Unofficial Comment Form
Project 2007-17.4 PRC-005 Order No. 803 Directive
Standard Authorization Request

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the Standard Authorization Request (SAR) by 8:00 p.m. Eastern, July 10, 2015.

Documents and information about this project are available on the project page. If you have questions contact Senior Standards Developer, Stephen Crutchfield (via email) or at (609) 651-9455.

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."

The Protection System Maintenance and Testing Standard Drafting Team (PSMTSDT) proposed revision of the standard specific defined terms “Automatic Reclosing” and “Component Type” as follows:

Automatic Reclosing – Includes the following Components:
- Reclosing relay
- Supervisory relay(s) – relay(s) that perform voltage and/or sync check functions that enables or disables operation of the reclosing relay
- Voltage sensing devices associated with the supervisory relay(s)
- Control circuitry associated with the reclosing relay or supervisory relay(s)

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 Rationales for “Automatic Relaying” and “Component Type” were also revised to reflect the proposed revisions to the defined terms above. Tables 4-1 and 4-2 were updated by adding “supervisory relay(s)” as appropriate. A new Table 4-3 was added to address maintenance activities and intervals for Automatic Reclosing with supervisory relays. No substantive revisions are being proposed for the Requirements of the standard. The only revisions to Requirements R1 and R3 included updating the Table numbering to reflect the addition of Table 4-3. The VSLs were updated to reflect the Requirement language for R1 and R3. All references to table numbering throughout the standard have also been corrected to reflect the addition of Table 4-3. This version of PRC-005 used PRC-005-5 developed under Project 2014-01 as the starting point for revisions to address the directive.

The PSMTSDT has proposed combining the Implementation Plans for previous versions of PRC-005 (including PRC-005-3, PRC-005-3i, PRC-005-3ii, PRC-005-4 and PRC-005-5). The team believes that the proposed Implementation Plan for PRC-005-6 alleviates the burden of multiple revisions of the Protection System Maintenance Program (PSMP) by aligning the effective dates of all of these version of PRC-005 while minimizing risk to the Bulk Electric System.
You do not have to answer all questions below. Due to the expected volume of comments, the PSMTSDT asks that commenters consider consolidating responses and endorsing comments provided by another.

Questions

1. Do you agree that the scope and objectives of the 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 Balancing Authority should not be included in the Reliability Functions section of the SAR. PRC-005 does not apply to a Balancing Authority.

2. The PSMTSDT 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 revised definitions? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.

☐ Yes  ☒ No

Comments: The definition of Automatic Reclosing should have words to describe what Automatic Reclosing is in addition to the components that comprise it. Suggest wording similar to:
Automatic Reclosing is a control scheme or system for automatically closing circuit breakers that have automatically tripped in response to abnormal system conditions. The PSMTSDT should consider changing the nomenclature of what is to be defined to “Automatic Reclosing System”.

The listing of new definitions in Section 6 of the Introduction of the Standard is inconsistent with other NERC standards which have them listed on the Definitions of Terms Used in Standard page.
3. The PSMTSDT has added Table 4-3 to address maintenance activities and intervals for voltage sensing devices associated with supervisory relays. Do you agree with the proposed table? If not, please provide specific comments regarding the table and any suggestions for alternative language.

☐ Yes
☐ No

Comments:

4. The PSMTSDT has made revisions to the Supplementary Reference and FAQ Document. Do you agree with the proposed revisions? If not, please provide specific comments regarding the revisions and any suggestions for alternative language.

☐ Yes
☒ No

Comments: From page 7 of the Supplementary Reference and FAQ Document:

“What is synchronizing or synchronism (Sync-Check - (25)) - check relay (Sync-Check - 25)?

A synchronizing device that produces an output that supervises closure of a circuit breaker between two circuits whose voltages are within prescribed limits of magnitude and, phase angle. It may or may not include voltage or speed control. A sync-check relay permits the paralleling of two circuits that are within prescribed (usually wider) limits of voltage magnitude and, phase angle.”

Suggest replacing “paralleling” with “connecting”.

From page 106:

“Is it necessary to verify the close signal operates the breaker?

Only when the control circuitry associated with automatic reclosing is a part of a RAS, then all paths that are essential for proper operation of the RAS must be verified, per table 4-2(b).”

It is good practice when testing to ensure that a close signal operates a breaker regardless of whether it is part of a RAS or not.
5. The PSMTSDT has proposed combining the Implementation Plans for previous versions of PRC-005 (including PRC-005-3, PRC-005-3i, PRC-005-3ii, PRC-005-4 and PRC-005-5). Do you agree with the proposed Implementation Plan? If not, please provide specific comments regarding the Implementation Plan and any suggestions for alternative language.

☐ Yes
☐ No

Comments: