Unofficial Comment Form

Project 2022-02 Modifications to TPL-001 and MOD-032

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2022-02 Modifications to TPL-001 and MOD-032 Standard Authorization Request (SAR).** Comments must be submitted by **8 p.m. Eastern, Friday, May 12, 2023.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2022-02-Modifications-to-TPL-001/MOD-032.aspx). If you have questions, contact Senior Standards Developer, [Ben Wu](mailto:ben.wu@nerc.net) (via email), or at 470-542-6882.

## Background Information

The NERC TPL-001-4 Reliability Standard was revised to TPL-001-5.1 (subject to Enforcement July 1, 2023), which expanded Footnote 13 from specific Protection System relays to include communication systems, station DC supply, and control circuitry. More specifically, Footnote 13.d now applies to control circuitry from the DC supply through and including the circuit breaker trip coil. However, the footnote only provides an exclusion for a single (non-redundant) monitored and reported trip coil, but not the control circuit itself.

By only excluding the trip coil and not permitting the control circuitry to be excluded, it implies that the remainder of the Protection System control circuitry is not excluded, even if it is monitored and reported. For example, it is very common to install trip circuit monitoring which monitors the control circuitry and the trip coil, but the trip coil is the only component that qualifies for the TPL-001-5.1 exclusion.

The current exclusion provides no practical mechanism to be used by the Distribution Provider (DP), Generator Owner (GO), and Transmission Owner (TO) other than installing redundant control circuitry when necessary to meet Bulk Electric System (BES) performance requirements under TPL-001-5.1. Modern Protection System design includes many additional components that typically are monitored (or could become monitored and reported). Including all of the components that are monitored and reported will result in a more practical, efficient, and effective Footnote 13.d exclusion rather than adding to Protection System complexity by installing completely redundant control circuits.

Modifying the Footnote 13.d exception to apply to any monitored and reported components of the control circuitry to be consistent with Protection System design and operational functionality will allow the DP, GO, and TO to achieve the required transmission performance mandated by TPL-001-5.1 in a much more efficient manner.

## Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Yes

No

Comments:

1. Provide any additional comments for the Standard Drafting Team to consider, if desired.

Comments: