UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Revisions to Emergency Operations Reliability Standards; Revisions to Undervoltage Load Shedding Reliability Standards; Revisions to the Definition of "Remedial Action Scheme" and Related Reliability Standards	Docket Nos. RM15-7-000 RM15-12-000 RM15-13-000

COMMENTS OF TRANSMISSION ACCESS POLICY STUDY GROUP

The Transmission Access Policy Study Group ("TAPS") respectfully submits these comments on the Commission's June 18, 2015 Notice of Proposed Rulemaking ("NOPR")[1] that proposes to approve revisions to the Emergency Operations and Undervoltage Load Shedding Reliability Standards[2] submitted by the North American Electric Reliability Corporation ("NERC").[3]

TAPS supports the Emergency Operations and Undervoltage Load Shedding standards as proposed by NERC, and urges the Commission to approve the standards without directives. Specifically, TAPS responds to the Commission's concern regarding the absence of the LSE from the applicability section of proposed EOP-011-1.[4]

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[1] *Revisions to Emergency Operations Reliability Standards; Revisions to Undervoltage Load Shedding Reliability Standards; Revisions to the Definition of "Remedial Action Scheme" and Related Reliability Standards*, 80 Fed. Reg. 36,293 (Proposed June 24, 2015), 151 FERC ¶ 61,230 (2015).

[2] EOP-011-1, PRC-010-1, and revised definition of the term "Remedial Action Scheme."

[3] Pet. of the N. Am. Elec. Reliability Corp. for Approval of Proposed Reliability Standard EOP-011-1-Emergency Operations, RM15-7, eLibrary No. 20141229-5107 ("NERC EOP Petition").

[4] NOPR, P 24 n.36.

I. INTERESTS OF TAPS

TAPS is an association of transmission-dependent utilities ("TDUs") in more than 35 states, promoting open and non-discriminatory transmission access.[5] As transmission-dependent utilities, TAPS members have long recognized the importance of grid reliability. As TDUs, TAPS members are users of the Bulk-Power System, highly reliant on the reliability of facilities owned and operated by others for the transmission service required to meet TAPS members' loads. In addition, many TAPS members participate in the development of and are subject to compliance with NERC Reliability Standards. Thus, TAPS is sensitive to both the need for standards to support grid reliability, as well as the need to make the standards clear and cost-effective.

Communications regarding these proceedings should be directed to:

John Twitty
Executive Director
TAPS
4203 E. Woodland St.
Springfield, MO 65809
Tel.: (417) 838-8576
E-mail: 835consulting@gmail.com

Cynthia S. Bogorad
Rebecca J. Baldwin
SPIEGEL & MCDIARMID LLP
1875 Eye Street, NW
Suite 700
Washington, DC 20006
Tel.: (202) 879-4000
Fax: (202) 393-2866
E-mail: cynthia.bogorad@spiegelmcd.com
rebecca.baldwin@spiegelmcd.com

II. COMMENTS

Proposed EOP-011-1, which would not apply to the LSE function, would replace, among others, EOP-002-3.1, which currently does apply to LSEs. Sub-requirement R9.1, the only EOP-002-3.1 requirement applicable to LSEs, states that when a Transmission Service Provider ("TSP") expects to elevate the transmission service priority of an

[5] Duncan Kincheloe, Missouri Public Utility Alliance, chairs the TAPS Board. Jane Cirrincione, Northern California Power Agency, is TAPS Vice Chair. John Twitty is TAPS Executive Director.

Interchange Transaction from Priority 6 to Priority 7, "[t]he deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002 'Energy Emergency Alerts.'"[6] The drafting team explains (emphasis in original):

> **LSEs have no Real-time reliability functionality with respect to [Energy Emergency Alerts].** Requirement R9 was in place to allow for a Transmission Service Provider to change the priority of a service request, informing the Reliability Coordinator so that the service would not be curtailed by a [Transmission Loading Relief]; and since the Tagging Specs did not allow profiles to be changed, this was the only method to accomplish it. Under NAESB WEQ Etag Spec v1811 R3.6.1.3, this has been modified and now the [Transmission Service Provider] has the ability to change the Transmission priority which, in turn, is reflected in the [Interchange Distribution Calculator]. This technology change allows for the deletion of Requirement R9 in its entirety. Requirement R9 meets … Criterion A of Paragraph 81 and should be retired.

EOP-011-1 standard development project mapping document.[7] The drafting team also proposes that Requirement R9 of EOP-002-3.1 be "[r]etired per P81 – this is addressed in NAESB tagging specification." *Id.* at 33. *See also* Independent Experts Review Panel ("IERP") Report at 27, recommending that Requirement R9 be retired based on P 81 considerations, because it addresses "a market (tariff) issue."[8] The Commission has cited the IERP report with approval.[9]

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[6] NERC, Reliability Standards for the Bulk Electric Systems of North America, Standard EOP-002-3.1, § R9.1. (effective Sept. 13, 2012), http://www.nerc.com/pa/Stand/Reliability%20Standards%20Complete%20Set/RSCompleteSet.pdf#page=937.

[7] NERC EOP Petition, Ex. D at 33-34.

[8] Standards Independent Experts Review Project (June 2013), http://www.nerc.com/pa/Stand/Standard%20Development%20Plan/Standards_Independent_Experts_Review_Project_Report-SOTC_and_Board.pdf.

[9] *N. Am. Elec. Reliability Corp.*, 149 FERC ¶ 61,141, P 60 (2014).

As the Standard Drafting Team's explanation makes clear, there is no reliability benefit to retaining EOP-002-3.1's Requirement R9, and thus no reliability risk from eliminating the LSE obligation to comply with it.

The NOPR questions whether there is a gap pertaining to other LSE responsibilities mentioned in the Functional Model, such as communicating requests for voluntary load curtailment and coordinating the use of controllable loads with the BA, P 24 n.36. However, the Functional Model is simply a guidance document. *See, e.g.*, Order No. 693, P 127.[10] Such responsibilities are not part of EOP-002-3.1 or any other currently-enforceable reliability standard applicable to LSEs, nor has the Commission directed NERC to develop such a standard. Accordingly, no additional risk results from elimination of the LSE function with respect to those Functional Model responsibilities.

[10] *Mandatory Reliability Standards for the Bulk-Power Sys.*, Order No. 693, 72 Fed. Reg. 16,416 (Apr. 4, 2007), FERC Stats. & Regs. ¶ 31,242, *effective date stayed*, 72 Fed. Reg. 31,452 (June 7, 2007), *aff'd*, Order No. 693-A, 72 Fed. Reg. 40,717 (July 25, 2007), 120 FERC ¶ 61,053 (2007).

CONCLUSION

For the reasons set forth above, TAPS respectfully requests that the Commission approve, without modification, NERC's proposed Emergency Operations and Undervoltage Load Shedding Standards.

Respectfully submitted,

/s/ *Rebecca J. Baldwin*

Cynthia S. Bogorad
Rebecca J. Baldwin

Attorneys for
Transmission Access Policy Study Group

Law Offices of:
Spiegel & McDiarmid LLP
1875 Eye Street, NW
Suite 700
Washington, DC 20006
(202) 879-4000

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