmission Service is not allowed unless it is coupled with curtailment-offsetting resources that are obligated to re-dispatch. Further, the curtailment activities cannot result in the shedding of any Firm load or in violations of Facility Ratings, either internal or external to the planning region."
Yes
We believe that FERC's directive in FERC Order RM-06-16-009 to prohibit the loss of non-consequential load in the event of a single contingency appears to extend beyond measures needed for "reliable operation" of the bulk-power system to prevent "instability, uncontrolled separation or cascading failures," none of which occur when utilities implement a planned and orderly loss of non-consequential load. Hence, the Commission's directive to prohibit utilities from incorporating carefully controlled loss of non-consequential load into their planning protocols appears to extend the Commission's reach beyond its review of measures that are needed for "reliable operation" of the bulk-power system as defined under Section 215 of the Federal Power Act. Such directive constitutes an overreaching of the Commission's jurisdiction under Section 215 of the Federal Power Act into the jurisdiction of state commissions which generally have responsibility for overseeing quality of service issues applicable to local load.
Group
Yes

Yes
This is an area of fuzziness between State jurisdiction and Federal jurisdiction. In all honesty, shedding load for local area impacts has nothing to do with BES reliability and should not be under FERC jurisdiction under Section 215 of the Federal Power Act, but rather State jurisdiction for quality of service issues. However, there is also the matter of FERC jurisdiction over commercial matters and the opportunity to "game" the original footnote by transmission providers by allowing firm load shedding to grant firm transmission service for themselves, thereby avoiding or deferring transmission investment, while at the same time denying or requiring others to build the same transmission avoided in order to obtain transmission service. We can see how difficult it is from a drafting team's perspective in achieving a balanced position between these different matters. The drafting team should be applauded for finding a reasonable position.
Individual
Roger Champagne
Hydro-Québec TransÉnergie (HQT)
No
The proposed changes do not adequately address FERC's concerns in RM06-16-009. The Commission again references Order 693 and specifically highlights comments by Duke Power Company and Northern Indiana Public Service Company by saying the arguments made to date to allow non-consequential load loss after a single contingency event is "based largely on the matter of economics, not reliability, with the underlying premise that it is not economically feasible to invest in the bulk electric system to the point that it can continue service to all firm load customers under some specific N-1 scenarios." The proposed changes to footnote 'b' indicate "No interruption of firm Load is allowed except:... (2) Planned or controlled interruption of Load supplied by Transmission Facilities made temporarily radial as a result of the Contingency and where that Load must be interrupted to meet performance requirements only on those now radial Transmission Facilities." The exception described appears to still allow non-consequential load loss. FERC describes in RM06-16-009 non-consequential load loss as "the removal, by any means, of any firm load that is not directly served by the elements that are removed from service as a result of the contingency." In referencing Order 693, the Commission reiterated its position that TPL standards "should not allow an entity to plan for the loss of non-consequential load in the event of a single contingency." "Must" should be used instead of "should" in the last sentence of the footnote, making it to read "Facility Ratings in those regions must also be respected."
Yes
Conflicts may arise between individual state commissions, who may have rate recovery authority, and utilities who attempt to abide explicitly with FERC's position on non-consequential load loss. State commissions with rate recovery authority may take the position that considering the economics of proposed investments intended to prevent non-consequential loss of small or remote load is acceptable. This potential conflict between state and federal positions could place utilities in a compromising position.
Individual
Dan Rochester
Independent Electricity System Operator
Yes
IESO supports the revisions made to footnote 'b' based on the present definitions of BES and Firm Demand and on the understanding that the NERC standards apply only to the BES as defined in the NERC Glossary as follows: "As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition." To be clear, our interpretation of the present definition of BES is that it defers to each Regional Reliability Organization to define the elements of the power system that are considered BES and, therefore in the NPCC Region, "BES as defined by NERC" = "BPS as defined by NPCC".
No