

Summary Response to TPL-008-1 Draft Comments Received

NERC Project 2023-07 Transmission Planning Performance Requirements
for Extreme Weather
July 2024

Comments Received Summary

There were 78 sets of responses, including comments from approximately 179 different people from approximately 99 companies representing 10 of the Industry Segments. A summary of comments submitted can be reviewed on the [project page](#).

If you have an interest in joining the distribution list for this project, please reach out to Senior Standards Developer, [Jordan Mallory](#).

If you feel that your comment has been overlooked, 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 Manager of Standards [Jamie Calderon](#) (via email) or at (404) 960-0568.

Consideration of Comments

The NERC Project 2023-07 thanks all of industry for your time and comments. The Standard Drafting Team (SDT) feels that many great points have been provided for the SDT to consider during the drafting phase of this project. High level themes received from industry are located below (bolded is the high-level theme followed by the SDT's response).

Benchmark Events

Many commenters expressed concern that they cannot fully approve the Extreme Temperature Assessment and definition and TPL-008-1 Standard without having benchmark events information. In addition, some entities expressed concern about having to agree to a requirement that has yet to be fully developed. Based on the technical rationale, there is an expectation that the ERO will determine suitability and make available benchmark events representative of probable futures. Once the initial library of events has been developed, we would be in a better position to consider support for this requirement.

Drafting team response:

NERC is still committed to providing additional information regarding the criteria used in the development of this initial population of the benchmark event library, the process for maintaining the library, the process for entity submitted benchmark events and the criteria for which they will be evaluated for approval, as well as the future state envisioned for ongoing curation of the library with industry involvement and climate data SMEs.

To best assist the team when voting “No” please provide comments specific to the Standard and requirements that are within scope for the team to address. As NERC is directed by FERC to create the benchmark event library, it is unclear what improvement to the Standard that the drafting team is able to make to the Standard draft or definitions.

Submitting Benchmark Events Process

Entities with an interest in submitting their own benchmark events are seeking a timeframe as to when the process will be provided to industry.

Drafting team response:

NERC is still committed to providing additional information regarding the criteria used in the development of this initial population of the benchmark event library, the process for maintaining the library, the process for entity submitted benchmark events and the criteria for which they will be evaluated for approval, as well as the future state envisioned for ongoing curation of the library with industry involvement and climate data SMEs.

The process is expected to be initially posted on the NERC website and will be maintained to ensure it is up to date. This process is not included within the balloting process and should be considered separately to be consistent with the balloting process.

Regional Entities to Complete Assessments

Some commenters stated that Regional Entities should be the entity who completes the assessment.

Drafting team response:

Regional Entities are not subject to compliance of standards and thus cannot perform assessment to meet standard requirements. Planning Coordinators in coordination with Transmission Planners are the appropriate entities to complete planning assessments.

Definitions

The SDT received comments with proposed updated definitions for consideration. Below provides a high-level list of what was received.

- Updated proposed terms (no definition updates):
 - Extreme Weather Assessment
 - Extreme Temperature Transmission Assessment
 - Expected Scope Assessment
- Request SDT to define the following terms;
 - Extreme heat and extreme cold temperature benchmark events

Drafting team response:

The SDT appreciates all the proposed term update considerations. It was determined to leave Extreme Temperature Assessment for many reasons. Those reasons are 1) temperature focuses on this specific project with regards to extreme cold and heat planning cases being based on temperature; 2) Transmission is not an appropriate addition to this term as entities are supposed to be looking at generator information during transmission outages (See Requirement R3); and 3) the definition has been drafted at a high level for the purpose of specifics that need to be added like steady state, transient stability, etc. which are mentioned in the requirement.

Regarding extreme heat and extreme cold temperature benchmark events – This will be further explained in the NERC Process document.

TPL-008-1 Applicability and Standard Requirements

The SDT received comments on Requirements R1 through R11 and Table 1. Below takes a deeper look into the comments received and the consideration the SDT made.

**Requirement R2
Benchmark events**

Some comments asked for clarification on the benchmark events development and maintenance process including the responsible entity, the criteria for the selection of benchmark events and access restrictions to the library. Some comments also questioned if additional benchmark events can be submitted to the library.

Drafting team response:

Questions on the benchmark events library will be addressed through a separate process document provided by the ERO. There will not be an attachment to the standard. Also, the entities will be allowed to submit benchmark events to the library. Details on the approval process will be included in the process document.

Compliance Obligation Separation

Some comments questioned who the responsible entity was and raised coordination concerns among the different entities.

Drafting team response:

Responsible entities are defined in R1. One entity will be chosen as the primary entity. Language was revised to further clarify this. Replaced ‘Each responsible entity’ with ‘The responsible entity established in R1’. Some entities may use PC as the primary responsible entity and others may use TP as the primary responsible entity. The language was drafted to allow for this, Regional Entities and EROs are not applicable entities and hence will not be allowed to perform the study.

Number of benchmark events

Some comments questioned if more than one extreme heat benchmark event and one extreme cold benchmark event can be studied.

Drafting team response:

The standard requires that at least one benchmark heat and one benchmark cold event is studied. The Responsible Entity can choose to study more than one event if they want to. The language was updated to say “at least” one event should be studied.

Clarification on “Functional Entities” in the Applicability section

Some comments suggested that the “Functional Entities” in the Applicability section be changed to “Responsible Entities”.

Drafting team response:

“Functional entities” in the Applicability section could mean the entities outside the Responsible Entities defined in R1 of the standard. The definition of “Functional Entity” is consistent with the other NERC TPL standards.

Minor wording changes

Some comments suggested that the word “temperature” be added to R2 when referencing extreme heat and cold benchmark events.

Drafting team response:

Comment accepted and R2 language was revised accordingly.

Requirement R3

Overlap with Other Reliability Standards

Some comments suggested the drafting team should add a provision that would allow work on other Reliability Standards to cover the requirements specified in TPL-008. Additionally, some suggested the responsible entity should follow the criteria set forth in FAC-014-3. Finally, some suggested the drafting team coordinate with Project 2023-06 CIP-014 Risk Assessment Refinement.

Drafting team response:

There are fundamental differences between TPL-001-5.1 and TPL-008 (e.g., TPL-001 has an annual periodicity while TPL-008 does not and TPL-008 requires broader coordination based on the selected benchmark temperature events). Nothing in the standard precludes the responsible entity from using similar information used in other standards to demonstrate compliance with TPL-008. Additionally, the requirements in TPL-008 do not contradict those in FAC-014-3 nor the CIP-014 drafting team efforts because they allow the responsible entity to determine the criteria, which may be the same or different than criteria used in other standards.

All Lines in Service

Some comments suggested PO should be evaluated with all lines in service as a base case.

Drafting team response:

Line outages may be included in the base case if those outages are consistent with the conditions defined in the selected benchmark temperate events.

Justification of Contingencies

Some comments questioned how the responsible entity could justify one set of outages versus another.

Drafting team response:

In accordance with Requirement R7, the responsible entity must provide the technical rationale for the contingencies selected for evaluation. In accordance with the TPL-008 Technical Rationale document, some, but not all, items to consider when developing the rationale for selecting Contingencies are past studies, subject matter expert knowledge of the responsible entity's System (to be supplemented with data or analysis), and historical data from past operating events.

Adjust Timeline for Implementation of CAPs

Some comments suggested that the implementation plan allow a ten-year period for implementation of CAPs that require capital investment to construct new facilities.

Drafting team response:

The drafting team did not modify the implementation plan; however, a sub-requirement was added under Requirement R9 stating that if circumstances beyond the control of the responsible entity prevent the timely implementation of CAPs, responsible entities may use Non-Consequential Load Loss to address the issue, provided they document the situation, evaluate alternatives, and record the actions taken.

Differentiation of "Planning Cases" and "System Models"

Some comments suggested the difference between "planning cases" and "system models" should be clarified because they are not defined in the NERC Glossary of Terms.

Drafting team response:

The drafting team concluded system models are components that are necessary to include in the development of benchmark planning cases, which is consistent with NERC Reliability standard TPL-001-5.1.

Clarity on P0 Events

Some comments suggested additional clarity is needed to determine when and if P0 and P1 events are required.

Drafting team response:

The drafting team concluded the responsible entity must include P0 in the assessment. The TPL-008-1 Technical Rationale document provides further information.

Requirement R4

MOD-032 Data

Some commenters asked if the drafting team feel it would be necessary to add any additional data to the table in MOD-032 to complete this work. In addition, some sought clarification on how MOD-032 will allow for the collection of additional information related to extreme heat and cold events.

Drafting team response:

MOD-032 ensures an adequate means of data collection for transmission planning and requires applicable registered entities to provide steady-state, dynamic, and short circuit modeling data to their transmission planner(s) and planning coordinator(s). As outlined in R1 and Attachment 1 of MOD-032, MOD-032 allows various data collection such as in-service status and capability associated with demand, generation, and transmission associated with various case types, scenarios, system operating states, or conditions for the long-term planning horizon. MOD-032 also requires applicable registered entities to provide “other information requested by the Planning Coordinator or Transmission Planner necessary for modeling purposes” for each of the three types of data required. Because the drafting team determined the responsible entities that will be developing benchmark planning cases are limited to planning coordinators and transmission planners, they will be able to request and receive needed data pursuant to MOD-032. Thus, the drafting team believes that there is no need to update MOD-032 because it allows planning coordinators and transmission planners to request any specific data needed for developing and maintaining benchmark planning cases required in R4 of TPL-008-1.

Requirement R5

Criteria for Thermal Constraints

Some comments questioned why voltage was being referenced but not thermal constraints.

Drafting team response:

The drafting team updated Requirement R5 to include “applicable Facility Ratings.”

Acceptable Deviation Range

Some comments suggested including an acceptable deviation range or acceptable based on common industry practice or technical basis as it is currently open-ended as to what criteria is “acceptable.”

Drafting team response:

The drafting team concluded the standard is flexible enough to allow for regional differences throughout the requirements, which is consistent with Reliability Standard TPL-001-5.1.

Language Change

Some comments suggested changing the language from “shall have criteria” to “shall define and document criteria” for consistency with Requirement R6.

Drafting team response:

The drafting team determined that “have” is the appropriate wording for this requirement as the responsible entity could be receiving this information from somewhere else based on how responsibilities are established in Requirement R1.

Language Change

Some comments suggested unless some exception is made for FAC-014-3 R6, there may be no further room possible with respect to operational limits.

Drafting team response:

The drafting team allowed flexibility on how the responsibility entity sets limits.

Use of "System Voltage Limits"

Some comments suggested using the recently adopted NERC Glossary term “System Voltage Limits.”

Drafting team response:

The drafting team determined “System Voltage Limits” focuses on operations and planning information may differ. The drafting team concluded to maintain the proposed language consistent with Reliability Standard TPL-001-5.1.

Coordinated Criteria

Some comments questioned if the Planning Coordinator must ensure all entities are using the same criteria for acceptable System steady state voltage limits.

Drafting team response:

The drafting team determined some Transmission Planners under a Planning Coordinator could have different voltage limits. In accordance with Requirement R1, the Planning Coordinator, in conjunction with its Transmission Planner(s), must determine individual or joint responsibilities.

Documentation to be used from a different standard

If a TP or PC believes that the work performed for a different standard will cover work required under TPL-008, can a provision for this be added to the standard?

Drafting team response:

Provision language does not need to be added to the TPL-008-1 standard. If an entity feels that documentation from another Reliability Standard, such as TPL-001, is sufficient, the entity can use that same information for the evidence of TPL-008-1.

Requirement R6

"Instability, uncontrolled separation, or Cascading" and IROs

Some comments questioned if the identification of “instability, uncontrolled separation, or Cascading” are expected to be different for the Extreme Temperature Assessment relative to Interconnection Reliability Operating Limits (IROs).

Drafting team response:

The drafting team does not specify how instability, uncontrolled separation, or Cascading should be defined. Additionally, the requirement allows the responsible entity flexibility to determine the criteria or methodology, which may be the same or different than criteria used in other standards.

Severity of ERO Library Events

Some comments expressed concern that if the events in the ERO library are too severe and lead to a significant increase in the events that trigger instability, these could be expensive problems to fix.

Drafting team response:

The drafting team determined entities are welcome to develop their own benchmark temperature events should the ones within the ERO library not suffice. Additionally, per Requirement R9, Corrective Action Plans are only required for Table 1 P0 or P1 Contingencies.

"Instability, uncontrolled separation, or Cascading" Boundary

Some comments questioned if entities must identify instability, uncontrolled separation, or Cascading of the System or the Interconnection.

Drafting team response:

The drafting team added "within an Interconnection" to Requirement R6.

Multiple Violations for a Single Issue

Some comments questioned if this is duplicative to TPL-001-5.1 or other standards, and if this will create a situation where two requirements would be violated for a single issue.

Drafting team response:

The drafting team determined that Reliability Standard TPL-001-5.1 is for standard conditions while TPL-008-1 is for extreme conditions (i.e., extreme heat and extreme cold temperature events).

Acceptable Load Loss Thresholds

Some comments suggested entities should be required to establish acceptable load loss thresholds for addressing thermal overloads identified before utilizing non-consequential load drops as a corrective action plan.

Drafting team response:

The drafting team determined the responsible entity may choose to define load loss thresholds in its criteria or methodology, or in coordination with its regulatory authorities or governing bodies. Recognizing regional variations in requirements, the drafting team finds it impractical to set a maximum limit. Therefore, there is no set load loss identified in TPL-008; however, Table 1 allows for Non-Consequential Load Loss.

Requirement R7

Acceptable Load Loss Thresholds

Some entities expressed that R7 should clearly indicate which contingency categories are required.

Drafting team response:

Requirement R7 identifies the contingencies are listed in Table 1.

Requirement R8

Timeframe Specificity

Some entities expressed concern that R8 may not provide enough specificity regarding the time frame to be assessed from the Long-Term Transmission Planning Horizon.

Drafting team response

The standard provides flexibility within the standard, which is consistent with other drafting efforts.

R8 requires study be performed minimum every five years for at least one year in the long-term horizon.

The standard requires a minimum, one. Nothing precludes an entity from completing more than one condition, should it be needed.

MOD-032 Clarity and Need for Sensitivity Analysis

Some entities request clarification on the purpose of sensitivity analyses in sub-part 8.2 and its association with MOD-032 data collection. Recommend clarity on the necessity of sensitivity analyses and its relation to data collection from the MOD-032 model build.

Drafting team response

MOD-032 is the appropriate standard to gather data needed for this project scope. Sensitivity studies are required by FERC order 896.

Requirement R9

Regulatory Burden

Many commenters raised concerns about the requirement to submit CAPs to regulatory authorities, suggesting it could delay approval, lacks justification, need clearer definitions, and should be limited or removed.

Drafting team response

The SDT reviewed the comments and determined that the requirement is necessary to address the directives of Order 896, specifically the directives mentioned in paragraphs 152 and 165.

Allowing Non-Consequential Load Loss (NCLL) for P0, Concerns about Inadequate Available Generation, and Addressing Inconsistencies in R9

Various entities commented on allowing NCLL (i.e., Load Shed) for P0, addressing inconsistencies between R9 and the Technical Rationale regarding load shedding requirements for P0. They suggested explicitly permitting load shedding for solvable P0 system conditions, noting that resource adequacy is not within the

scope of TPL-008 as per TR and Order 896, proposed allowing NCLL under extreme weather conditions for P0, and questioned if NCLL would be allowed for P0 if capital projects or Operating Plans are not completed before the operating horizon.

Drafting team response

The SDT reviewed the comments and updated the Technical Rationale to ensure consistency with Requirement R9. Specifically, the SDT removed the discussion on resource adequacy for P0 from the Technical Rationale for R9, as it is irrelevant to the Corrective Action Plan discussed in R9. Additionally, the SDT offered guidance on preparing solvable P0 cases in the Technical Rationale for R4 to address concerns about potential instances where benchmark planning cases and/or sensitivity cases might lack adequate available generation to meet demand.

The SDT added a sub-requirement under R9 stating that if circumstances beyond the control of the TP or PC prevent the timely implementation of a Corrective Action Plan, responsible entities may use Non-Consequential Load Loss to address the issue, provided they document the situation, evaluate alternatives, and record the actions taken.

Consistency and Clarity

Comments were made to improve clarity and address inconsistency between R9 and other related standards (TPL-008, TPL-001), such as Non-Consequential Load Loss and sharing CAPs.

Drafting team response

The SDT reviewed the comments and updated Requirement R9 for consistency and to provide clarity.

Clarity on Sensitivity Analysis

Various commenters questioned the necessity of a Corrective Action Plan for issues identified in sensitivity analysis, seeking clarity on how sensitivity analysis is handled.

Drafting team response

The SDT revised Requirement R9 to clarify that Corrective Action Plans are not required specifically for addressing performance requirements related to sensitivity cases.

Proposals Regarding Load Shedding

Some commenters recommended explicitly prohibiting load shedding as a CAP, while other entities suggested setting a maximum limit for non-consequential load loss.

Drafting team response

The SDT reviewed the comments and emphasizes that non-consequential load loss is explicitly prohibited for P0 as specified in Table 1 of TPL-008. Recognizing regional variations in requirements, the SDT finds it impractical to set a maximum limit for non-consequential load loss, leaving it to entities to determine for other planning events like P1. Additionally, R6 mandates defining and documenting criteria or methodologies in the Extreme Temperature Assessment to identify instability, uncontrolled separation, or

cascading events. The SDT believes that the maximum limit for non-consequential load loss could be specified within the methodology.

Requirement R10

Reasons for Requiring Possible Actions and Restrictions in Creating CAPs

Certain commenters questioned why possible actions are required for P2, P4, P5, and P7 contingencies, while others disagreed due to limitations in creating CAPs for these contingencies.

Drafting team response

The SDT reviewed the comments and affirms that the Technical Rationale for R10 adequately clarified the necessity for possible actions. Additionally, it is important to note that TPL-008 sets a baseline to fulfill the directives from Order 896 and does not prohibit responsible entities from exceeding these requirements.

Clarity and Communication on Possible Actions

A commenter questioned what actions the responsible entity intends to take based on the identified "possible actions." There is uncertainty about how these actions will be executed. In addition, it suggested that these possible actions should be communicated to the operators so they can prepare necessary plans and processes accordingly.

Drafting team response

The SDT acknowledges the commenter's concerns regarding implementing 'possible actions' and their communication to operators. The SDT asserts that Requirement 11 outlines the expected actions, mandating responsible entities to share Extreme Temperature Assessment results with any functional entities with reliability-related needs to enhance readiness for extreme temperature events.

Exclusion of P2, P4, P5, and P7 Contingencies

Some commenters proposed removing P5, citing that extreme weather conditions affect outdoor EHV elements but do not impact protective relaying. Additionally, other comments suggested excluding P2, P4, P5, and P7 events from TPL-008.

Drafting team response

The SDT reviewed the comments and updated Requirement 10 and Table 1 to remove the P5 contingency from TPL-008. The rationale for this decision is detailed in the Technical Rationale of R7.

Requirement R11

Timeline for Distributing Assessment Results

Some comments questioned if the 60 calendar days was appropriate.

Drafting team response:

The drafting team determined to keep the requirement unchanged as this strikes a good balance between allowing enough time for the responsible entity to distribute the results and the functional entity requesting the information to receive them.

Distribution of Assessment Results

Some comments questioned if the distribution of the Extreme Temperature Assessment results should be limited to select registered entities.

Drafting team response:

The drafting team determined to keep the requirement unchanged as it meets the following FERC directive in FERC Order 896, Paragraph 72: “Further, responsible entities must share the study results with affected transmission operators, transmission owners, generator owners, and other functional entities with a reliability need for the studies.” Therefore, the responsible entity must share with any functional entity that has a reliability related need and submits a written request for the information. Additionally, this is consistent with other approved NERC Reliability Standards (e.g., TPL-001-5.1 and TPL-007-4).

Metrics for "Reliability Related Need"

Some comments questioned if metrics should be associated with “reliability related need.”

Drafting team response:

The drafting team determined to keep the requirement unchanged as this is consistent with other approved NERC Reliability Standards (e.g., TPL-001-5.1 and TPL-007-4).

Table 1

Grammatical/Clarifying Changes

Some commenters recommended grammatical/clarifying changes to Table 1.

- A commenter requested the Facility Voltage Level of Contingency row, change the commas to colons,
- A commenter requested the Facility Voltage Level of Contingency row, clarify what is meant by “reference voltage,”
- A commenter requested the Stability Performance Criteria row, clarify what is meant by “initialization.”
- Many commenters recommended that the contingencies should be updated to 200 kV and above.
- Strongly suggest removing P5 from Table 1 for multiple reasons.
- Suggest the DT ensures footnotes and numbering in Table 1 are consistent. I.e., Table 1 category P4 contains a footnote #10, however footnote #10 is missing from the table on page 12.
- Some commenters said more work is needed to better address the Contingencies and Performance Criteria for Extreme Temperature Assessments.

Drafting team response:

Please see updated modifications to Table 1 based on comments received and listed above.

Monitor Entire BES

Table 1 is applicable to BES level 200 kV and above. The webinar recording, however, mentioned that the TP and PC should be monitoring the entire BES, not just 200 kV and above. A commenter requests the Table 1 language clarify that the entire BES be monitored.

Drafting team response:

Additional language has been added to the Purpose (Section A) and Requirement R9 to indicate that the performance criteria is applicable to all the BES.

Non-Consequential Load Loss

Some commenters questioned the performance requirements in Table 1 allow for the use of non-consequential load loss, but there does not appear to be any limit placed on the amount of non-consequential load loss that can be used. Some entities have a maximum amount of non-consequential load loss included in their Cascading criteria and/or other planning criteria, but some entities do not.

In addition, for entities that do not have a maximum amount of NCLL specified, does this mean that they can mitigate any issues with unlimited use of NCLL?

Drafting team response:

Please see the revised TPL-008-1 Requirement R9 for revised language regarding the Non-Consequential Load Loss where it is allowed and utilized. In addition, a maximum value for Non-Consequential Load Loss is not provided in the TPL-008-1 because of regional variances and requirements regarding criteria for identifying instability, uncontrolled separation, or Cascading.

Footnote Section of Table 1

Some commenters recommend the drafting team either include the full set of footnotes from TPL-001-5.1 Table 1 or clarify why TPL-008-1 contains only a limited subset of the footnotes to Table 1.

Drafting team response:

The Contingencies chosen for TPL-008-1 are different from TPL-001-5.1. TPL-008-1 standard is developed and organized to be independent from TPL-001-5.1. Based on this, not all footnotes were needed for TPL-008-1.

Violation Severity Levels (VSLs)

Some entities expressed concern regarding the severity level for the VSLs.

Drafting team response:

The team encourages entities to review the VSL Guidelines document. When a pass/fail requirement is drafted, any noncompliance with the requirement will have only one VSL – Severe. Link to guideline document: [VSL Guidelines \(Revised\) \(nerc.com\)](https://www.nerc.com/vsl-guidelines-revised).

Implementation Plan

Benchmark Events

Some entities request a date be established as to when the ERO will have the benchmark event library published.

Drafting team response:

An ERO Benchmark Event Process document has been published with the TPL-008-1 draft 2 posting. The ERO benchmark event library will be published and up and running by December 2024. This library will contain events for the first 5-year iteration of TPL-008-1. Additional time is essentially provided to entities as the benchmark events will be published and TPL-008-1 will be pending approval from the respective applicable governmental authorities. In addition, example benchmark event examples have been provided in a separate document for entities to see what they will be working with to meet the TPL-008-1 Reliability Standard. Please reference the process document for additional details on how the ERO plans to address preparing for the next 5-year iteration of benchmark events.

Requirement R1

Many entities disagreed with making Requirement R1 effective on the effective date of TPL-008-1 because this requirement includes the development of processes that currently do not exist.

Drafting team response:

Per FERC Order 896, Paragraph 7, “we direct NERC to ensure that the proposed new or modified Reliability Standard becomes mandatory and enforceable beginning no later than 12 months from the effective date of Commission approval of the new or modified Reliability Standard.” To meet this FERC directive, Requirement R1 is the most reasonable requirement to meet the 12-month implementation directive. 1 month from the approval date of TPL-008-1 is adequate time to **identify** individual and joint responsibilities for completing the Extreme Temperature Assessment. Requirement R3 is when the process should be developed and implemented, which per the TPL-008-1 Implementation Plan has 36-months. In addition, there is nothing precluding entities from starting discussion with other PCs and TPs once the petition has been submitted for approval with the respective governmental authorities.

Requirement R9

Some entities expressed concern that if R9 is intended to include the construction of capital projects, there should be additional time allowed for construction of those projects after the completion of the first Extreme Temperature Assessment study.

Drafting team response:

The drafting team did not change the implementation plan; however, Requirement R9.3 was added to permit the use of Non-Consequential Load Loss as an interim solution, which normally is not permitted in Table 1, in situations that are beyond the control of the Planning Coordinator or Transmission Planner that prevent the implementation of a Corrective Action Plan in the required timeframe. The use of Non-Consequential Load Loss as an interim solution in this situation is permitted, provided that each responsible entity documents the situation causing the problem, alternatives evaluated, and takes actions to resolve the situation. Additionally, Requirement R9.4 was added to permit having revisions to the CAP in

subsequent Extreme Temperature Assessments, provided that the planned BES continues to meet the performance requirements of Table 1.

Implementation Plan Diagram

One commenter pointed out that the diagram does not line up with the Implementation Plan Language and requested the team update it accordingly.

Drafting team response:

Please see the updated diagram in the Implementation Plan, which should provide clarity on any confusion.