

## Reliability Standards Suggestion Form

When completed, email this form to:

[Andy.Rodriguez@nerc.net](mailto:Andy.Rodriguez@nerc.net)

For questions about this form or for assistance in completing the form, call Andy Rodriquez at 404-446-2579.

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards and improvements to the standard development process. Please use this form to submit your suggestions related to NERC's Reliability Standards, [Reliability Standards Development Plan](#) (RSDP), or

standard processes in general. NERC will consider all input received for future development projects, revisions of the RSDP, or wherever else appropriate.

### Contact Information for Individual, Group or Committee submitting the suggestion.

<b>Date Submitted:</b>			
<b>Individual, Group, or Committee Name:</b>			
<b>Company or Group Name:</b>			
<b>Telephone:</b>		<b>Email:</b>	

### Suggestion (Check all that apply)

- ...for consideration by a drafting team assigned to an active project
- ...for consideration in a future project already identified in the RSDP
- ...to create a new project for inclusion in the RSDP
- ...to modify the Standard Development Process
- ...related to another issue or topic

### Suggestion Detail

**Notes:**

1. Please be as specific as possible.
2. Where applicable, please identify the specific element(s) of the standard (e.g. Requirement R1.2, Section D1.1, Measure M1, etc.) to which the suggestion pertains.
3. Where practical, please provide an example to clearly identify the issue.

4. Please provide an idea for improvement, including suggested alternative language where possible.

<b>Standard or Project Number (if applicable):</b>	TPL-001-0.1, TPL-002-0b, TPL-003-0a, and TPL-004-0													
<b>Standard or Project Title (if applicable):</b>	TPL-001-0.1 — System Performance Under Normal (No Contingency) Conditions (Category A) TPL-002-0 — System Performance Following Loss of a Single Bulk Electric System Element (Category B) TPL-003-0a — System Performance Following Loss of Two or More Bulk Electric System Elements (Category C) TPL-004-0 — System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements (Category D)													
<b>Other Identifying Information (e.g., step in the standard process):</b>	Currently enforceable standards and subsequent revisions that yet to be mandatory and enforceable. This suggestion may also impact the request for approval of TPL-001-2 (10/11/2011).													
<b>Problem or Concern:</b>	Ambiguous use of terms within the standard that are also NERC Glossary Terms may cause confusion and a potential reliability risk.													
<b>Example:</b>	<table border="1"> <tr> <td data-bbox="464 1304 686 1392"> <b>A</b> No Contingencies                 </td> <td data-bbox="686 1304 1195 1392">                     All Facilities in Service <span style="color: red;">No footnote "e"</span> </td> <td data-bbox="1195 1304 1414 1392">                     Yes                 </td> </tr> <tr> <td data-bbox="464 1392 686 1650" rowspan="2"> <b>B</b> Event resulting in the loss of a single element.                 </td> <td data-bbox="686 1392 1195 1570">                     Single Line Ground (SLG) or 3-Phase (3Ø) Fault, with Normal Clearing:                      1. Generator                      2. Transmission Circuit                      3. Transformer                      Loss of an Element without a Fault.                 </td> <td data-bbox="1195 1392 1414 1570">                     Yes                      Yes                      Yes                      Yes                 </td> </tr> <tr> <td data-bbox="686 1570 1195 1650">                     Single Pole Block Normal Clearing<sup>e</sup>:                      4. Single Pole (dc) Line                 </td> <td data-bbox="1195 1570 1414 1650">                     Yes                 </td> </tr> <tr> <td data-bbox="464 1650 686 1717"> <b>C</b> </td> <td data-bbox="686 1650 1195 1717">                     SLG Fault, with Normal Clearing<sup>e</sup>:                      1. Bus Section                 </td> <td data-bbox="1195 1650 1414 1717">                     Yes                 </td> </tr> </table>			<b>A</b> No Contingencies	All Facilities in Service <span style="color: red;">No footnote "e"</span>	Yes	<b>B</b> Event resulting in the loss of a single element.	Single Line Ground (SLG) or 3-Phase (3Ø) Fault, with Normal Clearing: 1. Generator 2. Transmission Circuit 3. Transformer Loss of an Element without a Fault.	Yes Yes Yes Yes	Single Pole Block Normal Clearing <sup>e</sup> : 4. Single Pole (dc) Line	Yes	<b>C</b>	SLG Fault, with Normal Clearing <sup>e</sup> : 1. Bus Section	Yes
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<p><b>Suggestion:</b></p>	<p><b>Suggestion #1:</b> The version 0 of these four standards became enforceable on June 18, 2007 and their content has not materially changed by subsequent versions. These standards use the capitalized terms “Normal Clearing” and “Delayed Clearing”. Where used, each term is footnoted (footnote e) in Table 1 of each standard.<sup>1</sup></p> <p>The footnoted term “Normal Clearing<sup>2</sup>” by capitalization references the approved NERC Glossary term. Upon careful study, the footnote e definition has the same meaning as the NERC Glossary term for “Normal Clearing<sup>3</sup>.” We suggest the term “Normal Clearing” either be:</p> <ol style="list-style-type: none"> <li>1. Made lowercase and continue to use the portion of footnote e reference to “normal clearing,” or the preferred</li> <li>2. Retained as capitalized using the NERC Glossary version and remove both the “e” footnote from the references to “Normal Clearing” and the definition of “Normal Clearing” from the Table 1, footnote e.</li> </ol> <p><b>Suggestion #2:</b> Given the case of “Normal Clearing” above, the footnote e term “Delayed Clearing<sup>4</sup>” is very similar NERC Glossary term “Delayed Fault Clearing<sup>5</sup>” and is significantly different. We suggest the term “Delayed Clearing” be:</p> <ol style="list-style-type: none"> <li>1. Changed to lowercase “delayed clearing” and continue to use footnote</li> </ol>						

<sup>1</sup> Except in Table 1, Category B — There is no footnote “e” for “Normal Clearing” in this instance.

<sup>2</sup> (TPL-002-0b, TPL-003-0a and TPL-004-0 footnote e) Normal clearing is when the protection system operates as designed and the Fault is cleared in the time normally expected with proper functioning of the installed protection systems.

<sup>3</sup> NERC Glossary (12/27/2007) Normal Clearing: A protection system operates as designed and the fault is cleared in the time normally expected with proper functioning of the installed protection systems.

<sup>4</sup> (TPL-002-0b, TPL-003-0a and TPL-004-0 footnote e) Delayed clearing of a Fault is due to failure of any protection system component such as a relay, circuit breaker, or current transformer, and not because of an intentional design delay.

<sup>5</sup> NERC Glossary (12/27/2007) Delayed Clearing: Fault clearing consistent with correct operation of a breaker failure protection system and its associated breakers, or of a backup protection system with an intentional time delay.

	<p>“e” to reference “delayed clearing” in Table 1, footnote e.</p> <p><b>Suggestion #3:</b> The term “protection system” used in Table 1 is not footnoted. The NERC Glossary contains the defined term “Protection System” which provides detail. We suggest the term “protection system” either be:</p> <ol style="list-style-type: none"> <li>1. Made uppercase to more clearly reflect the intent and composition of a protection system as it pertains to the standard(s), or</li> <li>2. Footnoted with the specific criteria needed to provide greater detail within each standard(s).</li> </ol>
<p><b>Intended Outcome (e.g., describe how the suggestion would improve reliability, make the standard clearer for auditors, etc.):</b></p>	<p><b>Suggestion #1:</b> The intended outcome of the suggestion for “Normal Clearing” is to either specifically reference the term within the standard(s) or rely on the NERC Glossary term. This improves reliability by using a singular reference by capitalization to reference the NERC Glossary and avoids future confusion due to the similarity in definitions.</p> <p><b>Suggestion #2:</b> The intended outcome of the suggestion for “Delayed Clearing” is to definitively point to footnote e by not capitalizing the term. This improves reliability by not inferring the term is a recognized NERC Glossary term which has a significant difference in definition.</p> <p><b>Suggestion #3:</b> The intended outcome of the suggestion for “protection system” is to properly align the term with the NERC Glossary term, if that is indeed the case or add the needed additional information within each standard. This improves reliability by using a defined term, which provides greater detail and clarity to its usage in the standard(s).</p>
<p><b>Additional Information:</b></p>	

Thank you for taking the time to submit your suggestion for improving the reliability of the bulk power system through improved reliability standards and standard processes!