

NERC Glossary Definition: System Operating Limit

Term: "System Operating Limit"

Definition:

Redline

~~All Facility Ratings, System Voltage Limits, and stability limits, applicable to The value (such as MW, Mvar, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configurations, used in Bulk Electric System operations for monitoring and assessing pre- and post-Contingency operating states. to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:~~

- ~~• Facility Ratings (applicable pre and post Contingency Equipment Ratings or Facility Ratings)~~
- ~~• transient stability ratings (applicable pre and post Contingency stability limits)~~
- ~~• voltage stability ratings (applicable pre and post Contingency voltage stability)~~
- ~~• system voltage limits (applicable pre and post Contingency voltage limits)~~

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All Facility Ratings, System Voltage Limits, and stability limits, applicable to specified System configurations, used in Bulk Electric System operations for monitoring and assessing pre- and post-Contingency operating states.

Introduction

The standard drafting team (“SDT”) for *Project 2015-09 Establish and Communicate System Operating Limits* developed these rationales to explain the modifications to the definition of the term “System Operating Limit” (“SOL”) to be incorporated into the Glossary of Terms Used in NERC Reliability Standards (“NERC Glossary”). As discussed below, the purpose of the proposed modified term is to provide greater clarity and consistency with the SOL concept and how SOLs work alongside operational performance criteria to result in reliable operations.

Background

The use of SOLs is a foundational concept in NERC’s Reliability Standards, as operating within SOLs for the pre- and post-Contingency state is a primary aspect of reliable Bulk Electric System (“BES”) operations. An SOL is currently defined in the NERC Glossary as:

The value (such as MW, Mvar, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:

- *Facility Ratings (applicable pre- and post-Contingency Equipment Ratings or Facility Ratings)*
- *transient stability ratings (applicable pre- and post- Contingency stability limits)*
- *voltage stability ratings (applicable pre- and post-Contingency voltage stability)*
- *system voltage limits (applicable pre- and post-Contingency voltage limits)*

SOLs are the primary focus of FAC standards FAC-010, FAC-011, and FAC-014. Per these FAC standards:

- Planning Coordinators are required to have a methodology for establishing SOLs in its area for use in the planning horizon (FAC-010-3).
- Planning Coordinators and Transmission Planners are required to establish SOLs for use in the planning horizon consistent with the Planning Coordinator’s SOL Methodology (FAC-014-2).
- Reliability Coordinators are required to have a methodology for establishing SOLs in its area for use in the operations horizon (FAC-011-3).
- TOPs are required to establish SOLs for use in the operations horizon consistent with the Reliability Coordinator’s SOL Methodology (FAC-014-2).

FAC-011-3 requirement R2 states that the “RC’s SOL Methodology shall include a requirement that SOLs provide BES performance consistent with the following.” The subsequent subparts to FAC-011-3 requirement R2 further describe pre-Contingency performance criteria (in R2.1), the post-Contingency performance criteria (in R2.2), and describe other rules related to the establishment of SOLs in the remaining subparts. The language in requirement R2 indicates that the SOLs established in accordance with

requirement R2 are expected to “provide” a level of pre- and post-Contingency reliability described in the subparts of requirement R2. Accordingly, the assessments of the pre-Contingency state and the post-Contingency state are expected to be performed as part of the SOL establishment process, yielding a set of SOLs that “provide” for meeting the performance criteria denoted in FAC-011 R2 and subparts. Requirements in FAC-014-2 then require the communication of those SOLs to the various operations and planning entities. TOP standards in effect at the time required TOPs to operate within these SOLs.

These FAC standards and related TOP standards established a construct for reliable operations. This SOL construct depicted in the body of Reliability Standards in effect in the 2007 timeframe is characterized by the following:

1. The TOPs and RCs would run studies for expected system conditions where the studies would examine the pre-Contingency state and the post-Contingency state.
2. If any performance criteria (in FAC-011 R2 subparts) were not being met in those studies, the TOP would establish an SOL which, if operated within, would result in all of those performance criteria being met.
3. The TOP would communicate those SOLs to System Operators.
4. The TOP System Operators would operate within those SOLs.

The TOP and IRO standards in effect prior to April 1, 2017 required TOPs to operate within these SOLs, the presumption being that if those SOLs were operated within in Real-time operations, then the acceptable pre- and post-Contingency operations criteria depicted in FAC-011-3 requirement R2 and subparts would be met.

It is important to note that prior to April 1, 2017 there were no Reliability Standards that required operational entities to perform assessments of the post-Contingency state in same-day or Real-time operations. Prior to April 1, 2017, the requirements associated with assessments of the post-Contingency state were folded into SOL establishment process – the establishment of SOLs that “provide” for meeting the documented pre- and post-Contingency performance criteria in FAC-011-3 requirement R2 and subparts.

The definition of SOL and the Reliability Standards that address SOLs – FAC-010, FAC-011, and FAC-014 – have remained essentially unchanged since their initial versions were approved and adopted in 2007. Since that time, many improvements have been made to the body of reliability standards, specifically those in the TPL, TOP, and IRO family of standards. The former TPL-001, -002, -003, and -004 Reliability Standards have been replaced with TPL-001-4, all of the TOP standards were replaced with the currently effective TOP-001, TOP-002, and TOP-003, and several IRO standards have been replaced as well. The definition of SOL and the FAC standards that address SOLs are inextricably linked to many of the TPL, TOP, and IRO standards, as they all address in some manner the foundational reliability concept of acceptable system performance. One of the primary objectives of Project 2015-09 is to make changes to the SOL definition and the related FAC standards to create better alignment with the currently effective TPL, TOP, and IRO

standards. The SDT's proposal to revise the definition of SOL improves clarity, reduces redundancy, and creates better alignment and continuity with the currently effective TOP and IRO standards.

Due to changes in the TOP and IRO Reliability Standards that became effective on April 1, 2017, this SOL construct described by the currently effective definition of SOL and the manner in which it is used in the FAC standards is not reflective of the construct encapsulated in the operational requirements in place today. The new TOP and IRO standards represent a new construct for managing reliability for the pre- and post-Contingency state. Under this new construct approved in Order No. 817¹:

1. TOPs and RCs are required to ensure that an Operational Planning Analysis (OPA) is performed to assess whether the planned operations for the next-day will exceed any of its SOLs and IROLs². The pre- and post-Contingency states are analyzed as part of the OPA.³
2. If the OPA identifies any potential exceedances, the RC and TOP must have an Operating Plan to address the exceedance.⁴
3. In Real-time, RCs and TOPs must perform Real-time Assessments (RTAs) at least once every 30 minutes to determine whether there are any expected or actual exceedances of SOLs (including IROLs) based on Real-time conditions.⁵ The pre- and post-Contingency states are analyzed as part of the RTA.⁶
4. If SOL exceedances are observed in TOP Real-time monitoring or RTAs, TOPs are required to implement its Operating plan to mitigate the conditions.⁷
5. If SOL or IROL exceedances are observed in RC Real-time monitoring or RTAs, RCs are required to notify TOPs of those exceedances.⁸

¹ *Transmission Operations Reliability Standards and Interconnection Reliability Operations and Coordination Reliability Standards*, Order No. 817, 153 FERC ¶ 61,178 (2015).

² IRO-008-2, Requirement R1; TOP-004-2, Requirement R1.

³ OPA – An evaluation of projected system conditions to assess anticipated (pre-Contingency) and potential (post-Contingency) conditions for next-day operations. The evaluation shall reflect applicable inputs including, but not limited to, load forecasts; generation output levels; Interchange; known Protection System and Special Protection System status or degradation; Transmission outages; generator outages; Facility Ratings; and identified phase angle and equipment limitations. (Operational Planning Analysis may be provided through internal systems or through third-party services.)

⁴ IRO-008-2, Requirement R2; TOP-004-2, Requirement R2.

⁵ IRO-008-2, Requirement R4; TOP-001-3, Requirement R13.

⁶ RTA – An evaluation of system conditions using Real-time data to assess existing (pre-Contingency) and potential (post-Contingency) operating conditions. The assessment shall reflect applicable inputs including, but not limited to: load, generation output levels, known Protection System and Special Protection System status or degradation, Transmission outages, generator outages, Interchange, Facility Ratings, and identified phase angle and equipment limitations. (Real-time Assessment may be provided through internal systems or through third-party services.)

⁷ TOP-001-3 requirement, Requirement R14

⁸ IRO-008-2 requirement, Requirement R5

6. If there is an expected or actual IROL exceedance identified in RC Real-time monitoring or RTAs, the exceedance must be resolved within the IROL T_v , which can be no longer than 30 minutes.⁹

Pursuant to the construct in the currently-effective TOP/IRO Reliability Standards, TOPs and RCs must assess system conditions, identify expected or actual SOL exceedances (including for the subset of SOLs designated as IROLs) and take steps to address any such exceedances to avoid the possibility of further deterioration in system conditions. Under this new construct, the pre- and post-Contingency states are assessed on an ongoing basis as part of OPAs and RTAs. Any SOL exceedances that are observed are required to be mitigated per the respective Operating Plans. Under this new construct, it is the OPA, the RTA, and the implementation of Operating Plans that “provide” for reliable pre- and post-Contingency operations. In the former construct, operating within the TOP-provided SOL “provided” for reliable pre- and post-Contingency operations. The proposed revised FAC standards and the proposed revised SOL definition is intended to reflect the new construct depicted in the TOP and IRO standards.

NERC SOL Whitepaper

As discussed in the whitepaper prepared by the SDT for Project 2014-03 Revisions to TOP and IRO Standards (the “Project 2014-03 Whitepaper”), which developed the currently-effective Transmission Operations (“TOP”) and Interconnection Reliability Operations and Coordination (“IRO”) Reliability Standards, while the term SOL is used extensively in the NERC Reliability Standards, there is significant confusion with, and many widely varied interpretations and applications of, the term SOL. While the Project 2014-03 SDT did not seek to modify the SOL definition, they drafted the Project 2014-03 Whitepaper to describe their understanding of the SOL term/concept and to “bring clarity and consistency to the notion of establishing SOLs, exceeding SOLs, and implementing Operating Plans to mitigate SOL exceedances.” The Project 2014-03 Whitepaper served as the conceptual basis for the development of the currently-effective TOP/IRO Reliability Standards.

As described in the Project 2014-03 Whitepaper, the central principles of the SOL concept in NERC’s Reliability Standards is to:

1. Know the Facility Ratings, voltage limits, transient Stability limits, and voltage Stability limits, and
2. Ensure that they are all observed in both the pre- and post-Contingency state by performing a Real-time Assessment.

These principles are reflective of the new construct for managing reliability for the pre- and post-Contingency state depicted in the TOP and IRO standards created as part of Project 2014-03.

Following the development of the currently-effective TOP/IRO Reliability Standards, NERC initiated a periodic review of the requirements in the Facilities Design, Connections, and Maintenance (“FAC”) group of Reliability Standards addressing SOLs. The periodic review team identified a need to revise or develop new definitions to be incorporated into the NERC Glossary to provide greater clarity and consistency in establishing SOLs and promote a common understanding of what it means to exceed SOLs. The periodic review team recognized that while the Project 2014-03 Whitepaper provided clarity on the SOL concept,

⁹ IRO-009-2, Requirements R1-R4; TOP-001-3, Requirement R12.

reliability would be further enhanced by (1) revising the SOL definition in the NERC Glossary, and (2) developing a new defined term SOL Exceedance. The periodic review envisioned that these two enhancements help to better align the definitions in the NERC Glossary with the Project 2014-03 Whitepaper and better support the SOL exceedance concept used in the TOP/IRO Reliability Standards. Subsequently, to address the issues identified in the periodic review, NERC initiated Project 2015-09 to revise the requirements for, and definitions related to, the methodology used for establishing and communicating SOLs.

In September of 2017 the SDT posted a proposed definition of SOL Exceedance for informal comment. The industry responses to the draft SOL Exceedance definition indicated numerous significant concerns. Given these responses, the SDT concluded that creating a definition of SOL Exceedance that adequately reflected reliable operating principles could create too much of an unnecessary compliance burden without significant modification to the existing TOP and IRO standards. Therefore, the SDT abandoned the idea of creating a definition for SOL Exceedance in favor of addressing the performance criteria through requirements in FAC-011-4 and FAC-014-3 similar to the way it is done in the currently effective FAC standards.

Modifications to SOL Definition

The Project 2015-09 SDT proposes to define the term System Operating Limit (SOL) as:

All Facility Ratings, System Voltage Limits, and stability limits, applicable to specified System configurations, used in Bulk Electric System operations for monitoring and assessing pre- and post-Contingency operating states.

The SDT's intent was to simplify and clarify the SOL definition by eliminating ambiguities such that SOLs are easily identifiable and easily measurable. The currently-effective SOL definition states that SOLs "are based upon certain operating criteria." The modified definition eliminates the phrase "are based upon" to more accurately state that the SOLs "are" the actual operating parameters which are to be observed for the pre- and post-Contingency states, leaving no confusion as whether a Facility Rating, stability limit, or voltage limit is an SOL. The unambiguous language in the modified definition should help facilitate a more consistent application of the SOL concept within the electric industry.

Facility Ratings, System Voltage Limits, and stability limits are the three types of operating criteria included in the existing SOL definition and carried forward into the modified definition that must be accounted for to ensure reliable operations. Facility Ratings must be established in accordance with Reliability Standard FAC-008-3. System Voltage Limits, as discussed below, is proposed to be defined as "the maximum and minimum steady-state voltage limits (both normal and emergency) that provide for acceptable System performance." Stability limits includes both transient stability limits and voltage stability limits. The intent of using the "stability limit" term (as opposed to the NERC Glossary term "Stability Limit") is to allow for a number of different types of stability-related limitations or phenomena, including, but not limited to, sub-synchronous resonance (SSR), phase angle limitations, transient voltage limitations on equipment, and weighted short-circuit ratio (WSCR). The Glossary term "Stability Limits" is not appropriate for use in the revised definition because its use is limited to a maximum power flow value. While some entities may use

maximum power flow values as a means by which to prevent instability, this approach represents only one particular method and may be too restrictive for some entities. Reliability tools allow entities to monitor and control parameters other than maximum power flow values in order to demonstrate acceptable stability performance.

Unlike the existing SOL definition, the proposed definition includes the phrase “used in Bulk Electric System operations” to distinguish those Facility Ratings, voltage limits, and stability limits that are used in planning. The SDT determined that the SOL concept should be limited to the operational time horizon and thus proposes to retire FAC-010-3. The Facility Ratings, voltage limits, and stability criteria used in the planning horizon are developed according to FAC-008-3 and TPL-001-4 and, as a result, there was no additional reliability need to require Planning Authorities to develop SOLs to be used in the planning horizon. The SDT concluded, however, that there was a reliability need to coordinate the Facility Ratings, voltage limits, and stability criteria used in planning with those used in operations. The SDT developed requirement R6 in proposed Reliability Standard FAC-014-3 to address that issue.

As discussed in detail below, the SDT determined that references to “most limiting criteria” and “acceptable reliability criteria”, and the manner in which the “specified system configuration” and the “pre- and post-contingency” phrases were used in the currently-effective definition of SOL were adding to industry confusion as to what constitutes an SOL.

Most limiting Criteria – The SDT concluded that removing the “most limiting criteria” concept in favor of designating all Facility Ratings, System Voltage Limits, and stability limits as SOLs is better aligned with the requirements in the TOP/IRO Reliability Standards. As noted above, under the TOP/IRO Reliability Standards, each RC and TOP must perform Operational Planning Analysis (OPAs) and Real-time Assessments (RTAs) to assess conditions in the day ahead and Real-time horizon and, if it identifies any actual, expected or potential SOL exceedance, take appropriate mitigating action to maintain pre- and post-Contingency reliable operations. Under the currently-effective SOL definition, RCs and TOPs must initially determine which operating parameter is the most limiting at that point in time to be designated as the SOL and then determine if there are any actual, potential, or expected exceedances of that SOL. The SDT understands that this has caused some confusion within industry. Specifically, it may be unclear in Real-time operations when an SOL ceases to be an SOL because it is no longer the “most limiting criteria.” Confusion is introduced when the most limiting criteria (and thus the SOL) changes from one RTA to the next.

The SDT determined that it is more straightforward to simply categorize all Facility Ratings, System Voltage Limits, and stability limits as SOLs. In performing OPAs and RTAs, RCs and TOPs should be assessing conditions as it relates to any operating parameter or reliability limit, not the most limiting parameter or limit based on a particular prior analysis. Under the new TOP and IRO requirements, RCs and TOPs are assessing conditions on an ongoing basis through OPAs and RTAs to determine whether there are any actual, potential, or expected exceedances of any Facility Rating, System Voltage Limit, or stability limit, which would necessarily include the most limiting of those parameters/limits. In this manner, the “most limiting criteria” concept is subsumed within the requirements of the TOP/IRO Reliability Standards and it is not necessary that it be included in the SOL definition. In short, the proposed SOL definition creates a simplified approach. There is no need to continuously identify and communicate the ever-changing “most

limiting” criteria. Entities must simply operate – and plan to operate – to prevent any exceedance of all Facility Ratings, System Voltage Limits, and stability limits.

The SDT determined that the removal of the “most limiting criteria” from the SOL definition represents an improvement to reliability. The “most limiting criteria” can adversely impact reliability by masking instability risks that may exist slightly beyond the point of the most limiting condition. To illustrate, where prior studies indicate that a thermal limitation is the “most limiting criteria,” if the studying entity does not study the performance of the system appreciably beyond this thermal limitation to reasonably expected stressed conditions, it cannot be safely concluded that a more significant instability risk does not exist slightly beyond the point where the “most limiting criteria” exists. Because actions may be taken in the actual system conditions that mitigate thermal and voltage limitations identified as a “most limiting criteria”, it may be necessary to identify where subsequent operation may approach a point of instability. Consistent with this concept, the RC and its TOPs have the responsibility of establishing stability limits in accordance with the Reliability Coordinator’s SOL Methodology, as required by FAC-011-4 Requirement R4 and FAC-014-3 Requirements R2 and R4.

Acceptable Reliability Criteria – The SDT determined that the “acceptable reliability criteria” concept is best addressed through requirement language and that the SOL definition should focus simply on what constitutes an SOL. Taken together, the operations performance criteria in FAC-011-4 requirement R6 and the corresponding requirement R7 in FAC-014-3 adequately addresses operation within acceptable reliability criteria.

Specified System Configuration – The SDT proposes to retain the reference to “specified system configuration” due to the fact that stability limits in particular are typically dependent on system configuration. While Facility Ratings and System Voltage Limits are not typically dependent upon system configuration, there may be times where they may be dependent on System configuration. For example, if a transmission line is connected by two circuit breakers at one end of the line, and one of those two circuit breakers is open, the value of the Facility Rating for line could be reduced due to current carrying capability of the remaining in-service circuit breaker.

Pre- and Post-Contingency – The currently effective SOL definition specifies that each of the listed operating limit types are applicable for both the pre- and post-Contingency states. The SDT determined that the pre- and post-Contingency concept needed to be retained; however, it should be used in a manner consistent with the construct depicted in the new TOP and IRO standards rather than the old construct where the SOL itself “provided” for pre- and post-Contingency acceptable performance. The proposed definition makes it clear that both the pre-Contingency state and the post-Contingency state must be considered when evaluating the System performance for Facility Ratings, System Voltage Limits, and stability limits. As OPAs and RTAs are the mechanisms in the Reliability Standards for determining potential SOL exceedances (OPA) and actual SOL exceedances (RTA),¹⁰ the definition of SOL should support the concept that both the pre- and post-Contingency states should be accounted for.

¹⁰ In Order No. 705 (at P 162), the Commission stated that system performance is determined through studies, stating “the Commission believes that to demonstrate the pre- and post-contingency performance metrics required by [FAC-010-1] Requirements R2.1-R2.2 an

One aspect of the improved clarity of the revised definition of SOL is seen in its intended use. Under the revised definition, SOLs are intended to be used as an input into the OPA and RTA process.¹¹ The OPA and RTA process itself examines SOLs for the pre- and post-Contingency states and determines whether the SOLs are being exceeded. Accordingly, while SOLs are an input to the OPA and RTA process, SOL exceedance is the output of the OPA and RTA process. FAC-014-3 requirement R7 effectively stipulates that the operations performance criteria denoted in FAC-011-4 requirement R6 must be used in OPAs, RTAs, and Real-time monitoring when identifying SOL exceedances.

Lastly, as with the currently-effective SOL definition, the proposed SOL definition does not include reference to IROLs. IROLs, as currently defined, are a subset of SOLs that, if exceeded, “could lead to instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the BES.” The determination of when an SOL should be designated as an IROL is most appropriately addressed in the RC’s SOL methodology. There is no need to mention IROLs in the definition of SOL.

assessment or analysis would need to be performed. As such, Requirements R2.1-R2.2 provide for actions that go beyond NERC’s characterization of the subject of the requirements as limited to a list of topics that must be included in a methodology. Therefore, we conclude that these Requirements are more Docket No. RM07-3-000 - 79 - properly treated as implementation or operational requirements that may have a direct impact on reliability.”

¹¹ Some Reliability Coordinators and Transmission Operators may establish stability limits in the context of an OPA or RTA. For entities who adopt this approach, the stability SOL would be established – and its exceedance determined – as part of the OPA or RTA.