Proposed Areas of Concern for FERC Order 881

PP 4

To address these issues with respect to transmission service in the near term, we adopt, with certain modifications, the NOPR proposal’s definition of an ambient-adjusted rating (AAR) as a transmission line rating that: (1) applies to a time period of not greater than one hour; (2) reflects an up-to-date forecast of ambient air temperature across the time period to which the rating applies; (3) reflects the absence of solar heating during nighttime periods where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently; and (4) is calculated at least each hour, if not more frequently. Additionally, we adopt two requirements for greater use of AARs. First, we require that transmission providers— including RTOs/ISOs for transmission service at their seams—use AARs as the basis for evaluation of transmission service requests that will end within 10 days of the request. Second, we require that transmission providers—including RTOs/ISOs for transmission service at their seams—use AARs as the basis for their determination of the necessity of certain curtailment, interruption, or redispatch of transmission service anticipated to occur within those 10 days.

Questions to consider:

1. Does this paragraph mean that Transmission Service Providers must now have a 240-hour rolling window of AAR adjusted TTCs?

PP5

To address these issues with respect to transmission service in the longer term, we require that transmission providers use seasonal line ratings as the basis for evaluation of transmission service requests ending more than 10 days from the date of the request. We also require that transmission providers use seasonal line ratings as the basis for the determination of the necessity of curtailment, interruption, or redispatch of transmission service that is anticipated to occur more than 10 days in the future.

1. For requests that begin within ten days of the request and end more than 10 days from the request, do we evaluate using seasonal ratings, or evaluate the portion occurring within 10 days with AAR-adjusted TTCs and evaluate the portion occurring more than 10 days from the request with seasonal ratings?
	1. If we evaluate the TSR using just seasonal ratings, would we have to immediately re-assess using AAR-adjusted TTCs to determine the necessity of curtailment of the portion occurring within 10 days?
	2. If we evaluate the portion occurring within 10 days with AAR-adjusted TTCs and evaluate the portion occurring more than 10 days from the request with seasonal ratings, we would have to maintain both sets of ratings within the near term 10-day window?

PP11

Finally, we adopt four requirements to enhance transparency. First, we require public utility transmission owners to share transmission line ratings and methodologies with their transmission provider(s) and with market monitors in RTOs/ISOs. Second, we require transmission providers to share their transmission owners’ transmission line ratings and methodologies with any transmission provider(s) upon request. Third, we require transmission providers to maintain a database of their transmission owners’ transmission line ratings and methodologies on the transmission provider’s Open Access Same-Time Information System (OASIS) site or another password-protected website. Fourth, we require transmission providers to post on OASIS or another password-protected website any uses of exceptions or temporary alternate ratings. Availability of this additional information on transmission line ratings and their methodologies will facilitate more cost-effective decisions by transmission customers and more accurate transmission line ratings. We find that these transparency reforms will ensure that prices reflect the true cost of the wholesale service being provided and thereby are necessary to ensure just and reasonable wholesale rates.

1. As discussed in point 1, does the Transmission Service Provider need to create a new methodology document (say an AARID) or can the Transmission Service Provider include the methodology in the ATCID?
2. If we are posting the database of ratings and methodologies on OASIS as discussed in point 3, does this satisfy the Transmission Service Provider to Transmission Service Provider request as discussed in point 2? This is an important point since in bullet point 3 is a fluid changing table of 240 hours for each transmission line.
3. Does the posting of transmission line ratings include all transmission lines, or just the lines that are impactful to TTC (depending on methodology)?
4. In bullet point 4 it requires the posting of any uses of the exceptions or temporary alternate ratings. How often and how quickly must this be documented?

Following is a list of the FERC define terms in this Order. We will need to discuss these terms to see if any or all will be used in the OASIS standards.

1. Transmission Line Rating
	1. the maximum transfer capability of a transmission line, computed in accordance with a written Transmission Line Rating methodology and consistent with Good Utility Practice, considering the technical limitations on conductors and relevant transmission equipment (such as thermal flow limits), as well as technical limitations of the Transmission System (such as system voltage and stability limits). Relevant transmission equipment may include, but is not limited to, circuit breakers, line traps, and transformers.
2. Ambient-Adjusted Rating (AAR)
	1. a Transmission Line Rating that:
		1. (a) Applies to a time period of not greater than one hour.
		2. (b) Reflects an up-to-date forecast of ambient air temperature across the time period to which the rating applies.
		3. (c) Reflects the absence of solar heating during nighttime periods, where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently.
		4. (d) Is calculated at least each hour, if not more frequently.
3. Seasonal Line Rating
	1. a Transmission Line Rating that:
		1. (a) Applies to a specified season, where seasons are defined by the Transmission Provider to include not fewer than four seasons in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent.
		2. (b) Reflects an up-to-date forecast of ambient air temperature across the relevant season over which the rating applies.
		3. (c) Is calculated annually, if not more frequently, for each season in the future for which Transmission Service can be requested.
4. Near-Term Transmission Service
	1. Transmission Service which ends not more than 10 days after the Transmission Service request date. When the description of obligations below refers to either a request for information about the availability of potential Transmission Service (including, but not limited to, a request for ATC), or to the posting of ATC or other information related to potential service, the date that the information is requested or posted will serve as the Transmission Service request date. “Near-Term Transmission Service” includes any Point-To-Point Transmission Service, Network Resource designations, or secondary service where the start and end date of the designation or request is within the next 10 days.
5. Emergency Rating
	1. a Transmission Line Rating that reflects operation for a specified, finite period, rather than reflecting continuous operation. An Emergency Rating may assume an acceptable loss of equipment life or other physical or safety limitations for the equipment involved.