

Comment Form — Proposed Relay Loadability SAR

This form is to be used to submit comments on the proposed Relay Loadability SAR Standards. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: sarcomm@nerc.com with the words "Relay Loadability SAR Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE. IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:**
- Do** enter text only, with no formatting or styles added.
 - Do** use punctuation and capitalization as needed (except quotations).
 - Do** use more than one form if responses do not fit in the spaces provided.
 - Do** submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not** insert tabs or paragraph returns in any data field.
 - Do not** use numbering or bullets in any data field.
 - Do not** use quotation marks in any data field.
 - Do not** submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name: CP9, Reliability Standards Working Group
Lead Contact: Guy Zito
Contact Organization: Northeast Power Coordinating Council (NPCC)
Contact Segment: 2
Contact Telephone: 212-840-1070
Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Kathleen Goodman	ISO-New England	NPCC	2
Michael Shiavone	National Grid	NPCC	1
Roger Champagne	TransEnergie (Quebec)	NPCC	1
David Kiguel	Hydro One Network	NPCC	1
Ron Falsetti	IESO (Ontario)	NPCC	2
Edwin Thompson	ConEdison	NPCC	1
Donald Nelson	MA Dept of Energy and Tele.	NPCC	
Sashi Parekh	MA Dept of Energy and Tele.	NPCC	
George Dunn	New York Power Authority	NPCC	1
Brian Hogue	Northeast Power Coord. Council	NPCC	2
Alan Adamson	New York State Rel. Council	NPCC	2
Guy Zito	Northeast Power Coord. Council	NPCC	2
Greg Campoli	New York ISO	NPCC	2

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

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Background Information:

Protective relays have often contributed to system disturbances including the Northeast Blackout of 1965, and the Blackout of August 14, 2003. During the 2003 blackout, relay loadability was found to have played a pivotal role in accelerating and spreading the early part of the cascade in Ohio and Michigan. Although the U.S.-Canada Power System Outage Task Force focused on the role played by “zone 3” relays, it was later found that other phase-distance and overcurrent relays also contributed to the cascade.

The purpose of the proposed Standard Authorization Request (SAR) is to ensure that protection systems and settings shall not limit transmission loadability, nor contribute to cascading outages. This transmission relay loadability SAR is submitted in response to the NERC Blackout Recommendation 8a, *Improve System Protection to Slow or Limit the Spread of Future Cascading Outages*, as included in the document approved by the NERC Board of Trustees on February 10, 2004.

The available [working paper](#) includes a proposed draft Transmission Relay Loadability Standard that codifies the relay loadability criteria prescribed in the NERC and U.S.-Canada Power System Outage Task Force recommendations on relaying. This working paper was prepared to assist the SAR and/or standards drafting team in the development of the proposed standard.

The requestor would like to receive industry comments on this SAR and to obtain the input of the industry prior to determining the final scope of the SAR. Although a proposed draft is provided in the working paper, *please limit your comments to the subject SAR* realizing there will be future opportunity to comment on any proposed standard. Accordingly, we request your comments be included on this form and emailed with the subject “Relay Loadability SAR Comments” by February 15, 2006 to sarcomm@nerc.com

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1. Do you agree there is a reliability need for a standard addressing relay loadability?

If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed scope of the SAR?

If not, please explain in the comment area.

Yes

No

Comments: NPCC reserves the right as stated in the SAR that determining what circuits are classified as Operationally Significant Circuits is the Region's responsibility. NPCC participating members are not in agreement with the definition as it appears in the "working paper".

3. Do you agree with the proposed applicability of the SAR?

If not, please explain in the comment area.

Yes

No

Comments: While we agree with the applicable of the standard we also recognize that the equipment owners have concerns regarding the emergency loadability of their equipment and the standard should recognize the ability for exceptions.

The TPSO definition in the whitepaper should be included in the SAR.

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- 4. Are you aware of any commercial considerations that might require a concurrent NAESB action associated with the proposed SAR?**

If yes, please explain in the comment area.

Yes

No

Comments:

5. Should the scope of the proposed SAR include relays associated with generators?

Please explain in the comment area.

Yes

No

Comments: Although NPCC's participating members believe that for the purposes of this SAR the relays associated with generators should not be included in the scope, it is important that the issue of coordination between generator and transmission system protection be addressed elsewhere in the NERC standards.

6. Are you aware of any regional differences that should be identified as part of the development of the standard?

If yes, please explain in the comment area.

Yes

No

Comments:

7. Do you have any additional comments on this SAR you would like to include?

If yes, please elaborate in the comment area.

Yes

No

Comments: The SAR and subsequent standard should emphasize that the loadability should apply only during emergency situations and not as a matter of normal system operations.