

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Proposed Request for Data or Information [DRAFT FOR COMMENT]

Order No. 762 Transmission System
Performance Following Loss of a Single Bulk
Electric System Element

RELIABILITY | ACCOUNTABILITY



Introduction and Survey Scope

In accordance with Section 1600 of the North American Electric Reliability Corporation (“NERC”) Rules of Procedure,¹ NERC may request data or information that is necessary to meet its obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d) of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations (“data request”). This is a proposal for such a request.

On April 19, 2012, the Commission issued Order No. 762² *Transmission Planning Reliability Standards* in which FERC remanded NERC’s TPL-002-0b — Transmission System Planning Performance Requirements Reliability Standard. Order No. 762 found that NERC’s proposed TPL-002-0b, which includes a provision that allows for planned load shedding in response to a single contingency provided that the plan is documented and alternatives are considered in an open and transparent process (“footnote b”), is vague, unenforceable and not responsive to the previous Commission directives on this matter. Accordingly, the Commission remanded NERC’s proposal as unjust, unreasonable, unduly discriminatory or preferential, and not in the public interest. FERC also directed NERC to utilize its Expedited Reliability Standards Development Process to develop timely modifications to footnote b in response to its remand.

The Commission also noted that several entities stated that the interruption of Firm Demand³ is rarely needed, but no support was provided for this conclusion. Accordingly, FERC directed NERC in Order No. 762 to identify the specific instances of any planned interruptions of Firm Demand under footnote b and how frequently the provision has been used. FERC directed NERC to gather this data under Section 1600 of its Rules of Procedure.

Due to the need for the data request to align with the tight schedule to be followed for revisions to TPL-002-0b Table 1 footnote b, NERC staff recommended shortening of the time period normally required, from forty-five (45) to twenty-one (21) days, to seek comment on a proposed request for data or information in accordance with section 1606 of the NERC Rules of Procedure. The NERC Board of Trustees approved that request at its May 9, 2012 meeting.

Accordingly, NERC is posting this proposed data request in accordance with the requirements of Section 1606 of the NERC Rules of Procedure for public comment. The twenty-one (21) day comment period will run from June 19 through July 9, 2012. NERC provided this proposed data request to FERC for information on May 23, 2012, as required by Section 1602 of the NERC Rules of Procedure. NERC will present this proposed data request, revised as appropriate in light of the comments received, to the NERC Board of Trustees for approval, as required by Section 1602 of the NERC Rules of Procedure. Upon NERC Board of Trustees approval, this data request will be issued and become mandatory.

¹ NERC’s Rules of Procedure are available at: http://www.nerc.com/files/NERC_Rules_of_Procedure_EFFECTIVE_20111117.pdf.

² *Transmission Planning Reliability Standards*, 139 FERC ¶ 61,060 (April 2012) (“Order No. 762”).

³ NERC Glossary of Terms Used in Reliability Standards defines Firm Demand as “That portion of the Demand that a power supplier is obligated to provide except when system reliability is threatened or during emergency conditions.” Available at http://www.nerc.com/files/Glossary_of_Terms.pdf.

The purpose of this data request is to solicit data and information from each registered Transmission Planner and Planning Coordinator in the United States and Canada⁴ in order to provide information identifying the specific instances of any planned interruptions of Firm Demand under footnote b and how frequently the provision has been used.

⁴ In the United States responding to this data request is mandatory. NERC strongly encourages Canadian entities to respond to this data request to ensure the completeness of the data collected.

NERC Contact Information

The data request must be completed in electronic format. Should the submitting entity experience any issues with submitting its data, contact Ed Dobrowolski, Order No. 762 Project Manager via email at ed.dobrowolski@nerc.net or by telephone at (609) 947-3673. If the respondent believes that any of the responses to this survey should remain confidential, contact the project manager directly for further instructions.

Official correspondence may be mailed to:

NERC – Order No. 762
C/O Ed Dobrowolski
3353 Peachtree Road, Suite 600, North Tower
Atlanta, GA 30326

Alternate NERC Points of Contact:

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Authority

Under Section 215 of the Federal Power Act (16 U.S.C. § 824o), Congress entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the Nation's bulk power system, and with the duties of certifying an Electric Reliability Organization ("ERO") that would be charged with developing and enforcing mandatory Reliability Standards, subject to FERC approval. NERC was certified as the ERO on July 20, 2006. NERC's authority for issuing this survey is derived from Section 215 of the Federal Power Act, and from the following sources:

NERC is requesting this information in accordance with its authority provided in 18 C.F.R. §39.2(d), which provides:

Each user, owner or operator of the Bulk-Power System within the United States (other than Alaska and Hawaii) shall provide the Commission, the Electric Reliability Organization and the applicable Regional Entity such information as is necessary to implement section 215 of the Federal Power Act as determined by the Commission and set out in the Rules of the Electric Reliability Organization and each applicable Regional Entity. The Electric Reliability Organization and each Regional Entity shall provide the Commission such information as is necessary to implement section 215 of the Federal Power Act.

NERC Rules of Procedure Section 1600 provides:

1601. Scope of a NERC or Regional Entity Request for Data or Information

Within the United States, NERC and regional entities may request data or information that is necessary to meet their obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d) of the Commission's regulations, 18 C.F.R. § 39.2(d). In other jurisdictions NERC and regional entities may request comparable data or information, using such authority as may exist pursuant to these rules and as may be granted by ERO governmental authorities in those other jurisdictions. The provisions of Section 1600 shall not apply to requirements contained in any Reliability Standard to provide data or information; the requirements in the Reliability Standards govern. The provisions of Section 1600 shall also not apply to data or information requested in connection with a compliance or enforcement action under Section 215 of the Federal Power Act, Section 400 of these Rules of Procedure, or any procedures adopted pursuant to those authorities, in which case the Rules of Procedure applicable to the production of data or information for compliance and enforcement actions shall apply.

1602. Procedure for Authorizing a NERC Request for Data or Information

1. *NERC shall provide a proposed request for data or information or a proposed modification to a previously-authorized request, including the information specified in paragraph 1602.2.1 or 1602.2.2 as applicable, to the Commission's Office of Electric Reliability at least twenty-one (21) days prior to initially posting the request or modification for public comment. Submission of the proposed request or modification to the Office of Electric Reliability is for the information of the Commission. NERC is not required to receive any approval from the Commission prior to posting the proposed request or modification for public comment in accordance with paragraph 1602.2 or issuing the request or modification to reporting entities following approval by the Board of Trustees.*
2. *NERC shall post a proposed request for data or information or a proposed modification to a previously authorized request for data or information for a forty-five (45) day public comment period.*
 - 2.1. *A proposed request for data or information shall contain, at a minimum, the following information: (i) a description of the data or information to be requested, how the data or information will be used, and how the availability of the data or information is necessary for NERC to meet its obligations under applicable laws and agreements; (ii) a description of how the data or information will be collected and validated; (iii) a description of the entities (by functional class and jurisdiction) that will be required to provide the data or information ("reporting entities"); (iv) the schedule or due date for the data or information; (v) a description of any restrictions on disseminating the data or information (e.g., "confidential," "critical energy infrastructure information," "aggregating" or "identity masking"); and (vi) an estimate of the relative burden imposed on the reporting entities to accommodate the data or information request.*
 - 2.2. *A proposed modification to a previously authorized request for data or information shall explain (i) the nature of the modifications; (ii) an estimate of the burden imposed on the reporting entities to accommodate the modified data or information request, and (iii) any other items from paragraph 1.1 that require updating as a result of the modifications.*
3. *After the close of the comment period, NERC shall make such revisions to the proposed request for data or information as are appropriate in light of the comments. NERC shall submit the proposed request for data or information, as revised, along with the comments received, NERC's evaluation of the comments and recommendations, to the Board of Trustees.*

4. *In acting on the proposed request for data or information, the Board of Trustees may authorize NERC to issue it, modify it, or remand it for further consideration.*
5. *NERC may make minor changes to an authorized request for data or information without board approval. However, if a reporting entity objects to NERC in writing to such changes within 21 days of issuance of the modified request, such changes shall require board approval before they are implemented.*
6. *Authorization of a request for data or information shall be final unless, within thirty (30) days of the decision by the Board of Trustees, an affected party appeals the authorization under this Section 1600 to the ERO governmental authority.*

1603. Owners, Operators, and Users to Comply

Owners, operators, and users of the bulk power system registered on the NERC Compliance Registry shall comply with authorized requests for data and information. In the event a reporting entity within the United States fails to comply with an authorized request for data or information under Section 1600, NERC may request the Commission to exercise its enforcement authority to require the reporting entity to comply with the request for data or information and for other appropriate enforcement action by the Commission. NERC will make any request for the Commission to enforce a request for data or information through a non-public submission to the Commission's enforcement staff.

1605. Confidentiality

If the approved data or information request includes a statement under Section 1602.1.1(v) that the requested data or information will be held confidential or treated as Critical Energy Infrastructure Information, then the applicable provisions of Section 1500 will apply without further action by a Submitting Entity. A Submitting Entity may designate any other data or information as Confidential Information pursuant to the provisions of Section 1500, and NERC or the Regional Entity shall treat that data or information in accordance with Section 1500. NERC or a Regional Entity may utilize additional protective procedures for handling particular requests for data or information as may be necessary under the circumstances.

1606. Expedited Procedures for Requesting Time-Sensitive Data or Information

1. *In the event NERC or a Regional Entity must obtain data or information by a date or within a time period that does not permit adherence to the time periods specified in Section 1602, the procedures specified in Section 1606 may be used to obtain the data or information. Without limiting the circumstances in which the procedures in Section 1606 may be used, such circumstances include situations in which it is necessary to obtain the data or information (in order to evaluate a threat to the*

- reliability or security of the Bulk Power System, or to comply with a directive in an order issued by the Commission or by another Applicable Governmental Authority) within a shorter time period than possible under Section 1602. The procedures specified in Section 1606 may only be used if authorized by the NERC Board of Trustees prior to activation of such procedures.*
- 2. Prior to posting a proposed request for data or information, or a modification to a previously-authorized request, for public comment under Section 1606, NERC shall provide the proposed request or modification, including the information specified in paragraph 1602.2.1 or 1602.2.2 as applicable, to the Commission's Office of Electric Reliability. The submission to the Commission's Office of Electric Reliability shall also include an explanation of why it is necessary to use the expedited procedures of Section 1606 to obtain the data or information. The submission shall be made to the Commission's Office of Electric Reliability as far in advance, up to twenty-one (21) days, of the posting of the proposed request or modification for public comments as is reasonably possible under the circumstances, but in no event less than two (2) days in advance of the public posting of the proposed request or modification.*
 - 3. NERC shall post the proposed request for data or information or proposed modification to a previously-authorized request for data or information for a public comment period that is reasonable in duration given the circumstances, but in no event shorter than five (5) days. The proposed request for data or information or proposed modification to a previously-authorized request for data or information shall include the information specified in Section 1602.2.1 or 1602.2.2, as applicable, and shall also include an explanation of why it is necessary to use the expedited procedures of Section 1606 to obtain the data or information.*
 - 4. The provisions of Sections 1602.3, 1602.4, 1602.5 and 1602.6 shall be applicable to a request for data or information or modification to a previously-authorized request for data or information developed and issued pursuant to Section 1606, except that (a) if NERC makes minor changes to an authorized request for data or information without Board approval, such changes shall require Board approval if a Reporting Entity objects to NERC in writing to such changes within five (5) days of issuance of the modified request; and (b) authorization of the request for data or information shall be final unless an affected party appeals the authorization of the request by the Board of Trustees to the Applicable Governmental Authority within five (5) days following the decision of the Board of Trustees authorizing the request, which decision shall be promptly posted on NERC's website.*

Data Requested

1. For which NERC Compliance Registry (NCR) numbers are you completing this Data Request?
2. Do the plans for the interconnected transmission system for which you have planning responsibility **currently** include any instances of planned interruption of Firm Demand to address BES performance requirements following a single contingency (i.e., any use of “planned or controlled interruption of supply”) as described in footnote “b” of the TPL-002-0b Reliability Standard?
3. If the answer to Question 2 is yes, please identify:
 - a. Each unique instance within your current plans in which planned interruption of Firm Demand has been used as a strategy to address BES performance requirements following a single contingency, including the size (in MW) of the planned interruption of Firm Demand, and the operating voltage level (kV) and description of each contingency.
 - b. The size (in MW) of the **smallest** instance of planned interruption of Firm Demand following a single contingency within your current plans.
 - c. The estimated cost (if known) of reinforcements needed to eliminate the need for the **smallest** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - d. The year (if known) in which reinforcements are planned to eliminate the need for the **smallest** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - e. The size (in MW) of the **average** instance of planned interruption of Firm Demand following a single contingency within your plans.
 - f. The estimated cost (if known) of reinforcements needed to eliminate the need for the **average** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - g. The year (if known) in which reinforcements are planned to eliminate the need for the **average** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - h. The size (in MW) of the **largest** instance of planned interruption of Firm Demand following a single contingency within your plans
 - i. The estimated cost (if known) of reinforcements needed to eliminate the need for the **largest** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - j. The year (if known) in which reinforcements are planned to eliminate the need for the **largest** instance of planned interruption of Firm Demand in your current plans following a single contingency.
 - k. What year was the **earliest** instance of planned interruption of Firm Demand following a single contingency that is still included your current set of plans identified?

- I. What year was the **most recent** instance of planned interruption of Firm Demand following a single contingency that is still included your current set of plans identified?
4. **How many instances** of planned interruption of Firm Demand following a single contingency were included in your plans developed in **2011**?
5. What was the size (in MW) of the **total** of all instances of planned interruption of Firm Demand following a single contingency included in your plans developed in **2011**?
6. **How many instances** of planned interruption of Firm Demand following a single contingency were included in your plans developed in **2010**?
7. What was the size (in MW) of the **total** of all instances of planned interruption of Firm Demand following a single contingency included in your plans developed in **2010**?
8. **How many instances** of planned interruption of Firm Demand following a single contingency were included in your plans developed in **2009**?
9. What was the size (in MW) of the **total** of all instances of planned interruption of Firm Demand following a single contingency included in your plans developed in **2009**?
10. **How many instances** of planned interruption of Firm Demand following a single contingency were included in your plans developed in **2008**?
11. What was the size (in MW) of the **total** of all instances of planned interruption of Firm Demand following a single contingency included in your plans developed in **2008**?
12. **How many instances** of planned interruption of Firm Demand following a single contingency were included in your plans developed in **2007**?
13. What was the size (in MW) of the **total** of all instances of planned interruption of Firm Demand following a single contingency included in your plans developed in **2007**?