UNOFFICIAL COMMENT FORM

Project 2007-06.2 Phase 2 of System Protection Coordination
TOP-009-1

DO NOT use this form for submitting comments. Use the electronic form to submit comments on draft one of TOP-009-1 – Knowledge of Composite Protection Systems and Remedial Action Schemes and Their Effects. The electronic form must be submitted by 8:00 p.m. Eastern, Thursday, November 19, 2015.

Documents and information about this project are available on the project page. If you have questions, contact Standards Developer, Scott Barfield-McGinnis, (via email) or at (404) 446-9689.

Background Information
This draft 1 posting is soliciting formal comment through a 45-day comment period and an initial ballot to be conducted in the last 10 days of the comment period.

Phase 1 (2007-06)
The System Protection Coordination Standard Drafting Team (SPCSDT) is creating a new results-based standard, PRC-027-1 to address coordination of Protection System performance during Faults. This standard incorporates and clarifies the Protection System coordination aspects of Requirements R3 and R4 contained in PRC-001-1.1 that is proposed for complete retirement.

Phase 2 (2007-06.2)
Phase 2 is addressing the remaining Requirements R1, R2, R5, and R6 in PRC-001-1.1 that is proposed for complete retirement. See the Mapping Document for a complete explanation on how Requirement R1 is being addressed by TOP-009-1 (Knowledge of Composite Protection Systems and Remedial Action Schemes and Their Effects) and how the reliability objective of Requirements R2, R5, and R6 are addressed by TOP/IRO standards that are awaiting regulatory approval.

The proposed TOP-009-1 standard incorporates PRC-001-1.1(ii), Requirement R1 into individual requirements for the Balancing Authority, Generator Operator, and Transmission Operator. Splitting the three applicable entities from PRC-001-1.1(ii) into individual requirements by entity improves clarity concerning the reliability objective of each function.
Questions

1. The initial draft of TOP-009-1 was well received with most questions arising from issues covered in several industry webinars prior to and during the initial posting. The drafting team believes it has addressed the comments within its purview and within the scope of the project. If you have additional comments about the standard not addressed by drafting team responses to the initial posting, please provide them below:

Comments:

In the B. Requirements and Measures, Rationale for Requirement R2 and Rationale for Requirement R3 the last sentence could use some modification.

“Personnel are also expected to understand how RASs are expected to detect predetermined BES conditions and automatically take corrective actions.”

Suggest using the following language: “Personnel are also expected to understand the operational functionality of RASs.”

Language in R3 needs to capture how BES affects the output of the facility as well as the facilities output and its affect on the BES.

Suggest using the following language: “Each Generator Operator shall ensure personnel responsible for Real-time control of Facility have knowledge of operational functionality of BES Composite Protection System; and Remedial Action Schemes that affect output of the Facility as well as the Facility’s output and its affect on the BES.”