Unofficial Comment Form for TPL Table 1 Order (Project 2010-11)

Please **DO NOT** use this form to submit comments on the 3rd posting for Project 2010-11: TPL Table 1 Order. Please use the electronic comment form posted on the following project page:

[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)

The electronic comment form must be completed by **January 3, 2011**. This is a 45-day formal comment period.

If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

**Background Information**

The Standard Drafting Team (SDT) posted Table I, footnote ‘b’ for an informal comment period from September 8, 2010 through October 8, 2010. Industry response was divided in relation to support for the proposed footnote ‘b.’ Although there were a number of supporters for the proposed footnote they were outnumbered by the commenters who did not support the footnote text for various reasons and offered their views and concerns.

The SDT carefully considered the feedback provided including minority opinions such as not allowing Demand interruption at all and has made clarifying revisions to the footnote ‘b’ text.

The revisions made to footnote ‘b’ following the informal comment period are shown below:

b) An objective of the planning process is to avoid should be to minimize the likelihood and magnitude of interruption of Demand following Contingency events. Interruption of Demand is discouraged and measures to mitigate such interruption should be pursued within the planning process. However, it is recognized that Demand may need to will be interrupted if it is directly served by the elements removed from service as a result of the Contingency. Furthermore, in limited circumstances Demand may need to be interrupted to address BES performance requirements. When interruption of Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

- Demand that is directly served by the elements that are removed from service as a result of the Contingency
- Interruptible Demand or Demand-Side Management
- Demand that does not adversely impact overall BES reliability where the circumstances describing where the use of such Demand interruption are documented, including alternatives evaluated; and where the application Demand interruption is subject to review and acceptance in an open and transparent stakeholder process that includes addressing stakeholder comments.
1. The SDT is proposing a revision to footnote ‘b’ in the TPL tables to comply with a FERC directive which required the ERO to clarify TPL-002-0, Table 1 - footnote ‘b’, regarding the planned or controlled interruption of electric supply where a single contingency occurs on a transmission system. Do you agree with the proposed changes and if not, please provide specific reasons for your disagreement.

☐ Yes
☒ No

Comments: There is concern with the use of the term Demand. It is unclear throughout the footnote whether or not the term Demand includes Interruptible Demand or Demand-Side Management. It is suggested that interruption of Demand be clarified to not include Interruptible Demand or Demand-Side Management to more clearly show the permitted use of Load shedding. It is unclear whether the second bullet includes Demand which is interrupted by the elements removed from service. Clarification should be made such that Demand which is interrupted by the elements removed from service should not be included in this bullet.

Language that mitigation of Load and/or Demand interruption should be pursued within the planning process should be reinstated as reinforcement of a Transmission Providers’ planning obligations to their load customers, and system operations. Footnote ‘b’ should be made to read as follows:

b) An objective of the planning process is to minimize the likelihood and magnitude of interruption of Load and/or Demand following Contingency events. Interruption of Load and/or Demand is discouraged and all measures to mitigate such interruption should be pursued within the planning process. However, it is recognized that Load and/or Demand will be interrupted if it is directly served by the elements automatically removed from service by the Protection System as a result of a Contingency. Furthermore, in extraordinary circumstances within the planning process Load and/or Demand may need to be interrupted to address BES performance requirements. When interruption of Load and/or Demand is utilized within the planning process to address BES performance requirements, such interruption is limited to:

- Circumstances where the use of Load and/or Demand interruption are documented, including alternatives evaluated; and where the Load and/or Demand interruption is made available for review in an open and transparent stakeholder process.

If Load and/or Demand interruption is necessary, planning should indicate the amount needed, and not specify how it would be obtained. What Load and/or Demand is interrupted is an operational decision.

Additional comments not included in the material listed for footnote ‘b’ on the Comment Form. In the paragraph below the bullets in footnote ‘b’, confusion is introduced through the use of the term “firm Demand”. It is unclear how this is different than the defined term “Firm Demand” and what the implications of the term “firm Demand” are. This footnote should not discourage such adjustments which actually increase the reliability of service to
end users. The last sentence of footnote ‘b’ is unnecessary and should be deleted. It is never acceptable to cause reliability concerns in another area while addressing your own.