Unofficial Comment Form
Project 2010-17 Definition of Bulk Electric System – Phase 2

Please **DO NOT** use this form for submitting comments. Please use the electronic form to submit comments on the definition. The electronic comment form must be completed by **8:00 p.m. ET, October 28, 2013**.

All documents and information about this project are available on the project page. If you have questions please contact Ed Dobrowolski or by telephone at 609-947-3673.

**Background Information - Project 2010-17 Definition of the BES (Phase 2)**

The SDT has been working on addressing the issues and directives for Project 2010-17 Definition of the BES – Phase 2. The latest output of this work is shown in the third posting of the definition (the Phase 2 roadmap document). In this third posting, the SDT is responding to industry comments raised in the second posting and successive ballot period that ended on September 4, 2013. The SDT has made the following changes to the definition:

- **Inclusion I4**: The language has been clarified based on industry comments to more clearly reflect the SDT’s intent to include individual dispersed power producing units (such as wind and solar units) that aggregate to greater than 75 MVA, along with the collector system that connects these units, from the point they aggregate to greater than 75 MVA to the point of connection at 100kV or higher. While the SDT recognizes that some stakeholders do not agree with the inclusion of individual dispersed power producing units, FERC Orders 773 and 773-A approved the inclusion of these individual units. No stakeholder has provided a technical rationale to support removal of the individual units from the definition. The SDT believes that stakeholder concerns about inclusion of individual units may be addressed by specifying the Facilities to which an individual standard applies within the Applicability section of that standard.

**I4 - Dispersed power producing resources** that aggregate to a total capacity greater than 75 MVA (gross nameplate rating), and that are connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage of 100 kV or above. Thus, the facilities designated as BES are:

a) The individual resources, and

b) The system designed primarily for delivering capacity from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above.
Questions

1. The SDT has re-structured the language of Inclusion I4 to more clearly reflect the SDT’s intent to include individual dispersed power producing units (such as wind and solar units) that aggregate to greater than 75 MVA, along with the collector system that connects these units, from the point they aggregate to greater than 75 MVA to the point of connection at 100kV or higher. While the SDT recognizes that some stakeholders do not agree with the inclusion of individual dispersed power producing units, FERC Orders 773 and 773-A approved the inclusion of these individual units. No stakeholder has provided a technical rationale to support removal of the individual units from the definition. The SDT believes that stakeholder concerns about inclusion of individual units may be addressed by specifying the Facilities to which an individual standard applies within the Applicability section of that standard.

   With this background, can you support the proposed clarifications to I4? If not, please provide technical rationale for your disagreement along with suggested language changes.

   Yes:

   No: X

   Comments: The use of the word “capacity” is a concern. Generators might not be considered BES under the definition. Suggested change to I4 as follows:

   I4 - Dispersed power producing resources that aggregate to a gross total nameplate rating greater than 75 MVA, and that are connected through a system designed primarily for delivering such energy to a common point of connection at a voltage of 100 kV or above. Thus, the facilities designated as BES are:

   a) The individual resources, and

   b) The system designed primarily for delivering energy from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above.

2. Are there any other concerns with this definition that haven’t been covered in previous postings, questions and comments?

   Yes:
No: X

Comments: