Unofficial Comment Form
Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS)
PRC-012-2

DO NOT use this form for submitting comments. Use the electronic form to submit comments on PRC-012-2 – Remedial Action Schemes. The electronic comment form must be submitted by 8 p.m. Eastern, Friday, March 18, 2016.

Documents and information about this project are available on the project page. If you have questions, contact Standards Developer, Al McMeekin (via email), or at (404) 446-9675.

Background Information
This project is addressing all aspects of Remedial Action Schemes (RAS) contained in the RAS-related Reliability Standards: PRC-012-1, PRC-013-1, PRC-014-1, PRC-015-1, and PRC-016-1. The maintenance of the Protection System components associated with RAS (PRC-017-1 Remedial Action Scheme Maintenance and Testing) are already addressed in PRC-005. PRC-012-2 addresses the testing of the non-Protection System components associated with RAS and the overall performance of the RAS.

In FERC Order No. 693 (dated March 16, 2007), the Commission identified PRC-012-0, PRC-013-0, and PRC-014-0 as “fill-in-the-blank” standards and did not approve or remand them. These standards are applicable to the Regional Reliability Organizations (RROs), assigning the RROs the responsibility to establish regional procedures and databases, and to assess and document the operation, coordination, and compliance of RAS. The deference to regional practices precludes the consistent application of RAS-related Reliability Standard requirements.

The proposed draft of PRC-012-2 corrects the applicability of the fill-in-the-blank standards by assigning the requirement responsibilities to the specific users, owners, and operators of the Bulk-Power System; and incorporates the reliability objectives of all the RAS-related standards.

45-day Formal Comment Period
The drafting team appreciates the feedback stakeholders provided on the previous posting. The drafting team considered all of the comments and revised the standard and its implementation plan, making clarifying changes to both documents. Responses to the most prevalent comments received and a summary of the changes to the documents are located in the Consideration of Comments document posted on the project page. Responses to individual comments are not required for a failed additional ballot in accordance with sections 4.12 and 4.13 of the Standards Process Manual. The drafting team will respond to all individual comments received in the last additional ballot; i.e., the passing ballot prior to conducting the Final Ballot. If you have a specific comment that you would like to discuss, please contact
the Standards Developer, Al McMeekin at 404-446-9675 or via email Al McMeekin. Please provide your comment, your contact information, and a convenient date and time for a discussion.

The drafting team is soliciting comments and feedback on the revised standard and its implementation plan.

Questions

1. PRC-012-2: Requirements R4 and R6, Attachments 1 and 2, and the Supplemental Material section of the standard were modified for clarity and completeness. Do you agree with the proposed changes? If no, please provide the basis for your disagreement and an alternate proposal.

☐ Yes  ☐ No

Comments: Footnote 1 in Requirement R4 is not needed as written. It just reiterates the wording of sub 4.1.3. Same applies to footnote 9 on page 46 as the wording in sub 4.1.3 pertains to the entire document. An appropriate footnote would read that NPCC Type 3 classification and the WECC LAPS classifications will be recognized as limited-impact RAS.

2. Implementation Plan for PRC-012-2: The drafting team revised the Implementation Plan to provide for the initial consideration of limited impact RAS, and to clarify that the initial obligation under Requirement R9 for a Reliability Coordinator that does not have a RAS database is to establish a RAS database by the effective date of PRC-012-2. Do you agree with the revised Implementation Plan? If no, please provide the basis for your disagreement and an alternate proposal.

☐ Yes  ☐ No

Comments: