Please DO NOT use this form to submit comments on the 6th draft of the TPL-001-2 standard for Assess Transmission Future Needs (Project 2006-02). This comment form must be completed by **May 31, 2011.**

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

**Background Information**

TPL-001-1 Transmission System Planning Performance Requirements

Comments on the 5th draft of the TPL-001-2 Transmission System Planning Performance Requirements standard were received from the industry through September 2, 2010. The Drafting Team received feedback on a number of issues, and the SDT appreciates the tremendous industry participation in the process. Below is a brief overview of the 6th draft of the standard highlighting areas where the SDT made changes based on stakeholder feedback as well as the Standards Quality Review Team. The team’s objectives remain unchanged - to create a single Transmission planning standard: 1) with clear, concise requirements set at an appropriate level to ensure reliability, and 2) that fully addresses all issues raised by FERC Orders 693 and 890, and industry inputs, including the SAR scope document.

**6th Draft Overview:**

The following changes were made due to industry comments:

1. The definitions of Near-Term Transmission Planning Horizon and Year One have been deleted as the same definition has already been filed by another project.

2. The following requirements were changed:
   a. Several grammatical changes for clarity.
   b. R1 – Establish P0 as the normal system condition.
   c. R2 – The VRF has been changed to High to reflect the importance of the Planning Assessment and to meet the latest guidelines.
   d. R2, part 2.1.4 – Change from ‘performance’ to ‘System response’.
   e. R2, part 2.1.4, bullet #7 – Change ‘planned’ to ‘known’.
   f. R2, part 2.6.2 – Added documentation of technical rationale.
   g. R2, part 2.8 2– Added ‘...of identified System Facilities and Operating Procedures’.
   h. R4, part 4.3.1 – Provided timing criteria and added that it is only applicable when high speed reclosing is utilized.
   i. R8 – Changed VRF from Low to Medium to meet latest guidelines.

3. Header note changes:
   a. Deleted ‘including Load’ as a redundant phrase.

4. Performance table changes:
   a. Changed Column 2 heading to ‘Initial Condition’.
b. Deleted superscript for footnote 9 in P0, column 6
   c. Added ‘Breaker’ to P2 Event column, parts 3 & 4 and P4 Event for clarity.
   d. Added ‘non-redundant’ to P5 Event for clarity.
   e. Spelled out ‘adjustments’ to P6 Initial Condition for clarity.
5. Extreme event – Stability 2 – Changed Protection System’ to ‘relay’ for clarity and added footnote 13 reference.
6. Footnote changes:
   a. #9 – Added resolutions from footnote ‘b’ clarification (Project 2010-11).
   b. #12 – Added resolutions from footnote ‘b’ clarification (Project 2010-11).
7. Measurement changes:
   a. Updated to reflect changes in requirements.
8. Data Retention – grammatical changes for clarity.

The following changes were made due to the Quality Review:

1. Added ‘Category’ to Requirement R1 for clarity.
2. Made grammatical changes to requirement R2 for clarity.
3. Added ‘For the Planning Assessment’ and made grammatical changes to Requirement R2 for clarity.
4. Added ‘For the Planning Assessment’ to Requirement R2, parts 2.2, 2.4, and 2.5 for clarity.
5. Added timing elements to Requirement R8 and adjusted Measure M8 and the VSL accordingly.
6. Added ‘dated’ to Measures M2, M3, M4, M5, and M6 to conform to the latest guidelines.
7. Added ‘in-force’ to Data retention for Requirement R1 and Measure M1 to conform to the latest guidelines.
8. Moved one item from Moderate to Severe in the VSL for Requirements R1, R2, and R4 to conform to the latest guidelines.
You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. The SDT has made revisions to the requirements language of TPL-001-2 based on industry comments and the Quality Review. Do you agree with these changes? 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 with clear indications as to which requirement you are commenting on.

   Yes: 

   No: X

Comments: The wording of Part 1.1.2, “known outages...with a duration of at least 6 months” should be revised to “…at least 1 year”. Also for consideration is that “known outages...with a duration of at least 6 months” are dealt with in operational studies rather than planning studies. Any adverse impacts that these outages might have are mitigated by operational decisions rather than planning decisions within a 6 month horizon. Moving this requirement out of the TPL Standard to an operational standard should be considered.

Make the wording consistent between 2.1 and 2.2 as it relates to qualified past studies. Specifically: Parts 2.1.2, 2.1.4, 2.1.5

The language of requirements 2.1.4 and 2.4.3 allowing the performance of one or more sensitivities appears to be inconsistent with language in 2.7.2. 2.7.2 requires multiple sensitivities to determine if actions to resolve performance deficiencies are necessary. Will varying only one measurable quantity several times in multiple simulations satisfy multiple sensitivity studies or just one sensitivity study? The numbers and types of required sensitivity studies is unclear, and subject to interpretation by PCs and TPs.

The current wording in Part 2.1.5, “spare strategy”, appears to be open-ended regarding the number of permutations to be analyzed. It should be restricted to assessing only one piece of equipment being unavailable or outaged at a time. 2.1.5 should be consistent with R2 and 2.1 regarding the use of the terms assessment and studies. As with the preceding comment regarding Part 1.1.2, moving this requirement out of the TPL Standard and to an operational standard should be considered.

It is unclear if the last sentence of R2.1.5 allows for the curtailment of firm transmission service before the application of category P0, P1 and P2 events. This last sentence states: “…with the conditions that the System is expected to experience during the possible unavailability of the long lead time equipment.”
The wording in Part 2.2 “be supported by the following annual current study, supplemented with qualified past studies” should be replaced with the similar statement in Part 2.1: “be supported by current annual studies or qualified past studies”.

Part 2.7.1 lists potential system actions to address System deficiencies. It is suggested that this list be moved to a guideline or white paper.

The wording in Part 8.1 needs to be amended to restrict comments to the most recent assessment only.

Contingencies on back to back HVDC installations are not mentioned in the standard. The treatment of combined cycle facilities (all units in outage?) needs to be clarified, as well as Footnote 7 of Table 1 requiring clarification. In Table 1, Event 1 of Category P2 and related Footnote 7 are not clear because of the use of the word “possibly”. If the intention is to simulate the line end opening condition of tapped lines, this should be clearly stated in the table (without reference to “Opening of a line section” and use of different language in the footnote).

From Table 1b: “Consequential Load Loss as well as generation loss is acceptable as a consequence of any event excluding P0.” Firm Transmission Services Loss is also acceptable and should be added (particularly in P1 loss of a single pole of a DC line for which the transfer is reduced accordingly to the remaining pole capability).

2. The SDT has made revisions to the VRF and VSL of TPL-001-2 which will be part of a non-binding poll with this posting based on industry comments and the Quality Review. Do you agree with these changes? 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. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

   Comments: