NORTH AMERICAN ENERGY STANDARDS BOARD
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March 26, 2010
Filed Electronically

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20585

RE: Transmission Loading Relief Reliability Standard and Curtailment Priorities (Docket No. RM10-9-000)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") herewith submits these comments in response to the Federal Energy Regulatory Commission Notice of Inquiry. The comments describe NAESB standards development underway for parallel flow visualization, related to the transmission loading relief reliability standard and curtailment priorities.

The report is being filed electronically in Microsoft® Word® 2003 and in Adobe Acrobat® Portable Document Format (.pdf). The report is also available on the NAESB web site (www.naesb.org). Please feel free to call me at (713) 356-0060 or refer to the NAESB website (www.naesb.org) should you have any questions or need additional information regarding NAESB work products.

Respectfully submitted,
Rae McQuade

Ms. Rae McQuade
President & COO, North American Energy Standards Board

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cc: Chairman Jon Wellinghoff, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner John R. Norris, Federal Energy Regulatory Commission
Commissioner Marc Spitzer, Federal Energy Regulatory Commission

Mr. Thomas R. Sheets, General Counsel of the Commission, Federal Energy Regulatory Commission
Mr. Joseph McClelland, Director, Office of Electric Reliability, Federal Energy Regulatory Commission
Ms. Jamie L. Simler, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission
Mr. Mason Emnett, Senior Legal Advisor, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Ralph Cleveland, Chairman and CEO, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. David Cook, General Counsel, North American Electric Reliability Corporation
Mr. Andrew Rodriquez, North American Electric Reliability Corporation

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Transmission Loading Relief	**)**	**Docket No. RM 10-9-000**
Reliability Standard and	**)**	
Curtailment Priorities	**)**	

COMMENTS OF THE NORTH AMERICAN ENERGY STANDARDS BOARD IN RESPONSE TO THE NOTICE OF INQUIRY

The North American Energy Standards Board ("NAESB") is pleased to provide these comments in response to the Federal Energy Regulatory Commission's ("FERC" or the "Commission") Notice of Inquiry regarding the Transmission Loading Relief ("TLR") Reliability Standard and Curtailment Priorities.

NAESB and the North American Electric Reliability Corporation ("NERC") have a long-standing and successful joint development process, which has been used for many standards that have a reliability component and a complementary market or business practices component. Standards to support transmission loading relief have been the subject of such joint development.

In our current development efforts, NAESB and NERC are jointly working to enhance parallel flow visualization. The parallel flow visualization transmission loading relief (PFV – TLR) project addresses three issues: (1) the use of static data in Native and Network Load calculation, (2) Reliability Coordinators in Eastern Interconnection lack visualization as to the source and magnitude of parallel flows when they experience congestion, and (3) priorities of generation to load impacts during firm curtailment.

It is expected that the NAESB business practices standards developed from the PFV-TLR project will support a more accurate and efficient means of curtailing electricity using parallel flow visualization to identify how much and what services should be curtailed. In today's environment for the Eastern Interconnection, the IDC (Interchange Distribution Calculator) uses

static data that may not provide as accurate a picture of the electricity flows depending on how much the data has changed since it was processed in the calculator. The data, resident in System Data Exchange (SDX) files, may be refreshed as often as every 20 minutes, or where it is not expected that the data will change, as infrequently as once a day.

This project is a collaboration of NERC and NAESB activities, including:

- NERC – developing modifications to the IDC, including the upload of data on a more frequent basis, targeting every 15 minutes, and
- NAESB – developing standards to support curtailment activities in the event of system congestion based on (1) classification of generator usage, (2) allocation rules for curtailing, and (3) the identification of firm and non-firm service.

In the NERC response to the Notice of Inquiry, they indicate that the parallel operations test of the Parallel Flow Visualization Project is to begin in November 2010. In order for the parallel operation test to provide meaningful results the following activities need to occur (1) NAESB identification of the generation-to-load flows priorities to be collected for the IDC, (2) NAESB working with NERC to have the IDC ready to accommodate the increased frequency of data collection and additional granularity of the data in the appropriate priorities – firm or non-firm service. The NERC parallel operations test is expected to last for 12-18 months. During that time, any fine tuning of the IDC and priority assignments by both NERC and NAESB resulting from the tests. It is planned that the IDC testing should begin in November 2010, and it is expected that NAESB will provide to NERC the suggested changes to the IDC in sufficient time to permit the testing to begin in the fourth quarter.

We appreciate the opportunity to provide these comments and support the ongoing work between NERC and NAESB to develop TLR standards and enhance the IDC.

Respectfully submitted,

Rae McQuade

Rae McQuade
President, North American Energy Standard Board