

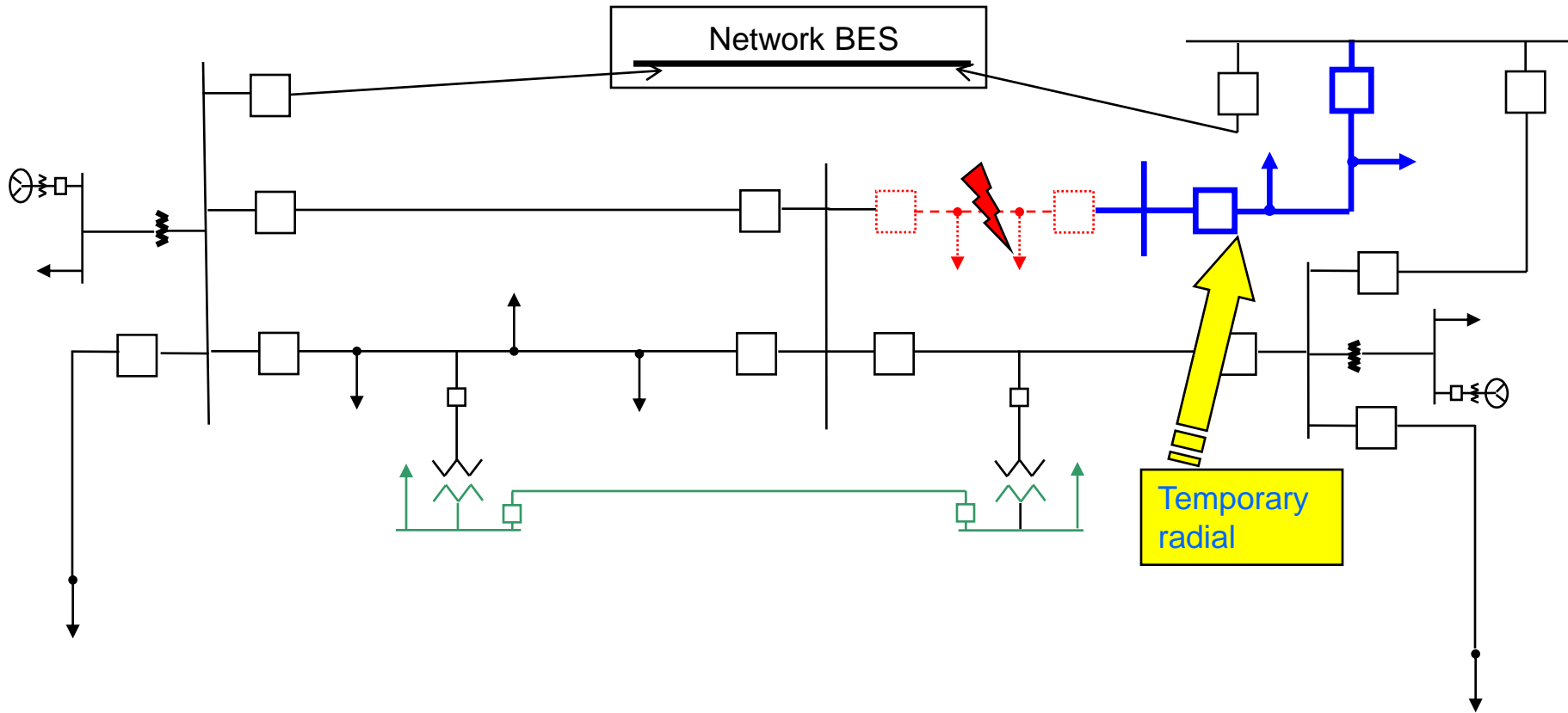
- Provide an update on 3 items
  1. Interpretation of TPL-002-0a requirement R 1.3.10
    - Issue - FERCs rejection of NERCs interpretation and alternative interpretation (Docket No. RM10-6-000)
  2. Table 1 Footnote b modification (Docket No. RM06-16-009)
    - Issue – “Planned or controlled interruption of radial customers or some **local Network customers** for a single contingency event on a transmission system”
      - Table appears in TPL-001, TPL-002, TPL-003, and TPL-004
  3. Status of TPL001-1
    - Issue - Next steps to be taken by the drafting team to address industry issues

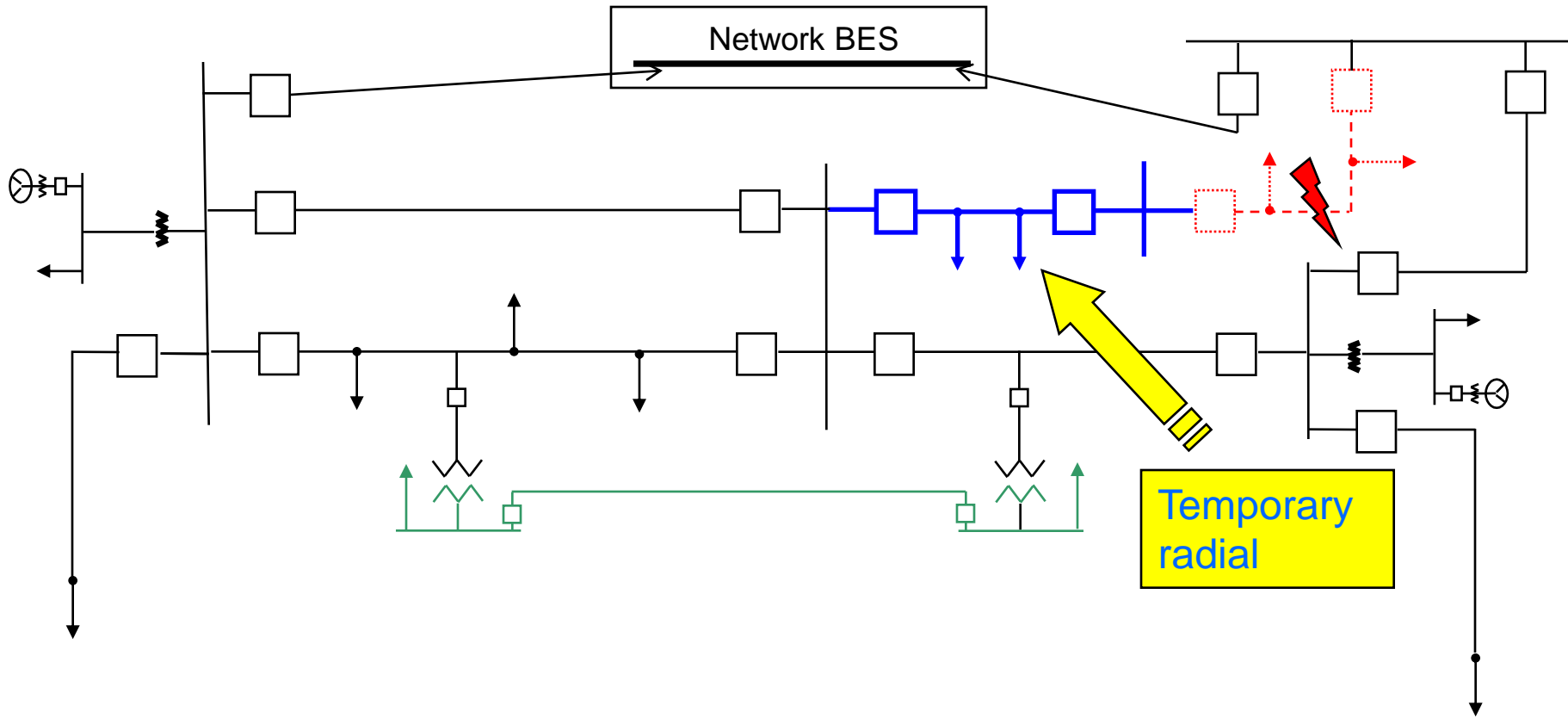
- TPL 002-0a Requirement R1.3.10
  - Proposed interpretation developed by NERC
    - Widely supported by the energy industry
      - 98.85% of the registered balloting body voting in its support
  - FERC rejected and proposes an alternative
  - NERC is preparing to submit comments
    - ISO/RTO council are preparing comments in support of NERC's position
  - Key points of NERC and ISO/RTO responses
    - NERC Interpretation Comports with the Plain Meaning of the Standard
    - Ensures Power System Reliability Without Any Gap in Contingency Evaluation

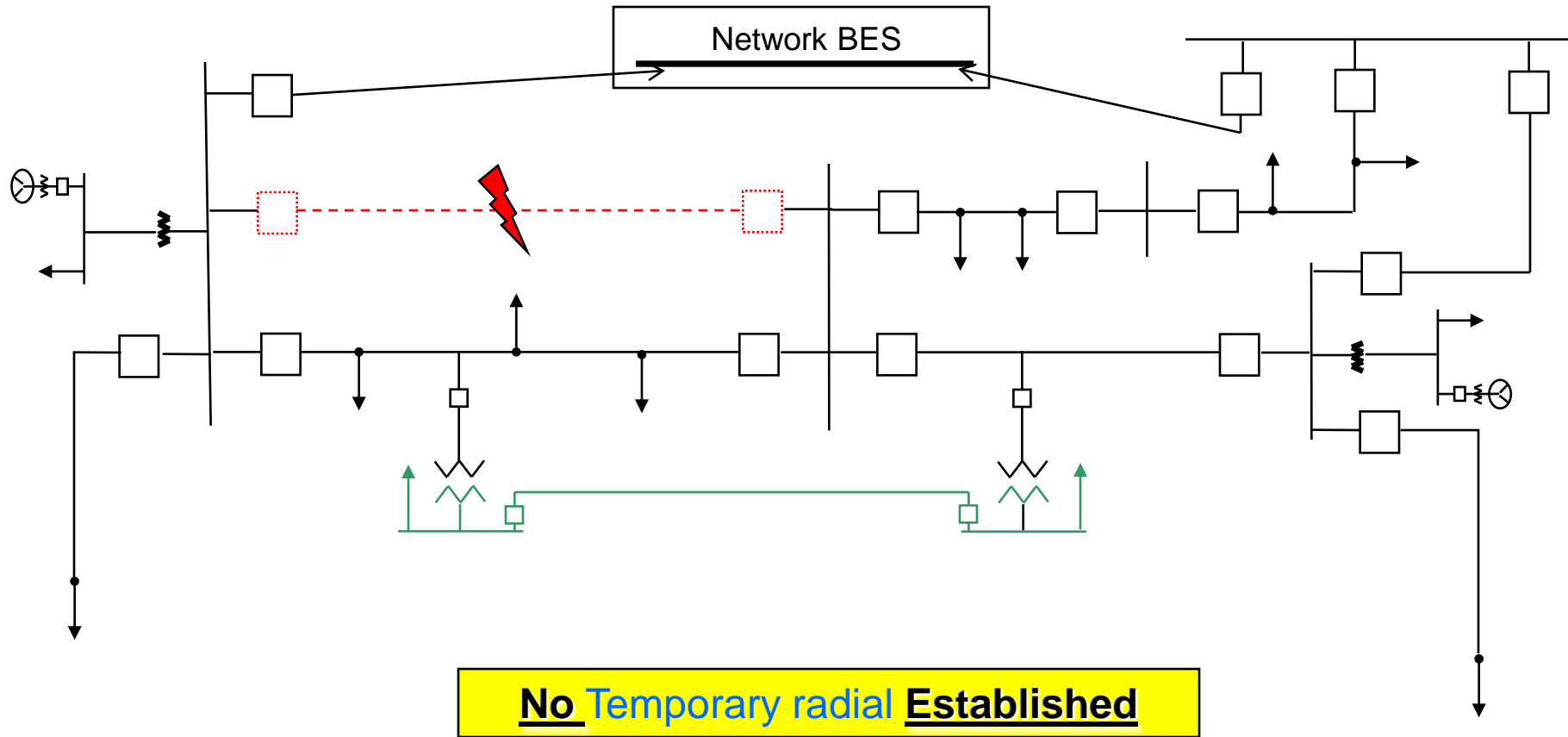
- Requires Study of the Effects of the Single Contingences Listed Under Category B on All Transmission System Equipment Including Existing and Planned Primary, Backup or Redundant Protection Systems
  - R1.3.10 –Include the effects of existing and planned protection systems, including any backup or redundant systems
- The Intentional Operation of Backup or Redundant Systems Are Accounted For under R1.3.12 –
  - Requires studies to Account for Planned Outage of the Primary Protection System Under Maintenance Outage Conditions
- Multiple-Contingency Events are Studied under TPL-003-0 and TPL-004-0

- Interpretation Set Out in the NOPR Is Inconsistent with the Language of TPL-002-0
- NERC Interpretation Should be Accepted by the Commission.
  - If Additional Explanation Is Needed, the Commission Should Remand the Interpretation to NERC for Clarification Rather than Set Aside the NERC Process

- Revised Footnote
  - **No interruption** of firm Load is allowed **except**: (1) Interruption of Load that is directly served by the elements that are removed from service as a result of the Contingency, or (2) Planned or controlled interruption of Load supplied by Transmission **Facilities made temporarily radial** as a result of the Contingency and where that Load must be interrupted **to meet performance requirements only on those now radial** Transmission Facilities.
  - Additional paragraph addresses firm transmission service
- Implementation:
  - 60 months after applicable regulatory approval.







Questions?