

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation )  
and Northeast Power Coordinating Council, Inc. )      Docket No. RC09-3-000

COMPLIANCE FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION AND NORTHEAST  
POWER COORDINATING COUNCIL, INC.  
IN RESPONSE TO THE DECEMBER 18, 2008 COMMISSION ORDER

In compliance with the Federal Energy Regulatory Commission's ("FERC" or the "Commission") December 18, 2008, order in the above-captioned proceeding ("December 18 Order"),<sup>1</sup> the North American Electric Reliability Corporation ("NERC") and the Northeast Power Coordinating Council, Inc. ("NPCC") (collectively "Joint Filing Parties") respectfully submit a comprehensive list of Bulk Electric System ("BES") facilities within the United States portion of the NPCC Region and responses to the set of questions and data requests of the Commission stated in the December 18 Order.

**I. Documents Submitted With This Filing**

1. Existing NPCC approved list of BES facilities currently being used for the application of NERC Reliability Standards, included in Attachment A (the "NPCC Approved BES List" of June 2007);
2. NPCC List of Bulk Power System ("BPS") busses within the United States portion of the NPCC region, pursuant to section 3.0 of NPCC's *Classification of Bulk Power System Elements (NPCC Criteria Document A-10)*, included in Attachment B (the "NPCC BPS List" of December, 2007);
3. NPCC Task Force on System Studies ("TFSS") documentation related to the NPCC BPS list: September 2007, November 2007, January 2008, May 2008, and November 2008, included in Attachments C1 through C5, respectively;<sup>2</sup>

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<sup>1</sup> *North American Electric Reliability Corporation and Northeast Power Coordinating Council, Inc.*, 125 FERC ¶ 61,295 (2008). *North American Electric Reliability Corporation and Northeast Power Coordinating Council, Inc.*, Notice of Extension of Time (Jan. 15, 2009).

<sup>2</sup> References to Canadian entity facilities have been excluded from the TFSS materials provided in Attachment C.

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4. NPCC Spreadsheets detailing a comprehensive list of transmission facilities rated at 100kV and above within the U.S. portion of the NPCC Region and indicating those BES elements **not** included in the NPCC Approved BES List or NPCC BPS List: New York Transmission Data, New York Generation Data, New England Transmission Data, and New England Generation Data, included in Attachments D1 through D4, respectively;
5. An NPCC spreadsheet listing Balancing Authority program data related to load shedding, included in Attachment E; and
6. An NPCC document listing and describing NPCC Special Protection System relay information in the U.S., included in Attachment F.<sup>3</sup>

Information set forth in Attachments A through F to the instant filing includes confidential and privileged information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C to the Rules of Procedure. Specifically, the information pertains to proprietary or business design information, including design information related to vulnerabilities of critical energy infrastructure information, that is not publicly available. Accordingly, the information set forth in the Attachments A through F have been redacted from the public filing. In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover. NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

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<sup>3</sup> Information regarding Canadian entity facilities has been excluded from the materials provided in Attachment F.

## **II. Correspondence and Communications**

Communications regarding this filing should be addressed to:

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\*Persons to be included on the Commission's service list are indicated with an asterisk. NERC and NPCC request waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.

## **III. Background**

In its December 18, 2008 Order directing the Submission of Data (Docket No. RC09-3-000), the Commission identified concerns over what appeared to be conflicting lists of BES elements developed by one of the balancing authorities, the New York Independent System Operator ("NYISO"), in the United States portion of the NPCC Region.<sup>4</sup>

The Commission raised further concern that the lists that were developed by the Balancing Authorities in the United States portion of the NPCC Region may not be consistent with the application of the NPCC impact-based methodology or with NERC's representation that "the Reliability Standards apply to load shedding and special protection relay facilities below

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<sup>4</sup> December 18 Order at P 12.

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100 kV, which are monitored by Regional Entities, in compliance with NERC's Reliability Standards."<sup>5</sup>

In order for the Commission to understand the scope and comprehensiveness of the definition of BES used in the NPCC Region, as well as internal consistency across the United States portion of the NPCC Region, the Commission directed the NERC and NPCC to respond within thirty days to a set of questions and provide a comprehensive list of bulk electric system facilities within the United States portion of the NPCC Region.<sup>6</sup>

### **IV. Description of Compliance Data Submitted**

In response, to the December 18 Order, NPCC is providing its existing approved list currently being used for the application of NERC Reliability Standards, (the "NPCC Approved BES List" of June 2007), the current list of BPS facilities determined pursuant to NPCC's *Classification of Bulk Power System Elements, NPCC Criteria Document A-10* (the "NPCC BPS List" of December, 2007) and the corresponding minutes of NPCC's TFSS deliberations of the list. NPCC has also compiled and is providing in response to the Commission's data request a comprehensive list of BES facilities meeting the NERC BES definition within the United States portion of the NPCC Region and identifying those facilities that are not captured in the current NPCC Approved BES List or NPCC BPS List.

#### **A. Description of the NPCC Lists Referenced in the Commission's December 18 Order.**

The December 18 Order references a number of lists of BES facilities, raises concerns that the lists developed by Balancing Authorities in the United States portion of the NPCC Region may not be consistent either with regard to the application of the NPCC impact-based methodology or with NERC's representation that "...the Reliability Standards apply to load

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<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at P 13.

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shedding and special protection relay facilities below 100kV, which are monitored by Regional Entities, in compliance with NERC's Reliability Standards"<sup>7</sup> and seeks additional information so that the Commission can understand the scope and comprehensiveness of the definition of BES used in the NPCC Region, as well as internal consistency across the United States portion of the NPCC Region.

There are two NPCC lists referenced in the December 18 Order. They are:

1. List associated with the informational filing made by NERC to the Commission on June 14, 2007 ("NPCC Approved BES List")<sup>8</sup>
2. List associated with each NPCC Area's application of NPCC's *Classification of Bulk Power System Elements* ("NPCC BPS List")<sup>9</sup>

The NPCC Approved BES List of June 2007 is the only listing of BES busses or facilities approved by NPCC and is the current list of BES elements within the U.S. portion of NPCC to which the NERC Standards apply. The NPCC BPS List of December 2007 applied the NPCC impact-based approach but has not been approved by NERC or NPCC. Therefore, because the NPCC Approved BES List is the only approved NPCC list and the second NPCC BPS List applying the NPCC impact-based method is still awaiting approval, there is a single consistent approach used by NPCC for identifying BES facilities within the U.S portions of its region. The remaining lists referenced by the Commission in its December 18 Order pertain to planning and operational studies performed within New York and are not lists used by NPCC in determining the BES facilities in the U.S. portion of NPCC to which NERC Reliability Standards apply.

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<sup>7</sup> See n.2 *supra*.

<sup>8</sup> Within this list the NYISO provided a list of facilities designated as BES facilities while the ISO New England, Inc. ("ISO-NE") provided a list of busses. In the case of the ISO-NE list, all facilities connected to the busses identified comprise the facilities of the New England BES.

<sup>9</sup> The NPCC BPS List includes a list of busses identified through NPCC's A-10 Criteria that qualify as bulk power system facilities. All facilities connected to these identified busses are also deemed by NPCC as BPS facilities.

**B. Responses to the Commission's Specific Questions and Data Requests**

The Joint Filing Parties provide the following responses and supporting data to the specific questions and data requests of the Commission.

1. *Provide NPCC's current list of bulk power system elements within the United States portion of the NPCC region, pursuant to section 3.0 of NPCC's Classification of Bulk Power System Elements.*<sup>10</sup>

On April 30, 2007, in response to NERC's request to furnish the definition of BES used in the Region, NPCC provided a list that consisted of facilities in the U.S. portion of NPCC only and was compiled based on historical application of the NPCC definition of Bulk Power System and pre-dated the use of the methodology detailed in NPCC's *Classification of Bulk Power System Elements*, the NPCC Approved BES List. At the time of the NERC request the identification of Bulk Power System elements using NPCC's *Classification of Bulk Power System Elements* had not been completed and the NPCC Approved BES List represented the currently approved NPCC list. To date, this list remains the only official approved NPCC list of Bulk Power System facilities. Attachment A contains this list of BES facilities.

This list has since been updated by each Balancing Authority in NPCC using the methodology contained in NPCC's *Classification of Bulk Power System Elements* (NPCC Criteria Document A-10). NPCC compiled the results of the testing into a list in December of 2007, NPCC BPS List, and presented it to the NPCC TFSS for review. This list has not received official approval by NPCC or NERC but comprises NPCC's most current, but un-approved, list of BPS elements and is included as Attachment B.

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<sup>10</sup> December 18 Order at P 13.

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2. *Provide all documentation regarding the NPCC Task Force on System Studies' deliberation and approval of the list provided in response to question 1 above.*<sup>11</sup>

NPCC has included copies of the relevant excerpts from the documentation of its TFSS reviewing the list of BPS elements described in NPCC's response to Question 1, in Attachments C1 through C5. These documents constitute all documentation regarding the NPCC TFSS deliberation of the NPCC BPS List.<sup>12</sup> Note, however, that TFSS review is only one step in the overall approval process for the NPCC BPS list. The remaining steps for official approval of this list, including approval by the NPCC Reliability Coordinating Committee (NPCC's top technical committee), have not been obtained.

3. *For the United States portion of the NPCC region, identify the following facilities that are **not** included in NPCC's current list of bulk power system elements:*

- (a) *each transmission facility rated at 100 kV and above;*
- (b) *each generation unit with a gross nameplate rating of 20 MVA or above that is directly connected to a 100 kV and above transmission facility; and*
- (c) *each "load shedding and special protection relay facility," regardless of the facility rating.[]*

*For each such facility or unit, identify: (i) the name of the facility; (ii) the balancing authority within which the facility or unit is located; (iii) the owner and operator of the facility or unit; (iv) the facility or unit rating; and (v) whether the facility or unit was included in a previous version of the NPCC list of bulk electric system elements (and identify the previous version of the list).*<sup>13</sup>

On December 22, 2008 and December 23, 2008, NPCC issued a data request to all users, owners and operators in the region requesting the information sought in the December 18 Order. This information was requested by January 9, 2009 and was used to assemble a comprehensive list of BES facilities within the U.S. portion of NPCC and further identify those elements that are

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<sup>11</sup> *Id.*

<sup>12</sup> At the request of NPCC's Canadian entities who are not under the jurisdiction of the FERC, references to Canadian entity facilities have been excluded from the TFSS materials provided in Attachment C.

<sup>13</sup> December 18 Order at P 13 (emphasis added).

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part of the NERC defined BES **not** included in NPCC's Approved BES List or NPCC BPS List. The spreadsheets identified below list all BES facilities pursuant to the NERC 100 kV brightline approach within the U.S. portion of NPCC and further identify which of these NERC defined BES elements are **not** included in NPCC's current approved list, the NPCC Approved BES List, or the list prepared according to NPCC's *Classification of Bulk Power System Elements* criteria document, NPCC BPS List. Collectively, each of these separate tables includes all the information requested by the Commission. The spreadsheet tables include:

- All transmission facilities rated at 100kV and above (in Attachments D1 – New York and D-3 New England); and,
- All generating units with a gross name plate rating of 20 MVA (or aggregate plant gross name plate rating of 75 MVA) and directly connected to a bus 100 kV and above transmission facilities (Attachments D2 – New York and D-4 New England).

The Joint Filing Parties are also providing the following additional information in response to the Commission's data request of 3(c):

- A description of Balancing Authority programs and data related to identification of location of load, shedding trip point, and percent of load shedding (in Attachment E); and
- Special Protection System ("SPS") relay information using the most current approved SPS listing for the U.S. maintained by the NPCC TFSS including the identification of amount of load/generation tripped in scheme and other information contained in SPS listing (in Attachment F).<sup>14</sup>

The relay facilities included in these load shedding and SPS lists are actively monitored by NPCC for compliance with NERC's Reliability Standards and would be expected to meet applicable NERC Reliability Standards. For example, the relay facilities associated with underfrequency load shedding, even though they may not be on a BPS defined bus, would still be required to meet the applicable NERC Reliability Standards and would be included in the scope of any CMEP discovery method including a Compliance Audit or Spot Check.

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<sup>14</sup> Information regarding Canadian entity facilities has been excluded from the materials provided in Attachment F.

**V. Conclusion**

The Joint Filing Parties respectfully request that the Commission accept this filing and Attachments as compliant with its December 18 Order.

Respectfully submitted,

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February 20, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 20th day of February, 2009.

*/s/ Rebecca J. Michael*

Rebecca J. Michael

*Attorney for North American Electric  
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**Attachments**