



November 21, 2003

Mr. Guy V. Zito
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1515 Broadway
New York, NY 10036-8901

Dear Mr. Zito

**Subject: Comments to the Posted Draft for Review of the NPCC Document C16 –
“Procedure for NPCC Review of New or Modified Bulk Power System Special Protection
Systems (SPS)”**

The Independent Electricity Market Operator (IMO) offers the following comments to the currently posted draft of the NPCC Document C16 – **“Procedure for NPCC Review of New or Modified Bulk Power System Special Protection Systems (SPS)”**

Introduction

The first paragraph incorrectly identifies the NPCC definitions are located in Document A-1. The last sentence in the first paragraph should be changed to refer to A-7 "NPCC Glossary of Terms", and the reference section also changed to refer to A-7.

Section 1

1. The document text indicates copies of notification to TFSS, TFCO and TFSP, but the top box of the flow chart only identifies copies to TFCO and TFSP. There needs to be changes if these two parts are to be consistent.
2. It is in IMO view the addition of the last sentence in the paragraph numbered 1, which reads as following, is attempting to add a new Criteria requirement for SPSs:
"The SPS must fully coordinate with other protection and control systems and applicable Regional emergency procedures."

Special Protection Schemes must be designed according to the A-11 Criteria document, which represent mandatory requirements, and includes the following coordination requirement.

"Close coordination must be maintained among system planning, design, operating, maintenance and protection functions, since both initially and throughout their life cycle, SPSs are a multi-discipline concern."

It may be clearer to everyone if the C-16 Procedure document limits itself to the procedure for review and concurrence rather than identify any additional criteria above and beyond A-11. If there are additional criteria, it must be added to A-11, rather than to C-16.

The IMO request that the above phase is clarified or reference document A11 to ensure there is no misunderstanding.

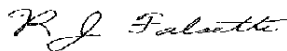
Section 3a

1. This section makes reference to the explicit requirements to meet Bulk Power System Protection Criteria A-5, and therefore this document should be listed as a reference. It further makes reference to the need for SPSs to conform to NPCC's protection standards, which leads one to believe these standards are over and above Bulk Power System Protection Criteria A-5. If so they should be specified.
2. Additionally, the section specifies that the requirements are to conform to the NPCC Special Protection System Guidelines document B11. It is our understanding this document has been replaced by Document A11 "Special Protection System Criteria". Documents A11 should be included as references as well.

In parallel with this transmittal, these comments will also have been posted on the NPCC Open Process Form at <http://www.npcc.org/>.

Thank you for your attention to these concerns.

Respectfully yours



Ronald J. Falsetti
Independent Electricity Market Operator (IMO)