

Consideration of Comments on Initial Ballot of Revised Interpretation of TPL-002 and TPL-003 — Requirements 1.3.2 and 1.3.12 for Ameren

Summary Consideration: The drafting team corrected a typographical error in the last paragraph of the interpretation, but did not make any other modifications to the interpretation based on the comments submitted.

Correction:

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 is** required.

Segment	Organization	Comment
1	Ameren Services Company	TPL-002-0 Requirement R.1.3.2: Do Not Approve. Comments: The proposed interpretation of R1.3.2 does not answer the following basic question with respect to the TPL standards: Does including contingent outages as part of the defined operating state exceed the contingency requirements specified in Table 1 of the TPL standards? Defining contingent outages in the assumed system operating state is not consistent with FAC or TPL standards. FAC-010 specifies in Requirement R2.1 In the pre-contingency state with all Facilities in service TPL-002-0 Requirement R1 provides the general description for the reliability assessment of the system. R1 states that the system shall be studied under the contingency conditions as defined in Category B of Table 1. How does the interpretation address the inconsistency of modeling contingent outages as critical system conditions outside of Table 1? Could a Transmission Planner or Planning Coordinator (Authority) specify one or more contingent transmission facility outages in their critical system conditions? The contentious application of “critical system conditions” did not apply to the specification of a base case dispatch scenario. The Planning Coordinator performed a First Contingency Incremental Transfer Capability (FCITC) analysis which modeled non-firm transactions to replace contingent generation outages. Does compliance with TLP-002 require sufficient import capability to provide access to external generation capacity for which there are not explicit capacity or transmission reservations at the discretion of the Planning Coordinator? FAC-012-1, Transfer Capability Methodology, requires that the Planning Coordinator (Authority) to document its current methodology used for developing its inter-regional and intra-regional Transfer Capabilities (Transfer Capability Methodology). Does this interpretation suggest that the Planning Coordinator has the requirement or responsibility to define a minimum level of transfer capability? Is it the intent of this interpretation that a Planning Coordinator’s transfer capability methodology be applied to TPL standards compliance? The draft interpretation states that the selection of a credible generation dispatch for modeling of critical system conditions is within the discretion of the

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		<p>Planning Coordinator: which of the current standards establishes a requirement that the Planning Coordinator develop a methodology to determine base case dispatch scenarios or gives the Planning Coordinator the authority to prescribe dispatch assumptions?</p>
<p>Response: We thank you for your comments, which address R1.3.2. However, most of the questions posed go well beyond the subject matter of the interpretation.</p> <p>The term “critical system conditions” is undefined in TPL-002 and TPL-003, and the standard itself gives no basis for defining it. Neither does the Functional Model, a standards reference document, provide any guidance. While this is understandably what Ameren is seeking in their comments, our interpretation could not provide a direct answer. However, we were able to articulate a process for obtaining the specificity desired by Ameren, which we reiterate below.</p> <p>The Functional Model language cited in the interpretation supports the Planning Coordinator’s supervisory role in directing the coordination of the planning process, including the specification of any methodologies to be used by Transmission Planners in its area. Such authority is also implied by a common sense reading of the standard itself. Assume that the standard was written with the understanding that the Planning Coordinator <i>did not</i> have this authority. Each of its Transmission Planners would be free to make adopt their own methods, and the Planning Coordinator’s assessment as well as each Transmission Planner’s assessment would be invalid on its face due solely to the lack of coordination. (Remember that M1 and M2 apply to both the Planning Coordinator <i>and</i> its Transmission Planners.)</p> <p>As we stated in the 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.”</p>		
1	American Transmission Company, LLC	<p>The interpretation applies to only the Planning Coordinator while the standard R1 applies to both the Planning Coordinator and Transmission Planner. ATC believes that the proposed interpretation is assigning greater authority onto the Planning Coordinator than the requirement specifies. Lastly, ATC believe that the Functional Model Reference Document should not be used for an interpretation. (What happens if the Functional Model document is changed so that it no long supports an interpretation?)</p>
<p>Response: We thank you for your comments, which address R1.3.2. We respectively disagree with ATC’s statement that “the proposed interpretation is assigning greater authority onto the Planning Coordinator <u>than the requirement specifies</u> (emphasis added).” The relationship between the Planning Coordinator and its Transmission Planners is not specified <i>in any requirement in TPL-002 or TPL-003</i>.</p> <p>The Functional Model language cited in the interpretation supports the Planning Coordinator’s supervisory role in directing the coordination of the planning process, including the specification of any methodologies to be used by Transmission Planners in its area. The Functional Model is a reference document, and as such it may be used to support the interpretation of a Reliability Standard. See NERC’s <i>Rules of Procedures</i>, Appendix 3A, p. 34. We have referenced a specific Functional Model version 3, not the current Functional Model, so our interpretation would not change if the Functional Model changed.</p>		

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<p>Such authority is also implied by a common sense reading of the standard itself, even without a reference to the Functional Model. Assume that the standard was written with the understanding that the Planning Coordinator <i>did not</i> have this authority. Each of its Transmission Planners would be free to make and adopt its own methods, and the Planning Coordinator's assessment as well as each Transmission Planner's assessment would be invalid on its face due solely to the lack of coordination. (Remember that M1 and M2 apply to both the Planning Coordinator <i>and</i> its Transmission Planners.)</p>		
1	Duke Energy Carolina	<p>Thank you for the opportunity to vote on this interpretation. We agreed with the September 12, 2007 Interpretation of Requirement 1.3.2, but do not agree with the March 13, 2008 Interpretation of Requirement 1.3.2, which places selection of critical system conditions under the authority of the Planning Coordinator. We agreed with the September 12, 2007 Interpretation of Requirement 1.3.12, and also agree with the March 13, 2008 Interpretation of Requirement 1.3.12.</p>
<p>Response: We thank you for your comments. However, since you offer no explanation as to why you disagree with R1.3.2, we can offer no response.</p>		
1	Entergy Corporation	<p>There are requirements in the standard that we feel are applied equally to the Transmission Planner and the Planning Coordinator. We believe that the interpretation erroneously attributes approval authority to the PC and the RE that is not called out for in the standard.</p>
<p>Response: We thank you for your comments. The relationship between the Planning Coordinator and the Transmission Planner is not specified in any of the requirements in TPL-002 or TPL-003.</p>		
<p>The Functional Model language cited in the interpretation supports the Planning Coordinator's supervisory role in directing the coordination of the planning process, including the specification of any methodologies to be used by Transmission Planners in its area. The Functional Model is a reference document, and as such it may be used to support the interpretation of a Reliability Standard. See NERC's <i>Rules of Procedures</i>, Appendix 3A, p. 34. We have referenced a specific Functional Model version 3, not the current Functional Model, so our interpretation would not change if the Functional Model changed.</p> <p>Such authority is also implied by a common sense reading of the standard itself, even without a reference to the Functional Model. Assume that the standard was written with the understanding that the Planning Coordinator <i>did not</i> have this authority. Each of its Transmission Planners would be free to make and adopt its own methods, and the Planning Coordinator's assessment as well as each Transmission Planner's assessment would be invalid on its face due solely to the lack of coordination. (Remember that M1 and M2 apply to both the Planning Coordinator <i>and</i> its Transmission Planners.)</p>		
1	Gainesville Regional Utilities	<p>I suggest the first sentence ending be changed from "are required" to "are performed within the discretion of the Planning Authority/Transmission Planner." This change will return the standard to its original interpretation concerning this matter and keep the volume of work hopefully within achievable limits. Secondly, the second sentence raised a concern that a planned outage should be considered a contingency which totally goes against the NERC</p>

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		Glossary of Terms. You must allow some necessary system adjustments to accommodate this condition before running any contingency studies.
<p>Response: We thank you for your comments, which address R1.3.12. We respectfully disagree with your suggested change in the first sentence which would make the consideration of planned outages within the discretion of the Planning Authority/Transmission Planner. R.1.3.12 is a requirement, and as such, cannot be optional or discretionary. However, the requirement does not specify a method for the modeling of planned outages; such modeling methods are within the discretion of the Planning Authority [Planning Coordinator] to specify, and those methods should be consistently used by all its Transmission Planners.</p> <p>We believe that Gainesville has misread our second sentence. We stated that a “planned outage is <u>not</u> [emphasis added] a “contingency” and that “necessary system adjustments” would be included prior to any contingency assessment.</p>		
1	Manitoba Hydro	Manitoba Hydro agrees with the interpretation outlined in TPL-003-0 R1.3.12; however, Manitoba Hydro does not agree with the interpretation of TPL-002-0 and TPL-003-0 R1.3.2. The standard puts the onus of defining critical system conditions on the PA/TP. The revised interpretation creates confusion as it is now unclear as to whether the PA/TP or RE as Compliance monitor is to determine the critical system conditions.
<p>Response: We thank you for your comments. We respectfully disagree with your conclusion regarding our interpretation of R1.3.2. The Planning Coordinator has the authority to specify “critical system conditions.” As we stated in the 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.”</p>		
1	Northeast Utilities	There remains a necessary level of coordination between the Transmission Planner and Planning Authority to determine generation dispatch and planned outage scenarios to be used in system assessments. The revised interpretation disregards the important role of the Transmission Planner, which the Standards themselves do not. Additionally, we believe NERC has not followed its Reliability Standards Development Procedure (Version 6.1) which in Step 9, First Ballot section, the last paragraph states; however, one or more members submit negative votes with reasons, regardless whether those reasons are resolved or not, a second ballot shall be conducted. NERC failed to follow this step. Further, in Step 9, Second Ballot section, the 3rd paragraph states; In the second ballot step, no revisions to the standard are permitted; as such revisions would not have been subject to public comment. However, if the Standards Committee determines that revisions proposed during the ballot process would likely provide an opportunity to achieve consensus on the standard, then such revisions may be made and the draft standard posted for public comment again beginning with Step 6 and continuing with subsequent steps. NERC has revised the interpretations (contrary to the 1st sentence) and has not posted for public comment again beginning with Step 6 (contrary to the 2nd). It did not seem necessary to revise interpretations for which, from an 86.7% quorum, 88.1% voted

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		affirmative.
<p>Response: We thank you for your comment, which addresses R1.3.2. We respectfully disagree that we have disregarded the role of the Transmission Planner. We have, however, clarified the relationship between the Planning Coordinator and the Transmission Planner.</p>		
<p>We did not proceed with a second ballot on the original interpretation because we agreed with many of the negative comments and therefore elected to revise the original interpretation instead of proceeding with a recirculation ballot. The procedure cited presumes that the comments received do not affect the standard drafting team's views on the balloted standard. In other words, it assumes that the comments do not cause the team to withdraw and revise the standard that was balloted. In our case, the comments we received in the first ballot caused us to revise our interpretation. Although the standards process does require that draft standards be posted for comment, the standards process does not require that interpretations be posted for comment. Interpretations are developed by a team and then posted for a 30-day pre-ballot review – there is no comment period for an interpretation.</p>		
1	Omaha Public Power District	The first sentence of the revised interpretation of TPL-002 and TPL-003 R1.3.12 is actually not a complete sentence, and as a result, it is impossible to understand it. The revised interpretation therefore should not be approved in its current form. Did the Planning Committee intend to insert the words "performed is" before the word "required" in the first sentence?
<p>Response: We agree. This appears to be a typographical error, and we will modify the first sentence by inserting the phrase "performed is" as shown: "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 is required."</p>		
1	Pacific Gas and Electric Company	While I agree with Interpretation 1 in that TPL standards are not meant for planning for resource adequacy. We do not necessarily disagree with Interpretation 2 because it seems to describe a planning methodology. I voted affirmative because NERC Standard is to specify what the requirements are and not how to meet them.
<p>Response: No response is required.</p>		
1	Sacramento Municipal Utility District	In explaining the revised interpretation for R1.3.2, that, "selection of a credible generation dispatch for the modeling of critical system conditions is within the discretion of the Planning Authority", the interpretation dilutes the discretion given in subsequent paragraphs. Specifically, it states the "Planning Coordinator would formulate critical system conditions" and that the "the RE determines what a "valid assessment" means". The word 'formulate' is much weaker than what is stated in the requirement R1.3.2 - "as deemed appropriate" by the planning coordinator/transmission planner. The new interpretation implies that until the 'regional entity' (WECC) approves our assessment, it is not valid. I do not believe that is the requirement. The new interpretation goes beyond the stated requirement. Determining a valid assessment should stay independent of who (PA or RE) is doing it.
<p>Response: We thank you for your comment. Our statement that the "Planning Coordinator would formulate critical system conditions" is not in conflict with our earlier statement that the "selection of critical generation dispatch for the modeling of critical system conditions is within the</p>		

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<p>discretion of the Planning Authority.” Neither is the “would formulate” language any weaker than the “as deemed appropriate” language in R.1.3.2. We have not altered this requirement. The Planning Coordinator would formulate the critical system conditions it deemed appropriate.</p> <p>With regards to the second comment regarding the role of the Regional Entity, in a sense an RE does “approve” a Planning Coordinator’s assessment since by not issuing a compliance violation, it has determined that measures M1 and M2 are satisfied; i.e., that the assessment is valid and that it has been properly reported. (Some REs may provide affirmative approval, so that a Planning Coordinator or Transmission Planner knows that its assessment has been approved). However, an RE’s obligation to determine whether an assessment is “valid” does not allow the RE to micromanage the assessments it reviews. For example, it cannot reject a corrective plan (e.g., the proposed construction of new facilities) because it believes another plan would be more cost effective. If the proposed corrective plan fulfills the standard’s requirements, it is not reviewable by the RE.</p> <p>Finally, we did not state that an RE performed assessments as your last sentence implies.</p>		
1	Salt River Project	<p>R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. Although SRP agrees that the Planning Authority (PA) shall have the discretion in choosing the appropriate conditions to study for their system(s), we disagree with the language as stated. There is no definition of how or what a PA shall do in the “methodology.” Methodology is not described in any Standard to this point. Therefore, how could compliance be measured? Methodology needs to be described or enumerated to be applied in Standards and for compliance. 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. SRP agrees with the revised interpretation of TPL-002-0 and TPL-003-0 R1.3.12 as developed by the NERC Planning Committee on March 12, 2008.</p>
<p>Response: We thank you for your comment. We agree that a methodology for defining “critical system conditions” is not part of TPL-002 and TPL-003. The reference to “methodology in the interpretation comes from the Functional Model language we cited, and that citation states that the Planning Coordinator “provides...Transmission Planners ...methodologies and tools for the simulation of the transmission system.” We further state that a “PC’s selection of “critical system conditions” fall within the purview of “methodology.” We use this citation to establish the Planning Coordinators authority for specifying “critical system conditions” which it determines are appropriate. The standards do not require a methodology, and our interpretation does not require one.</p>		
1	Southern Indiana Gas and Electric Co.	<p>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</p>

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		<p>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. Vectren requests that consideration be given to change the verbiage; “include any necessary system adjustments” to include the word “reasonable” or some other similar word to limit the system adjustments. The suggested verbiage would then read “include any reasonable and necessary system adjustments”. Vectren does not believe that the word “necessary” provides enough limitation to the adjustments that should be considered. If the system adjustment necessary to eliminate an overload caused by the planned outage combined with contingency assessment requires an unreasonable amount of generation redispatch or the dropping of firm load, there should be some ability for the Transmission Planner or the Planning Authority to make the determination that the adjustment is unreasonable and another remedy for the overload must be explored. Your consideration in this matter is appreciated.</p>
<p>Response: We thank you for your comment, which addresses R1.3.12. We do not believe that the addition of the word “reasonable” has additional interpretative value. The language posed by Southern Indiana Gas and Electric Co. is an attempt to remove load shedding as a possible “necessary system adjustment” prior to modeling a contingency assessment. We do not believe that the word “reasonable” will accomplish this goal, nor do we believe it is required. It is not required because we do not believe that load shedding would ever be considered a “necessary system adjustment which might be required to accommodate planned outages” as our interpretation states.</p> <p>In support of this conclusion, consider TPL-002. It does not permit the loss of demand except as noted in footnote “b.” If a Planning Coordinator or Transmission Planner attempted to “pass” TPL-002 by <i>a priori</i> load shedding under the guise of a “necessary system adjustment” for a planned outage, it would have shed load in order to comply with a standard that does not permit load shedding, and we would expect the RE reviewing the assessment to find it invalid.</p>		
1	Tucson Electric Power Co.	<p>The language in the Request for Interpretation is not clear. TEP requests clarification as to how planned outages are to be addressed. We believe planned outages, to the extent they may be known, should be treated as post-N-1 with system adjusted similar to the first event in a Category C 3 event wherein system adjustment is allowed following the outage. A distinction in the case of a planned outage may be made in that system adjustment would be implemented prior to taking the outage. In either case, system adjustment may include running generation, arming load shed for subsequent single contingencies, and/or other appropriate measures in preparation for the next event. This is important, as longer-term planned outages would include those outages needed to get system upgrades built and commissioned. Outages required to implement system upgrades should not be subjected to the same requirements as conditions with all facilities in service.</p>
<p>Response: We thank you for your comment, which addresses R1.3.12. Planned outages are modeled such that after the planned outage <i>and</i> any necessary system adjustments, the system is able to withstand a Category B event with Category B results. Therefore, the “necessary system adjustments” for the planned outage are taken <i>before</i> the planned outage.</p>		

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		<p>Although a Category C 3 contemplates system adjustments <i>after</i> the first Category B event, it is not the same as a planned outage followed by a Category B event. For a Category C 3 event, the system adjustments may be “in progress” and not fully completed before the next Category B event occurs, whereas for planned outages those adjustments have been completed. Finally, a Category C 3 event permits the interruption of customers, whereas a Category B does not except as noted in footnote “b.” If a planned outage were followed by a Category B event, no load loss except as noted in footnote “b” would be permitted.</p>
2	British Columbia Transmission Corporation	<p>R1.3.2 The first sentence of the response is acceptable, although it could be made clearer. We suggest that the appropriate response to the question would be: R1.3.2 does not require multiple contingent generating unit outages as part of the possible generation dispatch scenarios. However, it also does not preclude this if the Planning Coordinator deems that consideration of such condition is appropriate. The last paragraph is unacceptable because it states that the Compliance Monitor determines what a “valid assessment” means. This is incorrect. The TPL standard states what a valid assessment includes. The Compliance Monitor role is to audit whether the PC’s assessment includes the elements of a “valid assessment” and prescribed in the standard. R1.3.12 The statement made in the 13 March response is a correct statement. However, we do not understand the question, but do not believe the 13 March response answers the question. Since we do not understand the question, we do not know what an appropriate response would be.</p>
<p>Response: We thank you for your comment, which addresses R1.3.2 and R1.3.12. With regards to R1.3.2, we disagree with your statement that the Compliance Monitor does not determine whether an assessment is “valid.” That is what its auditing of compliance requires.</p> <p>However, an RE’s obligation to determine whether an assessment is “valid” does not allow the RE to micromanage the assessments it reviews. For example, it cannot reject a corrective plan (e.g., the proposed construction of new facilities) because it believes another plan would be more cost effective. If the proposed corrective plan fulfills the standard’s requirements, it is not reviewable by the RE.</p> <p>British Columbia Transmission Corporation said it did not understand the question posed in R1.3.12. While it was in the interpretation, we have restated below:</p> <p><i>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.</i></p>		
2	Midwest ISO, Inc.	<p>The Re-interpretation states in part: ** 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</p>

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		<p>Terms Used in Standards. ** With regard to the revised interpretation, the Midwest ISO does not agree with the revised interpretation and at a minimum recommends the following modification in double quotation marks, for the reasons described below. For studies that include planned outages, compliance with the contingency assessment for TPL-002-0 and TPL-003-0 as outlined in Table 1 may 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. ""In the alternative, if the PA or TP elected not to model in planning studies all available system adjustments and instead opted to upgrade the system to meet system performance, this would be acceptable under the requirements of the standard."" By stating that compliance would include any necessary system adjustments, this could be interpreted as non-compliance if in the discretion of the TP or PA, planning studies tested the system without applying all available system adjustments and therefore resulted in the construction of a more reliable system. It is inconceivable that NERC would judge an entity non-compliant with reliability standards for developing a more reliable system. Midwest ISO further believes strongly that the original interpretation was appropriate in articulating the discretion that TPs and PAs must have in planning their systems to be able to reasonably accommodate planned outages. Planning is performed years in advance in order that the system operator in real time will have a system that will perform reliably. All systems should be planned to be robust enough so that reasonable planned outages can be taken during typical maintenance periods (e.g. spring and fall) without the need for excessive redispatch or other operating steps merely to be able to withstand the next contingency. Large systems that include multiple separate sub-systems in close electrical proximity and with potentially redispatchable generation involving many different generation owners, must be planned to accommodate multiple planned outages on these adjoining systems. The Planning Authority over such a system must have the discretion to determine based on planning data and operating experience whether or not the interconnected system under its authority is robust enough to be able to take reasonable planned outages in several interconnected sub-systems with adequate reliability margin, and without having to resort to excessive redispatch or other operating steps in order to accommodate such planned outages. The PA may consider as excessive, for example, having to redispatch large amounts of base-load generation, or generation that does not belong to the entity taking the planned outage, or having to redispatch for a large number of separate possible planned outage conditions. The original interpretation appropriately supports this kind of discretion on the part of the PA.</p>
<p>Response: We thank you for your comments. The requested added language ("In the alternative, if the PA or TP elected not to model in planning studies all available system adjustments and instead opted to upgrade the system to meet system performance, this would be acceptable under the requirements of the standard.") is unacceptable for two reasons. First, our interpretation does not require "all available</p>		

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<p>system adjustments”; it requires only the “necessary system adjustments which might be required to accommodate the planned outages.” Second, the alternative language addresses a corrective plan (i.e., upgrade the system) and not the performance of the system. It is important that a standard not coningle a corrective plan with a performance requirement. The improper modeling of system adjustments is not made acceptable by an upgrade that may not have been required if system adjustments had been properly modeled.</p>		
3	Ameren Services Company	<p>TPL-002-0 Requirement R.1.3.2 : Do Not Approve. The proposed interpretation of R1.3.2 does not answer the following basic question with respect to the TPL standards: Does including contingent outages as part of the defined operating state exceed the contingency requirements specified in Table 1 of the TPL standards? Defining contingent outages in the assumed system operating state is not consistent with FAC or TPL standards. FAC-010 specifies in Requirement R2.1. In the pre-contingency state with all Facilities in service TPL-002-0 Requirement R1 provides the general description for the reliability assessment of the system. R1 states that the system shall be studied under the contingency conditions as defined in Category B of Table 1. How does the interpretation address the inconsistency of modeling contingent outages as critical system conditions outside of Table 1? Could a Transmission Planner or Planning Coordinator (Authority) specify one or more contingent transmission facility outages in their critical system conditions? The contentious application of “critical system conditions” did not apply to the specification of a base case dispatch scenario. The Planning Coordinator performed a First Contingency Incremental Transfer Capability (FCITC) analysis which modeled non-firm transactions to replace contingent generation outages. Does compliance with TLP-002 require sufficient import capability to provide access to external generation capacity for which there are not explicit capacity or transmission reservations at the discretion of the Planning Coordinator? â€œ FAC-012-1, Transfer Capability Methodology, requires that the Planning Coordinator (Authority) to document its current methodology used for developing its inter-regional and intra-regional Transfer Capabilities (Transfer Capability Methodology). Does this interpretation suggest that the Planning Coordinator has the requirement or responsibility to define a minimum level of transfer capability? Is it the intent of this interpretation that a Planning Coordinator’s transfer capability methodology be applied to TPL standards compliance? â€œ The draft interpretation states that the selection of a credible generation dispatch for modeling of critical system conditions is within the discretion of the Planning Coordinator: which of the current standards establishes a requirement that the Planning Coordinator develop a methodology to determine base case dispatch scenarios or gives the Planning Coordinator the authority to prescribe dispatch assumptions?</p>
<p>Response: We thank you for your comments, which address R1.3.2. However, most of the questions posed go well beyond the subject matter of the interpretation.</p> <p>The term “critical system conditions” is undefined in TPL-002 and TPL-003, and the standard itself gives no basis for defining it. Neither does</p>		

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<p>The Functional Model language cited in the interpretation supports the Planning Coordinator’s supervisory role in directing the coordination of the planning process, including the specification of any methodologies to be used by Transmission Planners in its area. Such authority is also implied by a common sense reading of the standard itself. Assume that the standard was written with the understanding that the Planning Coordinator <i>did not</i> have this authority. Each of its Transmission Planners would be free to make and adopt its own methods, and the Planning Coordinator’s assessment as well as each Transmission Planner’s assessment would be invalid on its face due solely to the lack of coordination. (Remember that M1 and M2 apply to both the Planning Coordinator <i>and</i> its Transmission Planners.)</p>		
<p>As we stated in the 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.”</p>		
3	BC Hydro and Power Authority	Integrated system planning roles and responsibilities in British Columbia (BC) are under review.
<p>Response: No response is required.</p>		
3	Consumers Energy	While the intent seems clear the following sentence from the last paragraph is not: "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." (What does the "are required" refer to, "inclusion" or "outages"?)
<p>Response: We thank you for your comment. There appears to be a typographical error in the cited first sentence, and we will modify the first sentence by inserting the phrase “performed is” as shown: “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 <u>performed is</u> required.”</p>		
3	Manitoba Hydro	Manitoba Hydro agrees with the interpretation outlined in TPL-003-0 R1.3.12; however, Manitoba Hydro does not agree with the interpretation of TPL-002-0 and TPL-003-0 R1.3.2. The standard puts the onus of defining critical system conditions on the PA/TP. The revised interpretation creates confusion as it is now unclear as to whether the PA/TP or RE as Compliance monitor is to determine the critical system conditions.
<p>Response: We thank you for your comments. We respectfully disagree with your conclusion regarding our interpretation of R1.3.2. The Planning Coordinator has the authority to specify “critical system conditions.” As we stated in the 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.”</p>		
3	MidAmerican Energy Co.	We believe the critical conditions for the Transmission Planner planning should be determined

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		by the Transmission Planner while we agree that the Planning Coordinator should determine the critical conditions for the Planning Coordinator's area.
Response: We thank you for your comment, which addresses R1.3.2. However, the comment is illogical unless the Planning Coordinator and the Transmission Planner are one and the same.		
3	Orlando Utilities Commission	AMEREN: 1.3.2: Recommend Affirmative vote. AMEREN: 1.3.12: Recommend Negative Vote. Comment: The revised interpretation left out the discretion on behalf of the TP or PC. The discretion of the TP and/or PC should remain part of the interpretation since it would be impractical to perform long term studies with every possible planned outage included. The discretion part allows the TP and/or the PC to include those outages that are of significant duration and not study those that are of short duration. There are other standards and practices under which outages are reviewed so that the system is operated reliability and mandated that additional study is done under the TPL standard for even a short outage is impractical and provides no reliability gain. To address our concern we recommend replacing the first sentence; "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." With the first sentence from the first interpretation: "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 second sentence is excellent and we agree that it addressed the question asked.
Response: We thank you for your comment. We respectfully disagree that the consideration of planned outages is somehow discretionary by the Planning Coordinator or Transmission Planner. R.1.3.12 is a requirement, and as such, cannot be optional or discretionary. However, the requirement does not specify a method for the modeling of planned outages; such modeling methods are within the discretion of the Planning Authority [Planning Coordinator] to specify, and those methods should be consistently used by all its Transmission Planners.		
3	Salt River Project	R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. Although SRP agrees that the Planning Authority (PA) shall have the discretion in choosing the appropriate conditions to study for their system(s), we disagree with the language as stated. There is no definition of how or what a PA shall do in the "methodology." Methodology is not described in any Standard to this point. Therefore, how could compliance be measured? Methodology needs to be described or enumerated to be applied in Standards and for compliance. 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. SRP agrees with the revised interpretation of TPL-002-0 and TPL-003-0 R1.3.12 as developed by the NERC Planning Committee on March 12, 2008.
Response: We thank you for your comment. We agree that a methodology for defining "critical system conditions" is not part of TPL-002		

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		<p>and TPL-003. The reference to “methodology” in the interpretation comes from the Functional Model language we cited, and that citation states that the Planning Coordinator “provides...Transmission Planners ...methodologies and tools for the simulation of the transmission system.” We further state that a “PC’s selection of “critical system conditions” fall within the purview of “methodology.” We use this citation to establish the Planning Coordinators authority for specifying “critical system conditions” which it determines are appropriate. The standards do not require a methodology and our interpretation does not require one.</p>
3	Southern Indiana Gas and Electric Co.	<p>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. Vectren requests that consideration be given to change the verbiage; “include any necessary system adjustments” to include the word “reasonable” or some other similar word to limit the system adjustments. The suggested verbiage would then read “include any reasonable and necessary system adjustments”. Vectren does not believe that the word “necessary” provides enough limitation to the adjustments that should be considered. If the system adjustment necessary to eliminate an overload caused by the planned outage combined with contingency assessment requires an unreasonable amount of generation redispatch or the dropping of firm load, there should be some ability for the Transmission Planner or the Planning Authority to make the determination that the adjustment is unreasonable and another remedy for the overload must be explored. Your consideration in this matter is appreciated.</p>
<p>Response: We thank you for your comment, which addresses R1.3.12. We do not believe that the addition of the word “reasonable” has additional interpretative value. The language posed by Southern Indiana Gas and Electric Co. is an attempt to remove load shedding as a possible “necessary system adjustment” prior to modeling a contingency assessment. We do not believe that the word “reasonable” will accomplish this goal, nor do we believe it is required. It is not required because we do not believe that load shedding would ever be considered a “necessary system adjustments which might be required to accommodate planned outages” as our interpretation states.</p> <p>In support of this conclusion, consider TPL-002. It does not permit the loss of demand except as noted in footnote “b.” If a Planning Coordinator or Transmission Planner attempted to “pass” TPL-002 by <i>a priori</i> load shedding under the guise of a “necessary system adjustment” for a planned outage, they would have shed load in order to comply with a standard that does not permit load shedding, and we would expect the RE reviewing the assessment to find it invalid.</p>		
3	Wisconsin Electric Power Marketing	<p>We agree with the principle that the TP and TO needs to apply discretion to the contingent topology of the cases, but the actual wording in the standard does not seem to allow that discretion.</p>

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<p>Response: We thank you for your comment. We believe that it is addressing our interpretation of R1.3.12, but are unsure. We do not state that R1.3.12 is discretionary in our revised interpretation.</p>		
4	Wisconsin Energy Corp.	We agree with the principle that the TP and TO needs to apply discretion to the contingent topology of the cases, but the actual wording in the standard does not seem to allow that discretion.
<p>Response: We thank you for your comment. We believe that it is addressing our interpretation of R1.3.12, but are unsure. We do not state that R1.3.12 is discretionary in our revised interpretation.</p>		
5	City of Tallahassee	While I agree with the Revised Interpretation, I have to vote no because of the text before it that would gain teeth if this were approved. "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." The Standard does NOT state "that the Compliance Monitor (or RE) has to approve the 'valid assessment". The Assessment is up to the PC and TP. The text quoted above IMPLIES that the RE must approve the assessment. If that is the case, put in a standard change request. The RE can only check that the assessment exists. If they don't like it, they can make a recommendation to change it, but it is not a compliance issue. IF the text was true, I should be able to submit my assessment for evaluation without risking a compliance violation for asking for the approval that you imply is needed. The Compliance folks at the RE have told me that if we ask a question and it is a violation, we would get investigated and reported. I have to have an assessment (or procedure) and follow it, but the RE doesn't have to like it. If they don't like it, they can make a SUGGESTION, but not find non-compliance.
<p>Response: We thank you for your comment. With regards to R1.3.2, we disagree with your statement that the Compliance Monitor does not determine whether an assessment is "valid." That is what its auditing of compliance requires. However, an RE's obligation to determine whether an assessment is "valid" does not allow the RE to micromanage the assessments it reviews. For example, it cannot reject a corrective plan (e.g., the proposed construction of new facilities) because it believes another plan would be more cost effective. If the proposed corrective plan fulfills the standard's requirements, it is not reviewable by the RE.</p>		
5	City Water, Light & Power of Springfield	The interpretation states that "The selection of a credible generation dispatch for the modeling under critical system conditions is within the direction of the Planning Authority." Under the proposed Version 4 of the NERC Functional Model, there is no longer a Planning Authority/Planning Coordinator. This interpretation means nothing if there is no longer a Planning Authority/Planning Coordinator.
<p>Response: We thank you for your comment. Version 4 of the Functional Model is not approved; in fact, it was just posted for public comment, and the results have not yet been released.</p>		
5	Dominion Energy	The original interpretation put the responsibility of determining the critical system condition on

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		both the Planning Authority and Transmission Planner. Local Transmission Owners should retain the ability to have internal planning criteria for their local systems and are not precluded from doing so by the Functional Model, Version 3. This interpretation appears to preclude that and would remove the Transmission Planner as a responsible party in determining this critical system condition.
<p>Response: We thank you for your comments. Our interpretation does not preclude a Transmission Planner from adopting stricter planning criteria than required by a standard. That is any Transmission Planner's prerogative. However, with regard to the assumptions for critical system conditions within a Planning Coordinator's area <i>associated with compliance with a NERC standard</i>, those are formulated by the Planning Coordinator.</p>		
5	Manitoba Hydro	Manitoba Hydro agrees with the interpretation outlined in TPL-003-0 R1.3.12; however, Manitoba Hydro does not agree with the interpretation of TPL-002-0 and TPL-003-0 R1.3.2. The standard puts the onus of defining critical system conditions on the PA/TP. The revised interpretation creates confusion as it is now unclear as to whether the PA/TP or RE as Compliance monitor is to determine the critical system conditions.
<p>Response: We thank you for your comments. We respectfully disagree with your conclusion regarding our interpretation of R1.3.2. The Planning Coordinator has the authority to specify "critical system conditions." As we stated in the 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."</p>		
5	Salt River Project	R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. Although SRP agrees that the Planning Authority (PA) shall have the discretion in choosing the appropriate conditions to study for their system(s), we disagree with the language as stated. There is no definition of how or what a PA shall do in the "methodology". Methodology is not described in any Standard to this point. Therefore, how could compliance be measured? Methodology needs to be described or enumerated to be applied in Standards and for compliance. R.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. SRP agrees with the revised interpretation of TPL-002-0 and TPL-003-0 R1.3.12 as developed by the NERC Planning Committee on March 12, 2008.
<p>Response: We thank you for your comment. What Salt River Project is seeking is a greater specificity in R1.3.2 and R1.3.12. However, such additional specificity cannot be provided by an interpretation.</p>		
5	Southern California Edison Co.	Interpretation of R1.3.2 addresses the question raised by Ameren. Interpretation R1.3.12 does not fully address question posed by Ameren which led to some discussion during our internal review process.

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Response: We cannot respond to this comment since no specific reason was given.		
5	Wisconsin Electric Power Co.	We agree with the principle that the TP and TO needs to apply discretion to the contingent topology of the cases, but the actual wording in the standard does not seem to allow that discretion.
Response: We thank you for your comment. We believe that it is addressing our interpretation of R1.3.12, but are unsure. We do not state that R1.3.12 is discretionary in our revised interpretation.		
6	Dominion Resources, Inc.	We do not support the removal of Transmission Planner.
Response: We cannot respond to the comment because we do not understand what part of the interpretation the comment references. In addition, it does not provide a reason.		
6	Manitoba Hydro	Manitoba Hydro agrees with the interpretation outlined in TPL-003-0 R1.3.12; however, Manitoba Hydro does not agree with the interpretation of TPL-002-0 and TPL-003-0 R1.3.2. The standard puts the onus of defining critical system conditions on the PA/TP. The revised interpretation creates confusion as it is now unclear as to whether the PA/TP or RE as Compliance monitor is to determine the critical system conditions.
Response: We thank you for your comments. We respectfully disagree with your conclusion regarding our interpretation of R1.3.2. The Planning Coordinator has the authority to specify "critical system conditions." As we stated in the 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."		
6	Southern Indiana Gas and Electric Co.	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. Vectren requests that consideration be given to change the verbiage; "include any necessary system adjustments" to include the word "reasonable" or some other similar word to limit the system adjustments. The suggested verbiage would then read "include any reasonable and necessary system adjustments". Vectren does not believe that the word "necessary" provides enough limitation to the adjustments that should be considered. If the system adjustment necessary to eliminate an overload caused by the planned outage combined with contingency assessment requires an unreasonable amount of generation redispatch or the dropping of firm load, there should be some ability for the Transmission Planner or the Planning Authority to make the determination that the adjustment

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Segment	Organization	Comment
		is unreasonable and another remedy for the overload must be explored. Your consideration in this matter is appreciated.
<p>Response: We thank you for your comment, which addresses R1.3.12. We do not believe that the addition of the word “reasonable” has additional interpretative value. The language posed by Southern Indiana Gas and Electric Co. is an attempt to remove load shedding as a possible “necessary system adjustment” prior to modeling a contingency assessment. We do not believe that the word “reasonable” will accomplish this goal, nor do we believe it is required. It is not required because we do not believe that load shedding would ever be considered a “necessary system adjustments which might be required to accommodate planned outages” as our interpretation states.</p> <p>In support of this conclusion, consider TPL-002. It does not permit the loss of demand except as noted in footnote “b.” If a Planning Coordinator or Transmission Planner attempted to “pass” TPL-002 by <i>a priori</i> load shedding under the guise of a “necessary system adjustment” for a planned outage, it would have shed load in order to comply with a standard that does not permit load shedding, and we would expect the RE reviewing the assessment to reject it.</p>		
9	Commonwealth of Massachusetts Department of Public Utilities	The interpretation says “Planning Authority/Transmission Provider”. The “and/or” can be read as either an “and” or an “or”. The difference is that the entities have to either come to a mutual agreement or can make independent assessments. Although it is thought that it will generally be a mutual decision, we think this is an issue that the two entities can work out how they address and doesn’t need to be dictated by the standard. Therefore we think the interpretation should have the “and/or” replaced with an “or”.
<p>Response: We thank you for your comment, but it appears that your comment refers to the original interpretation of R1.3.2, not our revised interpretation.</p>		