Project 2010-11 Revision of TPL-002 footnote ‘b’ and TPL-001 Footnote 12

Unofficial Comment Form

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) located at the link below to submit comments on the Standard. The electronic comment form must be completed by 8:00 p.m. ET, **January 11, 2013**.

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

**Project page**

**Background Information**
This posting is soliciting formal comment.

FERC Order No. 762 issued April 19, 2012 remanded TPL-002-1b as vague, unenforceable, and not responsive to the previous Commission directives on this matter. The Standards Committee directed the Standards Drafting Team (SDT) to revise footnote ‘b’ in accordance with the directives of Orders No. 693 and 762. The SDT was also charged with revising the corresponding footnote 12 of TPL-001-2 in order to prevent the remand of TPL-001-2.

The NERC Board of Trustees approved version of TPL-002-1b was used as a starting point for these deliberations. This was done because when FERC remanded the standard it was not because it contained a stakeholder process, but because the stakeholder process was not well defined, did not include quantitative and qualitative criteria for allowing curtailment of Firm Demand, and did not assure that BES reliability would be maintained. Thus, the initial balloted draft was designed to respond to those criticisms by adding the necessary detail and specificity to the already approved approach.

TPL-001-2 has been approved by the industry through the standards development process and by the NERC Board of Trustees. The Standards Authorization Request (SAR) for this project recognized this fact and thus did not allow for any changes to the utilization of footnote 12. Nothing in this project changes the application of footnote 12 within Table 1 of TPL-001-2.
The remand order from FERC requested that a Section 1600 data request be made to provide data on the actual usage of footnote ‘b’ by planners. The SDT utilized the data received in reaching its determination of the threshold values applied in the footnote and believes that the data request results provide a sufficient technical rationale for the threshold values. Furthermore, the SDT believes that any deviation from the thresholds derived from the actual data may be viewed as unacceptable in addressing the directives in Orders.

The proposed stakeholder process does not eliminate or reduce the role of local regulatory authorities, nor does it impose on local regulatory proceedings. The proposed stakeholder process was designed to incorporate an open and transparent proceeding to the potential utilization of footnote ‘b’ with all affected parties involved in the discussions. Local regulatory authorities are still free to perform their legislative mandates.

The SDT has made a number of clarifying changes to the footnote and Attachment based on comments received from the initial ballot posting. These changes include clarifying that Consequential Load Loss and Demand-Side Management programs are not affected by application of the footnote. The questions in this comment form are restricted to these changes. There have been no changes to the Implementation Plan originally filed with the respective standards.

The SDT requests that commenters refrain from repeating comments submitted in the previous posting. The SDT has noted those comments and responded to them to the best of its ability within the project constraints.

You do not have to answer all questions. Enter All Comments in Simple Text Format. Bullets, numbers, and special formatting will not be retained.

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with changes made to the body of the footnote? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☒ No

Comments: Dropping load generally should not be endorsed, but it is recognized that there are special situations where it cannot be avoided. If a regulator responsible for load is comfortable with greater than 75MW being dropped in a rare situation, there should not be a requirement to build out of the situation. Provided there is no widespread, adverse effect on the reliability of the interconnected BES, the effect of a interruption on customers is under the purview of the applicable regulatory authority that is responsible for
local transmission and retail service over the load to be curtailed. NERC must acknowledge that jurisdictional authorities can decide on the parameters for planning events that do not have an impact on the reliability of interconnected BES.

There are no limits on non-consequential load loss for Single Contingency P2-2 and P2-3 (HV only), multiple Contingencies P4 and P5 (HV only), and P6 and P7. Footnote 12 allows limited non-consequential load loss for single contingency P1, Multiple Contingency P3. Non-consequential load loss is not allowed for P2-2 and P2-3 (EHV), and P4 and P5 (EHV). Considering the extensive EHV Facilities in the Canadian regions of NPCC, it is not reasonable to accept some non-consequential load loss for single contingency P1 and P2-3, and then deny it for Multiple Contingency categories P4 and P5 which are statistically less frequent than the former. Also, the Multiple Contingency P7 (for which there is no limit on non-consequential load loss) is more frequent than P2-3, P4 and P5. This technical irregularity must be reviewed and addressed. This comment was submitted for the last posting.

2. Do you agree with the changes contained in Section II of Attachment 1? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☐ No
Comments:

3. Do you agree with changes contained in Section III of Attachment 1? If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☐ No
Comments:

4. If you have any other comments on this Standard that you haven’t already mentioned above, and that are not simply reiterating previous comments that the SDT has already responded to, please provide them here:

Comments: