



**DOE 2009 Congestion Study Workshop
Hartford, CT
July 9, 2008**

The Northeast Power Coordinating Council, Inc. (“NPCC”) appreciates this opportunity to offer the following comments prior to the start of the 2009 DOE Congestion Study.

NPCC

NPCC is a New York State not-for-profit membership corporation. The purpose of NPCC is to promote and enhance the reliable and efficient operation of the international, interconnected bulk power system in Northeastern North America through:

(i) the development of regional reliability standards, and compliance assessment and enforcement of the continent-wide and regional reliability standards, coordination of system planning, design and operations, and assessment of reliability, and

(ii) the establishment of regionally-specific criteria, and the monitoring and enforcement of compliance with such criteria.

NPCC has over 40 years of experience in an international, coordinated approach to maintaining reliability in Northeastern North America. NPCC’s website is www.npcc.org .



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Geographically, NPCC U.S. includes the six New England states and the state of New York. NPCC Canada includes the provinces of New Brunswick, Nova Scotia, Ontario and Québec. In total, NPCC covers nearly 1.2 million square miles, and is populated by more than 55 million people. From a net energy for load perspective, NPCC is approximately 45% U.S. and 55% Canadian. With regard to Canada, approximately 70% of Canadian load is within the NPCC Region.

Summary

DOE has stated that the 2009 Congestion Study will focus “chiefly on the analysis of recent or current electric transmission congestion.” The addition of new transmission and generation capacity over the past several years along with the growth of demand response programs (that reduce peak demand) have clearly strengthened the ability of New York and New England to reliably meet electricity demands.

The installation of a second 345 kV line between Maine and New Brunswick this past winter, last summer’s New Jersey to Long Island HVDC cable addition, along with the completion of other transmission upgrades in New England have strengthened the overall reliability of the NPCC system.



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Over the past several years, southwestern Connecticut has faced reliability problems due to transmission constraints into and within that geographic area. The combined effect of the increased transmission capacity placed in-service, along with the significant amount of demand response programs added in southwest Connecticut have gone a long way towards mitigating these concerns.

A number of transmission upgrades are in service or expected to be in-place this summer to enhance reliability within NPCC. Transmission upgrades completed last year, for example, have increased the capacity to import electricity into the Boston area by approximately 1,000 MW, alleviating previous reliability concerns.

NPCC would like to emphasize that the DOE 2009 congestion analysis consider the northeast as a whole, not only modeling those transmission, demand response, and generating resource projects in the United States, but also those corresponding projects in the neighboring Canadian systems.

Coordinated analysis is necessary to properly assess the operation and impact that future reinforcement of NPCC's (and it's neighboring Region's) transmission system, demand response programs, and generating resources will have on congestion.



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In addition to understanding the respective Market Rules in the Region, proper modeling of the operation of the NPCC system also requires an in-depth understanding of the applicable:

- **NERC Reliability Standards (see: <https://standards.nerc.net/>)**
- **NPCC Criteria (see: <http://www.npcc.org/documents/regStandards/Criteria.aspx>) and**
- **the New York State Reliability Council (“NYSRC”) Reliability Rules(see: <http://www.nysrc.org/>)**

NERC’s Reliability Standards set the reliability requirements for planning and operating the North American bulk power system.

NPCC’s Criteria further define more stringent, regionally specific reliability requirements.

The NYSRC’s mission is to promote and preserve the reliability of electric service on the New York State Power System through their Reliability Rules, which shall be complied with by the New York Independent System Operator and all entities engaging in electric transmission, ancillary services, energy and power transactions on the New York State Power System.

NPCC recommends that the DOE review the latest information available through the following regional reliability assessments and



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northeast reliability planning initiatives prior to the start of their 2009 Congestion Study:

- **The NPCC Seasonal Reliability assessments (see: <http://www.npcc.org/documents/reports/Seasonal.aspx>)**
- **The New England Regional System Plan (see: <http://www.iso-ne.com/trans/rsp/index.html>)**
- **The New York Comprehensive Reliability Planning Process (see: <http://www.nyiso.com/public/services/planning/crpp.jsp>)**
- **The Inter-Area Planning Stakeholder Advisory Committee (see: <http://www.interiso.com/default.cfm>)**
- **The Ontario Reliability Outlooks (see: http://www.ieso.ca/imoweb/pubs/marketReports/18MonthOutlook_2008jun.pdf and http://www.ieso.ca/imoweb/pubs/marketReports/ORO_Report-2007-2-2.pdf)**

NPCC thanks the DOE for their invitation to participate in today's workshop, and looks forward to working with the DOE during the course of the 2009 Congestion Study.



U.S. Department of Energy

Office of Electricity Delivery and Energy Reliability

DOE Plan for 2009 Electric Transmission Congestion Study

**David Meyer
Senior Advisor
Office of Electricity Delivery and Energy Reliability**

**Hartford, CT
July 9, 2008**

EPAct 2005

- **Welcome to DOE's Regional Workshop on Transmission Congestion.**
- **The Energy Policy Act of 2005 (EPACT) directs DOE to conduct a transmission congestion study every three years, beginning in August 2006.**
- **DOE is now engaged in preparing the study to be issued in August 2009.**
- **As part of the Department's efforts to consult with the States, regional reliability organizations, and other stakeholders, DOE is hosting six regional workshops on transmission congestion this summer. Today's workshop is the third of these meetings.**
- **In addition, DOE will schedule bilateral meetings with stakeholders upon request.**



Congestion Study and National Corridors

- **EPACT also authorizes, but does not require, DOE to designate National Interest Electric Transmission Corridors where the Department finds that consumers are adversely affected by transmission congestion or constraints.**
- **This series of workshops is focused on preparation of the 2009 Congestion Study, and not on the National Corridors designated last October, or any possible National Corridor designations that may be made in the future.**





Purpose of Workshops

- **DOE is holding these workshops to receive information to assist the Department in preparing the 2009 Congestion Study. Specifically, DOE seeks input on:**
 - **What publicly-available data should be considered to identify transmission congestion;**
 - **How to evaluate the character, magnitude, or significance of congestion from that data; and**
 - **How to distinguish between the effects of technical limits on line loadings and possible contractual limits on those same lines.**



Congestion Study Plan

- **The 2009 Congestion Study will focus only on recent or current congestion.**
- **As in the 2006 study, DOE will review the Eastern and Western Interconnections separately, using the same concepts where applicable.**
- **EPACT excluded ERCOT from the areas to be included in the DOE's congestion studies.**
- **For the West, DOE will work with WECC/TEPPC to review recent transmission planning studies and review recent congestion-related data.**
- **For the East, Lawrence Berkeley National Laboratory will engage a contractor to perform a similar analysis.**



Plan for Today's Workshop

- Today, we will hear from two panels.
- Each panelist will make a brief (5 minutes max) statement.
- DOE will then ask the panelists to discuss some key issues.
- There will be an opportunity at the close of this morning's workshop for non-panelists to make brief statements.
- DOE invites all interested persons to submit written comments and supporting information to www.congestion09.anl.gov .

Changes in Congestion since 2005

- **DOE's 2006 Congestion Study identified several areas in the Nation as areas of concern from a congestion perspective.**
- **We invite the panelists and others to bring us up to date on trends in their areas since 2005.**
- **Is there evidence of transmission congestion in areas not identified in the 2006 study?**





Next Steps

- **DOE requests all interested stakeholders to provide materials they consider relevant. We would like copies or links to existing documents ASAP; documents now in preparation should be provided by October 15 if possible.**
- **January–March, 2009: Analysis of data and development of report outline.**
- **April–May, 2009: Drafting of report.**
- **June–July, 2009: Internal DOE review of draft and preparation of publication text.**
- **August 2009: Publication of Congestion Study.**



How to Submit Written Comments to DOE

Interested persons should submit written comments and supporting information to:

www.congestion09.anl.gov

by October 15, 2008, if possible. If later delivery is necessary, please let us know what can be delivered when.

All comments will be posted on DOE's website at:

www.congestion09.anl.gov



Contact Information

**For questions or suggestions
on the DOE 2009 Transmission Congestion Study,
contact:**

**David Meyer
Senior Advisor
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
at:**

David.Meyer@hq.doe.gov

phone: 202-586-1411