



NORTHEAST POWER COORDINATING COUNCIL, INC.
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November 29, 2019:

The Task Force on System Protection (TFSP) Responses to Comments Received in the Second Open Process Posting of revised Directory#4 System Protection Criteria.

The TFSP would like to thank those who provided comments on the proposed revisions to Directory#4 which were posted from September 25, 2019 to November 9, 2019.

The TFSP responses to individual comments are provided below.

Comments on TFSP Proposed Revisions to Directory#4 System Protection Criteria:

Comments from HQT:

Comment 1:

Section 3.0 NERC ERO Reliability Standard Requirements

Even though the list is not limited, the following standards should be considered for inclusion:

Future PRC-027 (replacing PRC-001)

PRC-010 (why include UFLS- PRC-006 but not UVLS-PRC-010?)

FAC-008 (numerous requirements associated with thermal capabilities e.g. Dir 4 - 5.4.1 and 5.6.2)

PRC-004 and PRC-016 (For instance to verify Dir4 - 5.5 a misoperation assessment should verify correct operation time)

TFSP Response:

Thank you for your comment. PRC-004, 010, 027 and FAC-008 were added. PRC-016 was not added since it applies to RAS and it will be noted in Directory #7.

Comment 2:

Section 5.0 NPCC Full Member, More Stringent Criteria:

The criteria in Directory 4 should be in addition, more stringent or more specific than continent-wide standards. However:

Criterion 5.14.1 seems to be redundant with and no more specific than PRC-023 / PRC-025 / FAC-008 standards.

TFSP Response: Thank you for your comment.

TFSP considers this appropriate because not all BPS facilities may be subject to PRC-023/PRC-025/FAC-008.

Comments from National Grid:

Comment 1:

Section 3: Please include PRC-027 Coordination of Protection Systems for Performance During Faults.

TFSP Response:

Thank you for your comment. This has been added to Section 3.

Comment 2:

Section 4: Please reference PRC-006-NPCC, without the version number 2, to avoid future edits.

TFSP Response:

Thank you for your comment. This has been revised.

Comment 3:

Section 5: Please include “NERC” and “reliability”: These Criteria are in addition, more stringent or more specific than the NERC continent-wide reliability standards.

TFSP Response:

Thank you for your comment. This has been revised.

Comment 4:

Section 5.2.4: Please remove the extra “.” at the end of the section.

TFSP Response:

Thank you for your comment. This has been revised

Comments from the IESO:

Comment 1:

The IESO supports the proposed revisions with no comment.

TFSP Response: Thank you for your comment.