

Comments on Section 6.9 of Revised BP – Effective November 14, 2013	TO Response
<p>“Worst case” is very broad – probably negates criteria #1 which is based on a normal unit SU. No MW/voltage thresholds?</p>	<p>#1 is meant to capture “normal” start-up from a transmission delivery point. This “normal” may be starting more than 1 unit simultaneously. #2 is meant to capture “contingency” operation whether during start-up or in normal operation. “Worst case” may not be the best term to use, but the intention was to say the customer only needs to ask for service to cover the highest requirement of any set of contingencies that customer wants to be considered. Example: Contingency X on unit 1 results in 10MW load on the 138kv delivery point, while contingency Y on unit 2 results in 8MW load on the same (or electrically equivalent) 138kv delivery point, the “worst case” is the 10MW load.</p>
<p>How/where is primary/alternate designation made? Must both primary & alternate DPs be designated?</p>	<p>Customer needs to specify if the new delivery point is to be used during “normal” operation or “normal” start-up which would make it a primary delivery point. If the new delivery point is only going to be used during contingency operation, it would be considered an alternate delivery point.</p>
<p>Redundant with #1?</p>	<p>May be somewhat redundant to #1, but it is explicitly included in both as #1 is for increases in loads at existing delivery points and #3 is for new delivery points.</p>
<p>Change to “BES connection points for the aux loads”?</p>	<p>Needs to remain “transmission voltage level” as using BES would exclude 69kv delivery points.</p>
<p>Redundant with #1 above.</p>	<p>Somewhat redundant, but does relate this section of the BP to the thresholds utilized in Section 6.4 for load increases.</p>
<p>Delete “per Generator”. Discussions on this issue have focused on a single TSR for a plant/site, not an individual generator.</p>	<p>Agree.</p>

6.9TSRs for Generating Station Auxiliary Loads

The Transmission Customer must submit a new TSR for changes in the auxiliary loads at an existing generating station that meet any of the following criteria:

- 1.New TSR required for auxiliary load increases at an existing transmission level delivery point greater than threshold (5MW at 100kV and below; and 10MW at 100kV and above) based on normal start-up operation
- 2.New TSR required for auxiliary load increases at each transmission level delivery point with respect to worst case contingency configuration (customer's generator facilities) and threshold
- 3.New TSR required for any new auxiliary load delivery point, with the following conditions:
 - o If a request is deemed electrically equivalent, by the ITO and TO, to an existing primary delivery point, a System Impact Study and/or Facilities Study, may not be necessary
 - oCustomer must indicate whether new auxiliary load request is for a primary delivery point or for an alternate delivery point
 - oCustomer must also identify start-up loads if applicable

The following are evaluation criteria for customer to consider:

- A. Auxiliary load delivery points are defined based on transmission voltage levels that feed the generating station auxiliary loads.
- B. Multiple delivery points from same voltage level that are "electrical equivalent" may be considered a single delivery point
- C. Delivery point from tertiary winding of transmission level transformer may be considered a distinct delivery point
- D. No TSR needed for auxiliary load increases that are served off of the generator bus during normal running operation of the unit. Network Customer is responsible for updating the DNR levels and notifying the ITO if there is a reduction of network resource capability that falls below current DNR levels, as a result of an increase in auxiliary load served off the generator bus.
- E. Study thresholds would be the same as specified in Section 6.4 above for Network Loads (i.e. 5MW at 100kV and below; and 10MW at 100kV and above for existing delivery points).
- F. Use of alternate auxiliary load delivery point will be limited to switching the auxiliary load to the alternate delivery point as part of the n-1 analysis. TSR study will not include additional transmission contingencies. The alternative delivery points are not to be considered guaranteed (firm) delivery points.

In the event that any one or a combination of the three TSR required criteria's apply, only a single TSR on OASIS and Study is required per Generator. The highest projected load increase would be requested for the TSR on OASIS. However, in the TSR Study, all scenarios/combinations that meet one of the three criteria will be studied.