

April 20, 2007

## IESO Comments on C-44

### “NPCC, Inc. Regional Methodology and Procedures for Forecasting TTC and ATC”

1. The section **“7.2.4.: Uncertainties in system topology:** *Traditionally, planning horizon studies have used first contingency reliability criteria to assess transfer capability for peak load conditions. These studies have focused on assessing transmission transfer capability with single transmission outages on the system. More stringent planning and operating criteria such as analysis of contingencies may be used for the determination of TRM.”*

...should be written as

- “7.2.4.: Uncertainties in system topology:** *Traditionally, planning horizon studies have used first contingency reliability criteria to assess transfer capability for peak load conditions. These studies have focused on assessing transmission transfer capability with single transmission outages on the system. More stringent planning and operating criteria such as analysis of **multiple-element** contingencies **shall** be used for the determination of TRM.”*
2. On the market information page for Ontario – IESO, **page 22**, mention of Cat lake Power Utility Limited as transmitter, should be removed as this entity is no longer a licensed transmitter in the province.
  3. There are references to *“Transmission Provider”* throughout the document – this should be replaced with *“Transmission Service Provider”* to be consistent with the NERC Functional Model entity definitions.
  4. There is mention of *“MAAC-ECAR-NPCC”* and *“VACAR-ECAR-MAAC”* working groups – after the formation of RFC, these would have to be replaced with the appropriate committees instead.

5. **Section 9.2 Interregional Coordination** starts with “NPCC is interconnected with ECAR, PJM and MAPP...” – this would have to be replaced with “NPCC is interconnected with RFC (PJM in the south, MISO in the west) and MRO (Minnesota Power and Manitoba Hydro)” similar language in rest of the document would have to be updated accordingly – also, in order to maintain consistency, regional reliability entities surrounding NPCC should be named with the above mentioned operating entities specified.
6. Mentions to ECAR and MAPP should be replaced with RFC and MRO, as indicated above, throughout the document...
7. **Section 3.3, NERC ATC Principles:** ATC calculations are also dependent on the state / topology of the system. The sentence “ATC calculations must recognize the dependency of ATC on the points of electric power injection, the directions of transfer across the interconnected network, and the points...” should be modified to include knowledge on the state of the system as follows: “ATC calculations must recognize the dependency of ATC on the points of electric power injection, [the state of the interconnected system](#), the directions of transfer across the interconnected network, and the points...”
8. **Section 4.2, Determination of TTC:** The word “Path” in the underlying paragraphs of this section need not be capitalized – could be “[path](#)” instead...

Thank you for your attention to our comments and recommendations. In addition to this transmittal, the comments have also being posted on the NPCC Open-Process website.

Yours truly,



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