

October 21, 2010

Regional Entity Management Executives (REMG)

<i>FRCC</i>	—	<u><i>Sarah Rogers</i></u>	<i>SERC</i>	—	<u><i>Scott Henry</i></u>
<i>MRO</i>	—	<u><i>Daniel Skaar</i></u>	<i>SPP</i>	—	<u><i>Stacy Dachoda</i></u>
<i>NPCC</i>	—	<u><i>Edward Schwerdt</i></u>	<i>TRE</i>	—	<u><i>Larry Grimm</i></u>
<i>RFC</i>	—	<u><i>Timothy Gallagher</i></u>	<i>WECC</i>	—	<u><i>Louise McCarren</i></u>

Dear Regional Entity Executives:

RE: Common Regional Approach for Application of a Uniform 100-kv NERC Bulk Electric System Definition

FRCC, NPCC and WECC staffs (a/k/a the current BES Coordination Group (CG)) have been working toward developing a consistent, 100-kV based definition for the NERC Bulk Electric System (BES), prior to FERC action on their BES NOPR. A NERC BES SAR will be developed based on the agreed upon BES Framework and Principles, along with any necessary changes to the NERC Rules of Procedure, in accordance with the proposed Action plan.

Action Item

The REMG are respectfully asked to review the following CG proposed Framework, BES Principles, and Action Plan and provide feedback to the CG. Representatives from the other Regional Entities and NERC staff are invited to participate.

Proposed BES Framework

A common framework for a NERC BES definition that includes a uniform NERC-wide 100kV based definition, a common set of BES principles, and allows for application of Regional methodologies, consistent with the principles, to technically assess whether or not an element should be excluded from the BES.

These Regional assessments will utilize consistent technical, repeatable, methodological approaches for the determination of their respective BES exceptions that reflect and respect the nature of specific Regional configurations and topologies.

Proposed BES Principles

The proposed BES Principles recommended for this framework (to date) include:

1. Transmission elements operated at voltages of 100 kV or higher to be included in the BES;
2. Transformers, other than GSU transformers, including Phase Angle Regulators, with both primary and secondary windings of 100 kV or higher to be included in the BES;
3. Individual generation resources greater than 20 MVA (gross nameplate rating) and are directly connected via a step-up transformer(s) to designated BES Transmission facilities by a designated BES transmission path to be included in the BES
4. Generation plants with aggregate capacity greater than 75 MVA (gross nameplate rating) and are directly connected via a step-up transformer(s) to designated BES Transmission facilities by a designated BES transmission path to be included in the BES;

5. Generator step-up transformers and the generator interconnecting line lead associated with BES generators connected at 100 kV or higher to be included in the BES; and,
6. Black start Generators and Black start cranking paths will be included in the BES.

Proposed Action Plan

2010

September

- CG exchanges and reviews their Regions respective BES proposals
- Discuss/draft proposed Framework/Principles

October

- CG agreement on BES Principles/Framework/Action Plan
- CG recommended BES Principles/Framework/Action Plan presented to REMG for consideration
- CG continues reviewing/drafting BES exclusion approaches

November

- REMG comments on BES Principles, approval of proposed Action Plan/Framework
- CG sends BES Principles (with REMG comments) NERC staff for their review/comment
- CG reviews comments received from Regions/NERC staff

December

- CG revises BES Principles and exclusion approaches
- CG develops Draft SAR/proposed redlined changes to NERC Rules of Procedure based on comments received
- REMG reviews Draft SAR/proposed Rules of Procedure changes
- CG submits SAR/Rule of Procedure changes

Sincerely,

The BES Coordination Group

FRCC Pete Heidrich, Vince Ordax

NPCC Phil Fedora

WECC Steve Ashbaker, Richard Mabry, Michelle Mizumori, Laura Scholl