Individual or group. (39 Responses)
Name (22 Responses)
Organization (22 Responses)
Group Name (17 Responses)
Lead Contact (17 Responses)
IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (5 Responses)
Comments (39 Responses)
Question 1 (33 Responses)
Question 1 Comments (34 Responses)
Question 2 (33 Responses)
Question 2 Comments (34 Responses)

Individual
Oliver Burke
Entergy Services, Inc. (Transmission)
No
While we agree that protection system failures should be studied in TPL assessments, we have numerous concerns about the implementation difficulties of such studies. In many instances, breaker failure events were studied as a proxy for protection system failures because breaker failure events were not overly burdensome to simulate in TPL assessments such that assessments could be completed in a timely manner. A breaker failure event was independent of fault location, what types of redundancies were present, and the complexities associated with protection systems. The currently proposed interpretation is not a trivial expansion of scope. The technical and process challenges in completing such studies annually is overly burdensome and may result in overall study quality degradation as entities struggle to complete the analyses every year, especially in regions where rapid transmission expansion is occurring changing system characteristics substantially each year. Simply adding engineering resources is not a viable option due to extremely limited resource pools with the qualifications to perform such work and no end in sight to the shortage. The current definition of a protection system is too broad for application to TPL standards. DC control circuitry is not adequately defined. Is the ground grid part of DC circuitry? What about cable troughs? Failure modes of different protection system components are likewise inadequately defined. For example, what failure mode in a voltage sensing device is required to be studied? Loss of potential is usually a single phase loss of potential. Should planners simulate the loss of all three phases or just one, or all possible scenarios? Loss of potential is one mode but others could include introduction of harmonic content or noise into protective relays – how would relay response be predicted? In some cases, failures can result in inappropriate operation; others can result in failure to operate. Would all such permutations need to be assessed to have a valid assessment? How are the protection system engineers and planning engineers to develop valid assumptions such that TPL assessments are valid? This issue was explored in the TPL-001-2 ATFNSTD process and the standard proposes limiting failure analyses to specific protective relay types to reduce complexity and uncertainty in assumptions and analyses. The specific types of relays listed, in the opinion of the ATFNSDT, cover all historical failures which have led to BES events as well as every relay type that performs significant BES protection functions. While some obscure failure in an actual DC circuit wire, terminal block, CT, PT, etc. could occur, would those events not be replicated adequately by simulating a limited set of relay failures such as that proposed by the ATFNSDT? Mitigation plans could certainly focus on developing complete redundancy (not just the relay) for each instance where the relay failure (and potentially related protection system components) could result in BES reliability issues. The other simple but costly potential approach for the industry is to simply make all protection systems redundant. This poses similar challenges due to the inadequate protection system definitions. How would a redundant ground grid be installed? Is a terminal block part of the DC control circuitry? What about the primary winding of a PT or CT – would they need redundancy? What about a multiplexer in a communications circuit? Additionally, the attempt to add redundancy poses additional BES risk. Since protection systems cannot be modified with the facilities they protect in service in many cases, BES outages will have to occur. The proposed TPL has a 7 year implementation plan. Is that long enough to do the massive overhaul this interpretation may result in? What will be the operational risk we have to take to make upgrades? The industry could be forced to choose between violating operating standards and violating planning standards. We appreciate the efforts of the team on these extremely complex industry issues and we realize that perfection is not going to occur. However, we are convinced that limiting the complexity associated with these studies will provide for better overall study quality. The approach contemplated in the proposed TPL substantially raises the bar where protection systems are concerned and will result in more thorough assessments without introducing unmanageable complexity. We support that approach but cannot support the approach contemplated by this interpretation.
Yes
Group

TVA Transmission Reliability Engineering and Controls
Tim Ponseti, VP
Yes
While we agree with the response, we prefer the approach taken in the proposed standard TPL-001-2 which specifies failure of certain types of relays to test.
Yes
Group
SERC EC Planning Standards Subcommittee
Jim Kelley
Yes
While we agree with the response we are concerned with the technical feasibility of evaluating all possible protection system failures. We prefer the approach taken in proposed standard TPL-001-2 that specifies failure of certain types of relays to test.
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Yes
No
The interpretation would force Transmission Planners into studying non-redundant DC supply or battery failure in stability studies which would in turn cause a significantly negative effect on system performance. While the concept of engineering judgment is introduced in the first paragraph, the wording is such that it appears the most severe set of conditions is required. Additionally, the second paragraph requires study of a protection system component failure that impacts one or more protection systems. While it may not be clearly defined as being a part of the protection system, if considered, DC supply or battery failure could have significantly longer fault clearing times if all protection system components except the battery are fully redundant. Taking the first and second paragraphs together, it appears that failure of the battery system is a required aspect of testing. Transmission Planners should not be required to study the effects of a failed DC supply system as this would show significant impacts that were not intended in the drafting of the interpretation and it is inconsistent with the current draft of TPL-001-2. The DC supply or battery failure should be specifically excluded from consideration in system performance. The Drafting Team should explicitly state that "protection system" (lower case) referred to in Footnote (e) does not include station batteries (unlike "Protection System" in NERC Glossary of Terms). Additionally, because TPL-003 and TPL-004 refer to "protection system" in lower case, it does not refer to the NERC Glossary definition. Moreover, TPL-003 and TPL-004 are likely to be superseded by TPL-001-2 after regulatory approvals. In the development of TPL-001-2, the reference to "protection system" was clarified to be "relay" with a new footnote 13 which further specifies the types of relays to be considered. The Drafting Team should state that "protection system" (lower case) referred to in Footnote (e) includes only the relays identified in TPL-001-2 Table 1 footnote 13.
Individual
Thad Ness
American Electric Power
Yes
Yes
Group
NERC System Protection and Control Subcommittee (SPCS)
Bill Miller
Yes

Yes
The SPCS appreciates the consideration of its previous comment. The IDT revision to the interpretation addresses the SPCS concern noted during the first posting.
Individual
Nazra Gladu
Manitoba Hydro
Yes
No comment.
Yes
We generally agree with the respose. However, we suggest that the wording provided by Duke Energy should be adopted to add clarity: The term "Delayed Clearing" that is described in Table I, footnote (e) refers to fault clearing that results from a failure to achieve the protection system's normally expected clearing time. The Planning Authority and Transmission Planner are permitted engineering judgment in selection of their Category C or D contingencies, and selection of the protection system component failures for evaluation that would produce the more severe system results or impact (R1.3.1) and this would include addressing all protection systems affected by the selected component.
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
Yes
Yes
Individual
Carter B. Edge
SERC Reliability Corporation
Yes
While I agree with the response I am concerned with the technical feasibility of evaluating all possible protection system failures. I prefer the approach taken in proposed standard TPL-001-2 that specifies failure of certain types of relays to test.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Individual
Alice Ireland
Xcel Energy
Agree
Duke Energy
Group
Duke Energy
Greg Rowland
Yes
While Duke Energy is voting affirmative on this ballot, we note that the interpretation appears to expand upon historical industry practices. Some entities will need to expand their annual assessment to include more detailed

evaluation and complex analysis. As a result, mitigation plans may need to be developed. Therefore, an implementation plan should be developed to accompany this interpretation. We suggest an effective date of the first day of the first calendar quarter eighteen months after applicable regulatory approval.
Yes
Also, while Duke Energy agrees with Response 2, we believe wording changes are needed for clarity in the first paragraph to align it with the third paragraph. Suggest rewording : The term "Delayed Clearing" that is described in Table I, footnote (e) refers to fault clearing that results from a failure to achieve the protection system's normally expected clearing time. The Planning Authority and Transmission Planner are permitted engineering judgment in selection of their Category C or D contingencies, and selection of the protection system component failures for evaluation that would produce the more severe system results or impact (R1.3.1) and this would include addressing all protection systems affected by the selected component.
Group
Bonneville Power Administration
Chris Higgins
Yes
Yes
Group
Florida Municipal Power Agency
Frank Gaffney
Yes, Yes
No
FMPA does not agree with the conclusion of the last paragraph that: "the two standards do not prescribe the specific protection system components that must be addressed". The operative word of footnote e is "any" as in: "Delayed clearing of a Fault is due to failure of ANY protection system component such as a relay, circuit breaker, or current transformer, and not because of an intentional design delay" (emphasis added). In addition, the use of the phrase "such as" by definition is an introduction to a list that is not exhaustive. Hence, it is beyond argument footnote e includes consideration of delayed clearing due to failure of relays, circuit breakers, current transformers, and at least one additional protection system component. Common use of the term "protection system" includes the NERC glossary definition plus breakers (e.g., Wikipedia at: http://en.wikipedia.org/wiki/Power_system_protection). Consequently, FMPA believes that the term "protection system" as used in footnote e is more inclusive than the definition of Protection System in the NERC glossary (i.e., to include breakers). As such, footnote e is prescriptive of the minimum set of protection system components that must be considered: the components that comprise the glossary definition of Protection System, plus circuit breakers.
Group
Hydro One Networks Inc.
Sasa Maljukan
Yes
Yes
Individual
Kathleen Goodman
ISO New England, Inc
Yes
No
ISO New England disagrees with the wording for response 2. The interpretation would force Transmission Planners into studying non-redundant DC supply or battery failure in stability studies which would in turn cause a

significantly negative effect on system performance. While the concept of engineering judgment is introduced in the first paragraph, the wording is such that it appears the most severe set of conditions is required. Additionally, the second paragraph requires study of a protection system component failure that impacts one or more protection systems. While it may not be clearly defined as being a part of the protection system, if considered, DC supply or battery failure could have significantly longer fault clearing times if all protection system components except the battery are fully redundant. Taking the first and second paragraph's together, it appears that failure of the battery system is a required aspect of testing. Transmission Planners should not be required to study the effects of a failed DC supply system as this would show significant impacts that were not intended in the drafting of the interpretation and it is inconsistent with the current draft of TPL-001-2. The DC supply or battery failure should be specifically excluded from consideration in system performance. The cost of retrofitting redundant battery protection systems would clearly outweigh any reliability benefit possibly gained.
Group
Salt River Project
Bob Steiger
No
As written, Response 1 appears to go beyond the requirement of the existing standards. The statement in Response 1, "….. The ordered reading of the text in Table 1 in either standard explains that delayed clearing caused by a failure of a protection system or circuit breaker must be evaluated to examine its impact on BES performance", seems to require that the PA and TP must "evaluate" both breaker failure and protection system failures to determine whether one is more severe than the other. However, R1.3.1 of both Standards states that the "rationale for the contingencies selected for evaluation shall be available as supporting information" and "an explanation of why the remaining simulations would produce less severe system results", for example: "R1.3.1 Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information." Since the wording in these standards seems to make a distinction between "evaluation" and "explanation", the proposed would seem to disallow use of the engineering judgment (accompanied with explanation) by the PA and TP to select the contingencies (breaker failure or protection system failure) for study and evaluation and thus go beyond what is required in both existing standards, and could result in significant increase in planning efforts for only marginally increase in reliability benefits. We suggest that 1) the last sentence be changed to read, "The ordered reading of the text in Table 1 in either standard explains that THE MORE SEVERE CONTINGENCIES DUE TO delayed clearing caused by a failure of a protection system or circuit breaker must be evaluated to examine its impact on BES performance" and 2) the sentence "the Planning Authority and Transmission Planner is expected to provide the rationale for the contingencies selected for evaluation and make available the explanation of why the remaining simulations would produce less severe system results as supporting information" be added to end of Response 1.
Yes
Individual
Milorad Papic
Idaho Power Company
Yes
However, we do support a corrected response 1 made by Duke Energy.
Yes
However, we do support a corrected response 2 made by Duke Energy.
Individual
Mark Westendorf
Midwest Independent Transmission System Operator, Inc.
Yes
Yes
Group
Southwest Power Pool Realibility Standards development Team
Jonathan Hayes

Yes
Yes
We would suggest that the drafting team take a look at the effort surrounding FERC Order No. 754 which is clearly laid out for what to look at and how to look at single point of failure.
Group
Exelon
Chris Scanlon
Yes
Exelon recommends that a tiered implementation plan (by voltage level, for example) be established. Exelon also recommends that a timeframe of at least 5-years be permitted to review worst-case protection system failure scenarios, perform any required studies, and implement any additional actions that might be necessary to meet the TPL standards under the proposed interpretation of the requirements
Yes
Exelon recommends that a tiered implementation plan (by voltage level, for example) be established. Exelon also recommends that a timeframe of at least 5-years be permitted to review worst-case protection system failure scenarios, perform any required studies, and implement any additional actions that might be necessary to meet the TPL standards under the proposed interpretation of the requirements
Group
Western Electricity Coordinating Council
Steve Rueckert
No
It appears that the revised interpretation removes the discretion for the Planning Authority and Transmission Planner to use engineering judgement and system knowledge as rational for the contingencies selected in determining the "more severe system results" and now instead reqires studies of bothstuck breakers and protection system failure to determine the more severe system results or impacts. Was that the intent of the changes?
Yes
Group
Puget Sound Energy
Sunitha Kothapalli
No
The response is vague on how to evaluate a protection system failure, as it does not reference any single-point of failure methodology. Also, there is no specific exclusion of DC supply, which should be eliminated as a system component failure. The exclusion of DC supplies is in line with the protection system redundancy evaluation in Order No. 754 Table B.
No
The response is vague on how to evaluate a protection system failure, as it does not reference any single-point of failure methodology. Also, there is no specific exclusion of DC supply, which should be eliminated as a system component failure. The exclusion of DC supplies is in line with the protection system redundancy evaluation in Order No. 754 Table B.
Individual
Kenn Backholm
Public Utility District No. 1 of Snohomish County
Agree
Public Utility District No. 1 of Snohomish County supports the comments of Salt River Project.
Group
pacificorp
ryan millard
Yes

Yes

Group

ACES Standards Collaborators

Ben Engelby

No

(1) We appreciate the drafting team's response to our previous comment and thank them for addressing the term "evaluated" by adding the parenthetical. However, we do not think inclusion of the parenthetical clarifies what is meant by evaluation. We are concerned that auditors will read "evaluate" to mean that a simulation must be performed for all single line-to-ground (SLG) faults. For example, the interpretation states that evaluation of a SLG and three-phase fault "with delayed clearing is required and further defined by footnote (e)" and the statement is not qualified by indicating only those faults with delayed clearing that produce the more severe results. Because footnote (e) simply explains what is meant by delayed clearing and does not qualify it is only those delayed clearing faults that produce the more severe system results or impacts, this interpretation may cause an auditor to expect that simulations are required for all delayed clearing faults. Furthermore, a current simulation is not even required for those delayed clearing faults with more severe system results or impacts but rather "a current or past study and/or system simulation." (2) We continue to ask the team to state explicitly that the PC or TP would only have to perform simulations if the contingencies are expected to produce "more severe system results or impacts," otherwise, simulations are not required. We still believe this clarification is needed to allow PC/TP to consider actual system experience, previous studies, or steady state screening studies for the determination to include stuck breakers or protection system failures. (3) We think the response to Q1 is overly broad, redundant, and is still not consistent with the requirements of TPL-003 and TPL-004. We suggest revising the interpretation to make it more succinct and to answer the question directly. We suggest the following as the response to Q1 which addresses our issues in points (1) and (2). "The applicable entity must consider all Category C contingenices per R1.5 in its assessment. However, it is not required to evaluate or perform simulations for all Category C contingencies. Rather, it is only required to perform and evaluate 'only those Category C contingencies that would produce the more severe system results or impacts.' This is further supported by R1.3.1 that states the 'rationale for the contingencies selected for evaluation shall be available for supporting information' and an explanation of why the remaining simulations would produced less severe system results shall be available as supporting information." (4) The interpretation causes a lot of confusion because of the inconsistent use of "evaluation" in the interpretation as compared to in the standard. The standard appears to consider an evaluation to have a more detailed and specific meaning in R1.3.1 that would include simulation. Whereas the interpretation appears to use "evaluate" more consistently with "consider" in R1.5. Use of "evaluation" in the interpretation appears to be a high level review through engineering judgment. The inconsistent use of the language continues cause us confusion over exactly what is required. We suggest consistent use of these terms so they are aligned with the interpretation and the applicable requirements.

No

(1) Response 2 departs from the plain language of the requirements and actually expands the application of both standards which is not consistent with the standards process. According to the Standards Process Manual, "a valid interpretation response provides additional clarity about one or more requirements, but does not expand on any requirement." The interpretation clearly states in response 2 that a "protection system component failure that impacts one or more protection systems and increases the total fault clearing time requires the Planning Authority and Transmission Planner to simulate the full impact." This language is contradictory with the earlier statement that the PA and TP are permitted to use engineering judgment in selecting Category C and D contingencies. Nowhere in TPL-003-0a or TPL-004-0 does it say that the TP or PC have to perform full simulations for faults with delayed clearing. This is only required if they would produce the "more severe system results or impacts." The interpretation that the drafting team is proposing expands on the requirements and should not instruct the PC/TP to perform simulations beyond the existing language in the requirements. The manner in which the PC/TP determines which contingencies would produce "more severe system results and impacts" is not addressed in the standard. (2) The interpretation states that the Planning Authority and Transmission Planner must "consider the situation" that produces the more severe system results or impacts (i.e., TPL-003-0a, R1.3.1 and TPL-004-0, R1.3.1) due to a delayed clearing condition regardless of whether the condition resulted from a stuck breaker or protection system failure. We have concerns regarding how the PC/TP must document these "considerations" and whether the PC/TP must maintain paperwork when they decide that the delayed clearing condition would not produce a more severe system impact. We believe that the interpretation is requiring additional actions outside the requirements of the standard. (3) The interpretation should clearly state that there is no clear bright line about what constitutes "more severe" results. Thus, applicable entities may use engineering judgment in determining what more severe system results are. There is no clear bright line threshold for when a PC/TP must study and simulate stuck breakers or protection system failures. There are adverse impacts on the industry without clear direction, and the Interpretation Drafting Team may not be able to provide that clarity within the bounds of the Standards Process Manual. For example, if a protection system failure would increase clearing times and would produce "more severe system results and impacts," it would be required to be studied and simulated. However, if

it did not produce the "more severe system results and impacts," it would not be required to be studied and simulated. There is no clarity on what makes an impact more severe and therefore, the interpretation is requiring the PC/TP to study and simulate all contingencies because not doing so may result in a finding of noncompliance, even though some of those studies would not meet the threshold of "more severe." (4) The interpretation team should consider adding flexibility to considerations that a PC or TP could use to determine the need to simulate single points of failure. As example, actual system experience, past studies, or steady state screening studies could be relied upon. For instance, if there are not problems in the steady state and the contingency is electrically far from any generators, system experience or past studies could prove that transient or dynamic stability problems are not likely to occur. (5) We think both parts of the interpretation would benefit from clarifying what is meant by consideration of contingencies in TPL-003-0a R1.5 and TPL-004-0 R1.4 and evaluation in R1.3.1. TPL-003-0a R1.5 and TPL-004-0 R1.4 only require that the TP and PC consider Category C and D contingencies respectively. However, both standards say that a study or simulation is required only for the contingencies "that would produce the more severe system results or impacts" R1.3.1. We would like the drafting team to further clarify this issue. (6) We found a few typos, confusing clauses, and sentences that needed grammatical changes in Q2. In particular, the second sentence in Response 2 in confusing. We believe the sentence would be clearer if stated, "The PC and TP is permitted engineering judgment in its [selection of] Category C and D contingencies for protection system component failures…" (7) Second, the clause in the last sentence after (R1.3.1) "and this would include addressing all protection systems affected by the selected component" should be struck. It's a run-on sentence and adds more confusion than clarity. (8) Finally, we suggest striking everything in response 2 after the first paragraph because it only adds confusion. The first paragraph is clear that the TP and PC can apply engineering judgment in selecting Category C and D contingencies. What else needs to be said? (9) Thank you for the opportunity to comment.
Individual
Donald Weaver
New Brunswick System Operator
Agree
NPCC Reliability Standards Committee
Group
seattle City Light
paul haase
Agree
Salt River Project (SRP)
Individual
Jason Marshall
New England States Committee on Electricity (NESCOE)
No
The New England States Committee on Electricity (NESCOE) appreciates this opportunity to comment on a narrow issue raised by ISO New England (ISO-NE) regarding the intended meaning of "protection system component failure" in Response 2. In comments on Draft One of the proposed interpretation, ISO-NE requested clarification on whether a battery system is considered a component of a protection system for purposes of the standard. ISO-NE stated that the answer to this question could have significant implications for the outcome of stability studies, citing as an example that substations may have full redundancy protection in all aspects except for the battery system. NESCOE understands that ISO-NE will provide comments on this Draft 2 version noting that modeling non-redundant DC supply or battery failure was not intended in the drafting of the interpretation and that the cost of requiring redundant battery protection systems in all cases will be clearly outweighed by any reliability benefit gained. NESCOE shares ISO-NE's concern that the latest version of Response 2 does not resolve the ambiguity related to modeling protection system failures and whether battery systems are distinguished from other components. Specifically, the language in paragraph one provides that the planning authority and transmission planner may exercise "engineering judgment" in selecting protection system component failures for study. However, the subsequent paragraph appears to require study of the most severe event, which absent clarification could be read to mandate the modeling of battery failure. New England consumers should not be exposed to cost increases due to a lack of clarity. Nor, as in all cases, should consumers bear costs that are not justified by measurable reliability benefits. NESCOE requests that the IDT squarely address and resolve this ambiguity in a subsequent version of the proposed interpretation. Thank you for your consideration of these comments.
Individual
David Jendras
Ameren
Agree

SERC PSS
Individual
Steven Mavis
Southern California Edison Company
No
The additional time and resources entities would need to devote to the study of all "stuck breaker" and "protection system failure" scenarios in-order to determine which would produce the most severe system results/ impacts would be of marginal benefit for system reliability. Entities should be allowed to exercise their professional engineering judgement to choose between the scenarios when assessing system performance for Category C and D contingencies.
No
same as for question 1
Individual
Chifong Thomas
BrightSource Energy
No
While BSE does not disagree with the proposed Response 1 to Question 1, however, as written, Response 1 appears to go beyond the requirement of the existing standards. The statement in Response 1, "….. The ordered reading of the text in Table 1 in either standard explains that delayed clearing caused by a failure of a protection system or circuit breaker must be evaluated to examine its impact on BES performance", seems to require that the PA and TP "evaluate" both breaker failure and protection system failures to determine whether one is more severe than the other. However, R1.3.1 of both Standards states that only the "rationale for the contingencies selected for evaluation shall be available as supporting information" and "an explanation of why the remaining simulations would produce less severe system results", for example: "R1.3.1 Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information." Since the wording in these standards seems to make a distinction between "evaluation" and "explanation", the proposed would seem to disallow use of the engineering judgment (accompanied with rationale and explanation) by the PA and TP to select the contingencies (breaker failure or protection system failure) for study and evaluation, and thus go beyond what is required in both existing standards, and could result in significant increase in planning efforts for only marginally increase in reliability benefits. BSE suggests that 1) the last sentence be changed to read, "The ordered reading of the text in Table 1 in either standard explains that the more severe contingencies due to delayed clearing caused by a failure of a protection system or circuit breaker must be evaluated to examine their impact on BES performance" and 2) the sentence, "the Planning Authority or Transmission Planner is expected to provide the rationale for the contingencies selected for evaluation, and make available the explanation of why the remaining simulations would produce less severe system results as supporting information", be added to end of Response 1.
Yes
Individual
Darryl Curtis
Oncor Electric Delivery Conpany LLC
No
Oncor takes the position that the interpretation request by the System Protection and Control Subcommittee (SPCS) is not timely and will not provide additional clarity to complying with TPL-003-0a and TPL-004-0 in light of other NERC initiatives. Many of the concerns expressed (i.e. single point of failure) are already being addressed under the NERC Order 754 data request. Likewise the development of TPL-001-2 under Project 2006-02 Assess Transmission Future Needs and Develop Transmission Plans intends to combine six (6) Transmission Planning standards under a single standard, resulting in the retirement of TPL-003-0a and TPL-004-0.
No
Again, Oncor takes the position that the interpretation request by the System Protection and Control Subcommittee (SPCS) is not timely and will not provide additional clarity to complying with TPL-003-0a and TPL-004-0. Oncor does agrees with the statement in Response 2, "The Planning Authority and Transmission Planner is permitted engineering judgment in its Category C or D contingencies to select the protection system component failures for evaluation that would produce the more severe system results or impact (R1.3.1) and this would include addressing all protection systems affected by the selected component." However, Oncor takes the position,

that current NERC initiatives including NERC Order 754 Data request and current efforts under Project 2006-02 will ultimately address all concerns related to contingency selection validation.
Group
Iberdrola USA
John Allen
Yes
No
Since TPL-003 and TPL-004 refer to “protection system” in lower case, it does not refer to the NERC Glossary definition. Moreover, TPL-003 and TPL-004 have been superceded by TPL-001-2, approved by the NERC Board of Trustees in August 2011. In the development of TPL-001-2, the reference to “protection system” was clarified to be “relay” with a new footnote 13 which further specifies the types of relays to be considered. The Drafting Team should state that “protection system” (lower case) referred to in Footnote (e) includes only the relays identified in TPL-001-2 Table 1 footnote 13.
Individual
Cheryl Moseley
Electric Reliability Council of Texas, Inc.
Yes
Yes
Individual
Teresa Czyz
GTC
Yes
Yes
Individual
Michael Moltane
ITC
Yes
No
We have concerns regarding the use of terms like "engineering judgement" in requirments or interpretations. Such terms are vague and will lead to coninued uncertainty as to whether an auditor will find an entity in compliance (i.e,, will the "engineering judgement" applied by an entity be acceptable to an auditor?
Individual
Daniela Hammons
CenterPoint Energy Houston Electric, LLC
No
CenterPoint Energy agrees that the situation that produces the more severe system impacts due to delayed clearing conditions should be considered, regardless of whether the condition resulted from a stuck breaker or protection system failure; however, CenterPoint Energy believes that the interpretation appears to expand upon historical industry practices. Some entities may need to expand their annual assessments to include more detailed evaluations and analyses, which will take a finite period of time. CenterPoint Energy would vote "affirmative" if an implementation period were developed to accompany this interpretation.
Yes
Individual
Richard Vine

California Independent System Operator
No
The additional time and resources entities would need to devote to the study of all "stuck breaker" and "protection system failure" scenarios in-order to determine which would produce the most severe system results/ impacts would be of marginal benefit for system reliability. Entities should be allowed to exercise their professional engineering judgment to choose between the scenarios when assessing system performance for Category C and D contingencies.
No