

Rui Da Shu

From: Guy V. Zito
Sent: Wednesday, May 13, 2015 8:50 AM
To: rsballot
Cc: rscmembers
Subject: NERC Ballot-Project 2007-06 - System Protection Coordination - PRC-027-1

NPCC Members and Entities of the NERC Registered Ballot Body,

The NPCC Regional Standards Committee (RSC), in conjunction with the Task Force on System Protection (TFSP) has conducted a coordinated review of the subject draft standard currently posted for ballot through **8 pm Friday May 15th, 2015**. The TFSP recommendation, accepted by the RSC members responding, is to recommend a **Negative Ballot** on this standard. NPCC will be filing helpful comments to address the issues we have identified. Some of which are below.

- The 'when' regarding review of information used in the Short Circuit Study is not mentioned in the standard. The only evidence that is required for this standard with respect to the review of information used for the Short Circuit Study will be documentation of the 'what' lacking evidence 'when' it was followed.
- The standard R1, 1.1 is not results-based
- The drafting team indicates "System changes will reset the baseline for Fault current studies." What type of system changes? Even minor ones? This is vague and be extremely burdensome with little benefit.
- The Implementation Plan should be extended to 24 months. As drafted, entities only have 12 months to develop a process, establish a Fault Current baseline, and develop a tracking tool for Fault Current baseline changes and/or periodic review.

Posted comments submitted by the NPCC RSC will be posted on the NPCC website once finalized and submitted to NERC. They may found at :

<https://www.npcc.org/Standards/Regional%20Standards%20Comments/Forms/Public%20List.aspx>

Thanks and please contact me with any questions.

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