

# Meeting Notes

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

April 10, 2012 | 10:00 a.m. to 1:00 p.m. ET  
Conference Call and ReadyTalk Webinar

### Administrative

#### 1. Introductions

The chair noted no other feedback had been communicated between meetings by the team members. Scott Barfield-McGinnis (Advisor or Mr. Barfield-McGinnis) took attendance and there were no additions or changes. Those in attendance are listed below. R.W. Mazur stepped out from the meeting for about an hour and Bob Pierce joined the meeting about an hour after its start. Quorum was met.

| Present | Name                                 | Entity  |
|---------|--------------------------------------|---|
| X       | Scott Barfield-McGinnis<br>(Advisor) | North American Electric Reliability Corporation |
| X       | Eugene Blick (Observer)              | 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 |
| X       | John Zipp                            | ITC Holdings                                    |

## 2. NERC Antitrust Compliance Guidelines and Public Announcement

The Advisor read the guidelines and disclaimer to the team, there were no questions.

## 3. Review Current Team Roster

The Advisor presented the team roster and noted no members were added or removed. Two team member names had been updated to their preferred or common name.

## 4. Review Meeting Agenda and Objectives

The Advisor reviewed the agenda and objectives. There were no changes or additions.

### Agenda

#### 1. Review of Action Items from Last Meeting

The Advisor responded to the following action items from the previous meeting. Team members discussed item 1bi (see below) to the extent that the team believes the use of the phrase “such as” within footnote (e) is synonymous with “for example” over “including, but not limited to.” With regard to item 1biv, the team believes that by using the capitalized (i.e., NERC Glossary of Terms) version of “Protection System” narrows the meaning more than what was intended by the standards identified in the request for interpretation. More specifically, by capitalizing and inferring the NERC Glossary term, industry would believe that the DC supply (i.e., station battery) would be included in the scope of the assessment required by the standard. The team believes that making that conclusion goes (1) beyond the scope of the request for interpretation and (2) goes beyond the intent of the standard to address delayed clearing caused by a stuck breaker or protection system failure couched with the items in footnote (e). Team feedback concerning item 1bvii, the Advisor recommended tabling the discussion at the conclusion of the meeting when reviewing the schedule.

a. Team: Review the latest draft prior to the next meeting

b. Advisor:

- i. Investigate the meaning of “such as” from the legal standpoint. (Response: NERC legal considers the phrase “such as” an open-ended grouping providing examples but not limiting the set. It is equivalent to “including, but not limited to” or “for example.”)
- ii. Investigate the meaning of “such as” usage in other interpretation. (Response: No other usages were located)
- iii. Research the timing of the TPL standards and the approval of the definition for Protection System. (Response: NERC filed for approval of the modified definition for Protection System was adopted by the BOT on November 19, 2010 and filed for approval on March 30, 2011. The definition (new) was approved by FERC on February 3, 2012. The previous version of the definition – BOT adopted February 7, 2006 and FERC approved on March 17, 2007. “Protection System – Protective relays, associated communication systems, voltage

and current sensing devices, station batteries and DC control circuitry.” March 15, 2007, FERC approved 83 NERC Reliability Standards, the first set of legally enforceable standards for the U.S. bulk power system, effective June 4, 2007. FERC stated that voluntary compliance with NERC’s additional standards should continue as good utility practice.)

- iv. Investigate the concern about Order No. 754 approval of the interpretation of TPL-002 using the capitalized version of protection system. (Response: NERC legal encourages the use of the defined term in the standard. The terms defined in the Glossary should be used where appropriate to provide clarity on a standard. Technically, the team could use the undefined lower case term in the standard but this may lead to unnecessary confusion and the possibility of a Compliance Application Notice (CAN) – this would not be a favorable outcome. The industry supported this definition just over one year ago. The question is, how big a problem is it to use the defined and recently approved term. Team should consider further)
- v. Send the team the hyperlink to the protection system definition analysis conducted by the System Protection Testing and Maintenance Standard Drafting Team. (Response: Link provided in the meeting registration and agenda) [Assessment of Impact of Proposed Modification to the Definition of “Protection System”](#)<sup>1</sup>
- vi. For the definition analysis conducted by the System Protection Testing and Maintenance Standard Drafting Team, what considerations were given to the cases where protection system was lower case? (Response: The Advisor communicated with Charles Rogers, Chair of the Protection System Maintenance and Testing standard drafting team about the analysis. According to Mr. Rogers, there were no significant other considerations with respect to those standards having the lowercase occurrences other than confirming the usage would not conflict with the proposed definition. It was Mr. Rogers opinion that the lowercase phrasing of “protection system” is a carryover from the version zero standards.)
- vii. Identify a group for informal feedback since SPCS submitted the request. (Response: NERC staff recommends reaching out to the Regional planning and relay working groups)
- 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. (Response: The team is not required to post for stakeholder comment prior to making conclusions on the ability to suggest alternative action. The most significant action is notifying the Standards Process Manager of the team’s inability to reach a response conclusion.)

## 2. Review and Discuss Working Group’s Draft

The team worked on both responses. Based on discussion, the team pared the responses to eliminate the portions of the responses that were not focused on or added clarity to the questions

<sup>1</sup> [http://www.nerc.com/docs/standards/sar/PSMT\\_Definition\\_Impacts\\_Draft1\\_2009July23.pdf](http://www.nerc.com/docs/standards/sar/PSMT_Definition_Impacts_Draft1_2009July23.pdf)

posed in the request for interpretation. Concerns included using the phrase “such as,” “all,” or even “any” would imply the inclusion of the DC supply and was beyond the scope of the standard. The team also addressed FERC staff comments about the capitalization of “Delayed Clearing,” which is capitalized in the standard, but is not a defined NERC Glossary term. A similar term is “Delayed Fault Clearing.” To address the concern, the team made each occurrence lower case and eliminated an instance for clarity.

One team member posed the opportunity to utilize the system protection white paper (i.e., SPCS Protection System Reliability).<sup>2</sup> The Advisor cautioned that referencing the paper as a basis for the response may be construed as expanding the performance of the requirements identified in the request for interpretation. NERC technical staff concurred. The Advisor noted that the paper could be used to support the logic the team is using, but not the performance.

### 3. Review of Schedule

Mr. Barfield-McGinnis reviewed the schedule with the team to determine how to incorporate obtaining feedback from the regions. The team agreed with the direction of the Chair to work toward issuing a notice to the region working group chairs by April 20, 2012 and request feedback by May 4, 2012. The team identified May 9, 2012 as the next call for discussing and reviewing the regions’ feedback.

### 4. Next Steps – None

### 5. Action Items or Assignments

- a. Advisor – Communicate with Al McMeekin, NERC staff, to obtain contact information for the chairs of the Regional relay working groups.
- b. Advisor – Solicit the Regions for informal feedback on the team’s draft interpretation response. The team will seek feedback from the chairs of transmission planning working groups and/or relay working groups.
- c. Advisor and Chair – Draft questions and email letter request to the planning and relay working group chairs, circulate to the team, then issue by to the working group by April 20, 2012 with a May 4, 2012 response date.

### 6. Future Meeting(s)

Wednesday, May 9, 2012 | 11:00 a.m. to 1:00 p.m. ET

### 7. Adjourn

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<sup>2</sup> Protection System Reliability – Redundancy of System Protection Elements, NERC System Protection and Control Task Force (SPCTF), November 2008. ([http://www.nerc.com/docs/pc/spctf/Redundancy\\_Tech\\_Ref\\_1-14-09.pdf](http://www.nerc.com/docs/pc/spctf/Redundancy_Tech_Ref_1-14-09.pdf))