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

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by 8 p.m. ET March 19, 2014.

If you have questions please contact Al.McMeekin@nerc.net via email or by telephone at 404-446-9675.

The project page may be accessed by clicking here. (Please insert link to new project page)

Background Information
In early 2011, NERC staff decided to divide the approved project for Protection System Misoperations into two phases. Phase 1 of Project 2010-05 is addressing Misoperations of Protection Systems; the project began in April, 2011 and is ongoing. Project 2010-05.2 Special Protection Systems is Phase 2 of Protection Systems and will address all aspects of Special Protection Systems including misoperations of SPS. 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 because they are applicable to the Regional Reliability Organizations (RROs); consequently, they are not mandatory or enforceable. This project proposes to correct the applicability by assigning responsibilities to the specific users, owners, and operators of the Bulk-Power System. The existing NERC Glossary of Terms definition for a Special Protection System (SPS) or Remedial Action Scheme (RAS), as used in the Western Interconnection, lacks the clarity and specificity necessary for consistent identification and classification of protection schemes as SPS or RAS across the eight NERC Regions. This leads to inconsistent application of the SPS-related Reliability Standards. At the request of the NERC Standards Committee, the Planning Committee directed the System Protection and Control Subcommittee (SPCS) to research this issue. The SPCS authored the attached report and provided a draft definition of SPS for consideration in the standards development process. This project proposes to establish a definition for SPS that provides the needed specificity to promote the consistent application of the NERC Reliability Standards related to SPS. This project also proposes to address, in part, four recommendations related to identification and coordination of SPS from the joint FERC-NERC inquiry of the September 2011 Southwest Blackout Event. There is no FERC directive associated with the SPS project: however, this project is being coordinated with Project 2008-02 UVLS, which does have an associated directive in P 1509 of Order No. 693 to modify PRC-010-0. These projects are linked because the proposed definition for Special Protection Systems must be written relative to the proposed definition of UVLS Program.
Questions
You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. Do you have any specific questions or comments relating to the scope of the proposed SAR?
   - [X] Yes
   - [ ] No
   Comments: The annual assessment of SPS in transmission planning studies should be addressed within Transmission Planning (TPL) standards. We recommend that Transmission Planning requirements not be included in Protection and Control (PRC) standards.

2. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here.
   - [ ] Yes
   - [X] No
   Comments:

3. If you have any other comments on this SAR that you haven’t already mentioned, please provide them here:
   Comments: