Unofficial Comment Form

Project 2015-10 Single Points of Failure
TPL-001-5

**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, Wednesday, May 24, 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 with the proposed changes to Requirement 1, Part 1.1.2 that move away from the 6 month duration outage to limited known outages selected by the Planning Coordinator (PC)/Transmission Planner (TP) in consultation with their Reliability Coordinators (RCs) for the time horizon of the operations planning horizon through the near term planning horizon?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed changes to Requirement 2, Part 2.4.5 which addresses the Federal Energy Regulatory Commission (FERC) order to add the spare equipment with long lead time to the dynamics analysis?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the further clarification of relay to components of a Protection System with the additional footnote to clarify P5 and extreme events?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed Requirement 4, Part 4.6 additions which require a Corrective Action Plan for this subset of Table 1 extreme events (footnote 13, 2e-2h)?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the drafting team’s approach which doesn’t add additional applicable entities to the applicability of the standard? (e.g. RC, Transmission Operator (TO), Generator Operator (GO), Distribution Provider (DP))

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the 36 month implementation period to address All Requirements except for Requirement R4, Part 4.6, and Requirement 2, Part 2.7 associated with P5 due to Footnote 13 bullets 2, 3 and 4, as well as the definitions?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the 60 month implementation plan for Requirement 4, Part 4.6 and Requirement 2, Part 2.7 associated with P5 due to Footnote 13 bullets 2, 3 and 4?

[ ]  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 agree with the teams proposed changes to align the VRF/VSLs for Requirement 4, Part 4.6 with the VRF/VSLs for Requirement 2, Part 2.7?

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments: