Unofficial Comment Form
Project 2007-06.2 Phase 2 of System Protection Coordination

Do not use this form for submitting comments. Use the electronic form to submit comments on PER-006-1 – Specific Training for Personnel and the two proposed modified definitions of “Operational Planning Analysis” (OPA) and “Real-time Assessment” (RTA). The electronic form must be submitted by 8 p.m. Eastern, Monday, April 25, 2016.

Documents and information about this project are available on the Project 2007-06.2 Phase 2 of System Protection Coordination project page. If you have questions, contact Senior Standards Developer, Scott Barfield-McGinnis (via email) or at 404-446-9689.

Background Information
In conjunction with Project 2007-06 System Protection Coordination (Phase 1), NERC is proposing the complete retirement of PRC-001-1.1(ii). Requirements R1, R2, R5, and R6 are proposed for retirement in Project 2007-6.2 Phase 2 of System Protection Coordination. See the Mapping Document for an explanation of how the reliability objectives of those requirements are addressed by other standards, the proposed PER-006-1 – Specific Training for Personnel, and the proposed modified definitions of OPA and RTA. The remaining two Requirements R3 and R4 of PRC-001-1.1(ii) are addressed by PRC-027-1 – Coordination of Protection Systems for Performance During Faults. Details for Phase 1 are found on the 2007-06 project page. The complete retirement of PRC-001-1.1(ii) is contingent upon the approval of PRC-027-1 (under Phase 1) as well as the proposed Reliability Standard, PER-006-1 and the proposed definition modifications of OPA and RTA (under Phase 2). NERC is proposing the retirement of PRC-001-1.1(ii) in the implementation plans associated with both projects.

Phase 1 (2007-06)
The System Protection Coordination Standard Drafting Team developed a new Reliability 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 of PRC-001-1.1(ii). See the Mapping Document for a complete explanation on how the reliability objectives of Requirements R1, R2, R5, and R6 are addressed by other standards, the modified definitions of OPA and RTA, and the proposed PER-006-1 Reliability Standard.

Standard(s) Affected – PER-006-1, Retirement of PRC-001-1.1 (ii)
Questions

1. **Generator Operator**: Do you agree that the proposed PER-006-1 – Specific Training for Personnel appropriately replaces the responsibilities of the Generator Operator in PRC-001-1.1(ii) – System Protection Coordination, Requirement R1 (i.e., “...be familiar with the purpose and limitations of Protection Systems schemes...”)? If not, please explain and provide suggestions to improve the PER-006-1 requirement.

   ☐ Yes
   ☐ No

   Comments:

2. **Transmission Operator**: The reliability objective of PRC-001-1.1(ii), Requirement R1 for the Transmission Operator (i.e., “...be familiar with the purpose and limitations of Protection Systems schemes...”), that is not already covered by the Personnel Performance, Training, and Qualifications (PER) Reliability Standards, is addressed by inserting the phrase “functions, and limits” into the proposed modified definitions of OPA and RTA. The Transmission Operator, by integrating the “functions and limits” of Protection Systems and Remedial Action Schemes into its OPA and RTA, will ensure that the Bulk Electric System is operated within System Operating Limits (SOL) and Interconnection System Operating Limits (IROL). Do you agree that the proposed modification of these terms as defined by the Glossary of Terms Used in NERC Reliability Standards achieves this reliability objective? If not, please explain and provide suggestions.

   ☐ Yes
   ☐ No

   Comments:

   While we support the proposed revision to the two terms to achieve the intended purpose, we do not agree with the words “and limits”. The word “limits” lends itself to be interpreted as the system operating limits or interconnection system operating limits on which the Protection Systems, etc. have little bearing on. We suggest to reword the above to “functions and limitations” or “functions, limitations” to more accurately reflect the intent of the training on composite protection systems and RASs.
3. **Reliability Coordinator:** During the progression of Project 2007-06.2, it was determined that the Reliability Coordinator, a function that is not applicable to PRC-001-1.1(ii) should, similarly, “...be familiar with the purpose and limitations of Protection Systems schemes...” as found in Requirement R1 of the standard. The reliability objective for the Reliability Coordinator that is not already covered by the PER Reliability Standards, is being addressed by inserting the phrase “functions, and limits” into the proposed modified definitions of OPA and RTA. The Reliability Coordinator, by integrating the “functions and limits” of Protection Systems and Remedial Action Schemes into its OPA and RTA, will ensure that the Bulk Electric System is operated within SOL and IROL. Do you agree that the proposed modification of these terms as defined by the *Glossary of Terms Used in NERC Reliability Standards* achieves this reliability objective? If not, please explain and provide suggestions.

- [ ] Yes
- [x] No

Comments:

While we support the proposed revision to the two terms to achieve the intended purpose, we do not agree with the words “and limits”. The word “limits” lends itself to be interpreted as the system operating limits or interconnection system operating limits on which the Protection Systems, etc. have little bearing on. We suggest to reword the above to “functions and limitations” or “functions, limitations” to more accurately reflect the intent of the training on composite protection systems and RASs.

4. Do you agree with the proposed Violation Risk Factor (VRF) and Violation Severity Levels (VSLs) for the proposed PER-006-1 Requirement? If not, please provide a basis for revising the VRF and/or what would improve the clarity of the VSLs.

- [x] Yes
- [ ] No

Comments:

5. Do the PER-006-1, Application Guidelines provide sufficient guidance, basis for approach, and examples to support performance of the Requirement? If not, please provide specific detail that would improve the Application Guidelines.

- [x] Yes
- [ ] No

Comments:
6. Do you agree with implementation period (i.e., 12 months) of the proposed PER-006-1 Reliability Standard and the proposed definition modifications of OPA and RTA based on the considerations listed in the Implementation Plan? If not, please provide a justification for changing the proposed implementation periods.

☐ Yes
☐ No

Comments:

7. Are you aware of any conflicts between the proposed PER-006-1 Reliability Standard and any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or agreement? If so, please identify the conflict here.

☐ Yes
☒ No

Comments:

8. Are you aware of the need for a regional variance or business practice that should be considered with this project? If so, please identify it here.

☐ Yes
☒ No

Comments:

9. If you have any other comments not previously mentioned above, please provide them here:

Comments: