

Rui Da Shu

From: Guy V. Zito
Sent: Friday, October 02, 2015 9:38 AM
To: rsballot
Cc: rscmembers
Subject: NERC Ballot- 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS) | PRC-012-2

NPCC Entities and Members of the NERC Registered Ballot Body,

The Regional Standards Committee has reviewed the subject standard currently posted for ballot until 8pm October 5, 2015 and solicited input from NPCC's Task Forces. The Task Force on System Protection and the Task Force on Coordination of Planning have both recommended a **Negative Vote**. Additionally, those RSC members providing their voting positions, have all indicated they are unable to support this version of the standard. The major issues precluding support are as follows:

- RC will perform the reviews of new Remedial Action Schemes (RAS). We believe the PC is more aligned with this task.
- All RAS, regardless if they are Type III (local) or not, will require single component failure in their design and operation. NPCC's local SPSs were reviewed and approved and not required to have this level of reliability. It is not cost effective to revise these SPS designs and there is no indication that there have been misoperation or reliability related issues.
- All RAS will have to be reviewed at least once every 60 Calendar Months for "single component failure in the RAS, when the RAS is intended to operate, does not prevent the BES from meeting the same performance requirements(defined in Reliability Standard TPL-001-4 or its successor) as those required for the events and conditions for which the RAS is designed."
- The above requirement for a performing a 5-year periodic review for single component failure is applicable to the Transmission Planner(TP). This is inconsistent with the role outlined in the Functional Model V5 and also the TP does not, in many cases, have sufficient access to information regarding the design of the RAS(SPS). The TP will understand the functional characteristics of the RAS but not the design.

RSC Members have other issues which will be articulated in NPCC's final comment form and we will make recommendations to address our concerns.

In consideration of all of the above, NPCC's Regional Standards Committee recommends a **Negative** vote to reject the current version of standard.

If you have questions please contact me.

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