

Lettre au NPCC



June 26, 2026

SENT BY EMAIL

Jaqueline Jimenez
Vice President, Compliance
1040 Avenue of the Americas
4th Floor
New York, NY 10018

Junji Yamaguchi, Ing., MBA
Manager
Regulatory Affairs for the Reliability
Coordinator and Common Instructions
2, Complexe Desjardins, Tour Est
13e étage
Montréal (Québec) H5B 1H7
Cel. : 438 862-6407
Email : yamaguchi.junji@hydroquebec.com

Subject : TPL-001-5.1, Note 13d

Greetings,

The Reliability Coordinator in Québec (RC) has filed the TPL-001-5.1 Reliability Standard for adoption with the Régie de l'Énergie in Québec (Régie). Our application is currently under review. In a letter dated June 12th, 2026¹, the Régie has requested that the RC seek NPCC's input on the items detailed below, in relation to the application of TPL-001-5.1 Standard in the United States. The objective is to clarify our common understanding of note 13d of Table 1.

Redundancy of protection systems, note 13d of Table 1

Please confirm the following or provide an explanation accordingly:

1. It is necessary to consider whether or not all other constituent parts of the control circuitry are redundant in order to determine whether or not the control circuitry is redundant, even if the DC distribution panel that is part of the control circuitry includes redundant circuit breakers.
In other words, merely noting that the protective relays are "split across two (2) different DC circuit breakers" in "a single (1) DC distribution panel", is not sufficient to consider a single control circuit as a redundant component of a Protection System, within the meaning of Note 13d, thereby excluding it from the simulations to be performed by the Transmission Planner for Category P5 events and faults 2e through 2h in the "Stability" column of the "Extreme Events" section of Table 1 (Simulations).²
2. The following proposal by a registered entity—"A single DC distribution panel is not to be taken into account. However, the single main circuit breaker for the control circuits, included in this distribution panel, must be taken into account"—does not reflect the clarification provided in the Technical Rationale - "However, the trip coil(s), whether implemented singly or in pairs, are only part of the single control circuit; all its constituent parts should be included when considering whether the single control circuit may be a non-redundant component of a Protection System."³ Consequently, the registered entity's proposal regarding the DC distribution panel, taken on its own and in the absence of a finding of redundancy in the other constituent parts of the control circuitry, could not be considered a possible interpretation of the application of Note 13d.

¹ [R-4233-2023-A-0042-Corresp-Autres-2026_06_12.pdf](#), page 5

² https://www.nerc.com/globalassets/standards/reliability-standards/tpl/2015-10_technical-rationale_10112018.pdf#page=11, page 5

³ https://www.nerc.com/globalassets/standards/reliability-standards/tpl/2015-10_technical-rationale_10112018.pdf#page=15, page 10

3. According to NERC, there is “no reason to ensure redundancy” for the components of a Protection System if the Simulations conclude that the grid performance criteria “have been achieved.”²

Kindly note that the Régie has asked us to provide answers by July 13th and to comment on your response.

We would be pleased to organize a meeting the week of June 29th to discuss this at your convenience.

Best Regards,

Junji Yamaguchi, ing., MBA

Manager

Regulatory Affairs for the Reliability Coordinator and Common Instructions