Unofficial Comment Form

**Second Posting**

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=e609f1c6e44948e3b9631f3344233c7a)[[1]](#footnote-1) to submit comments on the data request. The electronic comment form must be completed by **Monday, June 25, 2012, 8:00 p.m. ET**.

If you have questions please contact Scott Barfield-McGinnis at [scott.barfield@nerc.net](mailto:scott.barfield@nerc.net) or by telephone at 404-446-9689.

**Click here for:**  [**Order 754 Project Page**](http://www.nerc.com/filez/standards/order_754.html)[[2]](#footnote-2)

# Background Information

This posting is soliciting informal comment in accordance with Section 1600 of the [NERC Rules of Procedure](http://www.nerc.com/page.php?cid=1|8|169).[[3]](#footnote-3) NERC may request data or information that is deemed necessary to meet its obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d) of the Federal Energy Regulatory Commission’s (FERC) regulations. Section 1602 requires NERC to post the proposed request for data or information or a proposed modification to a previously authorized request for data or information for a forty-five (45) day public comment period.

Order 754 is the Final Rule approving the interpretation of Interpretation TPL-002-0a PacifiCorp ([Project 2009-14](http://www.nerc.com/filez/standards/Project2009-14_Interpretation_TPL-002-0_PacifiCorp.html)[[4]](#footnote-4)) regarding requirement R1.3.10. In addition to the approval, the Commission expressed a concern about single point of failure of protection systems and issued a directive for further investigation. From the Order, “…the Commission believes that there is an issue concerning the study of the non-operation of non-redundant primary protection systems; e.g., the study of a single point of failure on protection systems” (P19). In the first part of the directive (P20), the Commission directed FERC staff to meet with NERC and its appropriate subject matter experts to explore this reliability concern, including where it can best be addressed, and identify any additional actions necessary to address the matter. This portion of the directive was satisfied by the October 24-25, 2011 Technical Conference. The second part of the directive (P20) requires NERC to submit an informational filing within six months of the Order (March 15, 2012) explaining whether there is a further system protection issue that needs to be addressed and, if so, what forum and process should be used to address that issue and what priority it should be accorded relative to other reliability initiatives planned by NERC. The data request will help NERC and the Commission to understand the extent of any reliability gap and guide any efforts to address any such reliability gap, if necessary.

**Modifications from the Initial Posting**

This second posting addresses many of the comments and concerns regarding the data request. Each applicable entity is encouraged to review the summary response to comments received posted on the [Order 754 Project Page](http://www.nerc.com/filez/standards/order_754.html). Significant modifications include; (1) allowing flexibility for an entity to use an alternative method that yields data consistent (in form and substance) with the method in the data request, (2) updated tables to promote a better understanding of the criteria to be applied in responding to the data request, (3) the period to respond has been extended to twenty-four months with a staged approach for reporting data, and (4) many examples and illustrations have been added to provide additional clarity.

**Comment Questions**

Not all sections require a comment. Enter comments electronically in text only format when cutting and pasting from other documents. Avoid using any special characters other than commas and periods.

1. Please enter specific comments about the method of the data request in the provided text box.

Comments:

1. Please enter specific comments about the data reporting template of the data request in the provided text box. Note: The posted template is the structure of reporting data and actual reporting may use a different mechanism, such as, this electronic comment form.

Comments:

1. Please enter specific comments about the reporting schedule of the data request in the provided text box.

Comments:

1. Please enter any other comments about the data request in the provided text box.

Comments:

1. <https://www.nerc.net/nercsurvey/Survey.aspx?s=d86ae2907b884db9af1cac68b0afb6ea> [↑](#footnote-ref-1)
2. <http://www.nerc.com/filez/standards/order_754.html> [↑](#footnote-ref-2)
3. <http://www.nerc.com/page.php?cid=1|8|169> [↑](#footnote-ref-3)
4. <http://www.nerc.com/filez/standards/Project2009-14_Interpretation_TPL-002-0_PacifiCorp.html> [↑](#footnote-ref-4)