

January 11, 2007

Comments on NPCC C-29 Document

“Procedure for System Modeling: Data Requirements & Facility Ratings”

Introduction:

The IESO thanks NPCC for the opportunity to provide comments on the C-29 document. We commend the drafting team for developing this document further. There are very few comments that we can offer but nevertheless these are highlighted below:

Comments:

- There is the use of the word “NERC Planning Standards”. We feel that these should be changed to “NERC Standards”. The word “planning” is more of a connotation and does not actually define the standard. In other words, there are only “NERC Standards” and not “NERC Planning Standards”.
- Section 1.1 should be removed from the document given the detailed description and applicability of MOD-14 and MOD-15 standards in Section 2.0 and, in our view, the inappropriateness or need to reference NERC’s compliance program or its oversight role. If this section is to be retained, the term MMWG needs to be spelled out as it is the first time it appears in the document.
- The second paragraph on page 4 of the document indicates that NPCC would maintain a contact list for short circuit data. It is not clear which working group would maintain the contact database. We suggest that the SS-37 working group should be responsible for this task given its nature and scope.
- On Page 6, Point # 2.1.10, there is mention of units that are not dispatched and the need for correct status representation in the model data. We feel that in addition to units, there should also be a mention regarding de-energized busses and devices, the status of which should be correctly represented in the power flow model data as well.

- On page 9, Point # 2.2.11 there is a mention of "...relays loads etc." Shouldn't this read as "...relays, loads etc." - a comma separating the two?
- The **Section 2.1, Base Case Development Data Requirements** should contain an additional requirement for the individual areas. Each area should have a well-documented coordination process in place whereby facility owners provide updated facility ratings when these are put back to service after necessary upgrades/modifications. Timely capture of facility rating changes is crucial to the success of any power flow modeling scenario.
- **Section 2.2, Data Requirements of Facility Owners**, states that "...Data provided by facility owners must comply with the NERC MMWG and SDDWG..." Does SDDWG still exist? If so, why were they deleted in Sections 2.0 and 2.1? If not, is this an oversight?
- **In Section 2.2, Data Requirements of Facility Owners, Generation Facility Owners:**
 - There is no mention of generation facility owners providing specific information related to Special Protection Schemes (SPS).
 - It should also be noted in this section that generation owners should also provide information on any contractual, environmental, or legal obligations and output limitations, if any, in order to develop better modeling assumptions.
 - It should also be noted that special attention must be given to modeling of Jointly Owned Units (JOUs).
- **In Section 2.2, Data Requirements of Facility Owners, Transmission Facility Owners:**
 - There is no mention of transmission facility owners providing specific information related to Special Protection Schemes (SPS).
 - It should also be noted in this section that transmission owners should also provide all modeling data related to Phase Shifters and mode of control employed for these equipment – local MW control or phase angle control.
- **In Section 2.3, Data Requirements of Load Serving Entities:** The language allows Load Serving Entities to get away with poor forecasts. Improper load forecasts have a huge bearing on power flow simulations (and loopflows) and

since LSE's are the primary source of peak customer demands, it should be stressed that LSE's must ensure minimal forecast error when submitting required load data.

In parallel with this transmittal, these comments have also been posted on the NPCC Open Process Form at <http://www.npcc.org/>.

Thank you for your attention to these concerns.

Yours truly,

A handwritten signature in cursive script that reads "R. J. Falsetti".

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