

## Rui Da Shu

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**From:** Guy V. Zito <gzito@npcc.org>  
**Sent:** Monday, December 15, 2014 7:49 AM  
**To:** rsballot  
**Cc:** rsc  
**Subject:** NERC Final Ballot PRC-026-1

NPCC Members and Entities of the NERC Registered Ballot Body,

The subject standard is currently posted for ballot through **8pm December 16, 2014**. The standard had achieved quorum and passed an “additional ballot” with a 67.39% approval rate.

The NPCC Regional Standards committee has not reached full consensus on a ballot position for this project. Of notable concern to a minority of RSC members is the potential for the need to have two separate Corrective Action Plans (CAP) covering the same element/device-one for a misoperation as identified in PRC-004-3 (currently filed with the FERC awaiting a rulemaking) and also in another CAP for a design parameter change required by this standard PRC-026-1. NPCC has reviewed the concern and also discussed this with Task Force on System Protection leadership. As a result of those discussions I would submit the following for your consideration.

- 1) The PRC-026 was written to ensure proper design settings of relays for an entity’s system are applied, if not, a “max” 6 month period for a corrective action plan (CAP) is provided to allow sufficient time to adjust settings on all an entity’s load responsive relays.
- 2) The PRC-004-3 (filed with the commission) was written to ensure all single misoperations are analyzed and a CAP for that single misop. is written within 60 days.

These are two separate and distinct CAPs. The first is a design based standard to ensure your load responsive relays meet specific parameters as specified in the PRC-026 standard. The second is related to reporting and mitigating future misops which have already happened, as required by the PRC-004 standard. Important to note is that if “power swing blocking” is not enabled and an operation occurs for stable power swing then it is not classified as a misoperation and doesn’t need to be reported as part of PRC-004. Also of importance to note is the issue of stable power swings contributing to the 2003 NE blackout and a regulatory directive. In addition, if there is any overlap of CAPs, the more conservative or shorter time supersedes the longer one although the potential probability for this, as noted, is very minimal. The incremental improvement in reliability and increase in system security outweighs the potentially isolated compliance concern which has been raised.

NPCC continues to support the standard as written and will cast an **Affirmative** ballot as the Regional Entity.

Please let me know if you have any questions.

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