

Interpretation of TPL-002-0 Requirement R1.3.2 and Requirement R1.3.12 and the Identical Requirements (R1.3.2 and R1.3.12) in TPL-003-0 for Ameren

Request for Interpretation of TPL-002 and TPL-003 Requirement R1.3.2 Received from Ameren on July 25, 2007:

Ameren specifically requests clarification on the phrase, 'critical system conditions' in R1.3.2. Ameren asks if compliance with R1.3.2 requires multiple contingent generating unit Outages as part of possible generation dispatch scenarios describing critical system conditions for which the system shall be planned and modeled in accordance with the contingency definitions included in Table 1.

From TPL-002-0 and -003-0:

[To be valid, the Planning Authority and Transmission Planner assessments shall:]

R1.3.2 Cover critical system conditions and study years as deemed appropriate by the responsible entity.

The following interpretation of TPL-002-0 and TPL-003-0 Requirement R1.3.2 was developed by the NERC Planning Committee on September 12, 2007:

TPL-002 and TPL-003 do not specify the process for selection of the credible critical generation dispatch for modeling of critical system conditions. The selection of the credible critical generation dispatch for modeling of critical system conditions is within the discretion of the Planning Authority/Transmission Planner.

The following **revised interpretation** of TPL-002-0 and TPL-003-0 Requirement R1.3.2 was developed by the NERC Planning Committee on March 13, 2008:

The selection of a credible generation dispatch for the modeling of critical system conditions is within the discretion of the Planning Authority. The Planning Authority was renamed "Planning Coordinator" (PC) in the Functional Model dated February 13, 2007. (TPL -002 and -003 use the former "Planning Authority" name, and the Functional Model terminology was a change in name only and did not affect responsibilities.)

- Under the Functional Model, the Planning Coordinator "Provides and informs Resource Planners, Transmission Planners, and adjacent Planning Coordinators of the methodologies and tools for the simulation of the transmission system" while the Transmission Planner "Receives from the Planning Coordinator methodologies and tools for the analysis and development of transmission expansion plans." A PC's selection of "critical system conditions" and its associated generation dispatch falls within the purview of "methodology."

Furthermore, consistent with this interpretation, a Planning Coordinator would formulate critical system conditions that may involve a range of critical generator unit outages as part of the possible generator dispatch scenarios.

Both TPL-002-0 and TPL-003-0 have a similar measure M1:

- M1.** The Planning Authority and Transmission Planner shall have a valid assessment and corrective plans as specified in Reliability Standard TPL-002-0_R1 [or TPL-003-0_R1] and TPL-002-0_R2 [or TPL-003-0_R2].”

The Regional Reliability Organization (RRO) is named as the Compliance Monitor in both standards. Pursuant to Federal Energy Regulatory Commission (FERC) Order 693, FERC eliminated the RRO as the appropriate Compliance Monitor for standards and replaced it with the Regional Entity (RE). See paragraph 157 of Order 693. Although the referenced TPL standards still include the reference to the RRO, to be consistent with Order 693, the RRO is replaced by the RE as the Compliance Monitor for this interpretation. As the Compliance Monitor, the RE determines what a “valid assessment” means when evaluating studies based upon specific sub-requirements in R1.3 selected by the Planning Coordinator and the Transmission Planner. If a PC has Transmission Planners in more than one region, the REs must coordinate among themselves on compliance matters.

Request for Interpretation of TPL-002-0 and TPL-003-0 Requirement R1.3.12 Received from Ameren on July 25, 2007:

Ameren also asks how the inclusion of planned outages should be interpreted with respect to the contingency definitions specified in Table 1 for Categories B and C. Specifically, Ameren asks if R1.3.12 requires that the system be planned to be operated during those conditions associated with planned outages consistent with the performance requirements described in Table 1 plus any unidentified outage.

From TPL-002-0 and -003-0:

[To be valid, the Planning Authority and Transmission Planner assessments shall:]

- R1.3.12** Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed.

The following interpretation of TPL-002-0 and TPL-003-0 Requirement R1.3.12 was developed by the NERC Planning Committee on September 12, 2007:

TPL-002-0 and TPL-003-0 explicitly provide that the inclusion of planned (including maintenance) outages of any bulk electric equipment at demand levels for which the planned outages are performed are within the discretion of the Planning Authority/Transmission Planner.

The following revised interpretation of TPL-002-0 and TPL-003-0 Requirement R1.3.12 was developed by the NERC Planning Committee on March 13, 2008:

TPL-002-0 and TPL-003-0 explicitly provide that the inclusion of planned (including maintenance) outages of any bulk electric equipment at demand levels for which the planned outages are required. For studies that include planned outages, compliance with the contingency assessment for TPL-002-0 and TPL-003-0 as outlined in Table 1 would include any necessary system adjustments which might be required to accommodate planned outages since a planned outage is not a “contingency” as defined in the *NERC Glossary of Terms Used in Standards*.