

**CENTRAL MAINE POWER COMPANY  
RESPONSE TO OFFICE OF THE PUBLIC ADVOCATE'S DATA REQUEST NO. 8  
DOCKET No. 2008-255**

April 2, 2009

**OPA-08-06**

- Q.** In the Rebuttal Testimony of George C. Loehr, starting on page 12 at line 11, it discusses the use in the MPRP of six different generator dispatch scenarios and describes such scenarios as realistic and credible.
- a. Please describe what criteria and/or procedure(s) Mr. Loehr used in evaluating the dispatch scenarios provide a copy of any workpapers produced as part of this evaluation.
  - b. What would be Mr. Loehr's opinion be regarding the use in transmission system planning of a dispatch scenario among these six scenarios that produced more than 80% of all the system violations uncovered by the use of all six dispatch scenarios? Please explain.
- A.**
- a. The outage of two generating units in a particular portion of the system is, in my opinion, quite reasonable. As I stated in my Rebuttal Testimony:

“In a February 8, 2005 interpretation of Standards TPL-002 and -003, NERC specifies that ‘a variety of possible dispatches should be included in planning analyses.’ NERC also states that the ‘selection of “critical system conditions” and its associated generation dispatch falls within the purview of [the Planning Coordinator’s] “methodology.”’ Finally, NERC directs that ‘a Planning Coordinator would formulate critical system conditions that may involve a range of critical generator unit outages as part of the possible generator dispatch scenarios.’

“Similarly, ISO New England Planning Procedure PP5-3 requires that ‘Testing should not be restricted to only typical dispatch; rather the dispatch(es) should be developed to reasonably test the proposed additions or changes.’ (Section 3.3.1.1 f.) Later, the same document specifies that ‘Generally, intra-area transfers will be simulated at or near their established limits (in the direction to produce “worst cases” results).’ (Section 3.3.1.1 g.)”

In addition, ISO New England Planning Procedure PP3, Section 3, “Area Transmission Requirements,” states: “With due allowance for generator maintenance and forced outages, design studies will assume power flow conditions with applicable transfers, load, and resource conditions that reasonably stress the system.”

- b. I'm uncertain as to the meaning of this question. If I'm interpreting it correctly, it's asking for my opinion in the event that more violations occur with one scenario than with others. But that's not the point. MPRP looked at a number of different generation scenarios – it shouldn't be surprising if one or two come up with more reliability violations than the others. That's exactly what one would expect. It seems to me that even a single reliability violation in just one generation scenario is sufficient to demonstrate the need for action. The MPRP studies turned up violations in a variety of generation scenarios. How many violations occurred in each scenario is, in my view, irrelevant.

**Response Prepared and Submitted By:**

George C. Loehr

Principal

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