

131 FERC ¶ 61,068
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
and John R. Norris.

North American Electric Reliability Corporation

Docket No. RD09-4-000

ORDER ON RELIABILITY STANDARDS INTERPRETATIONS

(Issued April 23, 2010)

1. Pursuant to section 215 of the Federal Power Act (FPA), the Commission approves the North American Electric Reliability Corporation's (NERC) interpretation of certain requirements of two Commission-approved Transmission Planning (TPL) Reliability Standards, TPL-002-0, System Performance Following Loss of a Single Bulk Electric System Element, and TPL-003-0, System Performance Following Loss of Two or More Bulk Electric System Elements, as discussed below.

I. Background

A. EPAAct 2005 and Mandatory Reliability Standards

2. Section 215 of the FPA requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.¹

3. Pursuant to section 215 of the FPA, the Commission established a process to select and certify an ERO² and, subsequently, certified NERC as the ERO.³ On April 4, 2006,

¹ See 16 U.S.C. § 824o(e)(3) (2006).

² *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval and Enforcement of Electric Reliability Standards*, Order No. 672, FERC Stats. & Regs. ¶ 31,204, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

³ *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd Alcoa, Inc. v. FERC*, 564 F.3d 1342

(continued)

as modified on August 28, 2006, NERC submitted to the Commission a petition seeking approval of 107 proposed Reliability Standards. On March 16, 2007, the Commission issued a Final Rule, Order No. 693, approving 83 of these 107 Reliability Standards, including TPL-002-0 and TPL-003-0, and directing other action related to these Reliability Standards.⁴ In addition, pursuant to section 215(d)(5) of the FPA, the Commission directed NERC to develop modifications to 56 of the 83 approved Reliability Standards.⁵

4. NERC's Rules of Procedure provide that a person that is "directly and materially affected" by Bulk-Power System reliability may request an interpretation of a Reliability Standard.⁶ In response, the ERO will assemble a team with relevant expertise to address the requested interpretation and also form a ballot pool. NERC's Rules provide that, within 45 days, the team will draft an interpretation of the Reliability Standard and submit it to the ballot pool. If approved by the ballot pool and subsequently the NERC Board, the interpretation is appended to the Reliability Standard and filed with the applicable regulatory authorities for regulatory approval.

B. NERC Petition

5. On October 24, 2008, NERC submitted a petition seeking Commission approval of interpretations of Requirements R1.3.2 and R1.3.12 of Reliability Standards TPL-002-0 and TPL-003-0. Requirements R1.3.2 and R1.3.12, which are identical in both TPL Reliability Standards, provide that the planning authority and transmission planner, when developing long-term assessments of system performance, must demonstrate adherence to the contingency standards established in Table I of the standard through a valid assessment.⁷ The two TPL Reliability Standards also describe certain features that may

(D.C. Cir. 2009).

⁴ *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

⁵ 16 U.S.C. § 824o(d)(5).

⁶ NERC Rules of Procedure, Appendix 3A, Reliability Standards Development Procedure, Version 6.1, at 26-27 (2007).

⁷ Table I sets forth the system performance requirements for planning authorities and transmission planners to meet when evaluating system response to single and multiple contingencies under TPL-002-0 and TPL-003-0, as well as normal conditions under TPL-001-0.

need to be included in a valid assessment, as approved by the applicable Regional Entity. For example, TPL-002-0 provides:

R1. The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission system is planned such that the Network can be operated to supply projected customer demands and projected Firm (non-recallable reserved) Transmission Services, at all demand levels over the range of forecast system demands, under the contingency conditions as defined in Category B of Table I. To be valid, the Planning Authority and Transmission Planner assessments shall: . . .

R1.3. Be supported by a current or past study and/or system simulation testing that addresses each of the following categories, showing system performance following Category B of Table 1 (single contingencies). The specific elements selected (from each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated Regional Reliability Organization(s). . . .

R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity. . . .

R1.3.12. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed.⁸

6. In the petition, NERC explains that Ameren Services (Ameren) requested an interpretation whether it was appropriate for planning authorities and transmission planners to include certain generation dispatch scenarios as “critical system conditions” referenced in Requirement R1.3.2 when modeling system performance under the contingencies identified in Table I. In addition, Ameren requested clarification how planning authorities and transmission planners should treat planned outages when

⁸ NERC Reliability Standard TPL-002-0. The text of TPL-003-0 is identical except that it references Table I, Category C instead of Table I, Category B.

considering Table I, Category B and C contingencies under Requirement R1.3.12 and whether a planned outage may itself be treated as a contingency.⁹

7. The petition also includes a Midwest Independent Transmission System Operator, Inc. (Midwest ISO) request for interpretation, seeking clarification whether Requirements R1.3.2 and R1.3.12 of TPL-002-0 and TPL-003-0 permit a transmission planner or planning authority to choose appropriate dispatch patterns under which to apply the Table I, TPL contingency requirements. In addition, Midwest ISO asked whether the term “planned outages” in Requirement R1.3.12 includes only scheduled outages that continue into the planning horizon, or whether “potential” planned outages must also be addressed.

8. Consistent with the NERC Rules of Procedure, NERC assembled a team to respond to the requests for interpretation and presented the proposed interpretations to industry ballot, using a process similar to the process it uses for the development of Reliability Standards. Consequently, the interpretations were approved by industry stakeholders comprising the ballot body and by the NERC Board of Trustees (Board) in July 2008, and filed with the Commission in October 2008. The interpretations do not modify the language contained in the Reliability Standard requirements under review.

9. NERC requests that the Commission approve the interpretations and make them effective immediately after approval, consistent with the Commission’s procedures.

II. Notices of Filings and Responsive Pleadings

10. Notice of the NERC petition was published in the *Federal Register*, with interventions and protests due on or before May 8, 2009.¹⁰ Midwest ISO, City of Santa Clara, ISO New England Inc., Exelon Corp., and Modesto Irrigation District filed timely motions to intervene. International Transmission Company filed a timely motion to intervene with accompanying comments.¹¹

⁹ Table I, Category B contingencies are events resulting in the loss of a single element (defined as a generator, transmission circuit, transformer or single pole of a DC line), while Category C contingencies are events resulting in the loss of multiple elements.

¹⁰ 74 Fed. Reg. 17475 (Apr. 15, 2009). The NERC petition was initially designated as a rulemaking (RM) docket, and subsequently assigned a docket with a “RD” prefix and a notice inviting public comment was published.

¹¹ International Transmission Company d/b/a/ ITC Transmission, Michigan
(continued)

III. Discussion

A. Procedural Matters

11. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2008), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

B. Interpretation of TPL Reliability Standards

12. The Commission approves NERC's interpretations of Requirements R1.3.2 and R1.3.12 of TPL-002-0 and TPL-003-0, as discussed below. The Commission approves the Reliability Standards with the interpretations that are appended in the currently filed versions. The Commission's approval is effective immediately after issuance of this order, as requested. Applicable entities should comply with the Reliability Standards, including the appended interpretations, following issuance of this order.

13. Reliability Standards TPL-002-0 and TPL-003-0 apply to transmission planners, and planning authorities.¹² The TPL Reliability Standards are intended to ensure that the transmission system is planned and designed to meet an appropriate and specific set of reliability criteria. Transmission planning is a process that involves a number of stages including developing models or base cases of the Bulk-Power System, assessing system performance for a range of operating conditions and contingencies, identifying operating conditions and contingencies that have an undesirable reliability impact, developing and evaluating a range of solutions, and selecting the preferred solution, while taking into account implementation time. The TPL Reliability Standards address the types of base cases that must be used in simulations and assessments to ensure that reliable systems are developed to meet present and future system needs, at both local and regional levels.

14. Reliability Standard TPL-002-0 addresses system planning related to performance under contingency conditions involving the failure or unplanned outage of a single element (single contingency). Reliability Standard TPL-003-0 seeks to ensure that the Bulk-Power System is planned to meet the system performance requirements of a system with the unplanned loss of multiple elements, i.e., multiple contingencies.

Electric Transmission Company, LLC and ITC Midwest LLC (collectively ITC).

¹² Order No. 693 discusses the TPL Reliability Standards. *See* FERC Stats. & Regs. ¶ 31,242 at P 1683.

1. TPL-002-0 and TPL-003-0, Requirement 1.3.2

a. Ameren Request

15. Ameren requested the ERO to interpret the phrase “critical system conditions” in TPL-002-0 and TPL-003-0, Requirement R1.3.2. Specifically, Ameren requested clarification whether compliance with Requirement R1.3.2 requires planning authorities and transmission planners to include “multiple contingent generation unit outages” in studies and simulations as possible generation dispatch scenarios describing critical system conditions to be reviewed under the contingency definitions included in the TPL Reliability Standards, Table I.¹³

16. Ameren suggested that the phrase “critical system conditions” could be interpreted as referring to “a set of known or planned system conditions pertaining to load, generation dispatch, and firm transmission service reservations such as might describe summer peak, winter peak or some other assumed system conditions.” Ameren also proposed that alternate generation dispatch scenarios be evaluated, but wishes to exclude multiple contingent generation unit outages, which it says are typically considered to satisfy resource adequacy planning. Ameren sought confirmation that the TPL Reliability Standards do not require the system to be planned to operate with these multiple contingent generation unit outages and meet the conditions associated with contingent outages in Table I.

17. Alternatively, Ameren proposed that the term “critical system conditions” be interpreted as including “a variety of possible dispatch patterns” including probability-based dispatch modeling addressing generation deficiency scenarios with multiple contingent outages, as defined by the transmission planner or planning authority. Ameren further proposed that, under its second interpretation, transmission planners and planning authorities must apply the multiple contingent generation outages in addition to the transmission contingency conditions in Table I, to comply with the TPL Reliability Standard.

18. Ameren supported its first proposal, predicting that reliance on its second interpretation could lead to inconsistent application of the contingency definitions based on different transmission planner determinations of critical system conditions. Ameren stated that the second option could create a *de facto* transfer capability requirement, lead to difficulties in compliance monitoring and create hurdles for connecting new generation to the system.

¹³ NERC petition, Exh. A-3, providing Ameren Jul. 25, 2007 request, at 1.

b. Midwest ISO Request

19. Midwest ISO requested clarification that a transmission planner or planning authority may choose appropriate dispatch patterns under which to apply the Table I, TPL contingency requirements.¹⁴ Specifically, Midwest ISO asked whether the TPL Reliability Standards required a specific dispatch to be applied when modeling Table I system contingencies, other than one representative of supply of firm demand and transmission commitments, and whether multiple dispatch patterns may be considered. Midwest ISO also asked, if consideration of a variety of possible dispatch patterns is permissible, including probabilistic-based dispatch representing generation deficiency scenarios, whether the TPL Reliability Standard permits application of the transmission contingency conditions in Table I, Category B to the dispatch patterns so determined.

20. Midwest ISO stated that failure to interpret the TPL Reliability Standards to provide transmission planners and planning authorities with discretion to make appropriate planning assumptions, including generation dispatch, may result in difficulty in planning a reliable system, failure to pursue transmission expansion, or improper cost recovery, if the TPL Planning Standards are construed to establish the precise system conditions to be modeled and planned for.

c. NERC Interpretation

21. NERC provides a single interpretation of Requirement R1.3.2 in response to the related requests of Ameren and Midwest ISO:

The selection of credible generation dispatch for the modeling of critical systems is within the discretion of the planning authority [now referred to as planning coordinator]. . . .

Under the Functional Model, the Planning Coordinator [planning authority] “Provides and informs Resource Planners, Transmission Planners, and adjacent Planning Coordinators of the methodologies and tools for the simulation of the transmission system” while the Transmission Planner “Receives from the Planning Coordinator methodologies and tools for the analysis and development of transmission expansion plans.” A [planning authority’s] selection of “critical system conditions” and its

¹⁴ See NERC petition, Exh. B-3, providing Midwest ISO request.

associated generation dispatch falls within the purview of “methodology.”

Furthermore, consistent with this interpretation a [planning authority] would formulate critical system conditions that may involve a range of critical generator unit outages as part of the possible generator dispatch scenarios.

22. NERC’s interpretation notes that regional entities are to measure compliance with TPL-002-0 and TPL-003-0 and determine whether a planning authority or transmission planner has developed a valid assessment based on the specific sub-requirements that are selected from Requirement R1.3. In its petition, NERC explains that it could not clarify the term “critical system conditions” because the term had not been previously defined, and to do so through the interpretations process would be improper.¹⁵ In light of this fact, NERC states that the proposed interpretation provides the process to determine critical system conditions, with the planning authority supervising transmission planners in directing the planning process.¹⁶ NERC notes that the Regional Entity, as the compliance monitor, determines whether an assessment is valid through its compliance enforcement responsibilities.

23. NERC explains its decision not to address Ameren’s specific questions regarding contingent outages or critical system conditions, stating that “the question ventured beyond interpreting the current version of the standard and would require revising the standards to adequately address.”¹⁷ NERC notes that other commenters questioned placing the planning authority in a supervisory role over transmission planners and cites confusion over the regional entity’s role in determining a valid assessment.

d. Comments

24. No party objects to the proposed interpretation. ITC supports the interpretation of TPL-002-0 and TPL-003-0 as supporting the reliability purpose of the Reliability Standards.

¹⁵ NERC petition at 12-13 (explaining that its interpretation process permits a clarification of the Reliability Standard requirements, but not expansion or re-definition of those requirements).

¹⁶ *Id.* at 13.

¹⁷ *Id.* at 14.

e. **Commission Determination**

25. The Commission approves the ERO's interpretation of Requirement R1.3.2 of TPL-002-0 and TPL-003-0. The ERO's interpretation is reasonable and in concert with the current TPL-002-0 and TPL-003-0 Reliability Standards, as explained below.

26. The ERO's interpretation explains that the selection of a credible generation dispatch for the modeling of critical system conditions is within the discretion of the planning coordinator. Further, the ERO interpretation explains that the planning coordinator would formulate critical system conditions that may involve a range of critical generator unit outages as part of the possible generator dispatch scenarios. We find this interpretation to be reasonable.

27. In the transmittal letter, the ERO explains that the two requests for interpretation raised a "host of questions" that, to respond completely, would require a re-writing of the requirements of the Reliability Standard and adding new definitions to the NERC Glossary of Terms (Glossary), which the interpretation process does not permit.¹⁸ The ERO emphasized that the term "critical system conditions" is currently not defined in the NERC Glossary and defining the term in the interpretation process is not permitted. We accept NERC's explanation that its interpretation process should not change the requirements of a Reliability Standard or add new definitions. In fact, the Commission noted in Order No. 693 that the TPL Reliability Standards do not provide specificity regarding the manner for studying "critical system conditions," and directed the ERO to develop modifications to the TPL standards to address this matter.¹⁹

¹⁸ *Id.* at 12 ("the interpretation process permits a clarification of the requirement [of a Reliability Standard] but not an expansion or re-definition of it").

¹⁹ In Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1765, the Commission explained:

"In assessing system conditions, Requirement R1.31. of TPL-001-0 requires entities to cover "critical system conditions and study years," as deemed appropriate by the entity performing the study. system conditions are as important as contingencies in evaluating the performance of present and future systems, [footnote omitted] and yet TPL-001-0 does not specify the rationale for determining critical system conditions and study years. . . . Accordingly, we direct the ERO to modify the Reliability Standard to require that critical system conditions and study years be determined by conducting sensitivity studies"

28. Given that the reliability of a responsible entity's interconnected transmission system is usually affected by the dispatch and/or outages of generation resources, it is reasonable that a valid assessment conducted by a transmission planner and planning authority to satisfy the TPL Standards would in most instances include different generation dispatch scenarios, including critical generation unit outages, in studying critical system conditions. We understand that a responsible entity must identify what it studies as the "critical system conditions," subject to Regional Entity oversight.²⁰ As provided in Requirement R1, quoted in part above, a credible choice of critical system conditions must support the planners' demonstration that the system is planned to meet projected customer demand and firm transmission load, at all demand levels over the range of forecast system demands. For example, if a transmission planner's area has a generation mix, topology, and load such that the outages of a few generation units have a significant impact on the ability to meet the performance requirements set forth in Table I of TPL-002-0 and TPL-003-0, it would be valid to study the outages of such units as critical system conditions to verify that the transmission system can supply firm load in the absence of these units under the contingency scenarios described in Table I, Categories B and C. Therefore, the selection of a credible generation dispatch for the modeling of critical system conditions is a necessary function and within the discretion of the planning authority and transmission planner.

29. Consequently, as discussed above, we approve the ERO's interpretation of Requirement R1.3.2 of TPL-002-0 and TPL-003-0. Furthermore, we urge the ERO to expeditiously complete the development of modifications to the TPL Reliability Standards to comply with the directives of Order No. 693, including further clarifying what constitutes critical system conditions.²¹

²⁰ See TPL-002-0, Requirement 1.3: "The specific elements selected (from each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated [Regional Entity]."

²¹ In Order No. 693, the Commission directed certain revisions to the TPL Reliability Standards, including that responsible entities determine critical system conditions by conducting sensitive studies. See Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1765, 1785. In the immediate proceeding, the ERO explains that the TPL Standards are currently under review and modification as an integral part of Project 2006-02 – Assess Transmission Future Needs. NERC petition at 14-15.

2. TPL-002-0 and TPL-003-0, Requirement 1.3.12**a. Ameren Request**

30. As provided in the NERC petition, with regard to Requirement R1.3.12, Ameren asked how planned outages should be addressed in the Table I, Category B and C contingency definitions. Specifically, Ameren asked if Requirement R1.3.12 requires the system to be planned to be operated during conditions associated with planned outages, consistent with the performance requirements described in Table I, “plus any unidentified outage.”²²

31. Ameren proposed two possible, but conflicting, interpretations of Requirement R1.3.12. Ameren’s first proposal would limit modeled outages to known outages planned for a given point in time and “accommodate” the outages by increasing the Category B and C contingencies by one event in those studies incorporating outages. Ameren proposed to accommodate potential planned outages through switching or redispatch to mitigate any limit or ratings violations.

32. Under Ameren’s second proposal, transmission planners and planning authorities would be required to plan the system to address potential planned outages such that the system can be operated under those conditions typically used to measure performance for planned outages. Ameren proposed that transmission planners and planning authorities be permitted to plan the system and increase the Category B and C contingencies by one additional event in studies of system conditions under which planned outages are typically studied. Ameren suggested that potential planned outages would be included among the Category B and C events listed in Table I and treated similarly.

33. Ameren suggested that the second interpretation is improper because it permits scheduling of outages, including maintenance outages, without the need to consider mitigation plans, alternative dispatch or other coordination efforts, and will result in confusion and difficulties to interconnecting generators. According to Ameren, the consequence of this interpretation would be that a transmission planner or planning authority could treat the combination of a Category B event and an additional “potential planned outage” as a Category C event, when modeling the system under the planned outage, and could shed load or curtail firm transmission in response.

²² NERC petition at 3.

b. Midwest ISO Request

34. The NERC petition explains that Midwest ISO asked whether the term “planned outages” in Requirement R1.3.12 includes only scheduled outages that continue into the planning horizon, or whether the term covers potential planned outages that may occur at the demand levels to be studied. Midwest ISO followed up, asking, in the event that transmission planners and planning authorities should consider potential planned outages, whether a system is properly planned if the transmission planner or planning authority relies on a system adjustment (load shedding, generation redispatch, or system reconfiguration) to respond to a combination of the “potential” planned outage and a Category B contingency. Midwest ISO characterized this option as planning the system “to be operated as for a category C3 N-2 event, even though the first event is a planned base condition.”

35. Midwest ISO asked, in the alternative, whether the interpretation is consistent with a September 2000 interpretation provided in relation to the voluntary standards, and whether reliance on an earlier interpretation would be acceptable for compliance purposes if NERC issues a new interpretation or changes its interpretation. Midwest ISO stated that reinterpretation of a standard following application of an earlier interpretation of the standard would create uncertainty in cost recovery for upgrades and a reluctance to undertake upgrades.

c. NERC Interpretation

36. In response to the requests of Ameren and Midwest ISO, NERC provides the following interpretation of Requirement R1.3.12:

This provision was not previously interpreted by NERC since its approval by [the Commission] and other regulatory authorities. TPL-002-0 and TPL-003-0 explicitly provide that the inclusion of planned (including maintenance) outages of any bulk electric equipment at demand levels for which the planned outages are [performed is] required. For studies that include planned outages, compliance with the contingency assessment for TPL-002-0 and TPL-003-0 as outlined in Table 1 would include any necessary system adjustments which might be required to accommodate planned outages since a planned outage is not a “contingency” as defined in

the NERC *Glossary of Terms Used in [Reliability] Standards*.²³

37. NERC states that this interpretation provides useful guidance on planned outages and supports the purpose of the TPL Reliability Standards, i.e., to provide for valid, periodic assessments. NERC states that the interpretation clarifies that planned outages do not constitute contingencies as defined in the NERC glossary and describes how planned outages should be considered in the development of the models, which are used to ensure that systems facing Category B and C contingencies operate within the system limits and impacts specified in Table I. Finally, NERC asserts that its interpretation does not re-define or expand the requirement.

d. Comments

38. No party objects to the proposed interpretation. ITC agrees with NERC's interpretation that planned outages of facilities under Reliability Standards TPL-002-0 and TPL-003-0 should not be considered a first contingency condition. ITC supports the interpretation of Requirement R1.3.12 as supporting the reliability purpose of the Reliability Standards and providing clarity that planned outages do not constitute contingencies as defined in the NERC glossary.

e. Commission Determination

39. The Commission approves the ERO's interpretation of Requirement R1.3.12 of TPL-002-0 and TPL-003-0. The interpretation reinforces that planned (including maintenance) outages are not contingencies and are required to be addressed in transmission planning for any bulk electric equipment at demand levels for which the planned outages are performed. The Commission understands that planned maintenance outages tend to be for a relatively short duration and are routinely planned at a time that provides favorable system conditions, i.e., off-peak conditions. Given that all transmission and generation facilities require maintenance at some point during their service lives, these "potential" planned outages must be addressed, so long as their

²³ The second sentence of the interpretation was to have been corrected to include the missing bracketed words. See NERC petition, Exhibit A-3, interpretation development record, "Consideration of Comments on Initial Ballot of Revised Interpretation of TPL-002 and TPL-003 – Requirements 1.3.2 and 1.3.12 for Ameren," at 1 (presenting revised interpretation).

planned start times and durations may be anticipated as occurring for some period of time during the planning time frames required in the TPL series of Reliability Standards.²⁴

40. The ERO's interpretation explains that Reliability Standards TPL-002-0 and TPL-003-0 "explicitly provide that the inclusion of planned (including maintenance) outages of and bulk electric system equipment at demand levels for which the planned outages are required."²⁵ Further, NERC clarifies that, for studies that include planned outages, "compliance with the contingency assessment for TPL-002-0 and TPL-003-0 as outlined in Table 1 would include any necessary system adjustments which might be required to accommodate planned outages since a planned outage is not a contingency."²⁶ We agree with NERC that a planned outage is not a contingency.²⁷

41. Consequently, for these reasons, we approve the ERO's interpretation of Requirement R1.3.12 of TPL-002-0 and TPL-003-0.

The Commission orders:

NERC's interpretations of Requirements R1.3.2 and R1.3.12 of Reliability Standards TPL-002-0 and TPL-003-0 are hereby approved, as discussed in this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

²⁴ See Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1715 ("simulations should faithfully duplicate what will happen in the actual power system and not a generic listing of outages").

²⁵ NERC petition, Exhibit A-1 at 3.

²⁶ *Id.*

²⁷ Nothing in this order alters the Commission's previous directives to TPL-002-0 and TPL-003-0, including the Order Setting Deadline for Compliance issued in Docket No. RM06-16-009.