Project 2010-05.1 Protection System Misoperations

Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=ad24943484fa47b786a356883a4feffe) at the link below to submit comments on the second draft of the PRC-004-3 standard for Protection System Misoperations. Comments must be submitted by **September 7, 2012.** If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963.

<http://www.nerc.com/filez/standards/Project2010-05_Protection_System_Misoperations.html>

### Background Information:

The initial draft of this standard and associated documents were posted for a 30-day formal comment period from June 10, 2011 through July 11, 2011. Stakeholders from 106 companies representing all 10 Industry Segments provided feedback. The Protection System Misoperation Standard Drafting Team (PSM SDT) has responded to all commenters and developed a second draft of the standard for Protection System Misoperation Identification and Correction based on stakeholder input. Changes to the standard include:

* Revisions to the definition of Protection System Misoperation.
* Revisions to the Applicability section to include exclusions for relay functions.
* Separating Requirement R1 into four requirements.
* Introducing time intervals and activities in Requirements R1, R2, and R3 associated with identifying, investigating, and addressing Misoperations.
* Addressing Misoperations when two or more entities own separate components in a Protection System.
* Modifying the VRFs and VSLs to reflect the changes listed above.
* Modifying the Guidelines and Technical Basis section to include more explanation and examples for the definition of Misoperation and the requirements.

**Please read and review the standard and the Consideration of Comments document carefully before answering the following questions**. The ‘**Guidelines and Technical Basis**’ section (pp 15-22) of the standard provides examples and discussion around the technical merits and intent of the requirements, measures, and definition(s), etc. Also, the drafting team’s responses to stakeholder’s comments and the subsequent changes made to the standard are explained in detail in the **Consideration of Comments** document. A thorough read and review of these documents may eliminate the need for additional comments thereby reducing workload for both the commenters and the drafting team. The PSM SDT is posting this standard for a formal 45-day comment period and successive ballot. The drafting team thanks you in advance for your constructive thoughts.

For questions 1-8, please provide specific comments related to the individual question. Please reserve question 9 for general comments not related to questions 1-9.

1. The definition of “Misoperation” has been revised from the initial posting. Do you agree with the revised definition? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R1 requires the responsible entities to identify and review each Protection System operation that operates the entity’s interrupting device, and designate each Misoperation. Do you agree with this approach? If you do not agree, please provide specific alternatives.

[ ]  Yes

[ ]  No

Comments:

1. Requirements R1, R2, and R3 introduce time limits associated with identifying, investigating, and addressing Misoperations. Do you agree with these time limits? If not, please provide specific reasons why not and alternative recommendations.

[ ]  Yes

[ ]  No

Comments:

1. The team has modified the standard to address Misoperations when two or more entities own separate components in a Protection System. Do you agree that the standard adequately deals with this situation? If not, please provide specific reasons why not and alternative recommendations.

[ ]  Yes

[ ]  No

Comments:

1. Attachment 1 lists and describes the data to be included in the quarterly reporting. Do you believe this data is appropriate for metric analysis? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. The team has included VRFs, VSLs, and Time Horizons with this posting. Do you agree with the assignments that have been made? If not, please provide specific reasons why not and alternative recommendations and justifications.

[ ]  Yes

[ ]  No

Comments:

1. The team has included Measures and Data Retention with this posting. Do you agree with the assignments that have been made? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. The team has included an Implementation Plan with this posting. Do you agree with the changes? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this Standard that you **have not already provided in response to the prior questions**, please provide them here.

Comments: