Note – This form is to comment on **Version 2** of the **"Assess Transmission Future Needs and Develop Transmission Plans"** SAR.

The latest version of this SAR **(**TRNS_NDS_&_PLNS_01_02**)** is posted on the Standards web site at: http://www.nerc.com/~filez/standards/Assess-Transmission-Future-Needs.html

E-mail this form between May 5 and June 5, 2004 to: sarcomm@nerc.com with "Comments" in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards – Gerry Cauley at 609-452-8060.

Background:

Version 1 of the **"Assess Transmission Future Needs and Develop Transmission Plans"** SAR was posted for a 30-day public comment period between April 2 and May 3, 2002. This first version was an abbreviated SAR, which included an "Industry Need" statement and a brief description of the proposed standard, but did not include a detailed description. The purpose of this first posting was to collect feedback from the industry on the following questions:

- Is there a reliability-related need for an Organization Standard to be developed on this topic?

If there is such a need, how should the scope of the SAR be changed?

- The scope of the SAR is fine as is
- The scope of the SAR should be expanded to include…..
- The scope of the SAR should be reduced to eliminate……

In January 2004, the Standards Authorization Committee (SAC) appointed a Drafting Team (DT) to address industry answers and comments to the questions posed. The DT was also charged with refining the SAR and drafting a detailed description of the proposed standard in preparation for the 2nd posting of the SAR.

Most of the industry respondents indicated that there is indeed a reliability-related need to develop a standard to address transmission assessment and planning issues. Comments were received from many different sources, including individuals, small and large utilities, groups of utilities, and Regional Councils. The SAR DT considered the comments submitted by each industry participant, and revised the SAR to conform to the changes that were technically sound and appeared to represent a consensus of participants.

The revised SAR (Version 2) is posted on the NERC web site given in the blue box at the top of this form. Also posted is a Consideration of Comments document, in which the DT has responded to the original industry comments from 2002. You can find Version 1 of the SAR and industry comments on this version at the same web location.

Please review Version 2 of the SAR and complete this Comment Form to let the SAR DT know if you agree or disagree with the SAR DT's assessment that this SAR is ready to be developed into a Standard.

Commenter Information (For Individual Commenters)
Name: Khaqan Khan **Organization:** Independent Electricity Market Operator **Industry Segment #:** 2 **Telephone: 905-855-6288** **E-mail: khaqan.khan@theIMO.com**

Key to Industry Segment #'s:

- **1 – Trans. Owners**
- **2 – RTO's, ISO's, RRC's**
- **3 – LSE's**
- **4 – TDU's**
- **5 - Generators**
- 6 - Brokers, Aggregators, and Marketers
- **7 - Large Electricity End Users**
- **8 - Small Electricity Users**
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)	
Name of Group:	**Group Chair:** **Chair Phone:** **Chair Email:**

List of Group Participants that Support These Comments:

Name	Company	Industry Segment #

Please Review Version 2 of the SAR and Answer the Following Questions

Insert a "check' mark in the appropriate boxes by double-clicking the gray areas.

1. Some members of the SAR drafting team believe that certain Category C events, as defined in Table 1 of existing Planning Standard I.A, are much less likely to occur than other events in Category C. It is felt that certain specific Cat. C events could be re-classified as Cat. D upon showing a low probability of occurrence (and low consequence) of these events.

   (a). Do you believe that the events in Categories B, C & D are classified correctly?

   ☒ Yes

   ☐ No

   ☐ Comments:

   (b). If your answer to (a) is No, how would you re-classify the events? If you have data to support your answer, please provide contact information for the individual responsible for the data.

   (c) Which of the following approaches do you favor regarding Table 1 of existing Planning Standard I.A?:

   ☐ Keep the same categories as now exist and re-classify the low probability (and low consequence) events as Category D events.

   Please explain your choice:

   ☐ Create a new category between C and D with performance characteristics between that of the present Categories C and D.

   Please explain your choice

   ☐ Keep the same categories as now exist, but allow for "good cause exceptions" upon a showing of low probability of occurrence (and low consequence) of specific Category C events.

   Please explain your choice:

   ☒ Comments: Any inclusion of above mentioned options [re: under item (c)] may result in deteriorated standard. Therefore, for purposes of continued goals of reliability, it is our suggestion that no changes should be made in categories B, C and D (as they presently exist in the Planning Standards).

2. Do you believe the standard should include requirements for reporting on the progress or status of *implementing* the plans developed in accordance with this standard?

   ☒ Yes

   ☐ No

☐ Comments:

3. If your answer to question 2 is Yes, given that transmission plans change over time as modeling assumptions, systems and plans change, how would you propose accounting for changes in a Transmission Plan?

   Comments: In the Northeast, the NPCC Annual Transmission Reviews address this and in addition NPCC keeps a "Major Projects List" to "track" BPS additions and modifications and includes transmission, generation and other major equipment identified as a BPS element.

   We also suggest that the resultant NERC standard not be overly prescriptive in requirements for reporting progress/status on the standard and flexibility be afforded to allow various documentation and processes already in place to achieve compliance, and moreover, we suggest that this be done annually.

4. Existing Planning Standard I.A requires: *"The systems must be capable of meeting Category C requirements while accommodating the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed".*

   The SAR drafting team believes that it is impractical to exhaustively test for every contingency described in each category plus every conceivable planned outage. Should the requirement to consider planned outages in addition to each Category A through D contingency remain part of this planning standard?

   ☐ Yes (consider planned outages in all Categories A through D).

   ☒ Yes (consider planned outages in some Categories only).

   Please specify which Categories:

   ☐ No

   ☒ Comments: We reiterate that the existing standards should not be weakened and request that the SAR be clarified to remove ambiguity regarding what is meant by "considering" a planned outage. Planned outages are considered however this is deemed an Operational Planning issue and is conducted so as to set Operational Limits for those conditions on a pre-contingency basis to allow for N-1 conditions.

   This particular SAR will ultimately result in a planning standard. The wording, as it has been phrased, infers that the system must be planned, designed and built to N-2 standards (i.e. a line out for maintenance on top of a circuit element outage). Treatment of planned outages should be considered to some extent and NPCC suggests the drafting team receive direction from the SAC regarding planned outages. We also concur with the NPCC/CP9 suggestion that planned outages should be considered only in categories in A through C.

5. Are you aware of any Regional or Interconnection differences in the requirements for assessing and planning transmission systems in North America? If so, please list and explain.

   ☐ Comments:

6. Do you have any other comments on the SAR?

   ☒ Comments:

   (1) We also resubmit our earlier suggested definition as given in the comments for the last(3rd) posted version of STD 200;

   Cascading Outage- "The uncontrolled successive loss of Bulk Electric System elements that propagate beyond a defined area (Balancing Area's) boundaries"

   (2) The IMO also supports the comments submitted by ISO/RTO Council- Standards Review Committee as well as the CP-9/NPCC Group