

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard	
<b>Date submitted:</b>	November 17, 2009
<b>Date accepted:</b>	December 2, 2009
<b>Contact information for person requesting the interpretation:</b>	
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<b>Identify the standard that needs clarification:</b>	
<b>Standard Number (include version number):</b>	PRC-001-1
<b>Standard Title:</b>	Protection System Coordination
<b>Identify specifically what requirement needs clarification:</b>	
<b>Requirement Number and Text of Requirement:</b>	
R1. Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.	
<b>Clarification needed:</b>	
<p>WPSC is requesting clarification of the term "Generator Operator" as it applies to this requirement. WPSC contends the term Generator Operator describes the registered entity as an organization and does not specifically refer to or require power plant personnel or power plant operators to be trained in protective relaying.</p> <p>Although not in the generation department, WPSC believes protective relay engineers within WPSC organization can be used to fulfill this requirement. Power plant personnel are responsible for identifying and responding to relay alarms and operations and have sufficient procedural direction and guidance for notifying the responsible department of any protective relay concerns.</p> <p>WPSC's interpretation of this requirement allows an entity to identify an efficient method of meeting the requirement based on the design of the organization without a decrease in the safety or reliability of the bulk electric system.</p>	
<b>Identify the material impact associated with this interpretation:</b>	
<b>Identify the material impact to your organization or others caused by the lack of</b>	

**clarity or an incorrect interpretation of this standard.**

An incorrect interpretation will lead to requiring an expanded training program for power plant operators and maintain records of protective relay training that is not explicitly required by the standard without a commensurate increase in the safety or reliability of the bulk electric system.

<b>Project 2009-30: Response to Request for an Interpretation of PRC-001-1, Requirement R1, for the Wisconsin Public Service Corporation (WPSC)</b>
<p>The following interpretation of PRC-001-1 — System Protection Coordination, Requirement R1, was developed by the System Protection and Control Standard Drafting Team.</p>
<b>Requirement Number and Text of Requirement</b>
<p><b>R1.</b> Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.</p>
<b>Question</b>
<p>WPSC is requesting clarification of the term “Generator Operator” as it applies to this requirement.</p>
<b>Response</b>
<p>The Generator Operator is one of the functional classes of entities responsible for complying with the standard, and the staff of a Generator Operator could include protection engineers and/or power plant personnel who perform the Generator Operator function. The intent of the requirement is to ensure that the actual personnel performing the Generator Operator function are familiar with the purpose and limitations of the Protection System schemes applied in its area so that the Generator Operator can perform its prescribed responsibilities.</p> <p>Being “familiar with the purpose and limitations of Protection System schemes applied in its area” does not require an in-depth knowledge of the specific settings and details of each of the applied Protection Systems, but rather a general knowledge of the types and functional characteristics, including capabilities and limitations, of the applied Protection Systems. For example, the applicable entities are expected to have an understanding of how system operations may be affected when a Protection System becomes inoperative.</p>