

March 21, 2016

**NPCC Task Force on System Protection (TFSP) Response to Comments Received during the Open Process Posting of:**

***C-30 Procedure for Task Force on System Protection Review of Disturbances and Protection Mis operations***

**and**

***C-39 Procedure to Collect Major Disturbance Event Sequence Data***

The TFSP would like to thank those who provided comments on the TFSP recommendation to retire the subject documents which was posted from January 5<sup>th</sup>, 2016 to February 19<sup>th</sup>, 2016.

The Task Force responses to individual comments are provided below.

***Comment #1:***

***Comment – Dominion:***

Dominion supports the retirement of NPCC Procedure documents C30 and C39 and will not be filing any additional comments.

**Task Force response: Thank you for the comment.**

*Comment #2:*

*Comment – Entergy:*

Agree with TFSP recommendation to retire C-30 and C-39.

**Task Force response: Thank you for the comment.**

**Comment #3:**

**Comment – NPCC :**

NPCC as the regional entity respectfully submits the following comments on the TFSP recommendation to retire procedure documents C-30 and C-39.

**C30- Procedure for TFSP Review of Disturbances and Protection Misoperations:**

TFSP justification:

1. SP-7 has been charged with reviewing all BES misoperations as per TFSP approved scope. Much of the tasks outlined in C-30 are covered by the SP-7 scope.
  2. NERC DAWG annual reports no longer exist.
  3. TFSP scope includes a line item to review major internal and external disturbances.
- NPCC Comment:

NPCC Comment:

*NPCC notes that the TFSP justification to retire C-30 is based on the understanding that the scope of the SP7 Working Group requires a review of all BES misoperations and likewise the scope of the TFSP obligates the group to review major internal and external disturbances.*

*NPCC acknowledges the importance of the content of each of these scoping documents, however retiring a procedure because its content resides in a scoping document should not be the justification for the retirement.*

*NPCC is concerned that the referenced scoping documents address a Task Force's general approach to its work and does directly obligate NPCC Members, who have agreed to abide by NPCC documents as per the NPCC by laws, to adhere to the content of a specific procedure.*

*Additionally, the content of a scoping document can be revised, eliminating important attributes of the procedures content.*

*Finally, the content of the procedure was embodied in the C30 document in order to give the subject more importance than it would otherwise achieve in a scoping document.*

NPCC Task Force on System Protection (TFSP) Response to Comments Received during the Open Process Posting of C-30 and C-39.

**TFSP Response:**

**TFSP appreciates the comments provided by NPCC staff. TFSP believes that C-30 document is outdated and superseded by the creation of Document C-45 and the SP-7 Misoperation Review Working Group.**

**TFSP intends to retain and revise the existing NPCC C-45 procedure document to include the new process for quarterly misoperation reporting to NERC and NPCC as required by the NERC Section 1600 Misoperation Reporting Data Request.**

**The C-45 document presently includes the following language, “The Protection System Misoperation Review Working Group, SP-7, will review all misoperations on behalf of TFSP and the Chair of SP-7 will report to TFSP at each meeting in accordance with its Terms of Reference. SP-7 will also review the Corrective Action Plan to confirm its adequacy in mitigating future misoperations of a similar nature.”**

**TFSP intends to retain and enhance this language in C-45 to clearly define the role of SP-7 and TFSP in the review of all reported misoperations from NPCC members.**

**C-45 also states:**

**“If any analysis indicates that an addition, clarification, or modification to the NPCC Protection Criteria, Directories, Guides or Procedures should be considered, a report must be furnished to the Task Force on System Protection (TFSP) as soon as possible. NPCC Compliance Staff may bring protection misoperation reports of special interest to the attention of TFSP. In addition, any incident of general interest should be reported to the TFSP at its next scheduled meeting.”**

**This language is clearly duplicative to the language contained in C-30 and will be retained with C-45.**

**C-45 requires that NPCC members analyze all protection operations and report all misoperations to NPCC. Thus, this document should serve as the single NPCC procedure for how protection system misoperations are reported and analyzed/reviewed within NPCC. This should address NPCC staff concern that this important process be contained within a formal NPCC procedure document as opposed to a work plan.**

### **C39- Procedure to Collect Major Disturbance Event Sequence Data:**

#### TFSP justification:

1. Superseded by NERC Event Analysis Process.
2. NERC standard EOP-004 covers event/disturbance reporting.

#### NPCC Comment: (revised with input from the NPCC Events Analysis Program Area):

*NPCC notes that procedure C-39 supports the use of three forms designed to gather information critical to completing the sequence of events for the disturbance.*

*TFSP states that its justification to retire C-39 relies on the assumption that the NERC Event Analysis Process (EAP) has superseded its content. However, the NERC EAP is completely voluntary and although EOP-004-2 is mandatory, its requirements are brief and only intended as a notification that an event has taken place (and rarely provides a detailed sequence of events.)*

*NPCC is concerned that the recent FERC NOPR which suggests that they have access to NERC's databases for Mis operations, TADs and GADs may create an environment where stakeholders are reluctant to participate in a voluntary Events Analysis program.*

*Additionally, NPCC Events Analysis Staff note that the three forms that C-39 supports were developed in response to the major disturbance that occurred in 2003 and are designed to receive and categorize disturbance data that will be used for reconstructing models and base cases to analyze such events.*

*The EAP program does not require the detailed level of disturbance data that C-39 supports.*

*NPCC notes that if such an event were to occur in the future the C39 forms could immediately be utilized to guide the collection of the necessary data as intended when the forms were designed.*

**Task Force response:**

**Thank you for your comment. There are NERC standards in existence today which were developed specifically in response to the 2003 blackout event to address adequate monitoring and retention of disturbance data. NERC standards PRC-002-NPCC-1 (to be retired) and the new continent wide DME standard PRC-002-2, require that registered entities share DME data, including sequence of event data to NERC, their Regional Entity or their Reliability Coordinator with 30 days of request. This is a mandatory and enforceable requirement which precludes the need for this procedure.**

**The new NPCC Directory 11 will also include a similar requirement regarding provision of DME data to requesting entities within 30 days. Modern DME data will be provided in the form of comtrade files, SOE spreadsheet exports and synchrophasor PMU traces which also preclude the need for manually populating the C-39 forms.**

**If an entity is reluctant to participate in a voluntary NERC Event Analysis program out of concern that FERC may have access to NERC data, they would also likely be reluctant to provide this information to NPCC via this procedure for two reasons:**

- 1. Failure to adhere to this procedure carries no threat of monetary fines due to compliance violations.**
- 2. This procedure does not restrict NPCC from sharing gathered data with NERC. As stated in the C-39 document introduction, the data gathering effort may be in response to the formation of a NERC investigation team. Thus, complying with this document is equivalent to complying with the EAP program.**

**TFSP understands the concerns of NPCC staff but does not agree that retention of this document will provide for greater compliance of data reporting when major events occur.**