

NPCC emphasizes that the DOE 2012 congestion analysis should consider the northeast as a whole, not only modeling those transmission, demand response, and generating resource projects in the United States, but also those corresponding projects in the neighboring Canadian systems.

Coordinated analysis is necessary to properly assess the operation and reliability impact that future reinforcement of NPCC's (and its neighboring Region's) transmission system, demand response programs, and generating resources will have on congestion.

In addition to understanding the respective Market Rules in the Region, proper modeling of the operation of the NPCC system also requires an in-depth understanding of the applicable:

- ✓ NERC Reliability Standards (see: <http://www.nerc.com/page.php?cid=2|20>)
- ✓ NPCC Regional Standards and Criteria (see: <https://www.npcc.org/Standards/default.aspx>) and
- ✓ the New York State Reliability Council ("NYSRC") Reliability Rules (see: <http://www.nysrc.org/>)

NERC's Reliability Standards set the reliability requirements for planning and operating the North American bulk power system.

NPCC's Regional Standards and Criteria further define more stringent, regionally specific reliability requirements.

The NYSRC's mission is to promote and preserve the reliability of electric service on the New York State Power System through their Reliability Rules, which shall be complied with by the New York Independent System Operator and all entities engaging in electric transmission, ancillary services, energy and power transactions on the New York State Power System.

NPCC recommends that the DOE review the latest information available through the following regional reliability assessments and northeast reliability planning initiatives prior to the start of their 2012

Congestion Study:

- ✓ The NPCC Seasonal Reliability assessments (see: <https://www.npcc.org/Library/Seasonal%20Assessment/Forms/Public%20List.aspx>)
- ✓ The New England Regional System Plan (see: <http://www.iso-ne.com/trans/rsp/2011/index.html>)
- ✓ The New York Reliability & Economics Planning Studies (see: http://www.nyiso.com/public/markets_operations/services/planning/planning_studies/index.jsp)
- ✓ The Inter-Area Planning Stakeholder Advisory Committee (see: <http://www.interiso.com/documents.cfm>)
- ✓ The Ontario Reliability Outlooks (see: http://www.ieso.ca/imoweb/pubs/marketReports/18MonthOutlook_2011nov.pdf)

NPCC thanks the DOE for the opportunity to comment and looks forward to working with the DOE during the course of the 2012 Congestion Study.

Sincerely,

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