

**Consideration of Comments on Successive Ballot — Project 2010-11 – TPL Table 1, Footnote b**

**Successive Ballot Dates:** 12/27/2010 - 1/5/2011

**Summary Consideration:**

The SDT reviewed all of the comments received and has made a clarifying change to the structure of the footnote to address industry concerns as to the intent of the SDT. No contextual changes have been made to the footnote. Therefore, the SDT is recommending that this project be moved to a recirculation ballot.

**b)** An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

Interruptible Demand or Demand-Side Management

circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.

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.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

| <b>Balloter</b>   | <b>Company</b>        | <b>Seg-ment</b> | <b>Vote</b> | <b>Comment</b>  |
|-------------------|-----------------------|-----------------|-------------|---|
| Richard J. Mandes | Alabama Power Company | 3               | Negative    | Southern Company is voting "no" on the footnote b ballot because of concerns that the reliability of firm transfers could be compromised. The existing Table I Transmission System Standards, |

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

| Balloter                  | Company                         | Segment | Vote     | Comment   |
|---------------------------|---------------------------------|---------|----------|---|
| Anthony L Wilson          | Georgia Power Company           | 3       | Negative | which have been in place as early as the 1997 NERC Planning Standards, do not allow Loss of Demand or Curtailed Firm Transfers under single (Category B) contingencies. Footnote B addressed two areas: 1) the loss of radial or local network load, which Southern Company agrees that the drafting team has appropriately clarified and 2) preparing for the next contingency, which Southern Company does not agree has been appropriately clarified. Southern Company believes the proposed wording "Curtailed of firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch" now allows for the curtailment of firm transfers for single contingencies, whereas Southern Company did not believe this was previously permitted under the standards. Southern Company interprets the new language to allow a planner to curtail firm transfers (generation) to address a single contingency. Southern Company interpreted the original language to not permit the curtailment of firm transfers (generation) for a single contingency, but rather that a planner would develop a suitable transmission reinforcement or other mitigation. Southern Company is concerned that the proposed language could result in a degradation in the dependability of firm transfers impacting the reliability of those customers who rely upon them. Southern Company agrees that a system reconfiguration including the redispatch of generation is appropriate when preparing for a second contingency (Category C). Therefore, a distinction is needed between what is allowed in response to a first contingency and what is allowed to be prepared for a second contingency. The curtailment of firm transfers should not be allowed as a response to the first contingency. This practice would undermine the concept of firm transfers. The curtailment of firm transfers should only be allowed in footnote b as a system adjustment to be prepared for a second contingency. We propose the following to clarify that curtailments are permitted only to prepare for the second contingency. "To prepare for the next contingency, curtailment of firm transfers is allowed, when coupled with the appropriate re-dispatch of resources obligated to re-dispatch". |
| Don Horsley               | Mississippi Power               | 3       | Negative |   |
| Horace Stephen Williamson | Southern Company Services, Inc. | 1       | Negative |   |

**Response:** The SDT has changed the wording 'coupled with' to 'achieved through' to better clarify the SDT's intent.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailed of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. ~~However,~~ It is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

~~Interruptible Demand or Demand-Side Management~~

~~circumstances~~ where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand

| Balloter   | Company                     | Segment | Vote     | Comment  |
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| interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.  |                             |         |          |  |
| <p><del>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.</del></p>  |                             |         |          |  |
| <p>As drafted, footnote ‘b’ clarifies that re-dispatch is allowable to “remain within” ratings, not to bring the Facilities within ratings. The draft language recognizes that System adjustments may be required after a single Contingency, since entities may utilize ratings in the planning horizon that can only be utilized for a limited time, such as a 2 hour emergency rating. It further clarifies that if an entity is obligated to re-dispatch its generation resources, the Transmission Planner can plan to re-dispatch those resources for a single Contingency. However, if the resources that impact the affected Facilities are not obligated to re-dispatch, the firm transfers cannot be curtailed. Therefore, the SDT does not believe that it is necessary to add the words “To prepare for the next Contingency” to the footnote. No change made.</p> |                             |         |          |  |
| Jennifer Richardson  | Ameren Energy Marketing Co. | 6       | Negative | <p>We agree with the statement that an objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand following single contingency events. While we appreciate the drafting team’s efforts in removing the need for acceptance by other parties in the stakeholder process, we still feel that language in the second bullet of the revised footnote b should be modified to remove all references to an open and transparent stakeholder process. Existing RTO stakeholder processes that we are aware of focus on larger system issues, rather than on local load serving issues. Therefore, we believe that the load serving issues following single contingency events are issues between the customer and the utility, and should be addressed in one-on-one forums between those entities.</p> |
| Kirit S. Shah  | Ameren Services             | 1       | Negative |  |
| <p><b>Response:</b> The SDT disagrees that this should be handled through two party interactions. The SDT believes that in situations where an entity’s planning studies require the interruption of Firm Demand to remain within BES Facility Ratings that the entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be impacted by those decisions have the ability to review those plans. No change made.</p>  |                             |         |          |  |
| Steven Norris  | APS                         | 3       | Negative | <p>It is not clear whether both bullets under “footnote b” have to be met or only one of the two have to be met. It is suggested that the standard be very clear about this</p>  |
| Mel Jensen   | APS                         | 5       | Negative |  |
| Robert D Smith   | Arizona Public Service Co.  | 1       | Negative |  |
| <p><b>Response:</b> The bullets – o Interruptible Demand or Demand-Side Management and o Circumstances where ... are not requirements that must be met, but rather they define the conditions, either one or both, where Load is allowed to be interrupted. The SDT has rearranged the footnote to clarify the intent of the footnote.</p>   |                             |         |          |  |
| <p><b>b)</b> An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch,</u></p>  |                             |         |          |  |

| Balloter  | Company                         | Segment | Vote        | Comment  |
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| <p><u>where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:</u></p> <p><u>Interruptible Demand or Demand-Side Management</u></p> <p><u>-Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</u></p> <p><u>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.</u></p> |                                 |         |             |  |
| John Tolo   | Tucson Electric Power Co.       | 1       | Negative    | The first sentence of the second paragraph appears to conflict with the first paragraph in that it indicates that curtailment of transfers is allowed under certain conditions as long as it doesn’t result in the shedding of any firm Demand. Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed.  |
| Scott Kinney  | Avista Corp.                    | 1       | Affirmative | The first sentence of the second paragraph appears to conflict with the first paragraph in that it indicates that curtailment of transfers is allowed under certain conditions as long as it doesn’t result in the shedding of any firm Demand. Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed.  |
| Robert Lafferty   | Avista Corp.                    | 3       | Affirmative |  |
| Brenda S. Anderson  | Bonneville Power Administration | 6       | Affirmative | Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed.  |
| William Mitchell Chamberlain  | California Energy Commission    | 9       | Affirmative | I am voting for this improved standard but I am concerned that the first sentence of the second paragraph appears to conflict with the first paragraph in that it indicates that curtailment of transfers is allowed under certain conditions as long as it doesn’t result in the shedding of any firm Demand. This problem could be corrected by adding language to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed. |

| Balloter          | Company  | Segment | Vote        | Comment  |
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| Chang G Choi      | City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power | 1       | Affirmative | Tacoma Power agrees that the revision is better than the existing language. However, to improve clarity on the interrelationship of the 2 paragraphs of Footnote B, we strongly suggest adding the following phrase to the end of the first sentence of the second paragraph, "unless the firm Demand is allowed to be shed pursuant to the above paragraph in this footnote."   |
| Max Emrick        | City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power | 5       | Affirmative |  |
| James Tucker      | Deseret Power  | 1       | Affirmative | As drafted the first paragraph of proposed Footnote B identifies the objective of minimizing interruption of Demand following Contingencies and goes on to identify the limited situation where interruption of demand may be necessary. However, the first sentence of the second paragraph appears to conflict with the first paragraph in that it indicates that curtailment of transfers is allowed under certain conditions as long as it doesn't result in the shedding of any firm Demand. Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed   |
| Chifong L. Thomas | Pacific Gas and Electric Company   | 1       | Affirmative | PG&E supports the proposed footnote B. We believe, however, there is a potential for confusion with the language as currently drafted. As drafted the first paragraph of proposed Footnote B identifies the limited situations where interruption of demand may be necessary and would be allowed. However, the first sentence of the second paragraph indicates that curtailment of transfers is allowed under certain conditions as long as it doesn't result in the shedding of any firm Demand. Taken together with the first paragraph, this requirement can be confusing because the first paragraph potentially conflicts with the second paragraph. Please change the first sentence in the second paragraph to read, "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, the interruption of which is otherwise allowed as described above." |
| James L. Jones    | Southwest Transmission Cooperative, Inc.   | 1       | Affirmative | Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed.  |
| Travis Metcalfe   | Tacoma Public Utilities  | 3       | Affirmative | Tacoma Power agrees that the revision is better than the existing language. However, to improve clarity on the interrelationship of the 2 paragraphs of Footnote B, we strongly suggest adding the following phrase to the end of the first sentence of the second paragraph, "unless the firm Demand is allowed to be shed pursuant to the above paragraph in this footnote."   |

| <b>Balloter</b>     | <b>Company</b>                    | <b>Segment</b> | <b>Vote</b> | <b>Comment</b>   |
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| Keith Morisette     | Tacoma Public Utilities           | 4              | Affirmative |  |
| Michael C Hill      | Tacoma Public Utilities           | 6              | Affirmative |  |
| Beth Young          | Tampa Electric Co.                | 1              | Affirmative | Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed   |
| Ronald L Donahey    | Tampa Electric Co.                | 3              | Affirmative |  |
| RJames Rocha        | Tampa Electric Co.                | 5              | Affirmative | Recommend adding language to paragraph 2, sentence 1 to clarify shedding of firm demand is allowed as stated in Paragraph 1.   |
| Benjamin F Smith II | Tampa Electric Co.                | 6              | Affirmative |  |
| Melissa Kurtz       | U.S. Army Corps of Engineers      | 5              | Affirmative | Language needs to be added to the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed.  |
| Brandy A Dunn       | Western Area Power Administration | 1              | Affirmative | As drafted, the first paragraph of proposed Footnote B identifies the objective of minimizing interruption of Demand following Contingencies and goes on to identify the limited situation where interruption of demand may be necessary. However, the first sentence of the second paragraph appears to conflict with the first paragraph in that it indicates that curtailment of transfers is allowed under certain conditions as long as it doesn't result in the shedding of any firm Demand. Western recommends that the Drafting Team include language at the end of the first sentence of the second paragraph of Footnote B that clarifies that the shedding of firm Demand as clarified in paragraph one of Footnote B is allowed. |

| Balloter        | Company                                  | Segment | Vote        | Comment  |
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| Louise McCarren | Western Electricity Coordinating Council | 10      | Affirmative | WECC supports the concept that is clarified in the proposed language for Footnote B. We have noted however, what could potentially be confusing language between paragraphs one and two of the proposed language. Paragraph one correctly indicates that one of the objectives of transmission planning is to minimize the likelihood and magnitude of interruption of Demand. The first paragraph also recognizes that while this is an objective, there may be certain limited conditions where Demand is interrupted. In recognizing this, the first paragraph lists those limited instances when Demand may be interrupted. However, the first sentence of paragraph two could be interpreted to mean that shedding of Firm Demand is not allowed. The sentence means that shedding of Firm Demand is not allowed due to curtailment of firm transfers, but if there is a situation where curtailment of firm transfers is necessary and curtailment of Demand per the reasons listed in the first paragraph occurs, it should be clear that this is allowed. Suggest adding the following language, or something similar, to the end of the first sentence of the second paragraph of Footnote B. ...except as allowed above. |

**Response:** The SDT has reorganized the footnote to clarify intent and address the issue raised.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

~~Interruptible Demand or Demand-Side Management~~

~~–Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.~~

~~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.~~

| Balloter                             | Company  | Segment | Vote     | Comment   |
|--------------------------------------|----------|---------|----------|---|
| Venkatarama<br>krishnan<br>Vinnakota | BC Hydro | 2       | Negative | <p>Footnote "b" of TPL-001/2/3/4 is still vague and not acceptable. The last paragraph of 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 the SDT to answer the following questions related to the paragraph quoted above:</p> <p>1) What is meant by "firm transfers"? Is it simply energy flowing in real-time on Firm Transmission Service (NERC defined term) that was not previously curtailed in the hour-ahead or day-ahead scheduling processes, or does it refer to ALL Firm Transmission Service that was sold on a path?</p> <p>2) Please provide an example of what an "appropriate re-dispatch of resources obligated to re-dispatch" could look like?</p> <p>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 that it has sold in order to prepare to withstand the next worst credible contingency?</p> <p>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 across a range of operating conditions?</p> <p>5) If the proposed Footnote b is approved, and assuming an appropriate obligation to redispatch could not be negotiated, would utilities have to reinforce their system (within 60 months) to ensure that Firm Transmission Services already sold on particular paths would not be curtailed when any one element of that path is out of service?</p> <p>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?</p> <p>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? Further, the Project 2010-11 SDT (Footnote "b") should be amalgamated with the Project No. 2006-02 SDT (TPL-001 through TPL004 amalgamation/update):</p> <p>1. It doesn't make any sense to update Footnote "b" of TPL-001 based on the existing approved</p> |

| Balloter   | Company                             | Segment | Vote     | Comment   |
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|  |                                     |         |          | <p>version of TPL-001 when the language in that standard is being revised and terms that Footnote "b" makes reference to will be changed. Draft #6 (2010-Oct-19) of TPL-001 has changed "Footnote b" to "Footnote 9".</p> <p>2. Draft #6 of TPL-001 has changed the column heading relevant to "Footnote b" from "Loss of Demand or Curtailed Firm Transfers" to "Interruption of Firm Transmission Service Allowed".</p> <p>3. Draft #6 of TPL-001 has seven new definitions including the following two definitions that would be expected to be relevant to Footnote b: 3.1. 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. 3.2. Non-Consequential Load Loss: Non-Interruptible Load loss that does not include: (1) Consequential Load Loss, (2) the response of voltage sensitive Load, or (3) Load that is disconnected from the System by end-user equipment.</p> <p>4. The Project 2006-02 SDT has placed Draft #6 of TPL-001 on hold, stating, "The team will delay moving the standard forward until the resolution of "footnote b" has become clear."</p> |
| <p><b>Response:</b> 1. For consistency with the existing standard text, the term 'firm transfer' is retained. Therefore, the interpretation of "firm transfers" remains unchanged.</p> <p>2. One example would be a contractual arrangement that defines clear expectations to alternately serve Load upon the removal of the firm transfer so that no loss of Load occurs.</p> <p>3. In the planning timeframe, footnote 'b' addresses single Contingencies (Cat. B) and footnote 'c' addresses the Cat. C Contingencies. Neither footnote prohibits System adjustments, which could include re-dispatch of your own resources to prepare for the next Contingency.</p> <p>4. How Firm Transmission Service (FTS) is sold is addressed in individual tariffs in concert with the MOD standards.</p> <p>5. The implementation plan provides 60 months after regulatory approval for entities to comply with the modified standard. How that is accomplished is up to individual entities.</p> <p>6. &amp; 7 Each circumstance may need to be evaluated individually and additional documentation of understandings may be necessary.</p> <p>7-1 - 4. Based on ballot comments and regulatory orders, the SDT determined that the best course of action was to address footnote 'b' as a standalone item and then incorporate the changes approved for footnote 'b' into the new TPL-001-2 in a manner consistent with the other proposed changes in TPL-001-2.</p> |                                     |         |          |   |
| Christopher L de Graffenried   | Consolidated Edison Co. of New York | 1       | Negative | <p>Interruptible Demand, like Demand-Side-Management, is an operational tool. We do not believe it appropriate to use operational tools for transmission planning. A load serving entity should not claim to serve loads it plans to disconnect during a design contingency. In other words, these loads should be excluded from the load forecast in the first place and, thereby, would not be represented in power flows that are utilized to assess system performance under the TPL standards. This approach prevents the use of such load interruptions to address any deficiency found in TPL-type</p>   |
| Peter T Yost   | Consolidated Edison Co. of New York | 3       | Negative |   |

| Balloter  | Company                                     | Segment | Vote     | Comment   |
|---|---|---------|----------|---|
| Wilket (Jack) Ng  | Consolidated Edison Co. of New York         | 5       | Negative | assessments.  |
| Nickesha P Carrol   | Consolidated Edison Co. of New York         | 6       | Negative |   |
| <p><b>Response:</b> Entities across the continent have many different Interruptible and Demand-Side Management programs that have many different attributes and rules. Some entities have Interruptible Demand programs that are appropriate for planning purposes.</p> |   |         |          |   |
| Chuck B Manning   | Electric Reliability Council of Texas, Inc. | 2       | Negative | <p>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.</p> <p>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 to 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.</p> <p>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.</p> <p>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.</p> |

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|          |         |         |      | <p>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.</p> <p>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.</p> <p>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.</p> |

**Response:** The SDT believes that the first part of the footnote is necessary to provide context for the items that follow and has crafted the language to provide a balance between flexibility and consistency across NERC. No change made.

The term "BES performance requirements" references the other requirements within the TPL standard and the SDT has removed the phrase "demand that does not adversely impact overall BES reliability".

In a previous posting, entities had stated that it was not clear that the use of Interruptible Load and Demand Side Management was permitted. The SDT added this section to address those concerns. The SDT has reorganized and reformatted the footnote to improve clarity.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. ~~However,~~ It is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm

| Balloter  | Company              | Segment | Vote     | Comment   |
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| <p>Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><del>Interruptible Demand or Demand Side Management</del></p> <p><del>Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</del></p> <p><del>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.</del></p> <p>The open and transparent process does not require "permission", but rather it facilitates the open sharing of information between entities that have responsibility for ensuring BES reliability.</p> <p>The SDT decided to not limit the use of the footnote to a specific time period because there are circumstances where the longer term use may be implemented without adversely impacting BES reliability.</p> <p>For consistency with the existing standard text, the term 'firm transfer' is retained. No change made.</p> |                      |         |          |   |
| Claudiu Cadar   | GDS Associates, Inc. | 1       | Negative | <p>We appreciate all the work conducted by SDT to adjust current footnote "b" however, we disagree with the current approach mainly from the same reasons iterated during last comment period, as follows:</p> <ul style="list-style-type: none"> <li>• The definition does not go far enough with recognition that interruption of Demand should be mitigated if at all possible. The language should encourage the TP to develop mitigation plans that could be implemented as an alternative to Demand interruption.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>We suggest using the following wording as emphasized below: "An objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand following Contingency events and to develop mitigation plans that do not call for the curtailment of Demand.</p> |

| Balloter  | Company        | Segment | Vote     | Comment   |
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|   |                |         |          | <p>It is recognized that Demand will be interrupted if it is directly served by the elements removed from service as a result of the Contingency and in very limited circumstances when approaching intermediate solutions to restore BES reliability. When interruption of Demand is utilized within the planning process, such interruption is limited to:</p> <ul style="list-style-type: none"> <li>? Demand that is directly served by the elements that are removed from service as a result of the Contingency,</li> <li>? Interruptible Demand or Demand-Side Management, where the Customer has given explicit rights to the Transmission Provider for curtailment of their Demand,</li> <li>? 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 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. 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.”</li> </ul> |
| <p><b>Response:</b> In the footnote, the SDT has acknowledged that interrupting Firm Demand is not the preferred solution to BES concerns, while recognizing that this may not always be possible. The SDT believes that the footnote as drafted strikes an appropriate balance. No change made.</p> <p>It is well understood that there must be some agreement or contract before interruptible Demand or Demand-Side Management can be utilized by the planner.</p> <p>The SDT disagrees that there should be a prohibition on utilizing other resources obligated to re-dispatch for Contingencies, unless it has been characterized as “conditional firm”. Entities should not be restricted from utilizing other dispatch scenarios, as long as Firm Demand is not interrupted.</p> <p>For the reasons stated above, the SDT has not modified the footnote as suggested.</p> |                |         |          |   |
| Joe D Petaski   | Manitoba Hydro | 1       | Negative | <p>The last bullet should be made clearer by adding the words “in jurisdictions” before the word “where”. Not all jurisdictions are mandated to have a stakeholder process, so the standard should be clearly written to recognize this situation. “Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and IN JURISDICTIONS where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.”</p>   |
| Greg C. Parent  | Manitoba Hydro | 3       | Negative |   |
| S N Fernando  | Manitoba Hydro | 5       | Negative |   |
| Daniel  | Manitoba Hydro | 6       | Negative |   |

| Balloter  | Company                     | Segment | Vote     | Comment   |
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| Prowse  |                             |         |          |   |
| <p><b>Response:</b> The SDT believes that if Firm Demand is planned to be interrupted utilizing footnote 'b', there must be an open and transparent stakeholder process to ensure that all parties that may be impacted have been notified and have an opportunity to provide comments. No change made.</p>   |                             |         |          |   |
| Spencer Tacke   | Modesto Irrigation District | 4       | Negative | <p>I am voting NO on the proposed revision because the second bullet of the proposed revision is nebulous as to how the exemption process will occur, and how it will be monitored by the auditors.</p> <p>Also, the last sentence of the last paragraph of the proposed change is nebulous about keeping facility flows within applicable Normal and Emergency thermal ratings. Thank you.</p>   |
| <p><b>Response:</b> Rather than mandate a one-size-fits-all process, the SDT has provided entities the latitude to utilize existing processes, modify existing processes, or create new processes to provide an open and transparent stakeholder process. The SDT cannot comment on future actions of the auditors.</p> <p>The SDT disagrees that maintaining Facilities within applicable Facility Ratings is a nebulous concept. That part of the footnote was included to ensure that the plans to resolve a situation on a planner's System did not create other overloads. No change made.</p> |                             |         |          |   |
| Saurabh Saksena   | National Grid               | 1       | Negative | <p>National Grid supports the direction the drafting team has taken. However, it has a few concerns with the language of the footnote as amended.</p> <ol style="list-style-type: none"> <li>1. Use of the term "Demand": In the first sentence, it is unclear whether the term Demand includes Interruptible Demand and Demand-Side Management. It is suggested that interruption of Demand be clarified to exclude Interruptible Demand or Demand-Side Management.</li> <li>2. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet.</li> </ol> |

| Balloter          | Company                                | Segment | Vote     | Comment   |
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| Michael Schiavone | Niagara Mohawk (National Grid Company) | 3       | Negative | <p>3. National Grid also suggests changing "Demand interruption" to "interruption of Demand" in second bullet under "b)" to avoid awkward and incorrect phasing.</p> <p>4. 'Addressing stakeholder comments' introduces undefined actions which may be required in response to the comments. If 'Demand interruption is subject to review in an open and transparent stakeholder process', then stakeholder comments will be addressed without creating an undefined commitment to require it. As a result, "that includes addressing stakeholder comments" should be deleted.</p> <p>5. The second paragraph seems to be restricting the use of Demand interruption for the sake of Firm Transfer reduction. This can be stated directly without adding the confusion of re-dispatch. By coupling re-dispatch with a constraint of not shedding Demand, the paragraph also creates confusion as to what to do in a situation where the amount of Demand that is allowed to be shed in the first paragraph could be reduced with re-dispatch. Would re-dispatch not be allowed? National Grid suggests that the paragraph be rewritten as follows: 'Curtailed firm transfers are allowed to meet BES performance requirements and meet applicable Facility Ratings, where it can be demonstrated it does not result in the interruption of any Demand (other than Interruptible Demand or Demand Side Management).'</p> <p>6. National Grid seeks clarification if there is an intended distinction between the use of the term "firm Demand" and the defined term "Firm Demand" or is that just a typo?</p> <p>7. The last sentence of footnote B is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own. This same thought would have to be added to multiple NERC standards if it were added here, otherwise it would infer that such actions are acceptable in all other standards.</p> |

**Response: 1.** The SDT has reorganized the text in the footnote to address this concern.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailed firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. ~~However,~~ It is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

| Balloter  | Company                        | Segment | Vote     | Comment   |
|---|--------------------------------|---------|----------|---|
| <p><del>Interruptible Demand or Demand Side Management</del></p> <p><del>Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</del></p> <p><del>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.</del></p> <p>2. The SDT has reorganized the text in the footnote to address this concern.<br/> 3. The SDT believes that the proposed change does not add additional clarity to the footnote. No change made.<br/> 4. The SDT disagrees that each review process automatically will have a response to comments element. Therefore, the SDT added that element to ensure that all stakeholder processes will include that element. No change made.<br/> 5. The SDT has reorganized the text in the footnote to address this concern.<br/> 6. The SDT has corrected the capitalization errors.<br/> 7. Since the planned action of curtailing of firm transfers may adversely impact neighboring systems, the SDT believes that it is important in this situation to articulate a condition that is normally implied. The SDT disagrees that an explicit statement in this footnote changes the intent of all other standards. No change made.</p> |                                |         |          |   |
| Tony Eddleman   | Nebraska Public Power District | 3       | Negative | NPPD votes NO due to the ambiguity of the terms "Curtailment of firm transfers is allowed, when coupled the appropriate re-dispatch of resources" with respect to a Category B contingency event. NPPD does not support the curtailment of firm transfers or re-dispatch to meet the performance requirements during a Category B (N-1) event. Curtailment of firm transfers and re-dispatch are allowable following acceptable performance for the Category B (N-1) event, to get ready for the next Category C type of event. |
| Don Schmit  | Nebraska Public Power District | 5       | Negative |   |
| <p><b>Response:</b> As drafted, footnote 'b' clarifies that re-dispatch is allowable to "remain within" ratings, not to bring the Facilities within ratings. The draft language recognizes that System adjustments may be required after a single Contingency, since entities may utilize ratings in the planning horizon that can only be utilized for a limited time, such as a 2 hour emergency rating. It further clarifies that if an entity is obligated to re-dispatch its generation resources, the Transmission Planner can plan to re-dispatch those resources for a single Contingency. However, if the resources that impact the affected Facilities are not obligated to re-dispatch, the firm transfers cannot be curtailed. No change made.</p>  |                                |         |          |   |

| Balloter        | Company                                      | Segment | Vote     | Comment  |
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| Randy MacDonald | New Brunswick Power Transmission Corporation | 1       | Negative | <p>In general: NERC standards should not dictate circumstances or acceptable transmission contingencies under which the tripping of customers loads is acceptable. That should be an issue between the utility of supply, the customer, and the local regulating body so long as the interruption to customers (for whatever contingency) is controlled and does not cause problems on the BES, or to neighboring utilities.</p> <p>Specifically, 1. The second bullet: The last sentence (following the semicolon) should be removed. The local regulating body should provide input or approval.</p> <p>2. NB Power Transmission interprets that the currently proposed footnote allows for the two bulleted options to be used exclusively or in combination. Thus for clarification suggest adding "or" after the first bulleted item.</p> |

**Response:** The SDT disagrees that this should be handled exclusively with the local regulating body. The SDT believes that in situations where an entity's planning studies require the interruption of Firm Demand to remain within BES Facility Ratings that the entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be adversely impacted by those decisions have the ability to review those plans. No change made.

The SDT has reorganized the footnote to clarify its intent and address the issue raised.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. ~~However,~~ It is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

~~Interruptible Demand or Demand-Side Management~~

~~circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.~~

~~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.~~

| Balloter     | Company                       | Segment | Vote     | Comment  |
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| Alden Briggs | New Brunswick System Operator | 2       | Negative | <p>NBSO agrees with the principles of the current version of the proposed footnote assuming NBSO's interpretation of the footnote is correct. NBSO has the following detailed comments: 1. The first paragraph contains many general statements that attempts to capture essential planning principles. NBSO feels that such language is not suited for a footnote. NBSO suggests re-wording of the first paragraph to state: Interruption of Demand may be utilized within the planning process to address BES performance requirements. Such cases are limited to:</p> <p>NBSO also suggests turning the phrase that addresses Demand lost that was served by elements removed from service as a result of a Contingency into a bullet item. NBSO feels that this adds clarity since all of the acceptable instances of Demand interruption are now listed as bulleted items.</p> <p>2. NBSO interprets that the currently proposed footnote allows for the two bulleted options to be used exclusively or in combination. Thus for clarification NBSO suggests adding "or" after each bulleted item, with the exclusion of the final bulleted item.</p> <p>3. NBSO suggests removing the last sentence of the last paragraph. Likely all industry members understand that causing reliability concerns in other areas is never acceptable. This principle is not limited to the standard in question, and thus such a statement could require the update of other standards.</p> <p>4. NBSO interprets that the use of the word "Demand" in the second bullet of the proposed footnote is referring to use of Firm Demand since the first bullet covers the other types of Demand (Demand = Firm Demand + Interruptible Demand). As such NBSO suggests replacing "Demand" with "Firm Demand" in the second bullet.</p> <p>5. NBSO feels that the statement "that includes addressing stakeholder comments" should be removed from the last phrase of the second bullet. An open and transparent stakeholder process should adequately address stakeholder comments and concerns. Explicitly specifying that all stakeholder comments be addressed may add undue burden if the word "address" is misconstrued. The task of addressing stakeholder comments is more appropriately addressed and defined in each area's respective process.</p> <p>6. NBSO suggests replacing the word "shedding" with "interruption" in the last phrase of the last paragraph to remain consistent with the rest of the proposed footnote. NBSO also suggests capitalizing "firm" in the term "Firm Demand" to remain consistent with the NERC glossary of terms.</p> |

| Balloter   | Company | Segment | Vote | Comment  |
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|  |         |         |      | <p>7. There is no term "transfers" in the NERC glossary of terms. Perhaps some other defined term from the glossary could be used in lieu of "transfers" (e.g. Firm Transmission Service).</p> <p>Taking into account the NBSO comments, the footnote could read as follows: b) Interruption of Demand may be utilized within the planning process to address BES performance requirements. Such cases are limited to: -Demand directly served by Elements removed from service as a result of a Contingency, or -Use of Interruptible Demand or Demand-Side Management, or -Interruption of Firm Demand when acceptable circumstances for such interruptions are documented (including alternatives evaluated), and where the Firm Demand interruption is subject to review in an open and transparent stakeholder process. Curtailment of Firm Transmission Service is allowed when coupled with the appropriate re-dispatch of resources obligated to do so, and it can be demonstrated that Facilities remain within applicable Facility Ratings and there is no additional interruption of Firm Demand.</p> |
| <p><b>Response: 1 &amp; 2.</b> The SDT believes that the first part of the footnote is necessary to provide context for the items that follow and has crafted the language to provide a balance between flexibility and consistency across NERC. The SDT has reorganized the footnote to clarify its intent and address the issue raised.</p> <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load.</u> Furthermore, in limited circumstances <u>Firm Demand</u> may need to be interrupted to address BES performance requirements. When interruption of <u>Firm Demand</u> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><u>Interruptible Demand or Demand-Side Management</u></p> <p><u>-Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</u></p> <p><u>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.</u></p> <p><b>3.</b> Since the planned action of curtailing of firm transfers may adversely impact neighboring Systems, the SDT believes that it is important in this situation to articulate a condition that is normally implied. The SDT disagrees that an explicit statement in this footnote changes the intent of all other standards.</p> <p><b>4.</b> The SDT has reorganized the footnote to clarify its intent and address the issue raised.</p> <p><b>5.</b> The SDT believes that in situations where an entity's planning studies require the interruption of Firm Demand to remain within BES Facility Ratings that the</p> |         |         |      |  |

| Balloter   | Company                      | Segment | Vote     | Comment  |
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| <p>entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be adversely impacted by those decisions have the ability to review those plans. No change made.</p> <p><b>6.</b> The SDT does not believe that replacing the term shedding with interruption adds clarity and did not make the proposed change. The SDT has reorganized the footnote to clarify its intent and address the second issue.</p> <p><b>7.</b> For consistency with the existing standard text, the term 'firm transfer' is retained. No change made.</p>  |                              |         |          |  |
| David H. Boguslawski   | Northeast Utilities          | 1       | Negative | <p>The revised language of Footnote b suggests that non-consequential demand interruption (load that is not directly served by the elements removed from service as a result of the contingency) could be used to mitigate reliability concerns arising from NERC Category B contingency events (i.e., single element contingencies). This language seems to encourage operational workarounds and adds burdens for operators of the system. NU believes this is not consistent with planning a highly reliable bulk electric system and thus does not support this weaker language.</p> |
| <p><b>Response:</b> The SDT believes that the language in this footnote is not weaker and does not encourage operational workarounds. The footnote language provides the framework necessary to ensure that in situations where an entity's planning studies require the interruption of Firm Demand to remain within BES Facility Ratings that the entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be adversely impacted by those decisions have the ability to review those plans. No change made.</p>  |                              |         |          |  |
| Brad Chase   | Orlando Utilities Commission | 1       | Negative | <p>"Two Items prevent us from voting yes. Item #1: The standard team should clarify if the bullets under note B are intended to be an AND (both conditions met) or an OR (either condition met). As currently written it is not clear.</p>   |
| Ballard Keith Mutters  | Orlando Utilities Commission | 3       | Negative | <p>Item #2: The section under firm transfers is in conflict with the section above. If Demand is being curtailed under the first or second bullet and it's served by firm service then service should also be curtailed, however as written any demand served by firm service could not be curtailed. Other than these items the revisions does an excellent job of addressing the issue of load shedding under first contingency conditions and practical reliability."</p>   |
| <p><b>Response:</b> The SDT has reorganized the footnote to clarify its intent and address this issue.</p> <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load.</u> Furthermore, in limited circumstances <u>Firm Demand</u> may need to be interrupted to address BES performance requirements. When interruption of <u>Firm Demand</u> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><u>Interruptible Demand or Demand-Side Management</u></p> |                              |         |          |  |

| Balloter  | Company                  | Segment | Vote     | Comment  |
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| <p><del>Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</del></p> <p><del>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.</del></p> |                          |         |          |  |
| Linda Brown   | San Diego Gas & Electric | 1       | Negative | <p>Footnote b is a group of exceptions to the requirements for Category B contingencies. To add clarity to the footnote, SDG&amp;E would prefer that each exception be listed separately within the footnote. As SDG&amp;E understands the footnote, the following exceptions can occur after the loss of a single element,</p> <ul style="list-style-type: none"> <li>• Interruptible Demand can be used to unload a circuit, but the circuit(s) must remain below emergency rating(s) at all times.</li> <li>• Demand-Side Management can be used to unload a circuit, but the circuit(s) must remain below emergency rating(s) at all times.</li> <li>• Demand served by a radial element which is faulted may be interrupted.</li> <li>• Curtailment of firm transfers is allowed, when coupled with re-dispatch of resources obligated to re-dispatch.</li> </ul> <p>SDG&amp;E votes against the proposed language for the following reasons: SDG&amp;E feels system reliability alone should drive the need for a technical standard and the language of the standard should reflect the need without reference to the process. FERC Order 890 set the forum for the stakeholder process which provides commercial incentives and a level playing field for any participant to build a transmission project. When considering compliance to the standards, reference to "stakeholder process" is inappropriate and should be removed. Section 4 of the TPL standards assigns responsibility for meeting the standards to the Planning Authority and the Transmission Planner. These entities are subject to penalties if the requirement is not met. Use of "stakeholder process" in the requirement implies that entities other than the Planning Authority or the Transmission Planner have authority over how the standards are to be met without any financial risk. If the "stakeholder process" language is not removed, SDG&amp;E feels stakeholders involved in the process should be registered with NERC and subject to the same audit requirements and penalties as the Planning Authority or the Transmission Planner. Furthermore, the California Transmission Owners have a FERC approved stakeholder process that is administered by the California ISO. Addition of the term "stakeholder process" in a standard may have unintended consequences.</p> |

| Balloter  | Company              | Segment | Vote     | Comment   |
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| <p><b>Response:</b> While the SDT believes that SDG&amp;E proposed bullet list is consistent with the footnote as drafted, the list is not as inclusive as the footnote. Therefore, the SDT has retained the existing text and reorganized the footnote for clarity.</p>  |                      |         |          |   |
| <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand.</u> <del>However, it</del> is recognized that <u>Firm Demand</u> will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, <u>or (2) Interruptible Demand or Demand-Side Management Load.</u> Furthermore, in limited circumstances <u>Firm Demand</u> may need to be interrupted to address BES performance requirements. When interruption of <u>Firm Demand</u> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><del>Interruptible Demand or Demand-Side Management</del></p> <p><del>Circumstances</del> where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</p> <p><del>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.</del></p> <p>The SDT believes that in situations where an entity’s planning studies require the interruption of Firm Demand to remain within BES Facility Ratings that the entity needs to share those plans in an open and transparent stakeholder process to ensure that other parties that may be adversely impacted by those decisions have the ability to review those plans. No change made.</p> |                      |         |          |   |
| Charles H Yeung   | Southwest Power Pool | 2       | Negative | <p>The second paragraph of the footnote seems to be restricting the use of Demand interruption for the sake of Firm Transfer reduction. This can be stated directly without adding the confusion of re-dispatch. By coupling re-dispatch with a constraint of not shedding Demand, the paragraph also creates confusion as to what to do in a situation where the amount of Demand that is allowed to be shed in the first paragraph could be reduced with re-dispatch. Would re-dispatch not be allowed? We suggest that the paragraph be rewritten as follows: “Curtailment of firm transfers is allowed to meet BES performance requirements and meet applicable Facility Ratings, where it can be demonstrated it does not result in the interruption of any Demand (other than Interruptible Demand or Demand Side Management).”</p> |
| <p><b>Response:</b> The SDT has reorganized the footnote to clarify its intent and address this issue.</p> <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch,</u></p>   |                      |         |          |   |

| Balloter  | Company                      | Segment | Vote        | Comment   |
|---|------------------------------|---------|-------------|---|
| <p><u>where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:</u></p> <p><u>Interruptible Demand or Demand-Side Management</u></p> <p><u>-Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</u></p> <p><u>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.</u></p> |                              |         |             |   |
| Larry Akens   | Tennessee Valley Authority   | 1       | Negative    | <p>TVA appreciates the SDT’s efforts to clarify and improve this complex and challenging area. However, as mentioned in our last comments regarding footnote b, TVA still believes that the SDT’s proposal is still focusing more on reliability of local loads than 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. Existing stakeholder processes (referred to in the SDT proposal) typically focus on larger system issues and not on local load serving. TVA believes that some local load should be allowed to be dropped in order to maintain BES reliability. Instead of the proposed footnote b, TVA suggests that the SDT define a “local area” with guidelines detailing the reliability requirements for these local area loads. This would separate the local area load requirements from the BES requirements in the TPL standards.</p> |
| Ian S Grant   | Tennessee Valley Authority   | 3       | Negative    |   |
| George T. Ballew  | Tennessee Valley Authority   | 5       | Negative    |   |
| Marjorie S. Parsons   | Tennessee Valley Authority   | 6       | Negative    |   |
| <p><b>Response:</b> The original footnote ‘b’ focused on local area and limited interruption of Demand. Since individual entities planning philosophies are different across North America, the SDT has been unable to determine a one-size-fits-all definition for local area. Therefore, the SDT adopted an approach that allows entities to utilize input from stakeholders in an open and transparent process. In this way, any affected party has a mechanism to ensure that the planners are planning a reliable BES. No change made.</p>   |                              |         |             |   |
| Pat G. Harrington   | BC Hydro and Power Authority | 3       | Negative    |   |
| Gordon Rawlings   | BC Transmission Corporation  | 1       | Negative    |   |
| <p><b>Response:</b> With no comment provided, the SDT is unable to provide a response.</p>  |                              |         |             |   |
| Gregg R Griffin   | City of Green Cove Springs   | 3       | Affirmative | <p>An objective of the planning process should be to minimize the likelihood and magnitude of interruption of Demand following Contingency events. However, it is recognized that Demand will</p>   |

| Balloter  | Company                                    | Segment | Vote        | Comment  |
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|   |  |         |             | <p>be interrupted if it is directly served by the Elements removed from service as a result of the Contingency. Furthermore, in limited circumstances Demand may need to be interrupted to address BES performance requirements. When interruption of Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to: Interruptible Demand or Demand-Side Management Circumstances where the uses of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments. 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.</p>   |
| <p><b>Response:</b> Thank you for your support.</p> |  |         |             |  |
| Guy V. Zito   | Northeast Power Coordinating Council, Inc. | 10      | Affirmative | <ol style="list-style-type: none"> <li>1. There is concern with the use of the term Demand. It is unclear throughout the footnote whether or not the term Demand includes Interruptible Demand or Demand-Side Management. It is suggested that interruption of Demand be clarified to not include Interruptible Demand or Demand-Side Management to more clearly show the permitted use of Load shedding.</li> <li>2. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet.</li> <li>3. Language that mitigation of Load and/or Demand interruption should be pursued within the planning process should be reinstated as reinforcement of a Transmission Providers’ planning obligations to their load customers, and system operations.</li> <li>4. Footnote ‘b’ should be made to read as follows: b) An objective of the planning process is to minimize the likelihood and magnitude of interruption of Load and/or Demand following Contingency events. Interruption of Load and/or Demand is discouraged and all measures to mitigate such interruption should be pursued within the planning process. However, it is recognized that Load and/or Demand will be interrupted if it is directly served by the elements automatically removed from service by the Protection System as a result of a Contingency. Furthermore, in extraordinary circumstances within the planning process Load and/or Demand may need to be interrupted to address BES performance requirements. When interruption of Load and/or Demand is utilized within the planning</li> </ol> |

| Balloter | Company | Segment | Vote | Comment  |
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|          |         |         |      | <p>process to address BES performance requirements, such interruption is limited to:</p> <ul style="list-style-type: none"> <li>• Circumstances where the use of Load and/or Demand interruption are documented, including alternatives evaluated; and where the Load and/or Demand interruption is made available for review in an open and transparent stakeholder process. If Load and/or Demand interruption is necessary, planning should indicate the amount needed, and not specify how it would be obtained. What Load and/or Demand is interrupted is an operational decision.</li> </ul> <p>5. Additional comments not included in the material listed for footnote 'b' on the Comment Form. In the paragraph below the bullets in footnote 'b', confusion is introduced through the use of the term "firm Demand". It is unclear how this is different than the defined term "Firm Demand" and what the implications of the term "firm Demand" are. This footnote should not discourage such adjustments which actually increase the reliability of service to end users.</p> <p>6. The last sentence of footnote 'b' is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own.</p> |

**Response: 1.** The SDT has reorganized the footnote to clarify its intent and address this issue.

b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of firm transfers or Firm Demand following Contingency events. Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner's planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. ~~However,~~ It is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load. Furthermore, in limited circumstances Firm Demand may need to be interrupted to address BES performance requirements. When interruption of Firm Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

~~Interruptible Demand or Demand-Side Management~~

~~–Circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.~~

~~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.~~

**2.** The SDT has reorganized the footnote to clarify its intent and address the issue raised.

| Balloter   | Company                  | Segment | Vote        | Comment   |
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| <p><b>3. &amp; 4.</b> The SDT addressed these concerns by including the phrase “including alternatives evaluated” and does not believe that it is appropriate to dictate that the planners must evaluate “all measures to mitigate” annually or the specific details concerning documentation of alternatives.</p> <p><b>5.</b> The SDT has corrected the capitalization errors.</p> <p><b>6.</b> Since the planned action of curtailing of firm transfers may adversely impact neighboring systems, the SDT believes that it is important in this situation to articulate a condition that is normally implied. No change made.</p>   |                          |         |             |   |
| Ajay Garg  | Hydro One Networks, Inc. | 1       | Affirmative | Hydro One is casting an affirmative vote on the revisions to Table 1, footnote ‘b’ in TPL-001-1, TPL-002-1b, TPL-003-1a, and TPL-004-1. However, we believe the proposed language might be confusing and should be modified to read as follows: “b) It is recognized that Demand will be interrupted if it is directly served by the Elements removed from service as a result of the Contingency. When interruption of Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to: o Interruptible Demand or Demand-Side Management o Circumstances where the uses of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments. 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 interruption 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.” Note that the voting system does not permit to enter re-lined comments. We can provide a red-lined document with our proposal upon request. |
| David L Kiguel   | Hydro One Networks, Inc. | 3       | Affirmative |   |
| <p><b>Response:</b> The SDT believes that the sentences deleted in your proposed footnote are necessary to provide context for the items that follow and has crafted the language to provide a balance between flexibility and consistency across NERC. The SDT has reorganized the footnote to clarify its intent.</p> <p>b) An objective of the planning process should be to minimize the likelihood and magnitude of interruption of <u>firm transfers or Firm Demand</u> following Contingency events. <u>Curtailment of firm transfers is allowed when achieved through the appropriate re-dispatch of resources obligated to re-dispatch, where it can be demonstrated that Facilities, internal and external to the Transmission Planner’s planning region, remain within applicable Facility Ratings and the re-dispatch does not result in the shedding of any Firm Demand. However, it is recognized that Firm Demand will be interrupted if it is: (1) directly served by the Elements removed from service as a result of the Contingency, or (2) Interruptible Demand or Demand-Side Management Load.</u> Furthermore, in limited circumstances <u>Firm Demand</u> may need to be interrupted to address BES performance requirements. When interruption of <u>Firm Demand</u> is utilized within the planning process to address BES performance requirements, such interruption is limited to:</p> <p><del>Interruptible Demand or Demand-Side Management</del></p> <p><del>o</del>circumstances where the use of Demand interruption are documented, including alternatives evaluated; and where the Demand interruption is subject to review in an open and transparent stakeholder process that includes addressing stakeholder comments.</p> |                          |         |             |   |

| Balloter  | Company                          | Segment | Vote        | Comment   |
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| <p><del>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.</del></p> |                                  |         |             |   |
| Henry Ernst-Jr  | Duke Energy Carolina             | 3       | Affirmative | The effective date in the Implementation Plan needs to be changed to match the Effective Date in the standards, in order to clarify the allowed interruption of Non-consequential load before the new Footnote 'b' takes effect.  |
| <p><b>Response:</b> The effective dates in the Implementation Plan match those in the standards. No change made.</p>  |                                  |         |             |   |
| Mark B Thompson   | Alberta Electric System Operator | 2       | Abstain     | While the AESO does not generally disagree with the intent of the proposed change, we have voted "abstain". In particular, as reflected in the adopted Alberta Reliability Standard TPL-002-AB-0, no loss of Demand and Generation have been given equal consideration for Category B contingencies. In addition, within the Alberta energy market structure and the operation of the transmission system, there are no firm transfers on transmission facilities in Alberta. |
| <p><b>Response:</b> Individual jurisdictions are allowed to have more restrictive standards and therefore, this revision to the standard does not dictate that a jurisdiction must change its requirements. The SDT recognizes that there may be areas or markets that do not utilize terms contained within the standard.</p>  |                                  |         |             |   |