

Meeting Notes

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

September 5, 2012
Conference Call and ReadyTalk Webinar

Administrative

1. Introductions

The meeting was brought to order by Doug Hohlbaugh (chair), at 11:00 a.m. ET on Wednesday, September 5, 2012. The meeting was facilitated by NERC staff via a ReadyTalk web session and conference call. The chair noted the meeting was not posted on the NERC calendar, but was announced several times to the plus list. Those in attendance were:

Name	Entity	
Doug Hohlbaugh (chair)	FirstEnergy Corp.	Member
R.W. Mazur	Manitoba Hydro	Member
John Odom	Florida Reliability Coordinating Council	Member
Bob Pierce	Duke Energy	Member
John Zipp	ITC Holdings	Member
Eugene Blick	Federal Energy Regulatory Commission	FERC Staff
Scott Barfield-McGinnis (advisor)	North American Electric Reliability Corporation	NERC Staff
Phil Tatro (technical)	North American Electric Reliability Corporation	NERC Staff

2. Determination of Quorum

The rule for NERC Standard Drafting Team (SDT or team) states that a quorum requires two-thirds of the voting members of the SDT. Quorum was achieved as five of the seven total members were present.

3. NERC Antitrust Compliance Guidelines and Public Announcement

The advisor read the NERC Antitrust Guidelines and disclaimer to the team, there were no questions.

4. Review Current Team Roster

The advisor noted Eugene Blick, FERC staff was removed from the team roster and the revised version is posted on the project webpage. Also, the advisor will be sending the roster to team members to verify their information is current.

5. Review Meeting Agenda and Objectives

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

Agenda

1. Review of Meeting Notes

The August 9, 2012 meeting notes were brought to the attention of the team well in advance of the meeting for review. There were no questions, concerns, or necessary revisions.

2. Review of Action Items from Last Meeting (Complete)

The advisor reviewed the following action items from the last meeting and noted all were complete.

- a. All team members – Reserve for full team conference call scheduled for September 5, 2012. (Complete)
- b. Advisor – Remove FERC staff from the posted team roster on the NERC website project page. (Complete)

Advisor – Reach out to NERC Compliance regarding compliance with an interpretation implementation plan by those entities which discover their performance must change based on the interpretation of TPL-003-0a and TPL-004-0. (Complete – The advisor noted that an Implementation Plan cannot provide a “safe harbor” for entities to begin complying with the standard that is already effective. The implementation should only be used if it is obvious the interpretation identifies a performance than was not clear)
- c. Advisor – Issue ReadyTalk meeting for August 29, 2012 for sub-team two. (Complete)
- d. Advisor – Issue ReadyTalk meeting for September 5, 2012 for entire team. (Complete)
- e. Chair and advisor – Issue final draft of the response to comments to the full team by close of business, August 31, 2012 for the September 5, 2012 full team conference call. (Complete)
- f. Chair – Issue ReadyTalk meeting for August 21, 2012 for sub-team one. (Complete)
- g. Chair – Reach out to Ed Dobrowolski, NERC Advisor for Project 2006-02 to ensure coordination between the projects regarding the recently remanded TPL-001-2 standard. (Complete – The chair noted that Mr. Dobrowolski participated in their sub team call)

3. Respond to Comments from 30-day Formal Posting (In progress)

The chair started off with the review of comment responses with Pepco. The Interpretation Drafting Team (IDT) decided to defer Pepco's second comment concerning the application of the Order No. 754 data request and the fact that batteries are not required to be considered as a contingency. The IDT made a note to reference the data request and finalize the response after going through the entire document.

A question was raised by an Interpretation Drafting Team (IDT) member as to why the team decided to accept ReliabilityFirst's suggestion in part two of their comments to Question #1. For example, "must be" was revised to "is;" and "must consider" was revised to "considers." The change was made so that the text does not sound like "requirement language" but interprets/describes what transmission planners currently study/assess. The IDT members revised its response in Question #1 based on the comments provided by ReliabilityFirst.

In Question #2 of the response to comments, an IDT member noted that the proposed response did not seem to address the System Protection and Control Subcommittee's (SPCS') concern about "increases clearing time" and "failure of a protection system component that affects the operation (disables or increases clearing times) of one or more protection systems." The IDT discussed the proposed response from the sub-team and made minor modifications to address the SPCS' comment. NERC Technical Staff, whom also participates with the SPCS, noted the revised response appeared to satisfy the SPCS comment. No other action was needed.

Additionally, the team discussed "any component" in footnote (e) and its relevance to the NERC Glossary term "Protection System" and the potential inclusion of the battery as a protection system component that must be evaluated as described in the footnote (e). The team agreed that batteries were not the concern of the interpretation, but were unsure how to bring clarity to the necessary components. The IDT agreed that additional work is needed to provide industry further clarity to what extent single component protection system failure must be evaluated within the planner's assessment to provide industry additional clarity. The chair and advisor agreed to revise the response and make a proposal to the IDT.

The chair highlighted portions of the NERC Informational filing, March 2012,¹ regarding four consensus points that industry stakeholders at the October 24-25, 2011 Technical Conference developed in response to the Commission's concern in Order No. 754. The IDT has been responsive to Question #2 in the Request for Interpretation (RFI) regarding consensus point 2 found in the informational filing.² The team considered the consensus points (i.e., #2 and #4) to determine if the proposed interpretation response(s) is overstepping NERC's filing with regard to Order No. 754. The question led to reviewing the responses posed in the RFI to determine if the IDT is accurately responding to the SPCS' question and is remaining within the realm of the consensus point of the Technical Conference.

¹ *Informational Filing of the North American Electric Reliability Corporation in Response to Order No. 754* (Docket RM10-6-000), March 15, 2012 (http://www.nerc.com/files/Final_Order_754_Informational_Filing_3-15-12_complete.pdf).

² *Ibid*, page 4.

Several commenters were concerned that batteries may be included in the performance based on the IDT's interpretation. The IDT realizes that the standard(s) do not use the defined NERC Glossary term, "Protection System" and is concerned because "any protection system component" in footnote (e) potentially captures battery systems within the scope of the standard. The IDT further recognizes that batteries, traditionally, do not fall within the scope of single points of failure that a TP would assess in TPL-003 and TPL-004; however, if the IDT were to interpret the specific components or declare "protection system" is the same as the defined NERC Glossary term, will extend performance beyond the four-corners of the standard. Increasing the required performance by interpretation is contradictory to established guidelines for responding to interpretations. As stated above the chair and advisor agreed to re-visit the IDT's response to Interpretation Question #2 to address this concern.

4. **Discuss Interpretation Response (Ongoing)**

The IDT ran short on time during the call and did not reach a point where revisions to the RFI could be made. The IDT inserted text in Response #2 as a placeholder for further consideration in the RFI. The IDT will consider additional revisions upon reaching overall consensus on the response to stakeholder comments.

5. **Review of Schedule (Not reviewed)**

The IDT ran short on time and did not review the schedule; however, the project remains ahead of the planned schedule.

6. **Next Steps (None at this time)**

There will be a 45-day comment period and 10-day initial ballot in the last 10 days of the comment period.

7. **Action Items or Assignments**

- a. Chair and advisor – Work to complete the response to comments and distribute to the team to refine via email with the goal of only having a follow call only if necessary.
- b. Advisor – Distribute the IDT roster to have members verify their information NERC has on file.
- c. Advisor – Create an online poll to determine IDT availability not earlier than September 14, 2012 and not later than September 21, 2012.

8. **Future Meeting(s)**

There is a full team conference call scheduled for September 19, 2012, 11:00 a.m. to 1:00 p.m. ET.

9. **Adjourn**

The meeting adjourned at 1:25 p.m. ET on September 5, 2012.