Unofficial Comment Form
Project 2010-13.2 Phase II Relay Loadability
PRC-025-1

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by July 19, 2013. If you have questions please contact Scott Barfield-McGinnis at Scott.Barfield@nerc.net or by telephone at (404) 446-9689.


Summary of changes
The generator relay loadability standard drafting team (SDT) has revised the proposed draft of PRC-025-1 – Generator Relay Loadability during its 30-day formal comment posting of the standard and successive ballot which received 69.23% stakeholder approval. The following narrative is a summary of the significant improvements made to the above standard.

PRC-025-1
• Purpose
  o Minor change for clarity
• Applicability
  o Included the Distribution Provider and Transmission Owner
  o Replaced “generator interconnection Facility” with “Elements that connect a GSU transformer to the Transmission system that are used exclusively to export energy directly from a BES generating unit or generating plant”
• Requirement
  o Added the Distribution Provider and Transmission Owner
• Measures
  o Added the Distribution Provider and Transmission Owner
• Compliance
  o Added the Distribution Provider and Transmission Owner
• Violation Severity Levels
  o Added the Distribution Provider and Transmission Owner
attachment 1
- General text revisions and clarifications
- Removed the Regional Reliability Organization (RRO) references
- Added the following elements to Options 15, 16, and 18; “Phase overcurrent supervisory elements (50) associated with current-based, communication-assisted schemes where the scheme is capable of tripping for loss of communications – installed on the high-side of the GSU transformer”

implementation plan
- The implementation period for applying settings to load-responsive protective relays that do not require replacement or removal changed from 48 months to 60 months
- The implementation period for applying settings to load-responsive protective relays that do require replacement or removal changed from 72 months to 84 months

VRF/ VSL justifications
- No change.
*Please use the electronic comment form to submit your final comments to NERC.*

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Please note that the official comment form does not retain formatting (even if it appears to transfer formatting when you copy 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.

1. The drafting team has made revisions to the PRC-025-1 standard and its associated documents which include addressing: (1) bright line of applicability between PRC-023-3 and PRC-025-1 by including the addition of the Distribution Provider and Transmission Owner to PRC-025-1, (2) increasing the Implementation Plan period from 48 to 60 months for applying settings where replacement is not necessary and from 72 to 84 months for replacement or removal, and (3) made clarifying revisions to the Guidelines and Technical Basis. Do you agree that the drafting team achieved the level of clarity needed for the proposed PRC-025-1 standard and the associated documents? If not or if you have any additional comment, provide specific suggestions to improve the clarity of the standard.

- [ ] Yes
- [X] No

Comments: We disagree with the Drafting Team’s decision not to make the change suggested during an earlier posting (remove the following words from R1 “...while maintaining reliable fault protection.”) This phrase should be replaced and therefore suggest R1 be revised to read Each Generator Owner, Transmission Owner, and Distribution Provider shall apply settings that are in accordance with PRC-025-1 – Attachment 1: Relay Settings, on each load-responsive protective relay while maintaining reliable fault protection...achieving its desired protection goals.