Unofficial Comment Form
Project 2010-05.2 – Special Protection Systems
Phase 2 of Protection Systems

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the proposed definition of Remedial Action Scheme (RAS). The electronic comment form must be completed by 8 p.m. Eastern, Tuesday, October 14, 2014.

If you have questions, please contact Al McMeekin, NERC Standards Developer by email at Al.McMeekin@nerc.net or by telephone at (404) 446-9675.

The project page may be accessed by clicking here.

Background Information
The existing NERC Glossary of Terms definition for “Special Protection System” (“SPS”) or “Remedial Action Scheme” (“RAS”) lacks the specificity necessary to consistently identify what equipment or protection schemes qualify as SPS or RAS across the eight NERC Regions. The existing definition also does not clearly stipulate the characteristics of a SPS or RAS. The actions listed in the definition of “Special Protection System” and “Remedial Action Scheme” are ambiguous and may unintentionally include equipment whose purpose is not expressly related to preserving System reliability in response to predetermined System conditions. Employing a single term; i.e., RAS, and clarifying its definition will lead to more consistent application of the NERC Reliability Standards related to RAS.

Note: The term “Remedial Action Scheme” (“RAS”) is and will be used throughout the documents associated with this Project to reflect the proposed retirement of the term “Special Protection System” (“SPS”).

Initially, the term SPS will be replaced with RAS in only those Reliability Standards that are currently fully implemented. There a few standards in implementation that NERC determined could be modified now, they are PRC-005-2, PRC-005-3, and PRC-024-1. For those Reliability Standards that contain references to SPS and that are still in the implementation phase or under development, the transition to RAS will occur after full implementation of the standard is completed. This approach will prevent any possible timing issues associated with the transition. To ensure there is no gap in the standards, the term SPS will not be retired until the last reference to SPS is replaced in the full body of Reliability Standards. Consequently, for a short time, there will be two definitions – one for SPS and one for RAS. Where SPS is used in a requirement, entities will continue to utilize the definition of SPS. Where RAS is used, entities will use the definition of RAS.

The Project 2010-05.2 Special Protection Systems Standard Drafting Team (SPSSDT) posted the first draft of the proposed RAS definition for comment from June 11, 2014 to July 25, 2014. The drafting team
considered all stakeholder comments and suggestions and revised the draft definition. The following is a summary of changes the drafting team made:

Changed the phrase “curtailing or tripping generation or other sources” to “adjusting or tripping generation (MW and Mvar)”

Changed the phrase “curtailing or tripping load” to “tripping load”

Changed the introductory sentence to the objectives from: “RAS accomplish one or more of the following objectives” to “RAS accomplish objectives such as” because the objective list is no longer all inclusive

Inserted “Bulk Electric System” (BES) as a qualifier in the pertinent objectives

Removed the last objective: “Address other Bulk Electric System (BES) reliability concerns” because it was deemed overly broad

Revised the fifth objective to read: “Limit the impact of Cascading or extreme event”

Removed the sentence: “These schemes are not Protection Systems; however, they may share components with Protection Systems.”

Added a new exclusion (a) that reads: “Protection Systems installed for the purpose of detecting Faults on BES Elements and isolating the faulted Elements”

Combined exclusions (b) and (c) to read: “Schemes for automatic underfrequency load shedding (UFLS) and automatic undervoltage load shedding (UVLS) comprised of only distributed relays”

Changed exclusion (d) from “Autoreclosing schemes” to “Automatic Reclosing schemes” to be in alignment with Reliability Standard PRC-05-3

In exclusion (e), changed the term “high voltage” to “overvoltage”

In exclusion (f), removed the term “generation excitation”

In exclusion (k), replaced “operator” with the defined term “System Operator”

Added a new exclusion (n) that reads: “Generator controls such as, but not limited to, automatic generation control (AGC), generation excitation [e.g. automatic voltage regulation (AVR) and power system stabilizers (PSS)], fast valving, and speed governing”
Updated the Background and FAQ document to reflect the changes and additions made to the proposed definition.

Updated Implementation Plan:
• added a specific Effective Date for PRC-024-1
• removed standards that are currently in implementation phase (these standards will be modified at a later date)
• removed retirement of “Special Protection System” (SPS) (the SPS definition will be needed until all references to SPS can be replaced with “Remedial Action Scheme” (RAS))

Updated the “Revised Reliability Standards for the Revised Definition of RAS” to reflect the reduction in standards currently being modified

Additional 45-day Formal Comment and Ballot Period
The SPSSDT is soliciting stakeholder feedback on the second draft of the RAS definition. The electronic comment form must be completed by 8 p.m. Eastern Tuesday, October 14, 2014.

Please enter comments in simple text format, as bullets, numbers, and special formatting will not be retained (even if it appears to transfer formatting when copying from the unofficial Word version of the form into the official electronic comment form). If you enter extra carriage returns, bullets, automated numbering, symbols, bolding, italics, or any other formatting, that formatting will not be retained when you submit your comments.

• Separate discrete comments by idea, e.g., preface with (1), (2), etc.
• Use brackets [ ] to call attention to suggested inserted or deleted text.
• Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.
• Do not use formatting such as extra carriage returns, bullets, automated numbering, bolding, or italics.

• Please do not repeat other entity’s comments. Select the appropriate item to support another entity’s comments. An opportunity to enter additional or exception comments will be available.
• If supporting other’s comments, be sure the other party submits comments.
Question:

1. Do you agree with the revised definition of a Remedial Action Scheme (RAS)? If not, please provide the basis for your disagreement and your proposed revisions.

☐ Yes
☒ No

Comments: In PRC-024-1(X), A. Introduction 5. Effective Date was removed, and replaced by the Effective Date paragraph. This change is not only not indicated in the redline, but more importantly it removed the “phased-in” implementation of PRC-024-1 which was necessitated by the requirements of the standard. Is the intent to remove the “phase-in” percentages by the single effective date indicated by the Effective Date paragraph in PRC-024-1(X)?

Under A.5 Effective Date: of PRC-025-1(X) the words “See Implementation Plan” were deleted. PRC-025-1(X) has its own Implementation Plan which is part of the standard’s “package”. However, to ensure clarity and avoid misunderstanding, suggest leaving “See Implementation Plan” in A.5. The Implementation Plan must be revised to be consistent with the intended revisions.

It should be made clear that all aspects of the Implementation Plans for PRC-024-1 and PRC-025-1 will remain applicable to those standards.

In part (b) on page 1, what is meant by “distributed relays”? Are “distributed relays” intended to be distribution system relays? The wording needs clarification.

Please add the following to “The following do not individually constitute a RAS:” list:
The controllers at each terminal of a High Voltage direct current (HVdc) Facility that may or may not rely on communications with the other terminals of the same HVdc Facility, that perform the intended control functions for that HVdc Facility.