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](http://www.nerc.com/filez/standards/Project2010-11_TPL_Table-1_Order.html) to submit comments on the Standard. The electronic comment form must be completed by **August 29, 2012**.

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

The project web page is located here:

[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)

**Background Information**

This posting is soliciting formal comment.

FERC Order No. 762 issued April 19, 2012 remanded TPL-002-0b 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 SDT adopted a philosophy of minimal changes to the actual footnote itself. This was done to minimize confusion as to what was changed, for ease of reading and following the footnote, and for formatting within the actual standards documents. This philosophy resulted in the development of an attachment to the footnote where the actual changes in response to the Commission Orders are contained. It should be noted that attachments to standards are part and parcel of the standard itself and thus are binding to applicable entities.

A draft data request to collect data to assist the SDT in its work was posted for an abbreviated comment period in accordance with Section 1600 of the NERC Rules of Procedure, through July 9, 2012. The draft data request will be revised as appropriate to reflect industry comments and then issued for formal response. The timing of the formal data request response will allow for the data to be evaluated by the SDT in the same timeframe as the responses to this posting.
The SDT has proposed three thresholds within the proposed footnote revision in Section III of Attachment 1 in order to address the Order.

- The last sentence in the body of the footnote is to allow for the placement of a maximum capacity limit to the amount of Firm Demand that be be dropped under footnote ‘b’. The value is currently shown as ‘x’ MW. The SDT will fill in the value after the above mentioned data request is complete and will submit the value for industry comment and approval in the next posting. However, industry comments on the proposed maximum capacity issue can be submitted now in response to question 1.
- The 300 kV threshold in Section III is derived from the EHV value approved by the industry through the Standards Development Process, approved by the NERC Board of Trustees, and favorably received by the Commission in the TPL-001-2 filing.
- The 25 MW threshold in Section III is duplicative of the registration limit for generation in the ERO Statement of Compliance Registry Criteria. It is submitted for comment at this time but will not be finalized until after the above mentioned data request is complete and the final value will be submitted for industry comment and approval in the next posting.

There have been no changes to the Implementation Plan originally filed with the standards.

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 the description and components of the Stakeholder Process in the body of the footnote including the maximum capacity threshold (currently shown as ‘x’ MW but the SDT will fill in the value after the data request is complete and will submit the value for industry comment and approval in the next posting)? 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. For the maximum capacity item, please supply any technical rationale for your comment along with limiting conditions and any current criteria in use at your entity.

☐ Yes
☐ No

Comments:
2. Do you agree with the description and components of the Stakeholder Process in Section I of Attachment I? 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 the Information for Inclusion in the Stakeholder Process contained in Section II of Attachment I? 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. Do you agree with the Instances for which Approval of Interruptions is required in Section III of Attachment I? 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:
5. If you have any other comments on this Standard that you haven’t already mentioned above, please provide them here:

Comments: NPCC reviewed the posted documents, and has no comments for this posting.