

RE: Question for Peter Mackin

Richard <lauckjr@hotmail.com>

Wed 5/13/2015 7:26 PM

To: MBrennan@bellevuewa.gov <mbrennan@bellevuewa.gov>

Cc: NMatz@bellevuewa.gov <nmatz@bellevuewa.gov>; Don Marsh <don.m.marsh@hotmail.com>; Larry Johnson <larry.ede@gmail.com>

Mike-

Regarding the answer you provided,

You refer to Appendix E to the report as providing the complete Reliability Standard TPL-001-4.

Appendix E to my copy of the report says to refer to Table 2. I can't find any Table 2 to refer to. **My copy of TPL-001-4 is a 22 page document . Please confirm that the TPL-001-4 is a 22 page document that can be downloaded from the NERC web site.** [My copy of TPL-001-4 is a 50 MB file so I am unable to email it to you].

Your response also refers to pages 48-51 as confirming the transfer source. I see that page 48 states that "known commitments" for Firm Transmission Service are 1500 MW in the northbound direction. Please provide a listing and copy of those "known commitments."

Your response also states "*Footnote 9 in Table 1 of the Standard TPL-001-4 notes an objective of the planning process (Steady State and Stability Performance Planning Events) should be to minimize the likelihood and magnitude of interruption of Firm Transmission Service following Contingency events.*" While their may be an objective to minimize the likelihood and magnitude of interruption of Firm Transmission Service, **the footnote does not say that is a requirement.** Further, please provide the Firm Transmission Service that you are thinking would be relevant this case. In other words, **please provide a copy of any and all contracts that you are aware of under which BPA has contracted to provide Firm Transmission Service in the northerly direction over this line.**

Other than your reference to Footnote 9 on PDF page 12 of 22 of this Standard, is there anything else in TPL-001-4 that you believe would require the load flow to include 1500 MW flowing north to Canada in the PSE studies?

Your reference to Footnote 9 also raises this question. BPA has known since about 1998 (when it chose not to build a transmission line to Oliver BC) that they could not provide Firm Transmission (i.e. guaranteed transmission under all loading and contingency events) in the northbound direction. That is why BPA first had manual procedures for curtailing transmission schedules in the northbound direction to Canada when conditions warranted. Then in 2007 BPA implemented an automated procedure for reducing these northbound schedules when conditions warranted. If there was some obligation to make these northbound schedules "Firm", then why wasn't the system studied and "fixed" in order to accomplish that long before the year 2018?

Thanks for any further clarification you can provide. At this point the explanation of where it is that NERC Reliability Criteria requires 1500 MW of power to flow north in the PSE studies is **insufficient**.

Further, FERC Order 1000 states that if a proposed transmission project meets more than one need (e.g. one need to meet PSE load and another need to demonstrate that 1500 MW can flow north to Canada), then there needs to be an allocation of the cost of the project. **Has Peter Mackin come up with an**





appropriate method for allocating the cost of this project between PSE and BPA? Further, FERC Order 1000 states that if a proposed project meets more than one need, that there is no Right of First Refusal to the incumbent utility (e.g. PSE) to build the line. The new line project must be put out to bid in order for the best bidder to be given the right to build and own the line. The line will be operated by the regional entity. FERC will decide how much people need to pay to use the line and the payments provided will be sent to the builder/owner. Has Peter Mackin addressed this FERC Order 1000 requirement? Why would Peter Mackin say that PSE needs to build this line?

Richard Lauckhart



---

From: MBrennan@bellevuewa.gov  
To: lauckjr@hotmail.com  
CC: NMatz@bellevuewa.gov  
Subject: RE: Question for Peter Mackin  
Date: Wed, 13 May 2015 23:29:16 +0000

Mr. Lauckhart,

I am responding to your question about the NERC requirement to include Firm Transmission commitments in electrical reliability planning for the Energize Eastside project. The [Independent Technical Analysis report](#) prepared by USE provides information specific to your question. Chapter 7 *Electric Utility Reliability Standards* is found on pp. 41-43 with a reference to the complete Reliability Standard TPL-001-4 attached as Appendix E to the report.

To independently determine the impact that power flows to and from Canada would have on the need for Energize Eastside, the Optional Technical Analysis modelled the elimination (among other Intertie flows) of the normal summer transfer flow of 1500 MW from Canada over the Northern Intertie (Path 3). The ITA on pp. 48-51 confirmed the transfer source, thus validating that PSE's Eastside Needs Assessment modeling plan for the transfers had an actual source in *known commitments for Firm Transmission Service and Interchange on Path 3*.

Footnote 9 in Table 1 of the Standard TPL-001-4 notes an objective of the planning process (Steady State and Stability Performance Planning Events) should be to minimize the likelihood and magnitude of interruption of Firm Transmission Service following Contingency events (such as eliminating normal summer flow from Canada) thus limiting the circumstances allowing the Interruption of Firm Transmission Service.

I hope this information is helpful.

Mike

**Michael A. Brennan**

Director

Development Services Department

Phone 425-452-4113

mbrennan@bellevuewa.gov

Join us at   



**From:** Richard [mailto:lauckjr@hotmail.com]  
**Sent:** Wednesday, May 06, 2015 12:47 AM  
**To:** Brennan, Mike  
**Subject:** Question for Peter Mackin

Mike-

I watched the video of the USE presentation in Bellevue yesterday on the Energize Eastside project.

Several times Peter Mackin mentioned that it is a NERC Reliability Requirement that 1500 MW of power needed to be forced to flow North on the Northern Intertie in the winter peak hour in transmission load flow studies like the ones done by PSE and USE.

I am familiar with NERC reliability criteria, but I am not aware of such a reliability requirement that deals with the Northern Intertie (or any intertie for that matter). He seemed to say that there is a NERC requirement that flows between regions (such as NorthWest to Canada) have to be modeled as flowing at a "Firm Transmission" level. That confuses me. I have not heard of that.

Can you ask Peter Mackin to point me to the NERC mandatory reliability requirement that he is referring to?

Thanks.

Richard Lauckhart  
El Macero, Ca  
530-759-9390