NPCC Members and Entities of the NERC Registered Ballot Body,

The subject standard is currently posted for ballot though 8pm, September 11, 2015. The NPCC Regional Standards Committee has reviewed the standard and has not reached a consensus position on a ballot recommendation. The majority have not indicated any intent to vote negatively. The two issues raised were:

- Applicability should be expanded to the RC for having knowledge of the operational functionality of the SPS
- There should be a requirement for ensuring there is sufficient communication and sharing of protection system functionality so that the entities applicable in the standard are able to demonstrate they have knowledge of protection systems owned by other entities.

NPCC, as the regional entity will be voting “Affirmative”, to accept the standard as written. It is our opinion that the RCs already have sufficient mechanisms in place to allow them the situational awareness and operational functionality of protection systems and RAS(SPS) without a need for further compliance burden and don’t believe there to be any reliability issue. Also there are many outside contractual agreements already in place that would likely make an additional requirement for sharing information on protection system functionality of little value. There are Interconnection Agreements, Tariffs, market rules etc. that should address this already.

If you have any questions please contact me.

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