



# **Attachment 1**

# **California ISO Planning Standards**

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## I. Introduction

The California ISO (ISO) tariff provides for the establishment of planning guidelines and standards above those established by NERC and WECC to ensure the secure and reliable operation of the ISO controlled grid. The primary guiding principle of these Planning Standards is to develop consistent reliability standards for the ISO grid that will maintain or improve transmission system reliability to a level appropriate for the California system.

These ISO Planning Standards are not intended to duplicate the NERC and WECC reliability standards, but to complement them where it is in the best interests of the security and reliability of the ISO controlled grid. The ISO planning standards will be revised from time to time to ensure they are consistent with the current state of the electrical industry and in conformance with NERC Reliability Standards and WECC Regional Criteria. In particular, the ISO planning standards:

- Address specifics not covered in the NERC Reliability Standards and WECC Regional Criteria;
- Provide interpretations of the NERC Reliability Standards and WECC Regional Criteria specific to the ISO Grid;
- Identify whether specific criteria should be adopted that are more stringent than the NERC Reliability Standards and WECC Regional Criteria where it is in the best interest of ensuring the ISO controlled grid remains secure and reliable.

### **NERC Reliability Standards and WECC Regional Criteria:**

The following links provide the minimum standards that ISO needs to follow in its planning process unless NERC or WECC formally grants an exemption or deference to the ISO. They are the NERC Transmission Planning (TPL) standards, other applicable NERC standards (i.e., NUC-001 Nuclear Plant Interface Requirements (NPIRs) for Diablo Canyon Power Plant and San Onofre Nuclear Generating Station), and the WECC Regional Criteria:

<http://www.nerc.com/page.php?cid=2|20>

<http://www.wecc.biz/Standards/WECC%20Criteria/Forms/AllItems.aspx>

Section II of this document provides additional details about the ISO Planning Standards. Guidelines are provided in subsequent sections to address certain ISO planning standards, such as the use of new Special Protection Systems, which are not specifically addressed at the regional level of NERC and WECC. Where appropriate, background information behind the development of these standards and references (web links) to subjects associated with reliable transmission planning and operation are provided.

## II. ISO Planning Standards

The ISO Planning Standards are:

### 1. **Applicability of NERC Reliability Standards to Low Voltage Facilities under ISO Operational Control**

The ISO will apply NERC Transmission Planning (TPL) standards, the NUC-001 Nuclear Plant Interface Requirements (NPIRs) for Diablo Canyon Power Plant and San Onofre Nuclear Generating Station, and the approved WECC Regional Criteria to facilities with voltages levels less than 100 kV or otherwise not covered under the NERC Bulk Electric System definition that have been turned over to the ISO operational control.

### 2. **Combined Line and Generator Outage Standard**

A single transmission circuit outage with one generator already out of service and the system adjusted shall meet the performance requirements of the NERC TPL standards for single contingencies (TPL002). Supporting information is located within Section IV of this document.

### 3. **Voltage Standard**

Standardization of low and high voltage levels as well as voltage deviations across the TPL-001, TPL-002, and TPL-003 standards is required across all transmission elements in the ISO controlled grid. The low voltage and voltage deviation guideline applies only to load and generating buses within the ISO controlled grid (including generator auxiliary load) since they are impacted by the magnitude of low voltage and voltage deviations. The high voltage standard applies to all buses since unacceptable high voltages can damage station and transmission equipment. These voltage standards are shown in Table 1.

All buses within the ISO controlled grid that cannot meet the requirements specified in Table 1 will require further investigation. Exceptions to this voltage standard may be granted by the ISO based on documented evidence vetted through an open stakeholder process. The ISO will make public all exceptions through its website.

**Table 1**  
**(Voltages are relative to the nominal voltage of the system studied)**

Voltage level	Normal Conditions (TPL-001)		Contingency Conditions (TPL-002 & TPL-003)		Voltage Deviation	
	Vmin (pu)	Vmax (pu)	Vmin (pu)	Vmax (pu)	TPL-002	TPL-003
≤ 200 kV	0.95	1.05	0.90	1.1	≤5%	≤10%
≥ 200 kV	0.95	1.05	0.90	1.1	≤5%	≤10%
≥ 500 kV	1.0	1.05	0.90	1.1	≤5%	≤10%

#### **4. Specific Nuclear Unit Standards**

The criteria pertaining to the Diablo Canyon Power Plant (DCPP) and San Onofre Nuclear Generating Station (SONGS), as specified in the NUC-001 Nuclear Plant Interface Requirements (NPIRs) for DCPP and SONGS, and Appendix E of the Transmission Control Agreement located on the ISO web site at:

<http://www.caiso.com/docs/09003a6080/25/a3/09003a608025a3bd.pdf>

#### **5. Loss of Combined Cycle Power Plant Module as a Single Generator Outage Standard**

A single module of a combined cycle power plant is considered a single contingency (G-1) and shall meet the performance requirements of the NERC TPL standards for single contingencies (TPL002). Supporting information is located in Section V of this document. Furthermore a single transmission circuit outage with one combined cycle module already out of service and the system adjusted shall meet the performance requirements of the NERC TPL standards for single contingencies (TPL002) as established in item 1 above.

A re-categorization of any combined cycle facility that falls under this standard to a less stringent requirement is allowed if the operating performance of the combined cycle facility demonstrates a re-categorization is warranted. The ISO will assess re-categorization on a case by case based on the following:

- a) Due to high historical outage rates in the first few years of operation no exceptions will be given for the first two years of operation of a new combined cycle module.
- b) After two years, an exception can be given upon request if historical data proves that no outage of the combined cycle module was encountered since start-up.
- c) After three years, an exception can be given upon request if historical data proves that outage frequency is less than once in three years.

The ISO may withdraw the re-categorization if the operating performance of the combined cycle facility demonstrates that the combined cycle module exceeds a failure rate of once in three year. The ISO will make public all exceptions through its website.

#### **6. Planning for New Transmission versus Involuntary Load Interruption Standard**

This standard sets out when it is necessary to upgrade the transmission system from a radial to a looped configuration or to eliminate load dropping otherwise permitted by WECC and NERC planning standards through transmission

infrastructure improvements. It does not address all circumstances under which load dropping is permitted under NERC and WECC planning standards.

1. No single contingency (TPL002 and ISO standard [G-1] [L-1]) should result in loss of more than 250 MW of load. This includes consequential loss of load as well as load that may need to be dropped after the first contingency (during the system adjustment period) in order to position the electric system for reliable operation in anticipation of the next worst contingency.
2. All single substations of 100 MW or more should be served through a looped system with at least two transmission lines “closed in” during normal operation.
3. Existing radial loads with available back-tie(s) (drop and automatic or manual pick-up schemes) should have their back-up tie(s) sized at a minimum of 50% of the yearly peak load or to accommodate the load 80% of the hours in a year (based on actual load shape for the area), whichever is more constraining.
4. Upgrades to the system that are not required by the standards in 1, 2 and 3 above may be justified by eliminating or reducing load outage exposure, through a benefit to cost ratio (BCR) above 1.0 and/or where there are other extenuating circumstances.

To better understand the potential impact of the updated “planning for new transmission versus involuntary load interruption” standard, this standard will be considered a guideline for the first year that it is in effect in order to get an inventory of stations and transmission elements not in compliance and a cost impact of bringing them into compliance.

### **III. ISO Planning Guidelines**

The ISO Planning Guidelines include the following:

#### **1. New Special Protection Systems**

As stated in the NERC glossary, a Special Protection System (SPS) is “an automatic protection system designed to detect abnormal or predetermined system conditions, and take corrective actions other than and/or in addition of faulted components to maintain system reliability.” In the context of new projects, the possible action of an SPS would be to detect a transmission outage (either a single contingency or credible multiple contingencies) or an overloaded transmission facility and then curtail generation output and/or load in order to avoid potentially overloading facilities or prevent the situation of not meeting other system performance criteria. A SPS can also have different functions such as executing plant generation reduction requested by other SPS; detecting unit outages and transmitting commands to other locations for specific action to be taken; forced excitation pulsing; capacitor and reactor switching; out-of-step tripping; and load dropping among other things.

The primary reasons why SPS might be selected over building new transmission facilities are that SPS can normally be implemented much more quickly and at a much lower cost than constructing new infrastructure. In addition, SPS can increase the utilization of the existing transmission facilities, make better use of scarce transmission resources and maintain system reliability. Due to these advantages, SPS is a commonly considered alternative to building new infrastructure in an effort to keep costs down when integrating new generation into the grid and/or addressing reliability concerns under multiple contingency conditions. While SPSs have substantial advantages, they have disadvantages as well. With the increased transmission system utilization that comes with application of SPS, there can be increased exposure to not meeting system performance criteria if the SPS fails or inadvertently operates. Transmission outages can become more difficult to schedule due to increased flows across a larger portion of the year; and/or the system can become more difficult to operate because of the independent nature of the SPS. If there are a large number of SPSs, it may become difficult to assess the interdependency of these various schemes on system reliability. These reliability concerns necessarily dictate that guidelines be established to ensure that performance of all SPSs are consistent across the ISO controlled grid. It is the intent of these guidelines to allow the use of SPSs to maximize the capability of existing transmission facilities while maintaining system reliability and optimizing operability of the ISO controlled grid. Needless to say, with the large number of generator interconnections that are occurring on the ISO controlled grid, the need for these guidelines has become more critical.

It needs to be emphasized that these are guidelines rather than standards. In general, these guidelines are intended to be applied with more flexibility for low exposure outages (e.g., double line outages, bus outages, etc.) than for high exposure outages (e.g., single contingencies). This is to emphasize that best engineering practice and judgement will need to be exercised by system planners and operators in determining when the application of SPS will be acceptable. It is recognized that it is not possible or desirable to have strict standards for the acceptability of the use of SPS in all potential applications.

### **ISO SPS1**

The overall reliability of the system should not be degraded after the combined addition of the SPS.

### **ISO SPS2**

The SPS needs to be highly reliable. Normally, SPS failure will need to be determined to be non-credible. In situations where the design of the SPS requires WECC approval, the WECC Remedial Action Scheme Design Guide will be followed.

### **ISO SPS3**

The total net amount of generation tripped by a SPS for a single contingency cannot exceed the ISO's largest single generation contingency (currently one Diablo Canyon unit at 1150 MW). The total net amount of generation tripped by a SPS for a double contingency cannot exceed 1400 MW. This amount is related to the minimum amount of

spinning reserves that the ISO has historically been required to carry. The quantities of generation specified in this standard represent the current upper limits for generation tripping. These quantities will be reviewed periodically and revised as needed. In addition, the actual amount of generation that can be tripped is project specific and may depend on specific system performance issues to be addressed. Therefore, the amount of generation that can be tripped for a specific project may be lower than the amounts provided in this guide. The net amount of generation is the gross plant output less the plant's and other auxiliary load tripped by the same SPS.

#### **ISO SPS4**

For SPSs, the following consequences are unacceptable should the SPS fail to operate correctly:

- A) Cascading outages beyond the outage of the facility that the SPS is intended to protect: For example, if a SPS were to fail to operate as designed for a single contingency and the transmission line that the SPS was intended to protect were to trip on overload protection, then the subsequent loss of additional facilities due to overloads or system stability would not be an acceptable consequence.
- B) Voltage instability, transient instability, or small signal instability: While these are rare concerns associated with the addition of new generation, the consequences can be so severe that they are deemed to be unacceptable results following SPS failure.

#### **ISO SPS5**

Close coordination of SPS is required to eliminate cascading events. All SPS in a local area (such as SDG&E, Fresno, etc.) and grid-wide need to be evaluated as a whole and studied as such.

#### **ISO SPS6**

The SPS must be simple and manageable. As a general guideline:

- A) There should be no more than 6 local contingencies (single or credible double contingencies) that would trigger the operation of a SPS.
- B) The SPS should not be monitoring more than 4 system elements or variables. A variable can be a combination of related elements, such as a path flow, if it is used as a single variable in the logic equation. Exceptions include:
  - i. The number of elements or variables being monitored may be increased if it results in the elimination of unnecessary actions, for example: generation tripping, line sectionalizing or load shedding.
  - ii. If the new SPS is part of an existing SPS that is triggered by more than 4 local contingencies or that monitors more than 4 system elements or variables, then the new generation cannot materially increase the complexity of the existing SPS scheme. However, additions to an existing SPS using a modular design should be considered as preferable to the



addition of a new SPS that deals with the same contingencies covered by an existing SPS.

- C) Generally, the SPS should only monitor facilities that are connected to the plant or to the first point of interconnection with the grid. Monitoring remote facilities may add substantial complexity to system operation and should be avoided.
- D) An SPS should not require real-time operator actions to arm or disarm the SPS or change its set points.

### **ISO SPS7**

If the SPS is designed for new generation interconnection, the SPS may not include the involuntary interruption of load. Voluntary interruption of load paid for by the generator is acceptable. The exception is that the new generator can be added to an existing SPS that includes involuntary load tripping. However, the amount of involuntary load tripped by the combined SPS may not be increased as a result of the addition of the generator.

### **ISO SPS8**

Action of the SPS shall limit the post-disturbance loadings and voltages on the system to be within all applicable ratings and shall ultimately bring the system to within the long-term (4 hour or longer) emergency ratings of the transmission equipment. For example, the operation of SPS may result in a transmission line initially being loaded at its one-hour rating. The SPS could then automatically trip or run-back additional generation (or trip load if not already addressed under ISO SPS7 above) to bring the line loading within the line's four-hour or longer rating. This is intended to minimize real-time operator intervention.

### **ISO SPS9**

The SPS needs to be agreed upon by the ISO and may need to be approved by the WECC Remedial Action Scheme Reliability Task Force.

### **ISO SPS10**

The ISO, in coordination with affected parties, may relax SPS requirements as a temporary "bridge" to system reinforcements. Normally this "bridging" period would be limited to the time it takes to implement a specified alternative solution. An example of a relaxation of SPS requirement would be to allow 8 initiating events rather than limiting the SPS to 6 initiating events until the identified system reinforcements are placed into service.

### **ISO SPS11**

The ISO will consider the expected frequency of operation in its review of SPS proposals.

### **ISO SPS12**

The actual performance of existing and new SPS schemes will be documented by the transmission owners and periodically reviewed by the ISO and other interested parties so that poorly performing schemes may be identified and revised.

### **ISO SPS13**

All SPS schemes will be documented by the owner of the transmission system where the SPS exists. The generation owner, the transmission owner, and the ISO shall retain copies of this documentation.

### **ISO SPS14**

To ensure that the ISO's transmission planning process consistently reflects the utilization of SPS in its annual plan, the ISO will maintain documentation of all SPS utilized to meet its reliability obligations under the NERC reliability standards, WECC regional criteria, and ISO planning standards.

### **ISO SPS15**

The transmission owner in whose territory the SPS is installed will, in coordination with affected parties, be responsible for designing, installing, testing, documenting, and maintaining the SPS.

**ISO SPS16** Generally, the SPS should trip load and/or resources that have the highest effectiveness factors to the constraints that need mitigation such that the magnitude of load and/or resources to be tripped is minimized. As a matter of principle, voluntary load tripping and other pre-determined mitigations should be implemented before involuntary load tripping is utilized.

### **ISO SPS17**

Telemetry from the SPS (e.g., SPS status, overload status, etc.) to both the Transmission Owner and the ISO is required unless otherwise deemed unnecessary by the ISO. Specific telemetry requirements will be determined by the Transmission Owner and the ISO on a project specific basis.

## **IV. Combined Line and Generator Unit Outage Standards Supporting Information**

**Combined Line and Generator Outage Standard** - A single transmission circuit outage with one generator already out of service and the system adjusted shall meet the performance requirements of the NERC TPL standards for single contingencies (TPL002).

The ISO Planning Standards require that system performance for an over-lapping outage of a generator unit (G-1) and transmission line (L-1) must meet the same system performance level defined for the NERC standard TPL-002. The ISO recognizes that this planning standard is more stringent than allowed by NERC, but it is considered appropriate for assessing the reliability of the ISO's controlled grid as it remains consistent with the standard utilized by the PTOs prior to creation of the ISO.

## V. Loss of Combined Cycle Power Plant Module as a Single Generator Outage Standard Supporting Information

### Loss of Combined Cycle Power Plant Module as a Single Generator Outage

**Standard** - A single module of a combined cycle power plant is considered a single (G-1) contingency and shall meet the performance requirements of the NERC TPL standards for single contingencies (TPL002).

The purpose of this standard is to require that an outage of any turbine element of a combustion turbine be considered as a single outage of the entire plant and therefore must meet the same performance level as the NERC TPL standard TPL-002.

The ISO has determined that, a combined cycle module should be treated as a single contingency. In making this determination, the ISO reviewed the actual operating experience to date with similar (but not identical) combined cycle units currently in operation in California. The ISO's determination is based in large part on the performance history of new combined cycle units and experience to date with these units. The number of combined cycle facility forced outages that have taken place does not support a double contingency categorization for combined cycle module units in general. It should be noted that all of the combined cycle units that are online today are treated as single contingencies.

Immediately after the first few combined cycle modules became operational, the ISO undertook a review of their performance. In defining the appropriate categorization for combined cycle modules, the ISO reviewed the forced outage history for the following three combined cycle facilities in California: Los Medanos Energy Center (Los Medanos), Delta Energy Center (Delta), and Sutter Energy Center (Sutter)<sup>1</sup>. Los Medanos and Sutter have been in service since the summer of 2001, Delta has only been operational since early summer 2002.

Table 2 below sets forth the facility forced outages for each of these facilities after they went into operation (i.e. forced outages<sup>2</sup> that resulted in an output of zero MWs.) The table demonstrates that facility forced outages have significantly exceeded once every 3 to 30 years. Moreover, the ISO considers that the level of facility forced outages is significantly above the once every 3 to 30 years even accounting for the fact that new combined cycle facilities tend to be less reliable during start-up periods and during the initial weeks of operation. For example, four of the forced outages that caused all the

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<sup>1</sup> Los Medanos and Sutter have two combustion turbines (CT's) and one steam turbine (ST) each in a 2x1 configuration. Delta has three combustion turbines (CT's) and one steam turbine (ST) in a 3x1 configuration. All three are owned by the Calpine Corporation.

<sup>2</sup> Only forced outages due to failure at the power plant itself are reported, forced outages due to failure on the transmission system/switchyard are excluded. The fact that a facility experienced a forced outage on a particular day is public information. In fact, information on unavailable generating units has been posted daily on the ISO website since January 1, 2001. However, the ISO treats information regarding the cause of an outage as confidential information.

three units at Los Medanos to go off-line took place more than nine months after the facility went into operation.

Facility	Date	# units lost
Sutter <sup>3</sup>	08/17/01	No visibility
Sutter	10/08/01	1 CT
Sutter	12/29/01	All 3
Sutter	04/15/02	1 CT + ST
Sutter	05/28/02	1 CT
Sutter	09/06/02	All 3
Los Medanos <sup>4</sup>	10/04/01	All 3
Los Medanos	06/05/02	All 3
Los Medanos	06/17/02	All 3
Los Medanos	06/23/02	1CT+ST
Los Medanos	07/19/02	All 3
Los Medanos	07/23/02	1CT+ST
Los Medanos	09/12/02	All 3
Delta <sup>5</sup>	06/23/02	All 4
Delta	06/29/02	2 CT's + ST
Delta	08/07/02	2 CT's + ST

*Table 2: Forced outages that have resulted in 0 MW output from Sutter, Los Medanos and Delta after they became operational*

The ISO realizes that this data is very limited. Nevertheless, the data adequately justifies the current classification of each module of these three power plants as a single contingency.

## **VI. Background behind Planning for New Transmission versus Involuntary Load Interruption Standard**

For practical and economic reasons, all electric transmission systems are planned to allow for some involuntary loss of firm load under certain contingency conditions. For some systems, such a loss of load may require several contingencies to occur while for other systems, loss of load may occur in the event of a specific single contingency. Historically, a wide variation among the PTOs has existed predominantly due to slightly differing planning and design philosophies. This standard is intended to provide a consistent framework upon which involuntary load interruption decisions can be made by the ISO when planning infrastructure needs for the ISO controlled grid.

<sup>3</sup> Data for Sutter is recorded from 07/03/01 to 08/10/02

<sup>4</sup> Data for Los Medanos is recorded from 08/23/01 to 08/10/02

<sup>5</sup> Data for Delta is recorded from 06/17/02 to 08/10/02

The overarching requirement is that implementation of these standards should not result in lower levels of reliability to end-use customers than existed prior to restructuring. As such, the following is required:

1. No single contingency (TPL002 and ISO standard [G-1] [L-1]) may result in loss of more than 250 MW of load. This includes consequential loss of load as well as load that may need to be dropped after the first contingency (during the system adjustment period) in order to protect for the next worst single contingency.

This standard is intended to coordinate ISO planning standards with the WECC requirement that all transmission outages with at least 300 MW or more be directly reported to WECC. It is the ISO's intent that no single contingency (TPL002 and ISO standard [G-1] [L-1]) should trigger loss of 300 MW or more of load. The 250 MW level is chosen in order to allow for differences between the load forecast and actual real time load that can be higher in some instances than the forecast and to also allow time for transmission projects to become operational since some require 5-6 years of planning and permitting with inherent delays. It is also ISO's intent to put a cap on the footnote to the NERC TPL-002 that may allow radial and/or non-consequential loss of load for single contingencies.

2. All single substations of 100 MW or more should be served through a looped system with at least two transmission lines "closed in" during normal operation.

This standard is intended to bring consistency between the PTOs' substation designs. It is not the ISO's intention to disallow substations with load below 100 MW from having looped connections; however it is ISO's intention that all substations with peak load above 100 MW must be connected through a looped configuration to the grid.

3. Existing radial loads with available back-tie(s) (drop and automatic or manual pick-up schemes) should have their back-up tie(s) sized at a minimum of 50% of the yearly peak load or to accommodate the load 80% of the hours in a year (based on actual load shape for the area), whichever is more stringent.

This standard is intended to insure that the system is maintained at the level that existed prior to restructuring. It is obvious that as load grows, existing back-ties for radial loads (or remaining feed after a single contingency for looped substations) may not be able to pick up the entire load; therefore the reliability to customers connected to this system may deteriorate over time. It is the ISO's intention to establish a minimum level of back-up tie capability that needs to be maintained.

4. Upgrades to the system that are not required by the standards in 1, 2 and 3 above may be justified by eliminating or reducing load outage exposure through a benefit to cost ratio (BCR) above 1.0 and/or where there are other extenuating circumstances.

It is ISO's intention to allow the build-up of transmission projects that are proven to have a positive benefit to ratepayers by reducing load drop exposure.

**Information Required for BCR calculation:** For each of the outages that required involuntary interruption of load, the following should be estimated:

- The maximum amount of load that would need to be interrupted.
- The duration of the interruption.
- The annual energy that would not be served or delivered.
- The number of interruptions per year.
- The time of occurrence of the interruption (e.g., week day summer afternoon).
- The number of customers that would be interrupted.
- The composition of the load (i.e., the percent residential, commercial, industrial, and agricultural).
- Value of service or performance-based ratemaking assumptions concerning the dollar impact of a load interruption.

The above information will be documented in the ISO Transmission Plan for areas where additional transmission reinforcement is needed or justified through benefit to cost ratio determination.

## **VII. Interpretations of terms from NERC Reliability Standard and WECC Regional Criteria**

Listed below are several ISO interpretations of the terms that are used in the NERC standards that are not already addressed by NERC.

**Combined Cycle Power Plant Module:** A **combined cycle** is an assembly of heat engines that work in tandem off the same source of heat, converting it into mechanical energy, which in turn usually drives electrical generators. In a combined cycle power plant (CCPP), or combined cycle gas turbine (CCGT) plant, one or more gas turbine generator(s) generates electricity and heat in the exhaust is used to make steam, which in turn drives a steam turbine to generate additional electricity.

### **Entity Responsible for the Reliability of the Interconnected System Performance:**

In the operation of the grid, the ISO has primary responsibility for reliability. In the planning of the grid, reliability is a joint responsibility between the PTO and the ISO subject to appropriate coordination and review with the relevant local, state, regional and federal regulatory authorities.

**Entity Required to Develop Load Models:** The PTOs, in coordination with the utility distribution companies (UDCs) and others, develop load models.

**Entity Required to Develop Load Forecast:** The California Energy Commission (CEC) has the main responsibility for providing load forecast. If load forecast is not

provided by the CEC or is not detailed and/or specific enough for a certain study then the ISO, at its sole discretion, may use load forecasts developed by the PTOs in coordination with the UDCs and others.

**Projected Customer Demands:** The load level modeled in the studies can significantly impact the facility additions that the studies identify as necessary. For studies that address regional transmission facilities such as the design of major interties, a 1 in 5-year extreme weather load level should be assumed. For studies that are addressing local load serving concerns, the studies should assume a 1 in 10-year extreme weather load level. The more stringent requirement for local areas is necessary because fewer options exist during actual operation to mitigate performance concerns. In addition, due to diversity in load, there is more certainty in a regional load forecast than in the local area load forecast. Having a more stringent standard for local areas will help minimize the potential for interruption of end-use customers.

**Planned or Controlled Interruption:** Load interruptions can be either automatic or through operator action as long as the specific actions that need to be taken, including the magnitude of load interrupted, are identified and corresponding operating procedures are in place when required.

**Time Allowed for Manual Readjustment:** This is the amount of time required for the operator to take all actions necessary to prepare the system for the next contingency. This time should be less than 30 minutes.