

**NERC**

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# Transmission Planning Standards

Industry Webinar: Footnote 'b'

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**RELIABILITY | ACCOUNTABILITY**



- Brief History
- Overview of Data Request and Results
- Approach to address concerns
- Overview of “as posted” draft standard
- Changes since last posting
- Summary of needs addressed in proposal
- Posting and balloting dates
- Question and Answer

## What is Footnote ‘b’?

*Table I. Transmission System Standards — Normal and Emergency Conditions*

- b) Planned or controlled interruption of electric supply to **radial customers or some local Network customers**, connected to or supplied by the Faulted element or by the affected area, may occur in certain areas without impacting the overall reliability of the interconnected transmission systems. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted Firm (non-recallable reserved) electric power Transfers.

- Issue first raised by FERC in Order No. 693 issued in March 2007:
  - Created the term Consequential Load Loss
  - Directed NERC to clarify the Reliability Standard
- Issue covered in TPL-001-2 as footnote 12
- In its March 18, 2010 Order, FERC directed NERC to clarify footnote 'b' by March 31, 2011
- Revisions to footnote 'b' in the existing TPL standards were filed on March 31, 2011

- Order No. 672 was issued in April 2012 that:
  - Remanded the TPL Standards (with footnote 'b' revision) to NERC
  - Urged NERC to develop an appropriate modification in a timely manner
  - Provided guidance on acceptable approaches that addressed their concerns
  - Directed NERC to issue a Section 1600 Data Request to collect information about current utilization of footnote 'b'

- Notice of Proposed Rulemaking (NOPR) was issued in April 2012 that:
  - Proposed to remand TPL-001-2 (new TPL standard)
  - Similar objections for footnote 12
  - NOPR indicates a rapid resolution of this one matter will allow consideration of other TPL improvements

- NERC issued Section 1600 Data Request on July 31, 2012
- 100% participation (189 respondents)
  - 171 respondents (90%) reported no instances where they utilized footnote 'b' in their planning process
  - 18 respondents (10%) reported instances where they utilized footnote 'b'
- 78 instances were reported
- Maximum value reported – 75 MW
- Average value – 19.5 MW

- To meet the Commission's directives contained in Order 762, the Standard Drafting Team (SDT) wanted to:
  - Establish meaningful substantive parameters governing the stakeholder process
  - Establish quantitative and/or qualitative criteria for use of footnote 'b'
  - Establish a further review by the Regional Entity or NERC



## Comparison to industry and NERC Board of Trustees approved standard

- Two major changes:
  - Added Attachment 1
  - Limited use of footnote 'b' to 75 MW max

- Attachment 1:
  - Stakeholder Process
  - Information for inclusion in process
  - Instances where regulatory review is required

- Stakeholder Process (Attachment 1 – Section I)
  - Defines conditions for open and transparent
  - Meetings must be open to affected parties
  - Notice must be provided in advance of meetings
  - Information about proposed utilization of footnote ‘b’ must be made available

- Information for inclusion in the process (Attachment 1 – Section II)
  - Defines parameters where footnote ‘b’ is utilized in planning process
  - Allows stakeholders to evaluate the proposed use

- Information for inclusion in the process (Attachment 1 – Section II)
  - Key parameters include:
    - Data to evaluate likelihood, including contingency description, ratings, & MW expected to be interrupted
    - Future plans to mitigate the need
    - Alternatives considered by the planner
    - Assessment of potential overlapping uses

- Instances where regulatory review is required (Attachment 1 – Section III)
  - Voltage level of Contingency > 300kV
  - Planned interruption of  $\geq 25$ MW

- Instances where regulatory review is required (Attachment 1 – Section III)
  - Verification that the applicable regulatory authority responsible for retail electric service issues does not object before it is allowed as part of a Corrective Action Plan in Year One of the Planning Assessment
  - Must submit information from Section II to the ERO for determination of Adverse Reliability Impacts

- Footnote ‘b’ changes
  - Clarified that footnote ‘b’ may be utilized “throughout the planning horizon”
  - Clarified that review through the stakeholder process was only required for the Near-Term Transmission Planning Horizon
  - Limited the use of footnote ‘b’ to a maximum of 75 MW



- Stakeholder Process (Attachment 1, Section I)
  - Clarified that a “new” stakeholder process was not required
  - Clarified that an entity does not need to go through the stakeholder process each year if there is not a material change in the information

- Information for inclusion in the process (Attachment 1, Section II)
  - Clarified that the assessment was on the effect of the interruption on the health, safety, and welfare of the community
  - Clarified that the planner must perform an assessment of potential overlapping uses within their footprint and with adjacent planners

- Instances where regulatory review is required (Attachment 1 – Section III)
  - Changed language from “approval” to “assure that” regulatory body “does not object”
  - Changes language so that the planner must submit the information to the ERO rather than the Regional Entity
  - Removed language that the Regional Entity must “verify”

- With this draft standard, the SDT has:
  - Clearly defined the parameters of the stakeholder process
  - Established a quantitative criteria by limiting the maximum amount of Load that can planned to be interrupted using footnote 'b' to 75 MW

- With this draft standard, the SDT has:
  - Established a qualitative criteria by requiring the stakeholder process with extensive information sharing for each use of footnote 'b'
  - Established a qualitative criteria by requiring regulatory review for each instance where more than 25 MW of Load is planned to be interrupted or the Contingency is >300 kV
  - Created a requirement where the pertinent information is submitted to the ERO

- Revised TPL-002-1c (footnote 'b') and TPL-001-2a (footnote 12) were posted for a combined 45-day comment and ballot period on October 5, 2012
- 30-day comment period concludes on November 5, 2012
  - Coincides with ability to join ballot pool
- 10-day ballot period runs November 9, 2012 through November 19, 2012
- Only need to submit one set of comments – you do not need to enter comments for both the comment period and the ballot

A large, semi-transparent blue map of North America is centered on the page. The map is overlaid with a horizontal blue band that contains the text 'Question and Answer'. The background of the slide is white with a dark blue header and footer.

# Question and Answer

Website: [http://www.nerc.com/filez/standards/Project2010-11\\_TPL\\_Table-1\\_Order.html](http://www.nerc.com/filez/standards/Project2010-11_TPL_Table-1_Order.html)