Additional Comments of the
Northeast Power Coordinating Council
On the
U.S. Department of Energy’s
Office of Electric Delivery and Energy Reliability (‘‘OE’’)
Notice of Inquiry and Opportunity to Comment
on
Consideration for Transmission Congestion Study and Designation of National
Interest Electric Transmission Corridors
(Federal Register, Volume 71 No. 22, Thursday, February 2, 2006)

The Northeast Power Coordinating Council (‘‘NPCC’’) offers the following additional
comments in response to questions raised during the U.S. Department of Energy’s
(‘‘DOE’’) Office of Electric Delivery and Energy Reliability’s March 29, 2006 Technical
Conference for Designation of National Interest Electric Transmission Corridors
(NIETCs).

ADDITIONAL COMMENTS

1. Principle of High Reliability
Since DOE has already stated that they would be considering the NERC reliability
standards in its NIETC process, some questioned the meaning of ‘‘high reliability’’ in
DOE’s Draft Criterion 1: ‘‘Action is needed to maintain high reliability.’’

NPCC recommends that DOE expressly state that the definition of ‘‘high reliability’’ in its
NIETC designation includes not only conformance with NERC/ERO reliability
standards, but also conformance with applicable regional reliability criteria. Regional
reliability criteria address the specific physical, operational and geographic characteristics
of the electrical infrastructure of a particular region. DOE should affirm that the most
stringent reliability requirement is controlling in the case of inconsistencies.

2. NIETC Corridor Width
When considering the ‘‘width’’ of a NIETC corridor, NPCC recommends that DOE be
aware that submitted NIETC projects may require additional transmission and/or
supporting facilities to be built outside the specified NIETC corridor to meet
NERC/ERO reliability standards and/or more stringent regional and local reliability
criteria. DOE should clarify that the FERC backstop for NIETC projects must apply to
all the parts of the proposed NIETC project, including all lines/upgrades/facilities
associated with that project required to meet the NERC/ERO reliability standards and/or
more stringent regional and local reliability criteria.