

Meeting Notes

Project 2012-INT-02 Interpretation of TPL-003-0a and TPL-004-0 for SPCS

March 29, 2012
Conference Call and ReadyTalk Webinar

Administrative

1. Introductions

Scott Barfield-McGinnis (advisor) took attendance and there were no additions or changes. Those in attendance are listed below. The chair needed to leave the meeting early, and Bob Pierce agreed to lead the remainder of the meeting. The goal is to bring the drafting of the interpretation to a close by the April 4, 2012 meeting.

Present	Members	Entity
X	Scott Barfield-McGinnis	North American Electric Reliability Corporation
X	Eugene Blick	Federal Energy Regulatory Commission
X	Doug Hohlbaugh (Chair)	FirstEnergy Corp.
X	R. W. Mazur	Manitoba Hydro
X	Bill Middaugh	Tri-State Generation and Transmission
X	John E. Odom	Florida Reliability Coordinating Council
X	Bob Pierce	Duke Energy
X	Patrick Sorrells	Sacramento Municipal Utility District
X	Phil J. Tatro	North American Electric Reliability Corporation
	John Zipp	ITC Holdings

2. NERC Antitrust Compliance Guidelines and Public Announcement

Mr. Barfield-McGinnis read the guidelines and disclaimer to the group, there were no questions.

3. Review Current Team Roster

Mr. Barfield-McGinnis noted the team roster has no changes or updates.

4. Review Meeting Agenda and Objectives

Mr. Barfield-McGinnis reviewed the agenda.

Agenda

1. Review and Discuss Working Group's Draft

The team reviewed and discussed the working group's efforts. Several concerns came up regarding the use of "protection system" in standard and its connection with the definition and how to deal with it in the interpretation. An observer noted that "protection system" was capitalized in Order No. 754 in the previous interpretation team's response to the interpretation of TPL-002. This raised concern whether a precedent had been set. Another observation included the work being done by the Protection System Maintenance and Testing Standard Drafting Team (PSMTSDT). The PSMTSDT performed an analysis of all standards for the occurrence of the phrase "protection system." The team wanted to know what consideration was given to the TPL standards in use of the lowercase protection system in the PSMTSDT analysis called, [Assessment of Impact of Proposed Modification to the Definition of "Protection System."](#)¹

Other discussion concerned footnote "e" and its use of "such as." Team members thought it might be beneficial to know if other interpretations have dealt with the phrase, "such as" and what conclusions were made. Additionally, the team wanted to know the legal ramification and meaning of how "such as" is used. Team consensus was that the phrase means "for example" and is not an exhaustive or complete list; however, it raises questions on the listed example items of the footnote and its connection with the parenthetical for Category C, Delay Clearing (stuck breaker or protection system failure) in Table of the TPL-001 through TPL-004 standards.

The team asked for guidance on options that are available if they are unable to reach a conclusion about the interpretation. The advisor shared the options provided for in the Interpretation Drafting Team (IDT) Guidelines with the team. The advisor also responded to the question raised at the last meeting about whether the interpretation could have an implementation period or not. This was also reviewed from the guidelines (See below).

¹ http://www.nerc.com/docs/standards/sar/PSMT_Definition_Impacts_Draft1_2009July23.pdf

An interpretation may not:

- be used to change an approved Reliability Standard or its applicability;
- address a gap or perceived weakness in the approved Reliability Standard;
- clarify or interpret sections of an approved Reliability Standard other than the requirements of the standard;
- provide an opinion on a particular approach to complying with the requirements.

Suggestions for drafting clear interpretations

- Sometimes an interpretation may not be possible without expanding on the scope of the approved Reliability Standard. If the IDT believes it cannot draft an interpretation that stays within the bounds of the approved Reliability Standard, the IDT should report this to the Standards Process Manager without delay. If the request for interpretation involves multiple questions, and the IDT can address part of the request but not all of the questions, it should report this as well.
- If an analysis of the interpretation request or if the draft interpretation reveals a reliability gap that requires changes to the standard, the drafting team should report its conclusion to the Standards Committee, and recommend the appropriate corrective action to bridge the gap.
- Some interpretations may require time for entities to become fully compliant. IDTs should consider this and if warranted, propose an **implementation** timeframe.

The team raised the question about having an informal group provide feedback on the team's conclusion. A member recommended the System Protection and Control Subcommittee (SPCS); however, the advisor pointed out that the SPCS submitted the interpretation; therefore, it would be inappropriate. The advisor took the question as an action item. Another concern was about whether or not the team had to post for comment before reaching any definitive conclusions on the interpretation. The advisor did not believe so, but took it as an action item.

In closing, the team ended up paring down the interpretation text primarily on the second response. The team recognized their initial efforts were providing more rationale and explanation than was needed and should be more concise in responding to the interpretation questions. In preparation for the next meeting, the team will be reviewing the latest draft for discussion.

2. Review of Schedule

Mr. Barfield-McGinnis reviewed the schedule.

3. Next Steps – None

4. Action Items or Assignments

- a. Team: Review the latest draft prior to the next meeting
- b. Mr. Barfield-McGinnis:
 - i. Obtain NERC legal opinion on the meaning of “such as.”
 - ii. Investigate the meaning of “such as” usage in other interpretations.
 - iii. Research the timing of the TPL standards and the approval of the definition for protection system.
 - iv. Investigate the concern about Order No. 754 approval of the interpretation of TPL-002 using the capitalized version of “protection system”.
 - v. Send the team the hyperlink to the protection system definition analysis conducted by the PSMTSDT.
 - vi. For the definition analysis conducted by the PSMTSDT, what considerations were given to the cases where “protection system” was lower case?
 - vii. Identify a group for informal feedback since SPCS submitted the request.
 - viii. Determine if the team is required to post for comment or if a perceived gap exists whether or not the team can recommend a solution.

5. Future Meeting(s)

The next conference call is scheduled for Tuesday, April 4, 2012 at 10:00 a.m. ET (1:00 p.m. ET because of the advisor’s travel conflict, confirm with the team). The team was notified of this change on April 1, 2012.

6. Adjourn