April 8, 2011

RE: Entities Registered as Transmission Planners in the SPP RE footprint: Requirements under TPL-001 to TPL-004

Greetings:

This notice to the registered Transmission Planners [TP] in the SPP RE footprint is being made to remind each Transmission Planner that the current version of the TPL Standards indicates that each TP has an individual activity that is required above and beyond the collective effort of the SPP Transmission Working Group [SPP TWG]. All of the four TPL Standards have a requirement that is assigned to the TP and states ‘… Transmission Planner shall each demonstrate through a valid assessment….’

The SPP RE supports and believes that the collaborative effort of the Transmission Planners in the SPP RE footprint results in a more superior product than individual efforts performing the same studies and requirements, however, the evolution of the standards has not indicated that a collective effort alone is acceptable and the annual report of the SPP Transmission Working Group does not elaborate on individual TP footprints in the detail required by the standards.

Therefore, we are issuing this notice to the registered Transmission Planners in the SPP RE footprint to provide additional guidance for these standards. The standards require that each TP ‘demonstrate through a valid assessment that its portion of the interconnected transmission system is evaluated ….’ which indicates that individual TPs must make an internal assessment of the reports of the SPP TWG or from its own studies. This assessment must be written, filed within your company and be made available to the SPP RE upon request [typically during an audit or other compliance monitoring method]. The assessment should include all of the elements listed in the requirements of each of the standards and how each of those requirements was met for your individual footprint. The SPP TWG TPL report issued at the end of each year provides a good source for the components of your assessment but your assessment must indicate how each of the study activities impacted your system and how that activity meets the
requirements enumerated in the standards. This issue is particularly critical to assure yourself and the SPP RE that your system was adequately studied by the SPP TWG TPL effort and each requirement of the standards has been satisfied. **In addition, the preparation of these assessments increases the depth of knowledge that your individual subject matter experts have concerning both the collaborative planning process and the impact on your individual footprint.**

The assessments should evaluate how the studies or the projected corrective actions produce a system that meets all of the requirements of the Category from NERC Table 1 associated with each standard. In addition, these assessments should include discussions about specific areas of your footprint that have known or emerging voltage, thermal or stability issues.

There are some common themes that are present in more than one of this suite of standards. For example:

R1.3.1 of TPL-002 to -004 requires a rationale for the choice of the contingencies studied as well as a rationale for not performing other simulations. It is particularly important for each TP to explain how the SPP TWG report for TPL-002 to TPL-004 meets the requirements as they pertain to the individual TP footprint. As a reminder, because the standards indicate each TP must perform the assessments, there is no indication that there are exemptions for any TP under TPL-004 due to a collaborative study effort.

R2.2 of TPL-001 to -003 requires the TP to assess prior corrective action plans and assess the continued need for those corrective plans based on the new studies and assessments. The continuum of annual assessments for this requirement, also provides a connectivity between the reliability issues identified in the annual studies and proposed construction plans and operating guides.

The examples shown above are provided to illustrate requirements that are common among the TPL standards and are required to be addressed in the annual assessments and are not a complete listing of the requirements that must be addressed in the individual TP annual assessments.

**Compliance Monitoring Notes**

The SPP RE has previously accepted the SPP TWG TPL report as a proxy for sufficient evidence for each of the participating Transmission Planners for the TPL-001 to -004 standards. The last approved review of the SPP TWG TPL report was for the year ending 2009 and was issued in February, 2010.

The 2010 SPP TWG TPL report is currently under review and a final report has not been issued by the SPP RE.
By copy of this notice to the registered Transmission Planners in the SPP RE footprint, the SPP RE is notifying you that the current 2010 SPP TWG TPL report is not sufficient evidence, taken alone, for your individual compliance activities for the TPL-001 to -004 standards.

We recommend that each TP in the SPP RE footprint insure that it performs its own 2010 assessment, as described above, of the 2010 SPP TWG TPL report or its own studies, for its own records. The SPP RE has a projected publication date of its review of the 2010 SPP TWG TPL report of May 31, 2011 and will consider the 2010 planning year closed at that point. We also recommend that each TP remain current in its assessments beginning with the 2011 SPP TWG TPL activities that have begun for the next annual update cycle.

The SPP RE will not, on its own volition, review historical individual assessments for the calendar years from 2007 to 2009.

**Longer Term Solutions**

As discussed earlier, the current version, and those under development, of the TPL standards do not indicate that a collective or collaborative effort by a group of registered Transmission Planners will meet the current standards unless the collaborative assessments are as detailed as individual assessments performed by the individual TPs.

The SPP RE recommends that the SPP TWG consider initiating a Standard Authorization Request [SAR] to NERC to consider a change to allow for a collaborative effort for these standards. This change could be similar to the Reserve Sharing Group effort in BAL-002 which allows the collective group, known as the Reserve Sharing Group, to substitute for the individual performance of its Balancing Authority members.

In addition, the SPP RE would recommend that each registered Transmission Planner review its individual registration profile and obligations under the NERC standards to determine if it is appropriately registered.

If you have any questions, please contact Ron Ciesiel, Executive Director of Compliance, Southwest Power Pool Regional Entity at rciesiel@spp.org or 501-614-3265.