

## **Comment Form for 6<sup>th</sup> Draft of Standard TPL-001-1 Assess Transmission Future Needs (Project 2006-02)**

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Please **DO NOT** use this form to submit comments on the 6<sup>th</sup> 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](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

### **Background Information**

#### **TPL-001-1 Transmission System Planning Performance Requirements**

Comments on the 5<sup>th</sup> 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 6<sup>th</sup> 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.

6<sup>th</sup> 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'.

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- 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.

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**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:

Comments:

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: The NSRF recommends that the VRF for Requirement 8 remain "Low", rather than be changed to "Medium". We do not believe that there is significant risk to the reliability of the BES if an annual Planning Assessment is not distributed to another entities or a documented response to Planning Assessment comments is not provided within 90 days of a request. The findings in an assessment report are not urgent, but address system needs that will emerge over years in the future. In addition, entities with a reliability related need for Planning Assessment information generally have the means to make their own independent planning assessment of adjacent systems or other areas of interest.

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: The NSRF recommends that the term, "System" be replaced with "BES" in various places throughout the standard when the reference should not be to the collective generation, transmission, and distribution systems, which is the definition of the NERC Glossary term, "System". These locations are: R2.1.4, R2.1.5, R2.4.3, R2.6.2, R2.7, R2.7.1, R2.7.4, R2.8.1, R2.8.2, R3.5, R4.5, R5, and R6.