

PPL comments on the 21-May-13 TRANSAC Meeting Material presented at the meeting

1. Mrs. Bauer made a reference to a FERC Compliance Officer during her anti-trust reading. Would NWMT please have the NWMT FERC Compliance Officer attend the next TRANSAC meeting and have the officer tell us how we (TRANSAC stakeholders) can help that person assure NWMT complies with all FERC requirements for TRANSAC?
2. In the Uncertainty file [08-UncertaintyScenraiosNextSteps2012-2013.pptx](#).
  - a. NWMT appears to have mistakenly called the near-term SOGF studies that PPL and NWMT agreed to work on “High Wind Generation NOGF”.
    - i. A more fitting name might be “Near-term SOGF SB congestion studies”.
  - b. A “No Coal” study was mentioned to be done but does not mention how the current Path 8 2200 MW rating will be maintained without the ATR’s ability to trip 2200 MWs of coal generation with sub-second speed. Recall the ATR is the main reason for the 2,200 Path 8 rating.
  - c. Many high non-hydro/thermal generation scenarios appear to be of interest to NWMT, but NWMT fails to state how the existing generation will be dispatched. In other words, NWMT should strive in these scenarios (which favor new generation) to include preservation the scheduling rights (aka injection rights) of the existing Network Resource Interconnection Service. These rights need to be maintained to allow existing NRIS generation to schedule their output as they do today, regardless of the MW output of the new non-hydro/thermal generators.
3. On the 7-March-13 conference call, NWMT agreed to include NB on SOGF studies in the Economic Studies using bitter cold conditions (7-Mar-13 minutes “*NWE is therefore willing to conduct the northbound economic study*”). This Economic Study Request appears to have been dropped since Kim McClafferty knew nothing of it as she reported on her Economic Study Plan.
4. PPL repeats the request made at TRANSAC on 21-May-13 to have access to the data used to calculate the results presented in the spreadsheet titled “*06-Highest\_Priority\_System\_Problems\_052113\_transac.xlsx*”. This data should be sent to PPL as a PTI PSS/E Base Case for Year 0 Light Spring (such as 2014 LSP) and also should include the associated credible double Contingency Files in PTI PSS/E Contingency File Format. NWMT indicated they would “think about” sharing the actual case with interested TRANSAC stakeholders. Will the FERC compliance officer be involved in the internal NWMT discussions that decide whether or not to make available to the TRANSAC stakeholders the PTI PSS/E powerflow case?
5. There appear to be many new double line outages and bus outages that cause trouble for NWMT as described in “*06-Highest\_Priority\_System\_Problems\_052113\_transac.xlsx*”. It also appears the mitigation for these outages might raise the transmission rates of the on-system rate-payer. Could NWMT please explain the source of these problems including why and how NWMT applies their (apparently) new double line outage criteria? Also, how does NWMT assure that none of the many new problems NWMT has recently identified in the TRANSAC process are

the result of accommodating the 845 MW of new generation which has been added to-date on NWMT's system, with very little (if any) new transmission built?

