Unofficial Comment Form for 4th Draft of PRC-005-2: Protection System Maintenance

Project 2007-17

Please DO NOT use this form to submit comments on the 4th draft of the standard for Protection System Maintenance. Comments must be submitted by 8 p.m. ET August 27, 2012 using the electronic comment form. If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963.


Background Information:
The standard recently passed ballot with the following results: Quorum – 79.46% and Affirmative – 79.00%; and for the VRF/VSL Non-binding poll: Quorum – 75.00% Affirmative – 70.21%. The drafting team appreciates the affirmative votes and the constructive feedback provided by the commenters. The team modified the standard based on stakeholder comments and anticipates posting the standard and associated documents in July 2012 for a 30-day formal comment period concurrent with a 10-day successive ballot.

The Protection System Maintenance and Testing Standard Drafting Team (PSMT SDT) made several changes to PRC-005-2 based on comments received from industry. The changes include:

- In Table 1-2, the interval for the second portion of the first row of the table was changed from 12 years to 6 years to correct the previous posting. After posting the previous change to this interval, the SDT concluded that a 12-year interval would not be sufficient to assure BES reliability.
- In Table 1-2, “channels” was modified to “communications systems” in two locations.
- In Table 1-2, the Component Attributes in the last row were modified to clarify that all attributes must be present to use the associated intervals and activities.
- Editorial changes were made to Tables 1-4c, 1-4d., and 1-4e. The words “Protection System” were added to the headers of Tables 1-4c and 1-4d; in Table 1-4e, a redundant “only” was removed.
- The Supplemental Reference and FAQ document was revised to reflect changes made to the draft standard and to address additional issues raised within comments.
You do not have to answer all questions. Enter All Comments in Simple Text Format.

For questions 1, 2 and 3, please provide specific comments related to the individual question. Please reserve question 4 for general comments not related to questions 1, 2 and 3. Comments not related to the specific question will not be addressed.

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. In response to stakeholder input, the SDT made several changes to Table 1-2 of the standard, as detailed below:
   - The interval for the second portion of the first row of the table was changed from 12 years to 6 years.
   - The term “channels” was modified to “communications systems” in two locations.
   - The Component Attributes in the last row were modified to clarify that all attributes must be present to use the associated intervals and activities.

Do you agree with these changes? If not, please provide specific suggestions for changes to Table 1-2 in the comment area.

☑ Yes
☐ No

Comments:

2. The SDT modified the Implementation Plan as follows:
   - Within “Retirement of Existing Standards”, the legacy standards will be retired upon full implementation of PRC-005-2, rather than upon PRC-005-2 becoming effective.
   - Within “General Considerations”, each entity shall be responsible for maintaining each of their Protection System components according to their maintenance program already in place for the legacy standards (PRC-005-1b, PRC-008-0, PRC-011-0, and PRC-017-0) or according to their maintenance program for PRC-005-2, but not both.

Do you agree with these changes? If not, please provide specific suggestions for changes to the Implementation Plan in the comment area.

☑ Yes
☐ No

Comments:
3. The SDT made complementary changes in the “Supplementary Reference and FAQ Document” to provide supporting discussion for the Requirements within the standard. Do you have any specific suggestions for further improvements?

☐ Yes
☒ No

Comments:

4. If you have any other comments that you have NOT provided in response to the above questions, please provide them here. (Please do not repeat comments that you provided elsewhere.)

Comments: