Unofficial Comment Form
Order 754 - Request for Data or Information

Please **DO NOT** use this form for submitting comments. Please use the electronic form¹ to submit comments on the data request. The electronic comment form must be completed by **Monday, February 6, 2012, 8:00 p.m. ET**.

If you have questions please contact Scott Barfield-McGinnis at scott.barfield@nerc.net or by telephone at 404-446-9689.

**Click here for:** Order 754 Project Page²

**Background Information**

This posting is soliciting informal comment in accordance with Section 1600 of the NERC Rules of Procedure.³ NERC may request data or information that is deemed necessary to meet its obligations under Section 215 of the Federal Power Act, as authorized by Section 39.2(d) of the Federal Energy Regulatory Commission’s (FERC) regulations. Section 1602 requires NERC to post the proposed request for data or information or a proposed modification to a previously authorized request for data or information for a forty-five (45) day public comment period.

Order 754 is the Final Rule approving the interpretation of Interpretation TPL-002-0a PacifiCorp (Project 2009-14⁴) regarding requirement R1.3.10. In addition to the approval, the Commission expressed a concern about single point of failure of protection systems and issued a directive for further investigation. From the Order, “…the Commission believes that there is an issue concerning the study of the non-operation of non-redundant primary protection systems; e.g., the study of a single point of failure on protection systems” (P19). In the first part of the directive (P20), the Commission directed FERC staff to meet with NERC and its appropriate subject matter experts to explore this reliability concern, including where it can best be addressed, and identify any additional actions necessary to address the matter. This portion of the directive was satisfied by the October 24-25, 2011 Technical Conference. The second part of the directive (P20) requires NERC to submit an informational filing within six months of the Order (March 15, 2012) explaining whether there is a further system

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¹ https://www.nerc.net/nercsurvey/Survey.aspx?s=d86ae2907b884db9af1cac68b0af6ea
² http://www.nerc.com/filez/standards/order_754.html
⁴ http://www.nerc.com/filez/standards/Project2009-14_Interpretation_TPL-002-0_PacifiCorp.html
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A 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. The data request will help NERC and the Commission to understand the extent of any reliability gap and guide any efforts to address any such reliability gap, if necessary.

Not all sections require a comment. Enter comments electronically in text only format when cutting and pasting from other documents. Avoid using any special characters other than commas and periods.

1. Please enter specific comments about the method of the data request in the provided text box.
   Comments:

2. Please enter specific comments about the data reporting template of the data request in the provided text box. Note: The posted template is the structure of reporting data and actual reporting may use a different mechanism, such as, this electronic comment form.
   Comments:

3. Please enter specific comments about the reporting schedule of the data request in the provided text box.
   Comments:

4. Please enter any other comments about the data request in the provided text box.
   Comments: Guidance for testing is not consistent and may produce less than meaningful results. There is a lack of necessary detail in the documentation. Clarifying information was provided during the webinar and needs to be included in the request. Other information is still unclear. Examples are: What system should be tested? Current or future system or some future system? Similarly, what year and load level should be considered? This is especially important when calculating consequential loss. If some TPs are basing their information off of an extreme weather forecast (sometimes referred to as a 90/10 forecast) and others are using a reference forecast (sometimes referred to as a 50/50 forecast), very different answers to similar situations could be reported.
What system conditions should be tested – dispatch, transfers, etc.? We suggest something along the lines of the most stressful conditions as determined by the TP.

Regarding Table A (page 8) of the Request for Data or Information, there is the likelihood that certain transmission lines above 100 KV may be identified that will not be owned by TOs or GOs. It is imperative to address how the collection of data from all entities will be accomplished.

When counting circuits in Table A, more clarification should be provided on the handling of distribution transformers, GSUs and the impact of normally open circuit breakers or switches. On the teleconference it was stated that transformers with connections less than 115 kV should not be counted unless they were a GSU. It was also stated that when there is a normally open circuit breaker or any switching device, that configuration creates a separate bus.

When determining remote clearing times, can credit be taken for failure of local blocking schemes, thus allowing high speed remote tripping?

On the teleconference it was stated that transformers with connections less than 115 kV should not be counted as a circuit for purposes of Table A unless they were a GSU. It is unclear how to deal with transformers that serve load and also connect generation on the low voltage winding. Suggest that these transformers not be considered GSUs unless the total generation is greater than 20 MVA nameplate. Also suggest that dedicated GSUs be ignored if the total generation is greater than 20 MVA nameplate.

What is the process if the TP fails to complete the survey by the deadline?

As stated in the Introduction and Survey Scope, at issue is “to first discover the extent and risk involved with single point of protection failure events.” The reliability risk with respect to this issue is sufficiently addressed in NPCC by the application of current NPCC Criteria, Standards, and Directories. Any power system element that can have a significant adverse impact on the bulk interconnected system is not vulnerable to a single point of protection failure for design criteria contingencies.

The NPCC A-10 Criteria tests identify the Bulk Power System elements that are necessary for the reliable operation of the bulk interconnected system. This assessment (annually performed) gauges the impact on the bulk power system under the scenario of a total failure of the local protection at the station being tested. In effect, this process addresses the issue of adequate assessments for single
point of protection failure that can have a significant adverse impact on the bulk interconnected system. NPCC Directory No. 4 requires that the “bulk power system shall be protected by two fully redundant protection groups, each of which is independently capable of performing the specified protective function for that element.” Therefore any power system element that can have a significant adverse impact on the bulk interconnected system is not vulnerable to a single point of protection failure for design criteria contingencies.