

## Consideration of Comments on Initial Ballot of the Interpretation of Requirements R1.3.2 and R1.3.12 in TPL-002-0 — System Performance Following the Loss of a Single Bulk Electric System Element and TPL-003-0 — System Performance Following Loss of Two or More Bulk Electric System Elements for Ameren

**Summary Consideration:** Although most balloters agreed with the interpretation, several stakeholders indicated that the interpretation doesn't adequately address the questions that were asked in the request for the interpretation. Based on these stakeholder comments, the Planning Committee, serving as the drafting team, has revised the interpretation for both R1.3.2 and R1.3.12:

With regard to R1.3.2, the committee revised its interpretation to clearly state that the Regional Entity, as the Compliance Monitor 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.

With regard to R1.3.12, the committee revised its interpretation to clearly state that planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.

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 the Vice President and Director of Standards, Gerry Adamski at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Process Manual:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

Voter	Entity	Segment	Vote	Comment
Kirit S. Shah Mark Peters	Ameren Services Company	1 3	Negative	<p>Comments 1.3.2</p> <p>(1) The interpretation is non-responsive to the request in that it provides no insight as to how the responsible entities should consider the requirement so as to be compliant.</p> <p>(2) The interpretation does not address the core issue for which interpretation was sought. The question was not intended to resolve what assumptions were to be applied to cover the critical base case conditions. Rather the question was intended to resolve whether compliance with the TPL standards shall include the consideration of non-firm incremental transfer capability, as might be modeled by multiple generator unit outages not included in the base case assumptions, in addition to the contingency scenarios defined in Table 1.</p> <p>Comments on R1.3.12</p> <p>(1) The interpretation is non-responsive to the request in that it provides no insight as to how the responsible entities should consider the requirement so as to be compliant.</p> <p>(2) The interpretation is not consistent with the interpretation submitted by the NERC PC as reflected in the meeting minutes of the NERC PC.</p>
<p>Response: The Planning Committee thanks you for your comment.</p>				
<p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p>				
<p>With regard to R1.3.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
Brian F. Thumm	ITC Transmission	1	Negative	<p>The choice of which planned outages to include in a study may be at the discretion of the transmission planner, but the choice of whether or not to include planned outages at all is not at their discretion. Furthermore, I find the "interpretation" to be unresponsive to the initial request. The "interpretation" does not interpret anything ... it merely restates the requirement.</p>
<p>Response: The Planning Committee thanks you for your comment.</p>				
<p>With regard to R1.3.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				

**Consideration of Comments on Initial Ballot of Interpretation of Requirements R1.3.2 and R1.3.12 in TPL-002-0 — System Performance Following the Loss of a Single Bulk Electric System Element and TPL-003-0 — System Performance Following Loss of Two or More Bulk Electric System Elements for Ameren**

Voter	Entity	Segment	Vote	Comment
Robert G. Coish		1		
Ronald Dacombe		3		
Mark Aikens		5		
Daniel Prowse	Manitoba Hydro	6	Negative	The interpretation outlined in R1.3.2 accurately reflects the Planning Committee's intent; however, it likely does not provide the detail that Ameren was looking for. The interpretation for R1.3.12 does not accurately reflect the Planning Committee's intent. The interpretation for R1.3.12 fails to include the phrase 'including any necessary system adjustments prior to application of the contingency' which is critical to the NERC Planning Committee interpretation.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p> <p>With regard to R1.3.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
Michael J Ranalli	National Grid			
Michael Schiavone	Niagara Mohawk (National Grid Company)	1		
		3	Affirmative	The interpretation states "Planning Authority/Transmission Planner". The "/" can be interpreted as either an "and" or an "or". In order to be consistent with the Reliability Standard TPL-002 and TPL-003 Requirement R1, the interpretations should state "Planning Authority and Transmission Planner". Therefore we think the interpretations for TPL-002-0 and TPL-003-0 R1.3.2 and R1.3.12 should have the "/" replaced with an "and".
<p>Response: The Planning Committee thanks you for your comment.</p> <p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p> <p>With regard to R1.3.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p> <p>These revised interpretations do not refer to the Planning Coordinator (formerly named the Planning Authority) or the Transmission Planner.</p>				

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Voter	Entity	Segment	Vote	Comment
Richard J. Kafka	Potomac Electric Power Co.	1	Negative	I do not believe the interpretations shown for ballot reflect the motion approved by the Planning Committee. There has been a round of emails from the Planning Committee, and the Executive Board says there was no intentional change, but I still believe the interpretation does not reflect what the PC said. In essence, what is missing, is that the PC said planning for contingencies should reflect operations in that the system would have been reconfigured (re-dispatch, switching, etc.) to provide N-1 reliability for any planned outages. That is, you don't just use the starting base case (dispatch) for all planned outages.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>The committee agrees and has revised its interpretation to R1.13.12. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
Hubert C. Young	South Carolina Electric & Gas Co.	3	Negative	SCE&G believes this interpretation needs additional clarification. The NERC "Glossary of Terms" defines contingency as "The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element". A planned outage is NOT unexpected and therefore is not a contingency, based on this definition. SCE&G suggest that the standard specifically state if planned maintenance 1) is part of the event in Table 1 or 2) is a change in base conditions that are tested against Table 1. Without this clarification the industry will be planning at different levels base on individual interpretation of this standard.
<p>Response: The Planning Committee thanks you for your comment and has revised its interpretation of R1.13.12.</p> <p>Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
James A. Maenner	Wisconsin Public Service Corp.	3	Negative	This interpretation is a disappointment; deferring the question back to the planning authority does not address the request for interpretation. Allowing individual Transmission Planners/Planning Authorities this discretion opens the door to wide variation across the interconnection.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>It is unclear if the comment provided is related to the interpretation provided for R1.3.2, R1.3.12 or a general statement related to each. In any case, we have revised our previous interpretations.</p> <p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p> <p>With regard to R1.3.12, planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				

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Christopher Plante	WPS Resources Corp.	4	Negative	The "interpretation" developed for this standard essentially defers back to the Planning Authority to make its own interpretation of the standard. Allowing each Planning Authority to make its own interpretation of a Reliability Standard defeats the purpose of having a standard. NERC should strive to develop clear and concise interpretations of its Standards that do not simply defer back to the responsible entity. A much more reasonable interpretation of this standard was developed and approved by the NERC Planning Committee at their September 2007 meeting.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p> <p>With regard to R1.13.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
Karl E. Kohlrus	City Water, Light & Power of Springfield	5	Negative	The interpretation does not provide guidance as to how to determine compliance but only suggests that this requirement is subject to the discretion of the Planning Authority/Transmission Planner. As such it is unclear how to consistently and comparably assess compliance within a Planning Authority's footprint and across NERC.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>With regard to R1.3.2, the committee has revised its interpretation. The Regional Entity, as the Compliance Monitor 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.</p> <p>With regard to R1.13.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				
William Franklin	Entergy Services, Inc.	6	Negative	The interpretation does not adequately address the 2nd question regarding R1.3.12, and furthermore the standards do not "explicitly" provide that inclusion of the questioned activities is within the discretion of the Planning Authority/Transmission Planner.
<p>Response: The Planning Committee thanks you for your comment.</p> <p>With regard to R1.13.12, the committee has revised its interpretation. Planned outages are not contingencies, and it is appropriate that studies that include planned outages include any necessary system adjustments needed to accommodate such outages.</p>				