

# Procedures for Monitoring and Reporting Critical Operating Tool Failures Comment Period (6/7/2011 - 7/22/2011)

The **NPCC Task Force on Coordination of Operation** is very sensitive to the burden placed on the NPCC membership of duplicate reporting. Accordingly, the TFCO will add the following language to Sections 3.1 and 3.2 of C-17 to preclude multiple reports if a tools failure has been reported as part of the NERC event analysis process:

### **3. Reporting and Monitoring Requirements for Critical Failure Modes**

The critical failure of any of the tools indicated above requires notification and a follow-up report if the failed state exists longer than 30 minutes.

The reporting requirements are as follows:

1. The affected responsible entity will provide initial notification using Appendix A within 10 business days of the tool failure to c17@npcc.org. The report shall identify the date and times of the failure as well as the failure type and summary.

*To avoid duplication of effort by the reporting entities, if a tool failure is being reported to NERC as part of the NERC Event Analysis Process, the "Critical Operating Tool Failure Form" of Document C-17 is not submitted to NPCC. Part B of the "Event Reporting Template (Appendix A)" of the "ERO Event Analysis Process-Phase 2 Field Test Draft-April 8, 2011" will be submitted to the offices of NPCC to satisfy simultaneously the reporting requirements of the NERC Event Analysis Process as well as NPCC Document C-17.*

CO-10 agrees that duplicate reporting should be avoided. Because the Event Analysis Process is currently in a Field Test mode, CO-10 has elected to refer to the NERC EA Process to avoid having to continuously update the procedure as the program continues to develop. The procedure has been revised as follows in regards to duplication of reporting:

**“To avoid duplication in reporting, an initial Appendix A shall not be required if the reporting entity has submitted a Brief Report required for the NERC Event Analysis Process.”**

2. The affected responsible entity will provide a final report using Appendix A to c17@npcc.org within 60 calendar days of the tool failure. The report shall identify the definitive cause of the failure, conclusions, corrective actions taken and any lessons learned.

*To avoid duplication of effort by the reporting entities, if*

*a final report of a tool failure is being reported to NERC as part of the NERC Event Analysis Process, the "Critical Operating Tool Failure Form" of Document C-17 is not submitted to NPCC. The "Event Analysis Report (EAR)" of the "ERO Event Analysis Process-Phase 2 Field Test Draft-April 8, 2011" will be submitted to the offices of NPCC to satisfy simultaneously the reporting requirements of the NERC Event Analysis Process as well as NPCC Document C-17. If lessons learned are identified, the "Lessons Learned Template (Appendix D)" will also be submitted to NPCC to in place of the "Critical Operating Tool Failure Form" of Document C-17.*

CO-10 agrees that duplicate reporting should be avoided. Also, because the Event Analysis Process is currently in a Field Test mode, CO-10 has elected to refer to the NERC EA Process to avoid having to continuously update the procedure as the program continues to move forward. The procedure has been revised as follows in regards to duplication of reporting:

“To avoid duplication in reporting, an initial Appendix A shall not be required if the reporting entity has submitted a Brief Report required for the NERC Event Analysis Process.”

July 22, 2011

The following comments are submitted by **Northeast Utilities** for the C-17 document.

**1. Section 1 - Introduction**

- a. For clarity, NU recommends that “Section 2 of this document” is clarified by parenthetically adding “Identification of Critical Operating Tools and Systems” so that the paragraph would read:

“... tools identified in Section 2 of this document (Identification of Critical Operating Tools and Systems) and to evaluate ...”

**Parenthetical added to C-17 as suggested.**

- b. NU agrees with the removal of the TO’s from the document applicability.  
**Subsequent to the posting of this document, TFCO has instructed that this process is applicable to TO’s.**

2. **Section 2.3g - Any other reliability tools** - NU suggests that “essential” is replaced by “critical” to ensure consistent wording throughout the document.

**We have made the change as suggested.**

**Section 3 - Title** - NU believes that changing the title of this section from Reporting and Monitoring Requirements for Critical Failure Modes to Reporting Requirements for Failure of Critical Tools would reduce confusion as to what is actually being asked of the relevant entities in this section. **We have made the change as suggested.**

3. **Section 3 - First Paragraph** - NU's suggested rewording is:

“The failure of any of the critical tools indicated above requires notification and a follow-up report if the failed state exists longer than 30 minutes.”

The suggested rewording is due to NU's interpretation of the term “critical failure” being understood as “the failure of a critical tool.” **We have made the change as suggested.**

4. **Section 4 - Non-Reportable Events**

- a. NU believes that Non-Reportable events should continue to be addressed via informal discussion at regular CO-10 meetings with no formal reporting requirement, as is the current practice.

**Responsible Entities are not obligated to complete an Appendix A report for non-reportable events. For convenience, we have provided an option to provide the information via Appendix A.**

- b. NU agrees with the change from “members” to “responsible entities”

5. **Appendix A - Non-reportable event checkbox** - NU suggests that this option be removed; Non-Reportable events should continue to be addressed via informal discussion at regular CO-10 meetings with no formal reporting requirement, as is the current practice.

**Responsible Entities are not obligated to complete an Appendix A report for non-reportable events. For convenience, we have provided an option to provide the information via Appendix A.**

July 6, 2011

The following comments are submitted by **United Illuminating** for the C-17 document.

1. Section 2.1 Primary voice communications – From a transmission owner perspective this is not very descriptive. A TO will have a communication path to the transmission operator, reliability coordinator, and paths to its substations and crews. Is this process focused on communication to the operator and reliability coordinator? Is it a complete loss of communication or partial loss?

The C-17 document clearly states in the introductory paragraph of Section 2 that the C-17 process is only concerned with tool failures relating to real time operation and monitoring of the Bulk Power System.

2. Section 2.2 Uninterruptible Power supply - Is this a failure of all power supplies supporting the control center or any one of the listed components of primary, backup and stand by?

Loss of any UPS or standby generation that directly impacts real time operation and monitoring of the Bulk Power System is a reportable event. This has been further clarified in the revised C-17 document.

3. Section 3.2 should include guidance for process if after 60 days a final report cannot be concluded. UI suggests "If a final report is cannot be prepared after 60 days following the event, then the entity shall provide a interim report. The interim report should include a report on the progress of the investigation, possible causes dismissed, remaining possible causes to be investigated, corrective actions under consideration, lessons learned, and projected date of completion of investigation. "

CO-10 appreciates comments, however we believe 60 days is a sufficient amount of time to provide a final report.

4. Has NPCC considered moving the reporting form to the web portal (not CDAA), or creating an Adobe document to download from NPCC website?

Yes, the document and reporting form will be posted on the NPCC website.