

Unofficial Comment Form

Project 2007-06.2 Phase 2 of System Protection Coordination TOP-009-1

DO NOT use this form for submitting comments. Use the [electronic form](#) to submit comments on draft one of **TOP-009-1 – Knowledge of Composite Protection Systems and Remedial Action Schemes and Their Effects**. The electronic form must be submitted by **8:00 p.m. Eastern, Friday, September 11, 2015**.

Documents and information about this project are available on the [project page](#). If you have questions, contact Standards Developer, [Scott Barfield-McGinnis](#), (via email) or at (404) 446-9689.

Background Information

This draft 1 posting is soliciting formal comment through a 45-day comment period and an initial ballot to be conducted in the last 10 days of the comment period.

Phase 1 (2007-06)

The System Protection Coordination Standard Drafting Team (SPCSDT) is creating a new results-based standard, PRC-027-1 to address coordination of Protection System performance during Faults This standard incorporates and clarifies the Protection System coordination aspects of Requirements R3 and R4 contained in PRC-001-1.1 that is proposed for complete retirement.

Phase 2 (2007-06.2)

Phase 2 is addressing the remaining Requirements R1, R2, R5, and R6 in PRC-001-1.1 that is proposed for complete retirement. See the Mapping Document for a complete explanation on how Requirement R1 is being addressed by TOP-009-1 (*Knowledge of Composite Protection Systems and Remedial Action Schemes and Their Effects*) and how the reliability objective of Requirements R2, R5, and R6 are addressed by TOP/IRO standards that are awaiting regulatory approval.

The proposed TOP-009-1 standard incorporates PRC-001-1.1(ii), Requirement R1 into individual requirements for the Balancing Authority, Generator Operator, and Transmission Operator. Splitting the three applicable entities from PRC-001-1.1(ii) into individual requirements by entity improves clarity concerning the reliability objective of each function.

Questions

1. As the Transmission Operator, do you agree that TOP-009-1, Requirement R1 addresses the reliability need of the first requirement in the existing PRC-001-1.1(ii) for the Transmission Operator? If not, please explain why or why not.

Yes

No

Comments:

2. As the Balancing Authority, do you agree that TOP-009-1, Requirement R2 addresses the reliability need of the first requirement in the existing PRC-001-1.1(ii) for the Balancing Authority? If not, please explain why or why not.

Yes

No

Comments: The Time Horizon for Requirement R2 refers to Operations Planning, Same-Day Operations, and Real-time Operations. The Requirement refers only to Real-time Operations. Suggest removing Operations Planning and Same-Day Operations from the Time Horizon.

3. As the Generator Operator, do you agree that TOP-009-1, Requirement R3 addresses the reliability need of the first requirement in the existing PRC-001-1.1(ii) for the Generator Operator? If not, please explain why or why not.

Yes

No

Comments: R3 should only include protection and Remedial Action Schemes that directly affect the generator. For example a RAS that includes a generator runback certainly would be included. But a nearby transmission RAS would not. The reason is the GOP needs to know how the generator is impacted, not how the transmission system is impacted. For transmission only, the GOP just needs to implement direction from the TOP, if necessary, post operation of a RAS.

4. Do you agree with the proposed Violation Risk Factors (VRF) and Violation Severity Levels (VSL) for the proposed requirements? If not, please provide a basis for revising a VRF and/or what would improve the clarity of the VSLs.

Yes

No

Comments:

5. Does TOP-009-1, Application Guidelines provide sufficient guidance, basis for approach, and examples to support performance of the requirements? If not, please provide specific detail that would improve the Application Guidelines.

Yes

No

Comments:

6. Do you agree with implementation period (i.e., 12 months) of the proposed standard based on the considerations listed in the Implementation Plan? If not, please provide a justification for changing the proposed implementation period.

Yes

No

Comments:

7. Are you aware of any conflicts between the proposed standard and any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or agreement? If so, please identify the conflict here.

Yes

No

Comments:

8. Are you aware of the need for a regional variance or business practice that should be considered with this project? If so, please identify it here.

Yes

No

Comments:

9. If you have any other comments on this Standard that you haven't already mentioned above, please provide them here:

Comments: PRC-012-2 will ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the Bulk Electric System (BES), and PRC-027-1 is intended to maintain the coordination of Protection Systems installed to detect and isolate Faults on Bulk Electric System such that those Protection Systems operate in the intended sequence during Faults. Neither of these explicitly requires the owner of a Composite Protection System or Remedial Action Scheme to provide the information necessary for entities (if not the owner) in TOP-009-1 to meet the requirement applicable to them. There needs to be an explicit requirement for the owner of a Composite Protection System or Remedial Action Scheme to

provide information sufficient to the operating personnel of an entity (BA, GOP, TOP) whose Bulk Electric System (BES) Facilities would be impacted by that Composite Protection System or Remedial Action Scheme to ensure the entity can comply with the applicable requirements of this standard.

Is the intention to maintain the awareness of the protection systems in abnormal situations too? Does *'knowledge of operational functionality and effects of Composite Protection Systems and Remedial Action Schemes'* include understanding how the BES or a plant would perform during an outage or a failure of a CPS or a RAS? From the operational perspective, awareness of the BES or a plant response in abnormal conditions is essential. The standard should clarify the term *'operational functionality'* so it includes outages or failures of the CPS or RAS.

In the VSL Table replace "Each Transmission Operator" with "The Transmission Operator".

From the Personnel Responsible for Reliable Operations section in the Application Guidelines on page 10 of TOP-009-1, does the "personnel responsible for Reliable Operation" of the BES include the personnel analyzing and authorizing maintenance outages on the Composite Protection Systems and RAS? This needs clarification.