

Outcomes and Options
Bulk Electric System Definition
100kV Bright Line

Draft #1
3/10/09

1. FERC orders NPCC to comply with the 100kV bright line.

a) NPCC and NYSRC comply.

b) NPCC and/or NYSRC petition FERC for a re-hearing, and argue that the performance-based approach is superior and assures a more reliable system than the bright line.

c) NYSRC accepts; but, either on its own or in cooperation with NPCC, seeks “grandfathered” status for existing lower voltage facilities not considered part of the NPCC Bulk Power System (BPS).

d) NYSRC indicates compliance, begins work of documenting all BES facilities which do not have a significant adverse impact outside the local area. These will constitute a list of facilities for which compliance with the NERC Standards is not necessary because they do not affect systems in other areas. NYSRC will present this list to NPCC and FERC.

e) NPCC requests an informal discussion with FERC Staff to discuss.

f) NPCC requests formal hearings.

2. NPCC voluntarily agrees to comply with the 100kV bright line.

a) NYSRC complies.

b) NYSRC petitions FERC for a re-hearing, and argues that the performance-based approach is superior and assures a more reliable system than the bright line.

c) NYSRC submits a list of facilities above 100kV which will comply with the Bulk Electric System (BES) definition, and another list of facilities above 100kV which will not. NYSRC demonstrates why a performance standard results in a higher level of reliability.

d) NYSRC accepts; but seeks “grandfathered” status for existing lower voltage facilities not considered part of the NPCC BPS.

e) NYSRC indicates compliance, begins work of documenting all BES which do not have a significant adverse impact outside the local area. These will constitute a list of facilities for which compliance with the NERC Standards is not necessary because they do not affect systems in other areas. NYSRC will present this list to NPCC and FERC.

f) NYSRC requests an informal discussion with FERC Staff to discuss.

g) NYSRC requests formal hearings.

3. FERC agrees with NPCC's position.

a) NPCC and NYSRC declare victory and go home.