

Response for Interpretation of TPL-003 and TPL-004 for SPCS

When completed, email this form to:

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Note: A valid interpretation request is one that requests additional clarity about one or more requirements in approved NERC reliability standards, but does not request approval as to how to comply with one or more requirements.

Request for an Interpretation of a Reliability Standard

Date submitted: December 12, 2011

Contact information for person requesting the interpretation.

Name: Jonathan Sykes (PG&E), Chairman SPCS

Organization: NERC System Protection & Control Subcommittee

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Identify the Standard (include version number, e.g., PRC-001-1) that needs clarification and its associated title.

Standard	Title
TPL-003-0a	System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)
TPL-004-0	System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements (Category D)

Identify specifically what Requirement needs clarification.

Standard	Requirement (and text)
TPL-003-0a	R1.3.1 Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system

	results shall be available as supporting information.
TPL-003-0a	R1.3.10. Include the effects of existing and planned protection systems, including any backup or redundant systems.
TPL-003-0a	R1.5. Consider all contingencies applicable to Category C.
TPL-004-0	R1.3.1. Be performed and evaluated only for those Category D contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.
TPL-004-0	R1.3.7. Include the effects of existing and planned protection systems, including any backup or redundant systems.
TPL-004-0	R1.4. Consider all contingencies applicable to Category D.

Identify the nature of clarification that is requested (Check as many as applicable).

- Clarify the required performance
- Clarify the conditions under which the performance is required
- Clarify which functional entity is responsible for performing an action in a requirement
- Clarify the reliability outcome the requirement is intended to produce

Please explain the clarification needed.

This interpretation request has been developed to address Commission concerns related to the term “Single Point of Failure” and how it relates to system performance and contingency planning clarification regarding the following questions about the listed standards, requirements and terms. More specifically, clarification is needed about the comprehensive study of system performance relating to Table 1’s, Category C and D contingency of a “protection system failure” and specifically the impact of failed components (i.e., “Single Point of Failure”). It is not entirely clear whether a valid assessment of a protection system failure includes evaluation of shared or non-redundant protection system components. Protection systems that have a shared protection system component are not two independent protection systems, because both protection systems will be mutually impacted for a failure of a single shared component. A protection system component evaluation would include the evaluation of the consequences on system performance for the failure of any protection system component that is integral to the operation of the protection system being evaluated and to the operation of another protection system.

On March 30, 2009, NERC issued an [Industry Advisory — Protection System Single Point of Failure](#)¹ (i.e., NERC Alert) for three significant events. One of which, the Westwing outage (June 14, 2004) was caused by failure of a single auxiliary relay that initiated both breaker tripping and the breaker failure protection. Since breaker tripping and breaker failure protection both shared the same auxiliary relay, there was no independence between breaker tripping and breaker failure protection systems, therefore causing both protection systems to not operate for the single component failure of the auxiliary relay. The failure of this auxiliary relay is known as a “single point of failure.” It is not clear whether this situation is comprehensively addressed by the applicable entities when making a valid assessment of system performance for both Category C and D contingencies.

Question 1: For the parenthetical “(stuck breaker or protection system failure)” in TPL-003-0a (Category C contingencies 6-9) and TPL-004-0 (Category D contingencies 1-4), does an entity have the option of evaluating the effects² of either “stuck breaker” or “protection system failure” contingency³, or does an applicable entity have to evaluate the contingency that produces the more severe system results or impacts as identified in R1.3.1 of both standards?

There is a lack of clarity whether R1.3.1⁴ requires an entity to assess which contingency causes the most severe system results or impacts (R1.3.1) and this ambiguity could result in a potential reliability gap. Whether the simulation of a stuck breaker or protection system failure will produce the worst result depends on the protection system design. For example when a protection system is fully redundant, a protection system failure will not affect fault clearing; therefore, a stuck breaker would result in more severe system results or impacts. However, when a protection system failure affects fault clearing, the fault clearing time may be longer than the breaker failure protection clearing time for a stuck breaker contingency and may result in tripping of additional system elements, resulting in a more severe system response.

Question 2: For the phrase “Delayed Clearing⁵” used in Category C⁶ contingencies 6-9 and Category D⁷ contingencies 1-4, to what extent does the description in Table 1, footnote (e)⁸ require an entity to model a single point of failure of a protection system component that may prevent correct operation of a protection system, including other protection systems impacted by that failed component based on

¹ NERC Website: (<http://www.nerc.com/fileUploads/File/Events%20Analysis/A-2009-03-30-01.pdf>)

² As required by NERC Reliability Standard TPL-003-0a, Requirement R1.3.10. and/or TPL-004-0, Requirement R1.3.7.

³ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5. and/or TPL-004-0, Requirement R1.4.

⁴ “Be performed and evaluated only for those Category (TPL-003-0a Category C and TPL-004-0 Category D) contingencies that would produce the more severe system results or impacts.”

⁵ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5. and/or TPL-004-0, Requirement R1.4.

⁶ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5.

⁷ As required by NERC Reliability Standard TPL-004-0, Requirement R1.4.

⁸ Footnote (e) Delayed Clearing: “failure of any protection system component such as a relay, circuit breaker, or current transformer, and not because of an intentional design delay,”

the as-built design of that protection system?

There is a lack of clarity whether footnote (e) in Table 1 requires the study and/or simulation of a failure of a protection system component (i.e., single point of failure) that may prevent correct operation of the protection system(s) impacted by the component failure. Protection systems that share a protection system component are fully dependent upon the correct operation of that single shared component and do not perform as two independent protection systems. This lack of clarity may result in a potential reliability gap.

Clarity is necessary as to whether (1) a valid assessment should include evaluation of delayed clearing due to failure of the protection system component (i.e., single point of failure), such as the failure of a shared protection system component, that produces the more severe system results or impacts; and (2) the study and/or simulation of the fault clearing sequence and protection system(s) operation should be based on the protection system(s) as-built design.

The lack of clarity is compounded by the similarity between the phrase “Delayed Clearing” used in TPL-003-0a and TPL-004-0, footnote (e), and the NERC glossary term “Delayed Fault Clearing.” While TPL-003-0a and TPL-004-0 do not use the glossary term, the similarity may lead to confusion and inconsistency in how entities apply footnote (e) to “stuck breaker” or “protection system failure” contingency assessments.

Identify the material impact to your organization or others, if known, caused by the lack of clarity or an incorrect interpretation of this standard.

There is a material impact to the entities required to perform transmission planning assessments and to the entities that may rely on these assessments. The lack of clarity in defining the required studies impacts entities by:

- Potential non-compliance if the correct contingencies are not studied
- Inefficient use of resources if contingencies are studied that are not required and mitigation plans are implemented that are not required
- Potential negative impact to grid reliability if the correct contingencies are not assessed

Interpretation 2012-INT-02: Response to Request for Interpretation of TPL-003-0a, Requirements R1.3.1, R1.3.10 and R1.5 and TPL-004-0, Requirements R1.3.1, R1.3.7 and R1.4 for the System Protection and Control Subcommittee

The following interpretations of TPL-003-0a, System Performance Following Loss of Two or More Bulk Electric System Elements (Category C), Requirements R1.3.1, R1.3.10 and R1.5 and TPL-004-0, System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements (Category D), Requirements R1.3.1, R1.3.7 and R1.4 were developed by members of the Assess Transmission Future Needs Standard Drafting Team (ATFNSTD), Protection System Misoperations Standard Development Team (PSMSDT), and Protection System Maintenance and Testing Standard Drafting Team (PSMTSDT).

Standard	Requirement (and text)
TPL-003-0a	R1.3.1 Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.
TPL-003-0a	R1.3.10. Include the effects of existing and planned protection systems, including any backup or redundant systems.
TPL-003-0a	R1.5. Consider all contingencies applicable to Category C.
<u>TPL-004-0</u>	<u>R1.3.1. Be performed and evaluated only for those Category D contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.</u>
<u>TPL-004-0</u>	<u>R1.3.7. Include the effects of existing and planned protection systems, including any backup or redundant systems.</u>
<u>TPL-004-0</u>	<u>R1.4. Consider all contingencies applicable to Category D.</u>

Question 1

For the parenthetical “(stuck breaker or protection system failure)” in TPL-003-0a (Category C contingencies 6-9) and TPL-004-0 (Category D contingencies 1-4), does an entity have the option of

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evaluating the effects⁹ of either “stuck breaker” or “protection system failure” contingency¹⁰, or does an applicable entity have to evaluate the contingency that produces the more severe system results or impacts as identified in R1.3.1 of both standards?

Response 1

The interpretation drafting team concludes that the Planning Authority and Transmission Planner must consider the situation that produces the more severe system results or impacts (i.e., TPL-003-0a, R1.3.1 and TPL-004-0, R1.3.1) due to a delayed clearing condition regardless of whether the condition resulted from a stuck breaker or protection system failure. The Reliability Standards TPL-003-0a (Table I, Category C contingencies 6-9) and TPL-004-0 (Table I, TPL-003-0a (Category C contingencies 6-9) and TPL-004-0 (Category D contingencies 1-4) involve an assessment of the effects of either a stuck breaker or a protection system failure. Evaluation of a single line ground (SLG) (TPL-003-0a, Table I, Category C) Fault and 3-phase (3 ϕ) (TPL-004-0, Table I, Category D) Fault with delayed clearing is required and further defined by footnote (e) and the parenthetical phrase “(“stuck breaker or protection system failure).” Footnote (e) explains that “Delayed clearing of a Fault is due to failure of any protection system component such as a relay, circuit breaker, or current transformer, and not because of an intentional design delay.” The parenthetical further emphasizes that the failure may be a “stuck breaker or protection system failure” that causes the delayed clearing of the fault. The ordered reading of the text in Table 1 in either standard explains that delayed clearing caused by a failure of a protection system or circuit breaker must be evaluated to examine its impact on BES performance. ~~Therefore, the transmission planner must consider the situation that produces the more severe system results or impacts due to a delayed clearing condition regardless whether the condition resulted from either a stuck breaker or protection system failure.~~

Standard	Requirement (and text)
<u>TPL-003-0a</u>	<u>R1.3.1 Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.</u>
<u>TPL-003-0a</u>	<u>R1.3.10. Include the effects of existing and planned protection systems, including</u>

⁹ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.3.10. and/or TPL-004-0, Requirement R1.3.7.

¹⁰ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5. and/or TPL-004-0, Requirement R1.4.

	<u>any backup or redundant systems.</u>
<u>TPL-003-0a</u>	<u>R1.5. Consider all contingencies applicable to Category C.</u>
TPL-004-0	R1.3.1. Be performed and evaluated only for those Category D contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.
TPL-004-0	R1.3.7. Include the effects of existing and planned protection systems, including any backup or redundant systems.
TPL-004-0	R1.4. Consider all contingencies applicable to Category D.

Question 2

For the phrase “Delayed Clearing¹¹” used in Category C¹² contingencies 6-9 and Category D¹³ contingencies 1-4, to what extent does the description in Table 1, footnote (e)¹⁴ require an entity to model a single point of failure of a protection system component that may prevent correct operation of a protection system, including other protection systems impacted by that failed component based on the as-built design of that protection system?

Response 2

The term “Delayed Clearing” that is described in Table 1~~4~~, footnote (e) refers to fault clearing that results from a failure to achieve the protection system’s normally expected clearing time. The Planning Authority and Transmission Planner is permitted engineering judgment in its Category C or D contingencies to select the~~Any failure of a~~ protection system component failures for evaluation that would produce the more severe system results or impact (R1.3.1) and this would include addressing all protection systems affected by the selected component.
A protection system component failure that impacts increases clearing times of~~one or more~~ protection systems and increases the total fault clearing time requires the Planning Authority and Transmission Planner ~~and Planning Authority~~ to simulate the full impact (clearing time and facilities removed) on the Bulk Electric System performance.

¹¹ As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5. and/or TPL-004-0, Requirement R1.4.

¹² As required by NERC Reliability Standard TPL-003-0a, Requirement R1.5.

¹³ As required by NERC Reliability Standard TPL-004-0, Requirement R1.4.

¹⁴ Footnote (e) Delayed Clearing: “failure of any protection system component such as a relay, circuit breaker, or current transformer, and not because of an intentional design delay,”

The interpretation drafting team bases this conclusion on the footnote (e) example “...any protection system component such as, relay, circuit breaker, or current transformer...” because the component “circuit breaker” is not addressed in the current or previously defined NERC glossary term. The interpretation drafting team initially believed the lowercase usage of “protection system” inferred the NERC glossary term and the components described therein; however, based on the interpretation drafting team’s further assessment of footnote (e), it concludes that the existing TPL standards (TPL-003-0a and TPL-004-0) do not implicitly use the NERC glossary term. Without an explicit reference to the NERC glossary term, “Protection System,” the two standards do not prescribe the specific protection system components that must be addressed by the Planning Authority and Transmission Planner in performing the studies required in TPL-003-0a and TPL-004-0.

Revision History (To be removed upon Final)

Version	Date	Description
1.0	5/9/2012	Draft 1 of the response to the request for interpretation.
<u>2.0</u>	<u>10/16/2012</u>	<u>Draft 2 of the response to the request for interpretation.</u>