

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Interpretation of Transmission Planning  
Reliability Standard

Docket No. RM10-6-000

**SUPPLEMENTAL COMMENTS OF  
THE EDISON ELECTRIC INSTITUTE,  
THE AMERICAN PUBLIC POWER ASSOCIATION,  
THE NATIONAL RURAL ELECTRIC  
COOPERATIVE ASSOCIATION, THE ELECTRIC  
POWER SUPPLY ASSOCIATION, THE  
TRANSMISSION ACCESS POLICY STUDY GROUP,  
AND THE CANADIAN ELECTRICITY  
ASSOCIATION**

The Edison Electric Institute (“EEI”), the American Public Power Association (“APPA”), the National Rural Electric Cooperative Association (“NRECA”), the Electric Power Supply Association (“EPSA”) the Transmission Access Policy Study Group (“TAPS”) and the Canadian Electricity Association (“CEA”) (collectively referred to as the “Trade Associations”) submit these Supplemental Comments regarding the Notice of Proposed Rulemaking (“NOPR”) issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) as part of the March 18, 2010 reliability orders.<sup>1</sup>

Trade Associations filed initial comments on May 10, 2010, opposing the NOPR’s proposal to reject the North American Electric Reliability Corporation (“NERC”) interpretation of Reliability Standard TPL-002-0 Requirement R1.3.10 and instead make mandatory and enforceable an alternative interpretation developed by the

---

<sup>1</sup> *Interpretation of Transmission Planning Reliability Standard*, Notice of Proposed Rulemaking, 75 Fed. Reg. 14,386 (proposed Mar. 25, 2010), FERC Stats. & Regs. ¶ 32,655 (2010) (“NOPR”).

Commission.<sup>2</sup> Supported by the Affidavit of Mr. Thomas Wiedman, Trade Associations demonstrated, among other things, that the redundancy that would be required by the NOPR will be expensive—approximately \$24 billion nation-wide—and will not significantly increase bulk-power system reliability. Trade Associations strongly urged the Commission to approve NERC’s interpretation of Reliability Standard TPL-002-0 Requirement R1.3.10 without change.

Given the continued pendency of this NOPR, on June 7, 2011 Trade Associations (with system protection experts) met with Staff from FERC’s Office of Electric Reliability, Office of Enforcement, and Office of General Counsel.<sup>3</sup> At this lengthy meeting, there was a robust discussion of the very highly technical issues related to this NOPR. Trade Associations appreciate the opportunity for this exchange of views.

Based on this meeting, Trade Associations reaffirm the views expressed in our May 10, 2010 comments and reiterate our request that the Commission swiftly approve, without change, NERC’s interpretation of Reliability Standard TPL-002-0 Requirement R1.3.10 – an interpretation that drew overwhelming support in the NERC balloting process. Nothing in the meeting altered our strong opposition to the NOPR. Continued Commission delay in approving NERC’s proposed interpretation does not advance our shared goal of cost-effectively maintaining and enhancing grid reliability.

---

<sup>2</sup> Comments of the Edison Electric Institute, the American Public Power Association, the Canadian Electricity Association, the National Rural Electric Cooperative Association, the Transmission Access Policy Study Group, and the Electric Power Supply Association (May 10, 2010), eLibrary No. 20100510-5196.

<sup>3</sup> CEA was not in attendance at this meeting.

As a separate matter, Trade Associations' meeting with Staff suggests that there may potentially be a system protection issue that merits further exploration by technical experts. Trade Associations suggest that the Commission:

- 1) Instruct its Reliability Staff to meet with NERC and its appropriate subject matter experts<sup>4</sup> to: (a) explore Staff's concerns and identify whether there is a further system protection issue warranting additional actions, and (b) if so, define the issue's scope and assess its importance. Such exchange of views among technical experts is intended to facilitate the subject matter experts' ability to recommend appropriate actions within NERC.
- 2) Direct NERC to submit an informational filing within six months to explain its view as to whether there is a further system protection issue that needs to be addressed and if so, what forum and process should be used to address that issue and what priority it should be accorded relative to other reliability initiatives planned by NERC.

### **CONCLUSION**

Trade Associations strongly urge the Commission to promptly approve, without change, NERC's proposed interpretation of TPL-002-0 Requirement R1.3.10.

---

<sup>4</sup> Subject matter experts with system protection expertise participate in the System Protection and Control Subcommittee of the NERC Planning Committee.

Respectfully submitted,

David K. Owens  
Executive Vice President – Business  
Operations  
James P. Fama  
Vice President– Energy Delivery  
Barbara A. Hindin, Associate General  
Counsel  
EDISON ELECTRIC INSTITUTE  
701 Pennsylvania Avenue, NW  
Washington, DC 20004  
(202) 508-5019

John D. McGrane  
Stephen M. Spina  
J. Daniel Skees  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
(202) 739-3000  
Counsel for EDISON ELECTRIC INSTITUTE

Nancy Bagot  
Vice President of Regulatory Affairs  
Jack Cashin  
Director of Regulatory Affairs  
ELECTRIC POWER SUPPLY ASSOCIATION  
1401 New York Avenue, NW  
11th Floor  
Washington, DC 20005  
(202) 628-8200

*/s/ Cynthia S. Bogorad*

---

Cynthia S. Bogorad  
Rebecca J. Baldwin  
Spiegel & McDiarmid LLP  
1333 New Hampshire Avenue, NW  
Washington, DC 20036  
(202) 879-4000  
Counsel for TRANSMISSION ACCESS POLICY  
STUDY GROUP

Susan N. Kelly  
Vice President of Policy Analysis and  
General Counsel  
Allen Mosher  
Senior Director of Policy Analysis and Reliability  
AMERICAN PUBLIC POWER ASSOCIATION  
1875 Connecticut Avenue, NW  
Suite 1200  
Washington, DC 20009  
(202) 467-2944

Richard Meyer  
Senior Regulatory Counsel  
Jay A. Morrison  
Vice President, Regulatory Issues  
Barry Lawson  
Associate Director, Power Delivery &  
Reliability  
NATIONAL RURAL ELECTRIC COOPERATIVE  
ASSOCIATION  
4301 Wilson Boulevard  
Arlington, VA 22203-1860  
(703) 907-5811

Pierre Guimond  
President and CEO  
CANADIAN ELECTRICITY ASSOCIATION  
350 Sparks Street, Suite 1100  
Ottawa, Ontario K1R 7S8  
Canada

Bonnie A. Suchman  
Troutman Sanders LLP  
401 9<sup>th</sup> Street, N.W.  
Suite 1000  
Washington, D.C. 20004  
Counsel for CANADIAN ELECTRICITY  
ASSOCIATION

July 13, 2011