



October 17, 2003

Mr. Guy V. Zito
Manager, Planning
Northeast Power Coordination Council
1515 Broadway
New York, NY 10036-8901

Dear Mr. Zito

Subject: **Comments to the Posted Draft for Review of the NPCC Document A2 – “*Basic Criteria for Design and Operations of Interconnected Power Systems*”**

The Independent Electricity Market Operator (IMO) offers the following comments to the currently posted draft of the NPCC Document A2 – “*Basic Criteria for Design and Operations of Interconnected Power Systems.*”

Section 2.1: Design Criteria - Last Paragraph

The IMO again strongly urges that the A-02 criteria document clearly articulates and focuses on ensuring the document contains **only** criterion binding each Area to designing and operating practices that **will NOT adversely impact its neighbors.** (i.e. the bulk power system) without being prescriptive on the HOW is it is achieved.

The IMO therefore urges that the last line in section 2.1 par. 3 "*An SPS should not be installed as a substitute for good system design or operating practices of the **bulk power system***" be deleted in its entirety. It is prescriptive in its approach of **how** the A-2 objective as stated in section 1 is to be achieved. Moreover the IMO is unable to support approval of document A2 with the line included.

Additionally, it is IMO's opinion that the revised wording of this paragraph, with the use of such terms as "infrequent" "temporary and "unusual", ambiguous. The criterion for SPS use needs to be specific and measurable.

Section 2.3, par. 2

"For reliability purposes, Areas shall share and coordinate forecast system information and real time information to enable and enhance the analysis and modeling of the interconnected bulk power system by security application software on energy management systems."

It is the IMO's opinion the following phrase "**on energy management systems**" in the paragraph to be prescriptive and far to restrictive. The IMO recommends deleting the phase in its entirety and stop the sentence after "**.....application software**".

Section 5.1 clarification of the phrase "when either of the two independent protection groups."

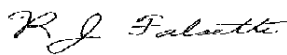
The IMO supports the TFSP position that both protection groups must be designed in such a manner as to ensure the system remains stable if cleared by the slowest of the two protection groups. It is unacceptable if the system were stable if cleared by the faster group, but unstable if cleared by the slower group. This is of particular importance if the faster of the 2 protection groups is removed from service for maintenance or fails to operate.

The IMO request that the above phase be clarified to ensure there is no misunderstanding.

In parallel with this transmittal, these comments will also have been posted on the NPCC Open Process Form at <http://www.npcc.org/>.

Thank you for your attention to these concerns.

Respectfully yours



Ronald J. Falsetti
Independent Electricity Market Operator (IMO)