



December 10, 2012

WICF Generator Lead Line White Paper: Forward Look at Project 2010-07 Impact on the Standard Development Process

Background

The Western Interconnection Compliance Forum (WICF) has been engaged by NERC to provide comments on key reliability matters. As a mechanism to formulate such technical discussion, WICF has formed various focus groups to vet these matters among registered entities. The WICF GOTO focus group was formed to stay abreast of the Generator Lead Line issue. This group's charter has two primary goals:

- 1) Develop collaborative compliance approaches to all current and future GOTO related standards filed with FERC for approval.
- 2) Work with NERC, FERC, NAGF, and others to establish a reasonable path forward for additional issues related to Generator Lead Line regulatory compliance.

Both NERC and WECC participate in the current GOTO focus group (as requested), with Jack Wiseman acting as the NERC liaison. Mallory Huggins has also been involved in the formation of this white paper. WICF would like to take this opportunity to thank our NERC liaisons and NERC as an organization for their original request for assistance from WICF.

Discussion

The WICF GOTO focus group applauds the industry and NERC for the July 2012 filing with FERC to request approval of Project 2010-07—Generator Requirements at the Transmission Interface. The WICF GOTO group feels strongly that the perceived reliability gap has been addressed by this Project. However, we want to look forward to ensure the great work done by this drafting team carries on to new and revised standards as they are developed. Essentially, the Project can be summarized in that the term “Interconnection Facilities” was added to applicable standards to ensure that the scope of the standard included the Generator Lead Line/Interconnection Facility. It is appropriate that the concepts developed by Project 2010-07 concerning interconnection facilities (aka lead lines) associated with generation are preserved in all new and revised standards as they are developed in the future. This is especially important now as some standard drafting teams (SDTs) may be revising or creating new standards that should maintain the language proposed for revision by Project 2010-07, which is still in final approval process. **There is no mechanism to address inclusion of the term “Interconnection Facilities” in future standard development or revisions.**

While Project 2010-07 solves the current perceived reliability gap, the WICF GOTO group thinks it is important to alert the SDTs of the lead line implications so their fantastic work forming new standards will not become obsolete. For example, the SDTs decided PRC-005-1 needed to be revised to address lead lines, but the revisions made for the FERC submission were not carried over to the recent industry approval of PRC-005-2. Therefore, the work done by the drafting team will be obsolete, creating a new potential reliability gap if Revision 2 of this standard is implemented as currently written. The notification being suggested by the WICF GOTO focus group does not need to be high-profile, which may hinder the approval of the Project 2010-07 by FERC. However, this issue does need to be addressed.

Therefore, the WICF GOTO focus group recommends updating the processes/procedures for both NERC and the Regional Entities to include a control to ensure that Interconnection Facilities are considered for every project. The justification for inclusion or exclusion must be documented. Obviously, some standards/projects will have no impact on generation lead lines, so the justification will simply reflect that in writing. However, for the standards that involve generation lead lines, the registered entities (both transmission and generation) deserve to know the compliance expectation associated with the standard as it relates to Interconnection Facilities.

If it is determined and documented that Interconnection Facilities need not be addressed, that documentation can be archived in the project files. However, in the instances where Interconnection Facilities are implicated in compliance monitoring activities, the wording of applicable standard requirements will be similar to the adjustments made for the four GOTO standards sent to FERC for approval in August. This effort is applicable to TOs and TOPs as much as it is GOs and GOPs, as transmission entities have indicated that they do not want interference in operation of the transmission grid from generation organizations that are not equipped for operation of these facilities. Conversely, the generation entities are currently not able to comply with many standards, as evidenced by the work of the GOTO drafting team.

The WICF GOTO focus group believes standards that apply to regional entities, transmission planners, Transmission Owners and Operators, and especially to Generator Owners and Operators, should be included. This will ensure that generator-owned interconnection facilities interconnected to the bulk power system shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the applicable NERC Standards.

Request

The WICF GOTO Focus Group respectfully requests that the NERC Standards Committee consider this whitepaper to achieve the goal of updating NERC and Regional Entity processes to ensure that all SDTs are required to consider Interconnection Facilities in development of all new applicable standards. We would appreciate a response to the white paper by January 31, 2013.