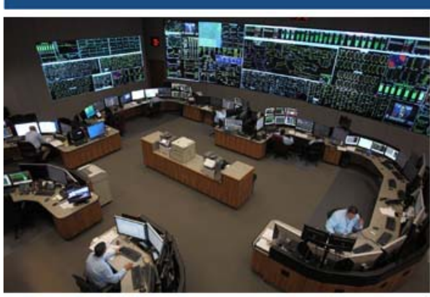
NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Project 2015-10

Single Points of Failure TPL-001 Technical Rationale

September 2017

RELIABILITY | ACCOUNTABILITY

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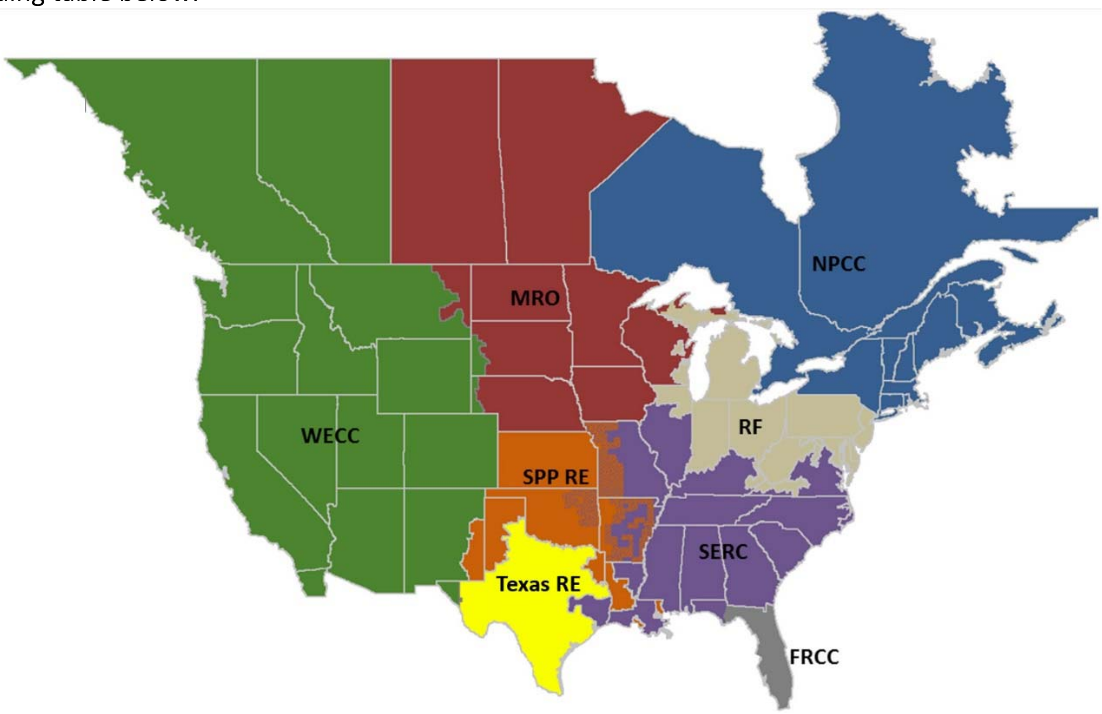
Preface

The North American Electric Reliability Corporation (NERC) is a not-for-profit international regulatory authority whose mission is to assure the reliability and security of the bulk power system (BPS) in North America. NERC develops and enforces Reliability Standards; annually assesses seasonal and long-term reliability; monitors the BPS through system awareness; and educates, trains, and certifies industry personnel. NERC's area of responsibility spans the continental United States, Canada, and the northern portion of Baja California, Mexico. NERC is the Electric Reliability Organization (ERO) for North America, subject to oversight by the Federal Energy Regulatory Commission (FERC) and governmental authorities in Canada. NERC's jurisdiction includes users, owners, and operators of the BPS, which serves more than 334 million people.

The North American BPS is divided into eight Regional Entity (RE) boundaries as shown in the map and corresponding table below.



The North American BPS is divided into eight RE boundaries. The highlighted areas denote overlap as some load-serving entities participate in one Region while associated transmission owners/operators participate in another.

FRCC	Florida Reliability Coordinating Council
MRO	Midwest Reliability Organization
NPCC	Northeast Power Coordinating Council
RF	ReliabilityFirst
SERC	SERC Reliability Corporation
SPP RE	Southwest Power Pool Regional Entity
Texas RE	Texas Reliability Entity
WECC	Western Electricity Coordinating Council

Executive Summary

Project 2015-10 Technical Rationale provides the background and rationale for proposed revisions to Reliability Standard TPL-001-4. The proposed revisions address reliability issues concerning the study of single points of failure (SPF) on Protection Systems from FERC Order No. 754, directives from FERC Order No. 786 regarding planned maintenance outages and spare equipment strategy for stability analysis, and replaces references to the MOD-010 and MOD-012 standards with the MOD-032 Reliability Standard.

Key Concepts of FERC Order No. 754

The Standards Development Team (SDT) took into account the recommendations for modifying NERC Reliability Standard TPL-001-4 identified in the SPCS and SAMS report titled *Order No. 754 Assessment of Protection System Single Points of Failure Based on the Section 1600 Data Request*. Proposed revisions changes extreme event (3-phase fault) to include a fault and failure of a non-redundant component of a Protection System. In "Table 1 – Steady State and Stability Performance Extreme Events," breaker failure and failure of a non-redundant component of a Protection System are differentiated. The SDT recognizes that sequence of Protection System action leading to Delayed Clearing may be quite different between the two causalities. Footnote 13 expands Protection System components to be considered for Category P5 and for extreme events 2e through 2h.

Key Concepts of FERC Order No. 786

The SDT considered the Commission's concern that the outages of significant facilities less than six months could be overlooked for planning purposes, Category P3 and P6 do not sufficiently cover planned maintenance outages, and Near-Term Transmission Planning Horizon requires annual assessments using Year One or year two, and year five, and known planned facility outages of less than six months should be addressed so long as their planned start times and durations may be anticipated as occurring for some period of time during the planning time horizon. Proposed revisions remove the six month outage duration and replace it with consultation with the Reliability Coordinator (RC) to identify known outages of significant facilities that cannot be readily managed through near-term operational coordination processes. Proposed revisions includes stability study for long lead equipment that does not have a spare.

Summary of proposed revisions:

- Requirement R1 – Updated for MOD-032-1 standard.
- Requirement R1, Part 1.1.2 – Modified how known outages are selected for study.
- Requirement R2, Part 2.1.3 – Modified the P1 contingency events simulated (steady state) for known outages.
- Requirement R2, Part 2.4.3 – Added model conditions for stability analysis of P1 events for known outages.
- Requirement R2, Part 2.4.5 – Added stability analysis requirement for long lead time equipment unavailability.
- Requirement R4, Part 4.2 – Added documentation requirement if Cascading observed given 3-phase fault SPF.
- Table 1 – Modified Category P5 event to include SPF.
- Table 1 – Modified Extreme Events, Stability column to differentiate SPF from stuck breaker.
- Table 1 – Modified Footnote 13 to specify SPF.

Introduction

NERC Reliability Standard TPL-001-4 (Transmission System Planning Performance Requirements) is being modified to address reliability issues and standard modification directives contained in FERC Order No. 754[1] and FERC Order No. 786.[2] Proposed Reliability Standard TPL-001-5 revises the TPL-001 standard to address the reliability risks posed by SPF on Protection Systems.

Background

FERC Order No. 754

FERC Order No. 754 directed NERC to study the reliability risk associated with single points of failure (SPF) in Protection Systems. The NERC System Protection and Control Subcommittee (SPCS) and the System Analysis and Modelling Subcommittee (SAMS) conducted an assessment of Protection System SPF in response to FERC Order 754, including analysis of data collected pursuant to a request for data or information under Section 1600 of the NERC Rules of Procedure. The SPCS and SAMS report titled *Order No. 754 Assessment of Protection System Single Points of Failure Based on the Section 1600 Data Request* provides extensive general discussion about the reliability risks associated with a SPF. Available

FERC Order No. 786

In Order No. 786, FERC directed NERC to address two issues. The first issue is the concern that the six month outage duration threshold could exclude planned maintenance outages of significant facilities from future planning assessments. FERC directed NERC to modify TPL-001-4 to address this concern. The second issue involves adding clarity regarding dynamic assessment of outages of critical long lead time equipment, consistent with the entity's spare equipment strategy. FERC directed NERC to consider this issue upon its next review of TPL-001-4. The NERC SAMS developed a white paper documenting the technical analysis conducted by SAMS to address the two directives contained in the FERC Order 786. The white paper provides extensive general discussion regarding the directives.

1 Order No. 754, *Interpretation of Transmission Planning Reliability Standard*, 136 FERC ¶ 61,186 (2011) ("Order No. 754").

2 Order No. 786, *Transmission Planning Reliability Standards*, 145 FERC ¶ 61,051 (2013) ("Order No. 786").

Section 1: Single Points of Failure on Protection Systems (FERC Order No. 754)

NERC Advisory

On March 30, 2009, NERC issued an advisory[3] report notifying the industry that a SPF issue had caused three significant system disturbances in 5 years.

Transmission Owners, Generation Owners, and Distribution Providers owning Protection Systems installed on the Bulk Electric System were advised to address SPF on their Protection Systems when identified in routine system evaluations to prevent N-1 transmission system contingencies from evolving into more severe or even extreme events.

These entities were additionally advised to begin preparing an estimate of the resource commitment required to review, re-engineer, and develop a workable outage and construction schedule to address SPF on their Protection Systems.

FERC Order No. 754

In Order No. 754 Paragraph 20, FERC directed NERC to "to make an informational filing within six months of the date of the issuance of this Final Rule 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."

FERC Technical Conference

A FERC technical conference concerning the Commission's Order 754 titled Staff Meeting on Single Points of Failure on Protection Systems was held on October 24-25, 2011 at FERC in Washington, DC.

At the Technical Conference, the attendees discussed the SPF issue and narrowed their concerns into four consensus points:

- The concern with assessment of SPF is a performance-based issue, not a full redundancy issue.
- The existing approved standards address assessments of SPF.
- Assessments of SPF of non-redundant primary protection (including backup) systems need to be sufficiently comprehensive.
- Lack of sufficiently comprehensive assessments of non-redundant primary Protection Systems is a reliability concern.

Joint SPCS-SAMS Report

One outcome of the FERC Technical Conference was that NERC would conduct a data collection effort to provide a broad factual foundation that could aid in assessing the reliability risks posed by SPF. The NERC Board of Trustees approved the request for data or information under Section 1600 of the NERC Rules of Procedure ("Order No. 754 Data Request") on August 16, 2012.

In September 2015, SPCS and SAMS issued a report to the NERC PC/OC, summarizing the information collected under the Order No. 754 Data Request. The assessment confirmed the existence of a reliability risk associated

[3] *See Industry Advisory: Single Point of Failure*

with SPF in Protection Systems that warrants further action. To address this risk, the SPCS and the SAMS considered a variety of alternatives and concluded that the most appropriate recommendation that aligns with FERC Order 754 directives and maximizes reliability of Protection System performance is to modify NERC Reliability Standard TPL-001-4 (Transmission System Planning Performance Requirements) through the NERC standards development process.

The report recommendations, as well as how they have been addressed in proposed TPL-001-5 by the Project 2015-10 standard drafting team are summarized in the following section.

Revisions to TPL-001-4

Table 1-Footnote 13

The SPCS/SAMS report recommended replacing “relay” with “component of a Protection System” in the Table 1 P5 event and replace Footnote 13 in TPL-001-4 with the following alternate wording:

> The components from the definition of ’Protection System‘ for the purposes of this standard include (1) protective relays that respond to electrical quantities, (2) single station DC supply that is not monitored for both low voltage and open circuit, with alarms centrally monitored (i.e., reported within 24 hours of detecting an abnormal condition to a location where corrective action can be initiated), and (3) DC control circuitry associated with protective functions through the trip coil(s) of the circuit breakers or other interrupting devices.

This revision to Footnote 13 clarifies the components of the Protection System that must be considered when simulating Delayed Fault Clearing due to the failure of a non-redundant component of a Protection System. This consideration is intended to account for:

- failed non-redundant components of a Protection System that may impact one or more Protection Systems;
- the duration that faults remain energized until Delayed Fault Clearing, and;
- additional system equipment removed from service following fault clearing depending upon the specific failed non-redundant component of a Protection System.

The SPCS/SAMS report described voltage or current sensing devices as having a lower level of risk of failure to trip due to robustness and likelihood to actually cause tripping upon failure. Therefore, these components of a Protection System are omitted from Footnote 13.

Noting that Requirements R3.3.1 and R4.3.1 require simulation of Protection System action, the drafting team sought to limit the scope of Footnote 13, item 1 with respect to protective relays that may be non-redundant components of a Protection System. Specifically, Footnote 13 limits single protective relays that may be a SPF to those which respond to electrical quantities and are used for primary protection resulting in Normal Clearing. An SPF in a single protective relay that is a non-redundant component of a Protection System may result in the primary Protection System failing to properly operate, leading to Delayed Fault Clearing performed by backup protective relays and/or overlapping zonal protection. Conversely, the drafting team did not include backup protective relays in the scope of Footnote 13, item 1 given that an SPF in a single protective relay used for backup protection will not affect primary protection resulting in Normal Clearing.

The drafting team recognizes that Bulk Electric System (BES) Elements are predominantly protected by relays which respond to electrical quantities. However, in some Protection System designs, non-redundant single protective relays which respond to electrical quantities may be redundant to protective relays that do not respond to electrical quantities. For example, an independent differential relay and independent sudden pressure relay may protect the same transformer from faults inside the transformer tank. In this example, the differential relay responds to electrical quantities, while the sudden pressure relay does not. While the transformer differential relay may be an SPF, an internal transformer tank fault may not lead to Delayed Clearing given the sudden pressure protection. Subsequently, the P5 event for a single phase-to-ground (line-to-ground) fault in the transformer tank need not be simulated for Delayed Fault Clearing due to the SPF of the transformer differential relay, but should be simulated for the sudden pressure relay clearing time, which may not be delayed. However, care must be taken when evaluating protective relays which respond to electrical quantities in combination with protective relays which do not respond to electrical quantities; in this same example, faults that occurred outside of the transformer tank given the SPF of the non-redundant transformer differential relay would be unaffected by the presence of the sudden pressure relay and would lead to delayed clearing, necessitating its assessment as a P5 event.

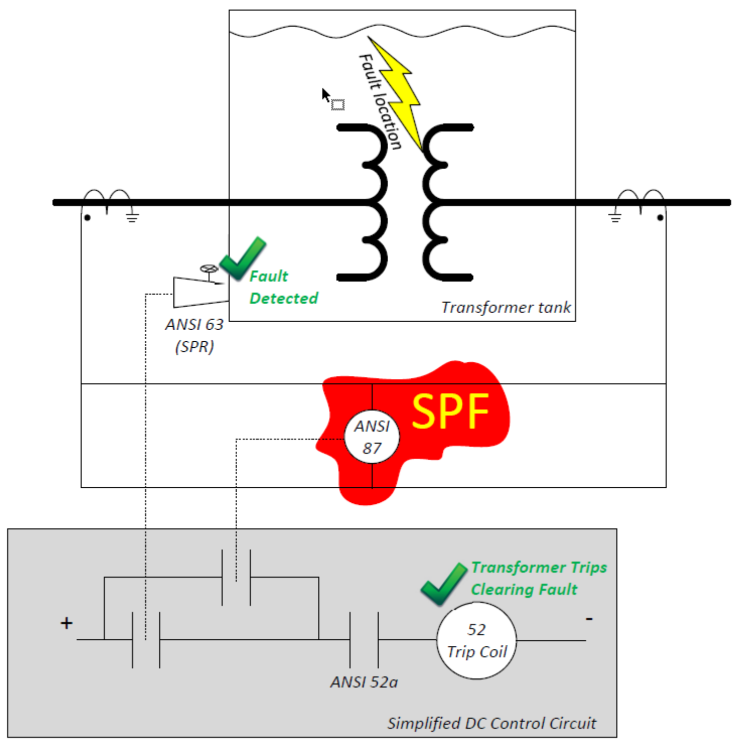


Figure 2.1: Internal Transformer Tank Fault with Sudden Pressure Protection and failed Transformer Differential Relay

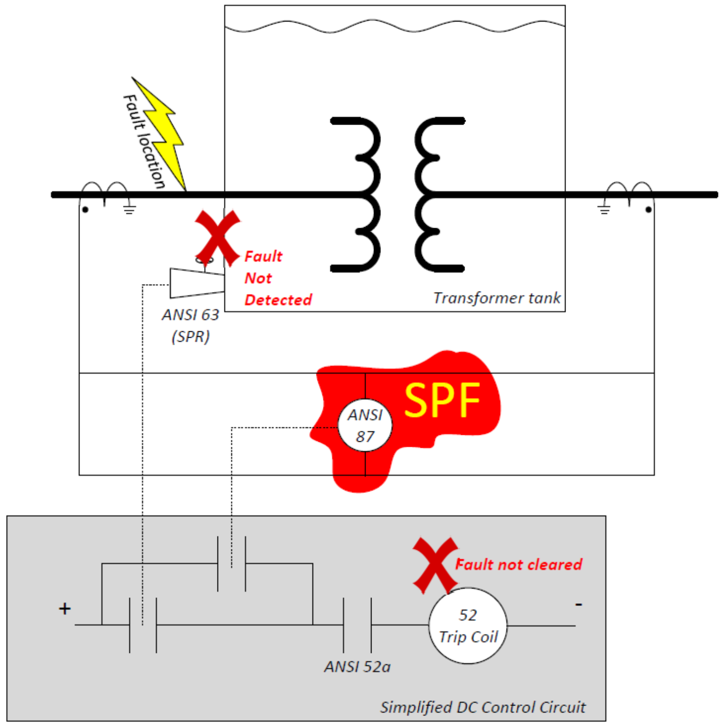


Figure 2.2: External Transformer Tank Fault with Sudden Pressure Protection and failed Transformer Differential Relay

Given the increasing importance of communication-aided Protection Systems (e.g., pilot protection schemes, direct transfer tripping schemes, permissive transfer tripping schemes, line differential relaying schemes, etc.), the proper operation of the communication system must be considered when considering potential SPF components of Protection Systems. The drafting team augmented the SAMS/SPCS recommendations to include reference to the subset of communication systems that are part of a communication-aided Protection System, necessary where the performance of that Protection System is required to achieve Transmission System Planning (TPL) Performance Requirements, enumerated in Table 1 of TPL-001-4. In other words, a communication-aided Protection System that may experience an SPF, causing it to operate improperly or not at all, must be considered as part of non-redundancy. The drafting team concluded that the failure of communication-aided Protection Systems may take many forms; however, by alarming and monitoring these systems, the overall risk of impact to the Bulk Electric System is reduced to an acceptable level. Most new Protection Systems deployed in the industry include communication-aided protection with component and communication failure alarms monitored at centralized Control Centers. This alarm monitoring is similar to the requirement associated with station DC supplies. Therefore, this requirement is more applicable to legacy systems that need communication-aided Protection Systems to meet performance requirements of the TPL standards.

Requirement R4 Part 4.2 Extreme Events

Analysis of the data collected under the Order No. 754 Data Request demonstrates the existence of a reliability risk associated with SPF in Protection Systems. Further, while the analysis shows that the risk from SPF is not an endemic problem and instances of SPF exposure are lower on higher voltage systems, the risk is sufficient to warrant further action. Risk-based assessment should be used to identify Protection Systems of concern (i.e., locations on the BES where there is a susceptibility to cascading if a Protection System component SPF exists). Given the risk to BES reliability, additional emphasis in planning studies should be placed on assessment of three-phase faults involving Protection System SPF. This concern (the study of Protection System SPF) is appropriately addressed as an extreme event in TPL-001-4, Requirement R4, Part 4.2. While less probable than single-phase-to-ground faults, three-phase faults typically initiate as single-phase-to-ground and often evolve into three-phase faults, leading to Delayed Fault Clearing scenarios more severe than the Table 1 P5 event. Therefore, TPL-001-4, Requirement R4, Part 4.5, which specifies that an evaluation of possible mitigating actions be conducted if analysis concludes there is cascading caused by the occurrence of this extreme event, is inadequate to address the risk of Protection System component SPF to the reliability of the BES. To address this concern the drafting team has modified Requirement 4 part 4.2.2 to require additional evaluation and documentation of possible actions designed to prevent the system from cascading for extreme events 2e-2h listed from the stability column of Table 1. The additional documentation shall list System deficiencies, the associated actions needed to prevent the System from Cascading, and the associated timetable for implementation. The analysis shall be reviewed in subsequent annual Planning Assessments for continued validity and implementation status. Thus, the drafting team has maintained the three-phase-fault given a Protection System component SPF as an extreme event, but modified Requirement R4, Part 4.2.2 to require additional evaluation and documentation of possible actions, including a timetable of implementation, designed to prevent the system from Cascading. This consideration is intended to account for:

- failed non-redundant components of a Protection System that may impact one or more Protection Systems;
- the duration that faults remain energized until Delayed Fault Clearing, and;
- Additional system equipment removed from service following fault clearing depending upon the specific failed non-redundant component of a Protection System.

Footnote 13 provides the attributes of the specific non-redundant Protection System components that the entity shall consider for evaluation.

Section 2: FERC Order No. 786 Directives

Background

In addition to addressing reliability issues involving SPF on Protection Systems, proposed Reliability Standard TPL-001-5 revises the TPL-001 standard to address two directives from FERC Order No. 786.

Order No. 786 P. 40: Maintenance outages in the Planning Horizon

FERC Order No. 786, Paragraph 40 directs NERC to modify Reliability Standard TPL-001-4 to address the concern that the six month threshold could exclude planned maintenance outages of significant facilities from future planning assessments. Order No. 786 provides the following considerations:

- Planned maintenance outages less than six months may result in impacts during peak and off-peak periods;
- Planned outages during those times should be considered to allow for a single element to be taken out of service without compromising the ability to meet demand;
- Criticality of elements taken out for maintenance could result in N-1 outage and loss of non-consequential load or impact to reliability;
- Planned outages are not “hypothetical outages” and should not be treated as multiple contingencies in the planning standard (should be addressed in N-0 base case);
- Relying on Category P3 and P6 is not sufficient and does not cover maintenance outages;
- The Near-Term Transmission Planning Horizon requires annual assessments using Year One or year two and year five. Known planned facility outages of less than six months should be addressed so long as their planned start times and durations may be anticipated as occurring for some period of time during the planning time horizon.

NERC SAMS Whitepaper Recommendations

To address this directive, the NERC SAMS recommended modifications to NERC Reliability Standards IRO-017-1 and TPL-001-4. The SAMS recommended that IRO-017-1 be used as the vehicle to assure that all types of known scheduled outages are being reviewed and coordinated to mitigate reliability impact as the most cost-effective means to address the intent of the NERC directive. The coordination process developed pursuant to IRO-017-1, Requirement R1 should be used to direct how all known scheduled outages are reviewed and the actions that must be taken. The SAMS recommended that following objectives should be added to R1:

- Describe how the review of known scheduled outages by the RC, PC, TO, and TP will be integrated into transmission plan development.
- Describe whether, how, and which known scheduled outages should be included in the Planning Assessment for the Near-Term Transmission Planning Horizon required by TPL-001-4.
- Describe how emerging challenges and the inability to schedule outages will be communicated from the TO and RC to the TP and PC to be addressed in a future Corrective Action Plan pursuant to TPL-001-4.

The NERC SAMS also recommended modifying TPL-001-4, Requirement 1.1.2 by removing “with duration of at least six months” and adding language referencing the outage coordination process developed in IRO-017-1, Requirement R1 as described above.

Revisions to TPL-001-4

Requirement R1 Part 1.1.2

The drafting team modified Requirement 1.1.2 consistent with FERC's directive and included necessary consultation with the Reliability Coordinator. This consultation is expected to assist the Transmission Planner and Planning Coordinator select known outages that are relevant, not hypothetical, and have a credible likelihood of being concurrent.

The change to Requirement 1, Part 1.1.2 eliminates the specified six month outage duration and provides the opportunity for the Reliability Coordinator to assist the Planning Coordinator and/or Transmission Planner to determine which known outages, if any, need to be considered in the Planning Assessment for the Near-Term. This change is for coordination of known outages beyond the Operations Planning time horizon.

Order No. 786 P 89: Dynamic assessment of outages of critical long lead time equipment

In paragraph 89 of Order No. 786, FERC stated:

> The spare equipment strategy for steady state analysis under Reliability Standard TPL-001-4, Requirement R2, Part 2.1.5 requires that steady state studies be performed for the P0, P1 and P2 categories identified in Table 1 with the conditions that the system is expected to experience during the possible unavailability of the long lead time equipment. The Commission believes that a similar spare equipment strategy for stability analysis should exist that requires studies to be performed for P0, P1 and P2 categories with the conditions that the system is expected to experience during the possible unavailability of the long lead time equipment.

FERC did not direct a change but did direct NERC to consider this issue upon the next review cycle of TPL-001-4. The Project 2015-10 Standard Authorization Request included this issue within the scope of this project.

NERC SAMS Whitepaper Recommendations

The NERC SAMS considered the following key points related to FERC's Paragraph 89 guidance:

- Removal of Elements in the Planning Assessment for spare equipment strategy is only applicable for those Elements that have "a lead time of one year or more."
- Each long-lead time Element that is removed from service creates a new operating condition considered the "normal" (P0) condition for Table 1. The applicable contingencies will be studied with that Element removed from service in the pre-contingency state for stability analysis. For example, if a long-lead time transformer does not have a spare, it would be studied as a P1.3 event. Since P0 does not include an Event, P0 does not and should not be included in the stability analysis section for long-lead time Elements not included as part of a spare equipment strategy.
- System adjustments may need to be made to the power flow base case to accurately reflect reasonable and expected operating conditions with that Element removed from service in the pre-contingency (P0) operating state.
- TPL-001-4, Requirement R4.1.1, related to P1 Events, requires that no generating unit pull out of synchronism. The outage of a long-lead time Element followed by a P1 contingency should not result in a generating unit losing synchronism.
- TPL-001-4, Requirement R4.1.2, related to P2 Events, allows for generating units to pull out of synchronism. The outage of a long-lead time Element followed by a P2 contingency should not result in

tripping of any Transmission System Elements other than the generating unit and its directly connected Facilities.

The NERC SAMS white paper contains the flowing recommendations for stability analysis for long lead time Elements not included as part of a spare equipment strategy:

- The outage of long lead time Elements has an equally important impact from a stability standpoint as it does from a steady-state standpoint.
- The Planning Coordinator and Transmission Planner must demonstrate that they have met the TPL-001-4 performance criteria for specified contingency events and contingency combinations thereof as per Table 1. This should include long lead time outages that can occur for equipment that does not have a spare equipment strategy.
- TPL-001-4, Requirement R4.1.1 requires that no generating unit pull out of synchronism, while R4.1.2 allows for generating units to pull out of synchronism so long as the resulting instability does not result in tripping of any Transmission System Elements other than the generating unit and its directly connected Facilities. The outage of a long lead time Element followed by a P1 contingency should not result in a generating unit losing synchronism.
- While the P2 contingency allows for individual generating unit instability, the Transmission Planner and Planning Coordinator must ensure that this instability does not result in tripping of any Transmission System Elements other than the generating unit and its directly connected Facilities and therefore should include P2 contingencies event.

Revisions to TPL-001-4

Requirement R2 Part 2.4.5

Consistent with FERC's Order No. 786 guidance and the SAMS recommendations, the Project 2015-10 standard drafting team revised TPL-001-4 Requirement R2 Part 2.4.5 to add a similar requirement for stability analysis. The change to Requirement R2, Part 2.4.5, which includes similar language to that used for the steady-state analysis under R2.1.5, adds clarity that the outage of long lead time Elements has an equally important impact from a stability standpoint as it does from a steady-state standpoint and should be assessed commensurate with an entity's spare equipment strategy.

Section 3: Applicability

The requirements remain applicable to the Planning Coordinator and Transmission Planner. Coordination and cooperation between operating and planning entities in concert with asset owners will be required to implement the standard requirements. The planning and protection engineers that will need to conduct the studies and submit the data may be working for different companies or business units, and time will be required to accommodate the development of processes and data flow that cross company or business unit lines.

Generator Owners, Transmission Owners, and Distribution Providers are required to evaluate the Protection System(s) for locations on the system where a failure of a non-redundant Protection System component could result in a potential reliability risk. These entities must provide this information, as well as resulting fault clearing times, to Transmission Planners for proper study.