



February 5, 2009

To: NPCC Reliability Coordinating Committee
and
NPCC U.S. Registered Transmission Owners (TO) and Transmission Operators (TOP)

Re: February 3, 2009 Board Direction Regarding NPCC Response to
December 18th, 2008 FERC Order (Docket No. RC09-3-000)

Ladies and Gentlemen:

The NPCC Board of Directors, at its February 3rd, 2009 meeting, discussed the NPCC response to the December 18th, 2008 FERC Order, (Docket No. RC09-3-000), which directed NERC and NPCC to submit a comprehensive list of bulk electric system facilities within the U.S. portion of the NPCC region. After thorough consideration, the Board agreed that the NPCC response to the Order should contain the information specifically requested in the Order. That information, for U.S. entities only, includes: the existing NPCC approved list of bulk power system facilities (the “Informational List” of July 2007), which is currently being used for application of NERC Reliability Standards; the December, 2007 NPCC Bulk Power List (the “NPCC BPS List” based on application of A-10 Criteria) as well as excerpts from the Task Force on System Studies meeting minutes related to the development of the NPCC BPS List, redacted to exclude any NPCC Canada information; a list of all New York and New England transmission facilities (lines and transformers) greater than 100kV; a comparison between the list of all transmission facilities greater than 100kV and both the Informational List and the NPCC BPS List; a list of generation (greater than 20 MVA) directly connected to a bus that is greater than 100kV; a summary listing of under frequency load shedding in NPCC (U.S.); and, a summary listing of Special Protection Systems in NPCC (U.S.).

The Board also directed NPCC staff to submit a companion letter to FERC Staff, explaining the reliability merits of the current NPCC impact based Bulk Power System definition, and committing to:

- (1) Identifying and evaluating the issues associated with utilizing, for applicability of NERC Reliability Standards within the United States portion of NPCC, the NERC definition of “bulk electric system” which includes facilities generally operated at voltages of 100 kV or higher and excludes radial transmission facilities
- (2) Assessing the impacts related to the adoption of such a bright line definition within NPCC (U.S.), including the international impact of having different definitions across the U.S. and Canadian portions of the NPCC Region
- (3) Filing the results of that assessment with FERC on September 20, 2009

Lastly, the Board directed that the NPCC Reliability Coordinating Committee coordinate through the NPCC Task Force structure the assessment of the utilization, in the U.S., of a 100kV “bright line” definition for the NPCC bulk electric system for application of NERC Reliability Standards. The Board envisions that this assessment will require each NPCC U.S. transmission owner and transmission operator to identify the implications of adopting the bright line definition, including, but not limited to, the impact on system reliability, necessary resources, investment requirements and costs to consumers. The Board directed that these assessments be completed in time to allow for an NPCC filing with FERC by September 20, 2009.

Please do not hesitate to contact Mr. Trey Kirkpatrick at tkirkpatrick@npcc.org or me at skopman@npcc.org if you wish to discuss this matter further.

Sincerely,

Stanley E. Kopman

Stanley E. Kopman
Assistant Vice President - Compliance

SEK:jm

cc: NPCC Board of Directors
NPCC Canada Registered Transmission Owners (TO) and Transmission Operators (TOP)