

**CENTRAL MAINE POWER COMPANY
RESPONSE TO ORAL DATA REQUEST NO. 1
DOCKET No. 2008-255**

November 18, 2008

ODR-01-62

Q. Is the generation in the large customer data set (behind the meter generators) available to ISO to use during a contingency event?

A. Behind the meter generation is available to be dispatched by the ISO under certain actions of ISO-NE Operating Procedure #4, *Action During a Capacity Deficiency* (OP4) (see attached). The following is a description of the conditions under which the ISO can and cannot dispatch these resources.

When ISO system operators are recovering from a system wide contingency, they generally restore system operating reserves to NPCC mandated levels by activating on-line dispatchable and off line fast start resources. If and only when those resources are insufficient, behind the meter generation can be dispatched under various actions of OP4. During system wide events, OP4 resources are dispatched unless they reside within export constrained areas.

Local system operators provide local contingency protection which means ensuring that transmission lines or interfaces are operated within limits proscribed in ISO-NE Operating Procedure #19, *Transmission Operations* (see attached). Mitigation plans fully utilize non- OP4 actions such as off cost dispatch and transaction curtailment. Once those actions are exhausted, actions of OP4 can be utilized. Unlike system wide contingencies, for local contingencies the system operators may elect not to implement actions of OP4 that activate behind the meter generation because they cannot readily determine the system impact of behind the meter generation to the transmission system. In other words, local system operators are unable to analyze whether activating *behind the meter* generation will mitigate or exacerbate a local transmission overload.

Response Prepared and Submitted By:

Rick Conant
Manager Power System Studies
RLC Engineering, LLC

Attachment(s):

1. ISO-NE Operating Procedure No. 4
2. ISO-NE Operating Procedure No. 19