Unofficial Comment Form

Project 2007-17.2 Protection System Maintenance and Testing - Phase 2 (Reclosing Relays)

2nd Draft of PRC-005-3

Please **DO NOT** use this form to submit comments. Please use the [electronic form](#) to submit comments on the 2nd draft of reliability standard PRC-005-3 — Protection System and Automatic Reclosing Maintenance. Comments must be submitted by 8:00 p.m. Eastern **Friday, August 23, 2013**. If you have questions please contact Al McMeekin or by telephone at 803-530-1963.

The project page may be accessed by [clicking here](#).

**Background Information:**

On February 3, 2012, the Federal Energy Regulatory Commission (FERC) issued Order No. 758 approving an interpretation of NERC Reliability Standard PRC-005-1, Transmission and Generation Protection System Maintenance and Testing. In addition to approving the interpretation, the Commission directed that concerns identified in the preceding Notice of Proposed Rulemaking (NOPR) be addressed within the reinitiated PRC-005 revisions. The concerns raised in the NOPR pertain to automatic reclosing (autoreclosing) relays that are either “used in coordination with a Protection System to achieve or meet system performance requirements established in other Commission-approved Reliability Standards, or can exacerbate fault conditions when not properly maintained and coordinated,” in which case “excluding the maintenance and testing of these reclosing relays will result in a gap in the maintenance and testing of relays affecting the reliability of the Bulk-Power System.” To address these concerns, the Commission concludes that “specific requirements or selection criteria should be used to identify reclosing relays that affect the reliability of the Bulk-Power System.”

In response to Order No. 758, the Protection System Maintenance and Testing Standard Drafting Team (SDT) drafted a Standard Authorization Request (SAR) to modify PRC-005 to include the maintenance and testing of reclosing relays that can affect the reliable operation of the Bulk-Power System. On May 10, 2012, the NERC Standards Committee (SC) accepted the SAR and authorized that it be posted for information only along with the 3rd draft of PRC-005-2. The NERC SC noted that PRC-005-2 was in the final stages of the development process, having passed a successive ballot with 79 percent approval on June 27, 2012 and was scheduled to be presented for approval at the November NERC Board of Trustees meeting. Consequently, in recognition of the consensus achieved, the NERC SC determined that the drafting team should complete the development of PRC-005-2 and immediately thereafter begin work on PRC-005-3 which would reflect the necessary revisions to address reclosing relays.
The SDT also requested the NERC Planning Committee (PC) provide the technical input necessary to develop the appropriate revisions to PRC-005. The NERC PC instructed the NERC System Analysis and Modeling Subcommittee (SAMS) and System Protection and Control Subcommittee (SPCS) to jointly perform a technical study to determine which reclosing relays should be addressed within PRC-005 and provide advice regarding the appropriate maintenance intervals and activities for those relays. The final report was approved by the NERC Planning Committee on November 14, 2012 and provided to the SDT for guidance in developing PRC-005-3.

In Order No. 758, the Commission also directed NERC to file, by July 30, 2012, either a completed project, or an informational filing providing “a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.” On July 30, 2012, NERC submitted an informational filing in compliance with Order No. 758 with a proposed schedule for addressing reclosing relays. The project number and name is as follows: Project 2007-17.2 Protection System Maintenance and Testing - Phase 2 (Reclosing Relays)

On January 17, 2013, the NERC SC authorized the draft SAR be posted for formal industry comment concurrent with project development. The SAR as well as the first draft of PRC-005-3 was posted for a 30-day comment period from April 5, 2013 through May 6, 2013. The PSMT SDT has responded to the comments from the initial posting and incorporated pertinent suggestions into the second draft of the standard.

Draft 2 of PRC-005-3 is posted for a 45-day formal comment period from July 10, 2013 through August 23, 2013. Ballot pools are forming now through August 8, 2013. A ballot and non-binding poll of the associated Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) will be conducted August 14-23, 2013.
You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

NOTE: The Standards Authorization Request specifically limits this project to modifying PRC-005-2 to address the addition of reclosing relays which can affect the reliability of the BES, and specifically precludes general improvements to PRC-005-2.

1. In response to comments, the drafting team revised the previously-posted draft of PRC-005-3 and the Supplementary Reference and FAQ document. Do you agree with these changes? If not, please provide specific suggestions for improvement.

☐ Yes  
☐ No  
Comments:

2. In response to comments, the drafting team developed an “Implementation Plan for Newly identified Automatic Reclosing Components due to generation changes in the Balancing Authority Area.” Do you agree with this additional Implementation Plan? If not, please provide specific suggestions for improvement.

☐ Yes  
☐ No  
Comments: Referencing Applicability Section 4.2.6, the Balancing Authority has to notify and provide documentation to the appropriate entities in 4.2.6.1 and 4.2.6.2 that automatic reclosing maintenance is required. TO substations within 10 circuit miles will need to be identified by the Balancing Authority as well.

To clarify Footnote 1 on page 4, suggest the following rewording:

Automatic Reclosing as addressed in Sections 4.2.6.1 and 4.2.6.2 may be excluded if the equipment owner can demonstrate that a close in three-phase fault not cleared for the length of a breaker trip-close-trip operating time does not result in a total loss of gross generation in the Interconnection exceeding the gross capacity of the largest BES generating unit within the Balancing Authority Area where the Automatic Reclosing is applied.

In the Implementation Plan the SDT did a good job inserting the appropriate wording to remove a potential conflict with regulatory practice with respect to the effective date of the standard. However, the wording needs to be inserted in Section 4 of the Background Section. Review the Implementation Plan and insert the following words where appropriate:
“, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.”

The Implementation Plan must be made available throughout the life of the Standard.