Unofficial Comment Form
Project 2007-17.4 PRC-005 Order No. 803 Directives

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the SAR. The electronic comment form must be completed by 8:00 p.m. ET on April 10, 2015.

If you have questions please contact Stephen Crutchfield via email or by telephone at stephen.crutchfield@nerc.net or 609-651-9455.

The project page may be accessed by clicking here.

Background Information

In Order No. 803, FERC approved Standard PRC-005-3 and, in Paragraph 31, directed NERC to:

"...direct that, pursuant to section 215(d)(5) of the FPA, NERC develop modifications to PRC-005-3 to include supervisory devices associated with auto-reclosing relay schemes to which the Reliability Standard applies. Further, we clarify that NERC’s proposal regarding the scope of supervisory devices is an acceptable approach to satisfy the Commission directive. Specifically, NERC proposed in its NOPR comments, and we find acceptable, that the scope of the supervisory devices to be encompassed in the Reliability Standard are those providing voltage supervision, supervisory inputs associated with selective auto-reclosing, and sync-check relays that are part of a reclosing scheme covered by PRC-005-3."

A revised Standards Authorization Request (SAR) was prepared along with a proposal to address the directive. The SAR provides background information regarding the directive. The proposed solution that the PSMTSDT developed to address the directive revises the standard specific defined terms “Automatic Reclosing” and “Component Type” as follows:

**Automatic Reclosing** – Includes the following Components:

- Reclosing relay
- Supervisory relay that monitors BES quantities (such as voltage, frequency, or voltage angle) and supervises operation of the reclosing relay
- Voltage and Current Sensing Devices associated with the supervisory
- Control circuitry associated with the reclosing relay or supervisory relay.

**Component Type** –
• Any one of the five specific elements of a Protection System.
• Any one of the two-four specific elements of Automatic Reclosing.
• Any one of the two specific elements of Sudden Pressure Relaying.

The term “supervisory relay” was also added as appropriate to Table 4-1. The Rationale section was also revised to reflect the proposed revisions to the defined terms above. A new Table 4-3 was added to address maintenance activities and testing for Automatic Reclosing with supervisory relays. No revisions are being proposed for the Requirements of the standard. This version of PRC-005 uses PRC-005-5 being developer under Project 2014-01 as the starting point for revisions to address the directive.

Questions

1. Do you agree that the scope and objectives of the revised SAR address the directive in Order No. 803? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

☐ Yes
☒ No

Comments: The Objective section on page 4 of the SAR should be revised to stipulate the revisions that will be needed for Automatic Reclosing, and Component Type that are listed in the Definitions Used in this Standard section of PRC-005-3. (The Proposed Methodology - PRC-005 Directive states on its page 2 that “This version of PRC-005 uses PRC-005-5 being developed under Project 2014-01 as the starting point for revisions to address the directive.”) Suggest revising the Objectives section in the SAR to read “Provide clear, unambiguous requirements, standard specific definitions, and standard(s)...”

2. The PSTMSDT has proposed revising the definition of “Automatic Reclosing” and “Component Type” to address the FERC directive in Order 803. Do you agree that the proposed revisions to defined terms as shown above address the directive? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.

☐ Yes
☒ No

Comments:
“Any one of the two specific elements of Sudden Pressure Relaying.” does not appear in the posted PRC-005-3, but it does appear in PRC-005-4, PRC-005-5. Sudden Pressure Relaying should only be capitalized if it is formally defined. It is assumed that the two specific elements of sudden pressure relaying are the actuating device and the associated control wiring.