Unofficial Comment Form

Project 2015-10 Single Points of Failure TPL-001

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on
**TPL-001-5 – Transmission System Planning Performance Requirements**. The electronic form must be submitted by **8 p.m. Eastern, Monday, October 23, 2017.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2015-10-Single-Points-of-Failure-TPL-001.aspx). If you have questions, contact Standards Developer, Latrice Harkness (via email), or at 404-446-9728.

## Background Information

The SPCS and the SAMS conducted an assessment of protection system single points of failure in response to FERC [Order No. 754](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20754%20-%20Approving%20Interp%20TPL-002-0%202011.9.15.pdf), including analysis of data from the NERC Section 1600 Request for Data or Information. The assessment confirms the existence of a reliability risk associated with single points of failure in protection systems that warrants further action**.**

Additionally, the two directives from FERC [Order No. 786](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/E-2%20Transmission%20PLanning%20Rel.%20Strd.pdf) (p. 40 and p. 89) and updates to the MOD reference in Requirement R1, Measure M1 and the Violation Severity Levels sections have been added to the scope of the project.

## Questions

1. Do you agree that an associated timetable for implementation of actions needed to prevent the System from Cascading (TPL-001-5 Requirement R4, Part 4.2.2.1) and an annual review of implementation status (TPL-001-5 Requirement R4, Part 4.2.2.2) should be required when analysis concludes there is Cascading caused by the occurrence of extreme events 2e-2h in the stability column?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the requirements of the proposed TPL-001-5 Requirement R4, Parts 4.2.2.1 and 4.2.2.2, including an implementation timetable and annual review of implementation status, should not and do not mandate actual implementation of actions identified as needed to prevent the System from Cascading? For example, do you agree that a capital project is not required to be implemented by Requirement R4, Parts 4.2.2.1 and 4.2.2.2, even if the capital project is the only feasible action available to prevent the System from Cascading when analysis concludes there is Cascading caused by the occurrence of extreme events 2e-2h in the stability column?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the omission, as proposed in TPL-001-5 Requirement R4, Part 4.2, of a requirement similar to that of Requirement R2, Part 2.7, which states that the planned System shall continue to meet the performance requirements in Table 1 in subsequent Planning Assessments?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with including Table 1 Footnote 13 a., “[a] single protective relay which responds to electrical quantities, without an alternative that provides comparable Normal Clearing times, *e.g*., sudden pressure relaying”, and its limitation to only the specific single protective relay and not to other elements of the associated Protection System?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the inclusion of Table 1 Footnote 13 b. & c. stipulation, “which is not monitored or not reported”, and that it conveys the expectation that the monitoring and reporting is sufficient to result in prompt remediation addressing the failure status of the associated equipment?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the inclusion of Table 1 Footnote 13 d., and that it, in conjunction with defined terms, identifies what constitutes all of the elements of, “A single control circuitry associated with protective functions including the trip coil(s) of the circuit breakers or other interrupting devices.”?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed changes to Requirement 1, Part 1.1.2 that modify which known outages shall be represented in System models from those “with a duration of at least six months” to those selected by the Planning Coordinator (PC)/Transmission Planner (TP) “in consultation with” their Reliability Coordinators (RCs).

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with omitting the Reliability Coordinator (RC) from the applicability of the TPL-001-5 standard given that Requirement R1, Part1.1.2 requires consultation between the TP/PC and the RC to determine which known outages to select for representation in System models?

[ ]  Yes

[ ]  No

Comments:

1. FERC Order No. 786 Paragraphs 40-45 direct modification to address significant planned maintenance outages with durations less than 6 months in planning assessments. Are you aware of an existing standard/requirement, consistent with industry practice and applicability that requires review and coordination of significant known maintenance outages less than 6 months in duration for inclusion in System models (TPL 001-4 Requirement R1 Part R1.1.2)?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the 36 month implementation period to address all Requirements except for Requirement R4, Part 4.2, and Requirement 2, Part 2.7 associated with the modified P5 events further defined in the redline changes to Footnote 13.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the 60 month implementation plan for Requirement 4, Part 4.2 and Requirement 2, Part 2.7 associated with the modified P5 events further defined in the redline changes to Footnote 13.?

[ ]  Yes

[ ]  No

Comments:

1. In looking at all proposed recommendations from the standard drafting team, are the proposed changes a cost effective approach which meets the FERC directives? (*see* [*Cost Effectiveness Background Document*](http://www.nerc.com/pa/Stand/Project_201510%20Single%20Points%20of%20Failure_TPL001_DL/2015-10_Cost_Effectiveness_Background%20Document_09072017.pdf))

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any other governing documents that could be in conflict with the current proposal for this draft of the standard?

[ ]  Yes

[ ]  No

Comments:

1. Do you have any other general recommendations/considerations for the drafting team?

[ ]  Yes

[ ]  No

Comments: