

NSRS Comments
CAN-0020 Equipment Maintenance Outages
TPL-002, TPL-003, TPL-004 and
TOP-002
5/9/2011

PART I

Comments Regarding: TPL-002-0 R1.3, R1.3.12; TPL-003-0 R1.3, 1.3.12 and TPL-004-0 R1.3, R1.3.9

NSRS agrees, in general, with the contents of the CAN for TPL-002, TPL-003, and TPL-004, however, it should not be interpreted to infer that studies or simulations must be performed for every *possible* outage that *could be* planned in the planning horizon. Furthermore, NSRS has concerns with selected terminology and would like more guidance regarding appropriate documentation.

“Planned” Outage Term – NSRS proposes that the term, “planned”, be clarified with further explanation, rather than just be addressed by the addition of the wording, “*and scheduled*”. NSRS recommends that the CAN offer a default definition of “planned outage”, such as approved outages in the applicable Reliability Coordinator’s outage schedule, when an entity does not have its own written definition for the term “planned outage”.

“Scheduled” Outage Term- If the term “*and scheduled*” is retained in the CAN, then NSRS suggests that it be more fully explained.

Which schedules are valid for compliance---- - the applicable Reliability Coordinators’; applicable Transmission Operator’s; applicable Generator Operators’; some of them, all of them, or something else?

Also, which scheduled entries are valid for classification as “planned”---- requested outages; proposed outages; approved outages; some of them, all of them, or something else? What if the RC, TOP, or GOP outage schedules are expected to be the basis for compliance, however one or more of the entities will not share their outage schedules and are not obligated to provide them?

“All” Outages Term - NSRS proposes that the term “all” be clarified or be dropped when addressing planned and scheduled equipment maintenance outages. The CAN does not address the possibility that some entities may interpret “all” to mean the simulation of all non-coincident outages that may be planned in the same general planning horizon time frame. In addition, planned outages that may even be coincident in planning horizon may be shifted to be non-coincident in the operating horizon if unacceptable system performance is discovered in operating horizon analysis. The system impacts of planned coincident outages may also be sufficiently independent that they do not have to be modeled in the same simulation. Therefore, planned outages should be allowed to be

simulated separately (e.g. N-1-1), rather than collectively (e.g. N-all outages-1) unless sufficient interdependence is expected.

Documentation Guidance

Outage Schedule Documentation - If outage schedules are suitable for compliance with the “planned outage” requirements, then what version (issue date) or versions (issue dates) of a valid outage schedule should be considered to be acceptable for compliance; within 12 months of the beginning of “year one” in the transmission system assessment; within 12 months of the transmission reliability assessment report publication date; both, or something else?

PART II

Comments Regarding: TOP-002-2

Requirement 11:

NSRS does not agree with the proposed clarification contained within CAN-020 for TOP-002-2 Requirement 11. NSRS believes that the proposed CAN is going outside of the Standards Development Process and defining a phrase that is undefined in the standard and NERC Glossary of Terms. In addition, this CAN goes against the NERC Board’s prior instructions on interpretation in which they made it clear that any clarification must reside within the boundaries of the standard.

NSRS reviewed this standard and was unable to find a single reference that supports the CAN’s position that the term “studies” and phrase “reflect current system conditions” means “all planned and scheduled maintenance outages – including short duration Protection System outages”. It is NSRS’s position that the TOP has to perform studies to determine SOLs, and how those studies are performed and to what degree information is included is determined by the TOP “as necessary” to achieve the goal of determining SOLs.

Seasonal Studies:

NSRS believes that the intent of this requirement is to look at the seasonal ratings and determine if SOL’s in a normal base case is going to result in SOL violations. The intent of the standard is not to run a study that looks at each hour and day to determine if a future planned / schedule outage is going to cause a SOL violation. This is a higher review based on anticipated load and generation mix.

The proposed interpretation may result in the TOP being required to expend valuable resources to follow-up the initial study for the specified session based on every planned / scheduled outage. Therefore, the seasonal study is looking over some period that the TOP would have to update each time the system is changed even though the seasonal

study is looking over a several month time frame. In addition, it is NSRS's interpretation that the proposed CAN language would also require NSRS to run a new seasonal study every time a BES Facility is removed and put back into service.

Next-day studies:

NSRS believes the proposed CAN could be interpreted that next day studies be performed for each minute of the day, rather than reflecting an assumption of the next day conditions. The proposed CAN would require that assumptions be developed for each minute of the day, and then subsequent studies performed to determine SOL's. Subsequent studies would be required because of the statement **all** planned and scheduled outage must be included forcing a rerun even if the change is minor in impact.

Example:

You perform a next day study at noon for each minute of the next day in order to align **all** planned and scheduled outages are covered. If you become aware of something changing even if it is one hour before midnight you will again have to rerun your next day studies to reflect that change. Otherwise your next day study will not reflect **all** planned and scheduled outages.

Current Day Studies:

Similar to NSRS's comments regarding next-day studies, current day studies are performed assuming what the system conditions for the day are in general, not for each minute of the day. And like the next-day studies, they would require new studies based on real-time system conditions changing.

It is NSRS's position that changing real-time conditions are properly addressed in other NERC Standards which identify requirements and NSRS is concerned that the proposed language is overly burdensome on proving that the studies reflected **all** planned and scheduled outages.

“The TOP shall update these Bulk Electric System studies as necessary”

NSRS wants to point out that the CAN fails to properly address the statement in the requirement that updates to any study is in the opinion of the TOP, as they deem necessary. A strict reading of the CAN would require numerous amount of re-study because it states that an entity will have to show that **all** planned and scheduled outages were included.

“The TOP incorporates all planned and scheduled maintenance outages, including Protection System maintenance outages”

The CAN does not clarify what qualifies as a planned outage versus a scheduled outage. Is this statement making a distinction between these two terms? What qualifies as a planned outage? (Is it when it is discussed as a possibility that an outage might be needed?) What qualifies as a scheduled outage? (Is it when a maintenance person pencils something in his book or the RC puts in the outage schedule, but before it is approved?)

NSRS believes that the proposed CAN goes against NERC historic practice of ensuring that studies are being performed to a practice in reviewing and providing what is

contained within each study. The questions from the NERC RSAW for this standard historically ask for evidence around the performance of the studies. The language in the CAN is adding a requirement to entities to show evidence that all planned and scheduled outages were covered in each study.

Language taken from the NERC RSAW:

“Determine if the Transmission Operator performed seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs.”

NSRS believes that NERC needs to reconsider the proposed language and that it should reflect what is contained within the standard and their historical review around compliance with the standard.

NSRS proposes the CAN be revised to state the following:

Requirement 11 states that seasonal, next-day and current-day studies are performed to determine SOLs, but the standard and requirement does not need to contain specific language as to what must be included in the entity’s studies. NSRS believes that the entity’s studies should reflect anticipated system conditions as appropriate to determine SOLs. Entities must continue to reflect compliance as to performing seasonal, next-day and current-day Bulk Electric System studies to determine SOLs.