

Comment Report

Project Name: 2018-01 Canadian-specific Revisions to TPL-007-2 | SAR
Comment Period Start Date: 3/30/2018
Comment Period End Date: 4/30/2018
Associated Ballots:

There were 9 sets of responses, including comments from approximately 38 different people from approximately 29 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the scope and objectives of the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.
2. What factors should the SAR drafting team consider to support reliability across the North American interconnected power grid? If possible, provide specific example(s) and supporting rationale.
3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC					
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC					

Michael Forte	Con Ed - Consolidated Edison	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Sean Cavote	PSEG	4	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Chantal Mazza	Hydro Quebec	2	NPCC
Kathleen Goodman	ISO-NE	2	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Caroline Dupuis	Hydro Quebec	1	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Gregory Campoli	New York Independent System Operator	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1,5	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
David Kiguel	Independent	NA - Not Applicable	NPCC

1. Do you agree with the scope and objectives of the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

BPA does not believe an additional benchmark event is needed because the existing standard accounts for latitude, longitude and the earth's conductivity variation adjustments for the benchmark and supplemental benchmark event. BPA believes it is not clear what would be achieved by creating a new benchmark event for Canadian entities since the existing benchmark event is based on the 1989 event that blacked out the Quebec system.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer Yes

Document Name

Comment

We agree with the scope and objectives of the SAR. Based on its strong experience and long historical records, we are qualified to define a pertinent GMD scenario targeting our specific transmission grid

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer Yes

Document Name

Comment

We fully agrees with the scope and objectives of the SAR. Based on the past experience and long historical records, Canadian Entities qualified to define a pertinent GMD scenario targeting our specific transmission grid.

Likes 0

Dislikes 0

Response

Payam Farahbakhsh - Hydro One Networks, Inc. - 1,3

Answer Yes

Document Name

Comment

We agree with the scope of the SAR. We also recommend the drafting team consider adding review of the revisions made to Requirement 7 in TPL-007-2, specifically R7.3 that introduced fixed timelines for implementation of potential Corrective Action Plans. Requiring fixed timelines for implementing Corrective Action Plans, especially in cases where capital investment maybe required, may not be compatible with existing electricity regulations in Canadian jurisdictions.

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

We agree with the scope and objectives of the SAR.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

2. What factors should the SAR drafting team consider to support reliability across the North American interconnected power grid? If possible, provide specific example(s) and supporting rationale.

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Payam Farahbakhsh - Hydro One Networks, Inc. - 1,3

Answer

Document Name

Comment

We support consideration of the following factors in developing the Canadian variance of TPL-007:

1. A risk-based approach to mitigating the risk of GMD to reliable operation of BES;
2. A risk-based approach, from an asset management perspective, to mitigate the risk to applicable transformers, subject to flow of GIC;
3. A forward looking Standard that recognizes that the understanding/knowledge of the GMD phenomena, its modeling and assessment is evolving;
4. A result-based Standard that does not dictate a specific GMD assessment methodology; and
5. A Planning Standard that recognizes that the first line of defense in mitigating GMD risk is achieved by developing, maintaining and implementing GMD Operating Plans as required by EOP-010-1. TPL-007 must consider these existing operating measures in assessing risks described in item 1 and 2.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer

Document Name

Comment

The main factors discussed in TP-007 and other factors specific to Canada.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec TransEnergie - 1

Answer

Document Name

Comment

he main factors discussed in TP-007 and other factors specific to Canada.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer	
Document Name	
Comment	
The specific geographical and geological characteristics of the Canadian provinces should be considered. Canadian registered entities should be able to leverage their operating experience, observed GMD effects and results of on-going research specific to their unique topology.	
Likes 0	
Dislikes 0	
Response	

3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

While BPA does not understand the need for the SAR, BPA acknowledges that if the Canadian provinces deem it necessary, there will be no negative impact to the North American interconnected power grid.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec TransEnergie - 1

Answer

Document Name

Comment

Canada has a long experience on GMD and should be able to apply the objectives of the reliability standard in the context of Canadian utilities.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer

Document Name

Comment

Canada has a long experience on GMD and should be able to apply the objectives of the reliability standard in the context of Canadian utilities.

Likes 0

Dislikes 0

Response

Payam Farahbakhsh - Hydro One Networks, Inc. - 1,3

Answer

Document Name

Comment

There is also an opportunity to require that results of GMD vulnerability assessments be considered in the maintenance of the GMD Operating Plans required by EOP-010-1.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

Review/Reconsideration of previously provided comments by SDT from Canadian entities.

Likes 0

Dislikes 0

Response