TRANS-TSO Standard Programs and Processes	**Transmission Reliability Order of Curtailment**	**TRANS-TSO-SPP-30.205 Rev. 0001**
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Revision Log

Revision or Change Number	Effective Date	Affected Page Numbers	Description of Revision/Change
0000	04/01/2019	All	Cadence Review
		All	TOPS-RC-SPP-30.205 has been superseded by TRANS-TSO-SPP-30.205
		4	Revised 3.1.1 to Vice President, Transmission Operations & Power Supply
		5	Revised language in 3.2.1, H.
		6	Revised table in 3.2.2
		7	Changed normal to nominal and added 230
		8	Revised language in 3.2.4
		8	Revised language in 3.2.5, A.
		8	Revised and consolidated language in 3.2.5, B.
		9	Revised language in 3.2.5
		10	Revised language in 3.2.5, D., E., F
0001	04-01-2021	All	Cadence Review Minor grammatical revisions for clarity
		4	Section 2.0, Added language
		5	Section 3.1.5 Added
		12	Section 5.0, Added Generator-to Load Distribution Factor definition and revised Generation Shift Factor
		14	Section 6.0, Revised references to reflect new titles
		15	Source Notes revised

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1.0 PURPOSE

This document establishes a process regarding actions to be taken to manage Interconnection Reliability Operating Limit (IROL) and System Operating Limit (SOL) exceedances, in real-time, on the Bulk Electric System (BES) by the Reliability Coordinator (RC), Balancing Authority (BA) and/or Transmission Operator (TOp) entities within the Tennessee Valley Authority (TVA) RC Area.

2.0 SCOPE

This procedure applies to all system operators within the TVA RC Area. It provides plans for all operating entities within the TVA RC Area to manage congestion and mitigate constraints within their respective BES service areas.

Review Cadence: This procedure will be reviewed every two years with the review documented in the Revision Log.

3.0 PROCESS

3.1 Roles and Responsibilities

3.1.1 Vice President, Transmission Operations and Power Supply

A. Responsible for the governance of Transmission Reliability Order of Curtailment.

B. The TOPS Vice President has overall responsibility for all aspects of implementation of this procedure as well as executive approval of this SPP.

3.1.2 Manager, Reliability Operations

A. Responsible for the oversight and support of Transmission Reliability Order of Curtailment.

B. Responsible for the review and technical information contained in this procedure.

3.1.3 TVA Reliability Coordinator

A. Responsible for the execution of Transmission Reliability Order of Curtailment.

B. The TVA Reliability Coordinator function is responsible for maintaining the Real-time operating reliability of the TVA RC Area and the wide-area view in coordination with its neighboring RC's. TVA RC has clear decision-making authority to act and to instruct actions to be taken by System Operators within its RC area to preserve the integrity and reliability of the BES. The RC will act in the interest of reliability for the overall RC area and the Interconnection before the interest of any other entity.

3.1.4 TVA RC Member Companies

A. Member company TOps and BAs are responsible for execution of the Transmission Reliability Order of Curtailment.

B. Each Member in the TVA RC Area shall comply with the TVA Reliability Coordinator's Operating Instructions, including Emergency Operating Instructions, unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. [IRO-001-4 R2]

3.1.5 Real Time Assessment

The TVA RC and member companies TOps will complete a Real-Time assessment at least once every 30 Minutes. The assessments will include an evaluation of system conditions using Real-time data to assess existing (pre-Contingency) and potential (post-Contingency) operating conditions. The assessment shall reflect applicable inputs including, but not limited to: load, generation output levels, known Protection System and Remedial Action Scheme status or degradation, Transmission outages, generator outages, Interchange, Facility Ratings, and identified phase angle and equipment limitations. [IRO-008-2 R4, TOP-001-5 R13]

3.2 Instructions

3.2.1 Operating Within Limits

The BES is continuously positioned to withstand the loss of any single element (contingency), within or outside of the TVA RC Area, without subjecting remaining facilities to exceed established System Operating Limits including thermal or stability limits.

A. Action will be taken to operate Real-time flows within normal continuous limits and first contingency flows within emergency limits. These actions may include congestion management through transmission reconfiguration, generation re-dispatch, Transmission Loading Relief (TLR) process, and load shed if required.

B. Real-time flows are monitored and alarmed based on normal ratings.

C. First contingency flows are monitored and alarmed based on emergency ratings.

D. Normal and first contingency monitoring and alarm ratings are provided by the TOp. If the TOp has not provided emergency ratings, then the first contingency alarm will be based on normal ratings.

E. Emergency ratings without a stated time duration are assumed to have a duration of 4 hours. LG&E/KU's emergency ratings are continuous ratings. Emergency ratings that have a shorter duration (short-term rating) must include the associated time duration.

F. When a facility experiences flow between normal and emergency ratings for a time duration up to 4 hours, the operator must return the facility to the normal rating or below for at least an 8 hour period. See reference [A]. This statement does not apply to LGE-KU since their emergency ratings are continuous ratings.

3.1.4 TVA RC Member Companies (continued)

G. When a facility experiences flow between the emergency and short term ratings, the operator must return the facility to the emergency rating or less for the amount of time of the event. For example, when a 1 hour short term rating is utilized for 1 hour, then the facility must not exceed the emergency rating for the next 3 hours. In other words, only one short term rating is to be used in any 4 hour period. See reference [A]. This statement does not apply to LGE-KU since their emergency ratings are continuous ratings.

H. For specific conditions ,Operating Guides can be provided that describe actions to be taken that differ from this procedure. If an Operating Guide is an exception to this procedure, then the exception will be clearly stated as such. An Operating Guide can also be provided to pre-identify mitigation options that are consistent with this procedure.

I. Communications regarding action plans or Operating Instructions to mitigate SOL or IROL exceedances shall be clear and concise, and 3-way communication shall be utilized.

1. Operating Personal that issue an oral two-party, person-to-person Operating Instruction shall take one of the following actions: **[COM-002-4 R1.2]**

   a. Confirm the receiver's response if the repeated information is correct.

   b. Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.

   c. Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.

3.2.2 SOL Thresholds for Action

When the Real-time loading consistently reaches or remains within the range specified below using normal limits or calculated post-contingency loading consistently reaches or remains within the range specified below, using emergency limits, then an action plan will be developed and implemented. **The thresholds and actions listed below are guidelines. The actual actions implemented will be dependent upon the power system conditions.**

3.2.1 Operating Within Limits (continued)

IROL	SOL (Real-time)	SOL (N-1)	ACTION
85 to < 90%	90 to < 95%	90 to < 95%	Develop action plan (evaluate, review existing Operating Guide (if applicable), verify loading and limits, coordinate, agree, notify, issue TLR 1)
90 to < 95%	95 to < 100%	95 to < 100%	Implement action plan which may include local reconfiguration, redispatch, or TLR 3/4
95 to < 100%	100% or greater	100% or greater	Implement action plan which may include local reconfiguration, redispatch, or TLR 3/4/5. Develop post-contingency load shed plan, if needed.
-	100% or greater emergency rating or approaching emergency rating time limit	-	Implement action plan and issue Emergency Operating Instructions, if required, including local reconfiguration, redispatch, reduce Regional Directional Transfer Limit (see RTO-RTOA-OP1-r2.0 Regional Transfer Operating Procedure) or load shed
100% or greater	-	-	Implement IROL Mitigation Measures including firm load shed
-	-	≥ 140%	Trigger for further evaluation to determine if event meets the IROL criteria (See TRANS-TSO-SPP-30.409 System Operating Limits Methodology for Operating Horizon)

NOTE

Manual Load shed shall be conducted to minimize overlap with automatic Load shed and should be capable of being implemented in a timeframe adequate for mitigation of the Emergency. **[EOP-011-1 R1.2.5]**

3.2.3 Voltage SOL Thresholds for Action

Below Nominal Voltage Level	Action
95% three or more BES facilities	Develop action plan (evaluate, verify reactive resources in the area)
92% three or more BES facilities	Implement action plan (remove reactors from service, place cap banks in service, return line(s) to service)
90% for three or more BES facilities	Trigger for further evaluation to determine if event meets the IROL criteria (See TRANS-TSO-SPP-30.409 System Operating Limits Methodology for Operating Horizon)

The TOp can provide an Operating Guide to Specify voltage criteria that differs from these voltage criteria. Nominal voltages are equal to 115, 138, 161, 230, 345, 500 kV.

3.2.4 Contingency Solution Analysis

The TVA RC monitors the State Estimator Real-Time Contingency Analysis (RTCA) application. If the State Estimator RTCA alarms for unsolved contingencies, the RC will investigate the cause of the unsolved contingencies. The RC may coordinate with SCADA/EMS and Advanced Power Applications support personnel, as well as Member Company TOps and neighboring RCs, to determine if the unsolved contingency represents an internal application issue with the State Estimator RTCA process or if it represents a potential Adverse Reliability Impact on the BES. If it is determined that the unsolved contingency represents a potential Adverse Reliability Impact to the BES, then appropriate actions will be taken to mitigate the situation.

3.2.5 Action Plan

Depending upon time available and circumstances, the process for developing and implementing an action plan to relieve Real-time or first contingency loading/voltage exceedances includes:

A. The TOp will inform the RC of actions taken to return the system to within limits when an SOL has been exceeded. **[TOP-001-5 R15]**. If needed, the RC will initiate communications with the TOp.

B. The RC will monitor and review RTCA indications and results from the affected facility, verifying limits and telemetered values. The RC and TOp will coordinate information collected or indicated. In instances where there is a difference in a derived limit, the BES will be operated to the most limiting parameter **[IRO-009-2 R4, TOP-001-5 R18]**.

   1. When the results of a Real-time Assessment indicate an actual or expected condition that results in, or could result in, an SOL or IROL exceedance within its Wide Area, the TVA RC shall notify impacted TOPs and BAs within the TVA RC Area, and other impacted RCs. **[IRO-008-2 R5]**

3.2.2 SOL Thresholds for Action (continued)

2. RC discusses with the respective TOp any abnormal system conditions contributing to the exceedance and determines the availability to return to service any out-of-service equipment that would alleviate the exceedance.

3. RC also discusses with the respective TOp any existing operating guides for the specific situation and reviews potential action plan indicated in Operating Guideline.

4. If time permits, perform a study for implementing TLR 3 or 4. If 95 percent or more of the relief is to be provided (due to tags that are source or sink by the entity with the SOL exceedance or there are no transactions or non-firm Market flow impacts) by the party with the SOL exceedance, then local area congestion management is preferred over the TLR process. Evaluate potential local transmission loading relief*, such as reconfiguration of the transmission system and generation redispatch. Reconfiguration should be evaluated to verify if additional N-1 SOL exceedances would be created or system reliability would be harmed.

   *See attachment 1 for Owensboro Municipal Utilities' (OMU) preferred method when handling a local post-contingency loading issue.

NOTE
In certain situations, the TVA RC will issue a TLR 3 which will not have any curtailments available from transactions or Market flows. This might be necessary in order to receive assistance from a neighboring RC.

5. If time permits, perform a study for implementing TLR 5. If 95 percent or more of the relief is to be provided (due to tags that source or sink by the entity or Network and Native Load (NNL) responsibility) by the party with the SOL exceedance, or there are no curtailments available from transactions, Market flows, or NNL, local area congestion management* is preferred over the TLR process.

   *See attachment 1 for OMU's prefer method when handling a local post-contingency loading issue.

C. The affected TOp will notify the RC of the mitigation plan that they propose to implement and actions being taken in order to operate or return within known limits. **[TOP-001-5 R15]**

1. The RC will evaluate the local and wide-area impacts of this mitigation, both Real-time and post-contingency, and determine if the actions being taken are appropriate or sufficient.

2. If the actions being taken are not appropriate or sufficient, the RC shall instruct the TOp or BA to return the system to within SOL by the following actions:

   a. Re-dispatch of generation that studies show have a 5% or greater Generator Shift Factor (GSF) on the constraint of thermal exceedance (see exception in below note.)

   b. Re-dispatch of generation that studies show have 1 kV or greater impact for a voltage exceedance (see exception in below note.)

NOTE

The RC will not direct re-dispatch of generation that studies show will have less than 5% GSF on the constraint for thermal exceedance and less than 1 kV impact for voltage exceedances, unless there is no other redispatch option and re-dispatch is needed to maintain system reliability.

However, the affected TOp may instruct their BA to re-dispatch generation that falls below the 5 percent GSF threshold for thermal constraints or impact of less than 1 kV for voltage exceedances.

3. If the TOp or BA cannot comply with the instruction they shall immediately inform the RC of the inability to perform the Operating Instruction so that the RC or the TOp can implement alternate remedial actions.

4. Load shedding will not be instructed by the TVA RC for a first contingency (N-1) SOL exceedance.

5. If an SOL is or becomes an IROL, then actions outlined in the section titled “Mitigation of IROL Violation”, of this procedure will be implemented.

D. If the RC and TOp are unable to reach a consensus, the RC shall direct with specific mitigation actions to be taken as soon as possible, but no later than 30 minutes from validation of SOL exceedance.

E. RC and TOp will implement agreed upon action plan or the RC will issue Operating Instructions.

   1. RC will document the action plan.

   2. Once SOL exceedance has been identified, attempt to implement mitigation within 60 minutes, unless mutually agreed otherwise by the RC and TOp. (e.g. Post-contingent load shedding or near-term removal of Raccoon Mountain unit)

   3. On-shift operators have the authority and responsibility to execute Operating Instructions without seeking management approval.

F. Mitigation measures may start to be removed or placed back normal when:

   1. When element(s) are no longer exceeding their SOL, and

2. It is expected that removal of mitigation measures will not result in a recurrence of the exceedance (for example, reduction of TLR level and reloading of curtailed interchange).

3.2.6 Communication of Emergency Events

When an Emergency event occurs, or is projected to occur, Member Company TOp and BA System Operators will clearly communicate the event to the RC as an Emergency and will document the Emergency event appropriately.

A. The Member Company TOp shall inform the RC, known impacted BAs, and known impacted TOps of its actual or expected operations that result in, or could result in, an Emergency. **[TOP-001-5 R8]**

B. Upon receiving an Emergency notification from a TOp or BA within the TVA RC Area, the TVA RC shall notify, within 30 minutes from the time of receiving the notification, other BAs and TOps within the TVA RC Area, and neighboring RCs. **[EOP-011-1 R5]**

3.2.7 Mitigation of IROL Violation

A. Exceeding an IROL is an **emergency condition** in which the RC will **take immediate action or issue an Emergency Operating Instruction to act to mitigate as soon as possible but no later than 30 minutes. [IRO-009-2 R3]** The RC will implement the appropriate action(s) which may include (and may be performed in any order). The BA or TOp will confirm when the actions have been accomplished.

1. Give an Emergency Operating Instruction re-dispatch of any generation resource (i.e., coal, hydro, nuclear, combustion turbine, and/or independent power producer) that has any positive impact, regardless of whether the generation falls below the 5 percent GSF threshold or 1 kV impact threshold as detailed above in this procedure.

2. Give an Emergency Operating Instruction reconfiguration of the transmission system.

3. Give an Emergency Operating Instruction for voluntary load reductions in area (i.e., Demand-side Management)..

4. Give an Emergency Operating Instruction for the immediate shedding of load (controlled load reductions).

5. If available and applicable, give an Emergency Operating Instruction for voltage reduction (at distribution system level) to be performed immediately.

6. Give an Emergency Operating Instruction for other immediate actions as appropriate.

B. After Emergency Operating Instructions to mitigate the IROL exceedance have been given, the TVA RC will take additional actions along with any emergency procedures that may include:

3.2.5 Action Plan (continued)

NOTE
Implementation of TLR 6 will cause all schedules (firm and non-firm) that impact the flowgate to be curtailed to zero.

1. Without delay, communicate the emergency condition **via the RCIS**.
2. Appropriately deny any planned facility outages that would aggravate or worsen the condition.
3. Request neighboring RCs to deny any planned facility outages that would aggravate or worsen the condition.
4. Complete necessary documentation of the event for management review.

4.0 RECORDS

4.1 QA Records

None

4.2 Non-QA Records

Notation of actions shall be recorded in the ROC eSOMS operator log and on Event Summary Reports.

5.0 DEFINITIONS

Adverse Reliability Impact – The impact of an event that results in frequent-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection.

Emergency Operating Instruction – (TVA defined) An Operating Instruction issued for an abnormal system condition that requires immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.

eSOMS (electronic Shift Operations Management System) – System Operator log application utilized by TVA RC, TOp and BA personnel.

Generator-to-Load Distribution Factor (GLDF) - The algebraic sum of a Generator Shift Factor and a Load Shift Factor to determine the total impact of an Interchange Transaction on an identified transmission facility or Flowgate.

Generator Shift Factor (GSF) – A factor to be applied to a generator's expected change in output to determine the amount of flow contribution that change in output will impose on an identified transmission facility or Flowgate.

3.2.5 Action Plan (continued)

Interconnection Reliability Operating Limit (IROL) – A System Operating Limit that, if violated, could lead to instability, uncontrolled separation, or Cascading Outages that adversely impact the reliability of the Bulk Electric System.

RCIS (Reliability Coordinator Information System) – The system that Reliability Coordinators use to post messages and share operating information in real time.

Regional Directional Transfer Limits (RDTL) – A directional limitation on the amount of power transfers between the MISO South region and the MISO Midwest region.

System Operating Limit (SOL) – the value (such as MW, MVar, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to: Facility Ratings (applicable pre and post contingency equipment or facility ratings), Transient Stability Ratings (applicable pre and post contingency stability limits), Voltage Stability Ratings (applicable pre and post contingency voltage stability), and System Voltage Limits (Applicable pre and post contingency voltage limits).

TLR – Transmission Load Relief

TVA Reliability Coordinator Area – The collection of generation, transmission, and loads within the footprint of the TVA Reliability Coordinator.

6.0 REFERENCES

A. TRANS-PLN-SOP-09.101 Facility Ratings Methodology For Compliance with NERC Standard FAC-008-3

B. TRANS-TSO-SPP-30.230 Reliability Plan for the TVA Reliability Coordinator Area

C. TRANS-TSO-SPP-30.409 System Operating Limits Methodology for Operations Horizon

D. RTO-RTOA-OP1 Regional Transfer Operations Procedure (MISO/SPP Settlement)

E. TRANS-TSO-SPP-30.209 TVA RC Communications Guidelines for Operating Instructions

F. TRANS-TSO-SPP-30.409 System Operating Limits Methodology for Operating Horizon

Attachment 1
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OMU's Prefer Method for Handling Local Post-Contingency Loading Issue

Due to firm transaction agreement between OMU and LGE-KU – OMU may mitigate a thermal constraint in their system via TLR process regardless of the IDC TLR study indicating that 95% or more of the relief being provided is by OMU (tags that are sourcing or NNL responsibility).

OMU Transmission Operator will utilize the following process to limit post-contingency loading (per T&D Operations System Supervisor):

A. If the Real-time Contingency Analysis (RTCA) indicates post-contingency short-term loading of 97% or greater, the OMU System Operator will contact TVA to have a TLR study run.

   1. OMU should self-regulate to stay below 97% of the short term rating if:

      a. The study indicates that OMU is contributing 95% or more to the overload.

      b. OMU can limit generation by less than what a TLR will cut.

   2. The TLR process should be considered if:

      a. The study indicates that OMU is not contributing 95% or more to the overload.

      b. ACES is unable to cut tags (because it is too close to the top of the hour).

      c. When NSI is going to be limited to less than 257 MW (OMU's firm transmission + losses).

B. Once this initial study is completed and the mitigation implemented, the OMU System Operator should call TVA once an hour to run another study TLR to make sure that the current limitations are appropriate.

C. Self-imposed generating limits should be developed at the top of the hour for the next hour so that ACES has time to cut tags.

Source Notes
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Requirements Statement	Source Document	Implementing Statement
Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator's Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements.	IRO-001-4 R2	3.1.4
Each Reliability Coordinator shall ensure that a Real-time Assessment is performed at least once every 30 minutes.	IRO-008-2 R4	3.1.5
Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes.	TOP-001-5 R13	3.1.5
Require its operating personnel that issue an oral two-party, person-to-person Operating Instruction to take one of the following actions: Confirm the receiver's response if the repeated information is correct. Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver. Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.	COM-002-4 R1.2	3.2.1
Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and	EOP-011-1 R1.2.5	3.2.2
Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded.	TOP-001-5 R15	3.2.5

Source Notes
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5.0 DEFINITIONS (continued)

Requirements Statement	Source Document	Implementing Statement
Each Reliability Coordinator shall operate to the most limiting IROL and Tv in instances where there is a difference in an IROL or its Tv between Reliability Coordinators that are responsible for that Facility (or group of Facilities).	IRO-009-2 R4	3.2.5
Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs.	TOP-001-5 R18	3.2.5
Each Reliability Coordinator shall notify impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, when the results of a Real-time Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Wide Area.	IRO-008-2 R5	3.2.5
Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded.	TOP-001-5 R15	3.2.5
Each Transmission Operator shall inform its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual expected operations that result in, or could result in, an Emergency.	TOP-001-5 R8	3.2.6

Source Notes
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6.0 REFERENCES (continued)

Requirements Statement	Source Document	Implementing Statement
Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority within its Reliability Coordinator Area shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators within its Reliability Coordinator Area, and neighboring Reliability Coordinators.	EOP-011-1 R5	3.2.6
Each Reliability Coordinator shall act or direct others to act so that the magnitude and duration of an IROL exceedance is mitigated within the IROL's Tv, as identified in the Reliability Coordinator's Real-time monitoring or Real-time Assessment.	IRO-009-2 R3	3.2.7