Background Information
This posting is soliciting formal comment.

The second draft of PRC-004-3 was posted for a 45-day formal comment period with concurrent initial ballot from July 25 – September 7, 2012. Stakeholders from approximately 145 companies representing 9 of the 10 Industry Segments provided feedback. The Protection System Misoperation Standard Drafting Team (PSM SDT) has responded to all commenters and developed a third draft of the standard for Protection System Misoperation Identification and Correction based on stakeholder input. Changes to the standard include:

- Revisions to the definition of Protection System Misoperation.
- Revisions to the Applicability ‘Facilities’ section.
- Revisions to the Requirements and Measures.
- Modifications to the VSLs to reflect the changes in the requirements.
- Revisions to the Implementation Plan including extending the Effective Date from six months to twelve months following applicable regulatory approvals.
- Removal of the Misoperations reporting aspects from the standard.
- Modifications to the Guidelines and Technical Basis section to include more explanation and examples.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.
Questions

1. Based on stakeholder input, the drafting team revised the definition of a Misoperation. The categories as well as the introductory sentence of the definition were modified for clarity. The introductory sentence indicates that a Misoperation pertains to ‘the failure of an Element’s composite Protection System to operate as intended.’ Do you agree with the revised definition? If not, please provide specific suggestions for improvement.

☐ Yes
☐ No
Comments:

2. Requirement R1 was revised to to provide more clarity regarding the responsibilities of the BES interrupting device owner and the Protection System owner (if they are different entities) when a Protection System operation occurs. Do you agree with these changes? If not, please provide specific suggestions for improvement.

☐ Yes
☐ No
Comments: The Protection System component owner who does not also own the interrupting device may be placed in a non-compliant situation through no fault of their own. Their compliance is contingent upon a timely notification from the owner of the BES interrupting device. If the notification is not made in a timely fashion to allow for investigation the Protection System component owner would be non-compliant for not conducting an investigation and documenting the findings within 120 days.

For this situation the BES interrupting device owner should have an abbreviated time frame to notify the Protection System component owner to provide sufficient time to collect the appropriate information and investigate the operation. Conversely, the owner of the Protection System component could be granted more time to investigate (i.e. 120 days from the notification by the BES interrupting device owner).

A misoperation investigation if Protection Systems are shared between two or more entities is often a joint effort. The Application Guide clearly defines that “it is expected that both entities will work together to investigate the cause of the operation”, which is desired. This is not clearly defined in R1 and should be clarified. The Application Guide should indicate that this notification should be done as soon as possible.
3. The Measures and VSLs were revised to reflect changes to the requirements. Do you agree with these changes? If not, please provide specific reasons why not and alternative recommendations and justifications.

☐ Yes
☒ No

Comments: We agree with the content of all the measures and VSLs, however measure M1 would have to be modified accordingly to coincide with the modifications suggested in question 2 above.

4. The drafting team modified the Guidelines and Technical Basis section to provide more supporting discussions, explanations, and examples for the various aspects of the standard. Do you have any specific suggestions for further improvements?

☐ Yes
☒ No

Comments:

5. If you have any other comments on this Standard that you haven’t already mentioned above, please provide them here:

Comments: The Compliance Section of Standard has “The Transmission Owner, Generator Owner and Distribution Provider that owns a BES Protection System shall retain evidence for all Misoperations with an open investigation, action plan, or CAP even if the BES interrupting device operation occurred prior to the current audit period.” The word “open” should precede not only investigation, but action plan and CAP for clarity. It should be made to read “open investigation, open action plan, or open CAP even if the BES interrupting device operation occurred prior to the current audit period”.

What is an Entity’s compliance obligation for an open investigation or open action plan that occurred prior to regulatory approval of this Standard but in the current audit period of an entity? The new standard establishes specific time limits. If an entity has an operation to investigate the day prior to the compliance obligation date, does the 120 day time limit apply the day the Standard is obligatory?

Regarding the Implementation Plan for Requirements R1, R2, R3 and R4:

“Entities shall be 100% compliant for any new Protection System Operation on the first day of the first calendar quarter twelve months” (this is the compliance obligation date) “following applicable regulatory approvals, or in those jurisdictions where no regulatory approval is required, on the first day of the first calendar quarter twelve months following Board of Trustees adoption. Protection System operations that occur before the compliance date shall comply with the previous version of the Standard.”
In this section of the Implementation Plan, what is meant by “new”? Is “new” any operation that occur after the compliance obligation date, or during the window of implementation between regulatory approval and compliance obligation date?