



April 30, 2007

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Dear Guy,

**Re: Comments on the Posted Draft Regional Reliability Directory #11, Special Protection Systems**

The Independent Electricity System Operator (IESO) offers the following high level comments on the posted draft of the NPCC Document – *“Regional Reliability Directory #11, Special Protection Systems”*.

Structure of the Draft Document

The IESO supports the notion of putting all criteria, standards, guidelines and procedures on one key topic in a single document.

With this approach, it is expected that the document will contain much more information than any single existing A or B or C document. It is the IESO's opinion that the proposed structure may not be most suited to provide a logical and easy to follow depiction of criteria, requirements and related information. For example, the proposed structure puts NERC requirements ahead of regional standards and criteria. This may make it appear that the requirements drive criteria, which in our view should be the other way around.

In addition, the present content in some of the sections could be condensed or relocated to allow readers easier navigation of key information such as the CBRE regional requirements and NPCC Inc. specific criteria. For example, the NERC requirements are already contained in existing NERC standards, they can be put as references or attached to the main document, or linked electronically to the sites where they are posted.

Suggestion for an Alternative Structure

To facilitate a more logical and easier to follow depiction of information, the IESO suggests the following alternative structure that can be sustainable and more adaptable to future changes, for your consideration:

INTRODUCTION

- Purpose including adequate reliability level this directory document is intended to achieve
- Background (minimum amount)

APPLICABILITY

- To whom does this directory applies

DEFINED TERMS

- Depicted in a similar as that in NERC's or NPCC's Glossary of Terms

## CRITERIA

- NERC (none exists today, may be specified in the future)
- Regional (NPCC Inc. Member, more stringent criteria), expected to be some of the materials in the existing A-Documents

## REQUIREMENTS

- NERC (as references or in attachment and/or cyber-link)
- CBRE Regional Requirements (to meet NERC's requirements and enforced under ERO)
- NPCC Inc. Member, requirements to meet more stringent regional criteria

## MEASURES AND ASSESSMENTS

- Performance measures corresponding to requirements, compliance assessment (non-compliance levels)

## GUIDELINE

- Guideline on design/actions to meet CBRE regional requirements and NPCC Inc. Member more stringent requirements

## PROCEDURE

- Procedure associated with implementing or documenting specific actions to meet requirements

## REFERENCES

- Other NPCC documents

## ATTACHMENTS

- NERC standards and other NPCC technical documents

## Discussion of some of the Key Sections

While most of the Section titles are self-explanation, we'd like to offer our views on some of the less obvious ones as follows.

### 1. CRITERIA - NERC

At present, NERC standards do not explicitly state the criteria. Over time, it is envisaged that NERC could modify its standards and create a criteria section to address FERC's request to stipulate the adequate reliability level. The NERC criteria section is created as a placeholder for this change.

### 2. REQUIREMENTS

The Requirements section puts all three sets of requirements together. However, since the NERC requirements are expected to be provided by references or attachments, the focus under this section will be the CBRE regional standards, when developed, and NPCC Inc. Member, more stringent requirements, which are expected to be some of the materials in the existing A-documents that are not criteria.

### 3. COMPLIANCE MEASURES AND ASSESSMENTS

It is expected that the CBRE regional requirements will be measured and their compliance assessed. This section will thus mirror the NERC's Measures and Violation Severity Level sections. In addition, there may be performance measures associated with NPCC Inc. Member more stringent requirements. This Section also provides these measures and non-compliance assessments.

#### 4. ATTACHMENTS

This houses the NERC requirements and other technical materials associated with the subject.

##### Comments on the Posted Directory

Since our primary concern and the above comments focus on the structure of the directory, we feel it is not appropriate to comment on the content of the directory at this time as it may change if an alternative structure is adopted. We look forward to future opportunities to review and comment on the content materials when they are presented in a near finalized directory structure.

Thank you for your attention to our comments and recommendations.

Yours truly,

A handwritten signature in cursive script that reads "R. J. Falsetti".

Ronald J. Falsetti, P. Eng.  
Independent Electricity System Operator (IESO)