**Unofficial Comment Form for Relay Loadability Order (No. 733) (Project 2010-13)**

Please **DO NOT** use this form. Please use the electronic form located at the link below to submit comments on the proposed standard, PRC-023-2 and on the associated SAR. The electronic comment form must be completed **by September 19, 2010**.

<https://www.nerc.net/nercsurvey/Survey.aspx?s=c64a2b0a1f9d4e98aef8640932516830>

If you have questions please contact Stephanie Monzon at Stephanie.monzon@nerc.net or by telephone at [610-608-8084

Project 2010-13: Relay Loadability Order (RLO SDT) – PRC-023-2

### **Background Information**

NERC Standard PRC-023-1 – Transmission Relay Loadability was approved by FERC as mandatory and enforceable in March 2010, with direction that NERC make a number of changes.

The Standard Drafting Team has made changes to PRC-023 to address the following directives from Order 733

• p. 60 . . . modify PRC-023-1 to apply an “add in” approach to sub-100 kV facilities that are owned or operated by currently-Registered Entities or entities that become Registered Entities in the future, and are associated with a facility that is included on a critical facilities list defined by the Regional Entity.

• p. 186 . . . require that transmission owners, generator owners, and distribution providers give their transmission operators a list of transmission facilities that implement sub-requirement R1.2.

• p. 203 . . . modify sub-requirement R1.10 so that it requires entities to verify that the limiting piece of equipment is capable of sustaining the anticipated overload for the longest clearing time associated with the fault.• p. 224 . . . make available for review to users, owners and operators of the Bulk-Power System, by request, a list of those facilities that have protective relays

• p. 237 . . . modify the Reliability Standard to add the Regional Entity to the list of entities that receive the critical facilities list. [sub-requirement R3.3]

• p. 244 . . . include section 2 of Attachment A in the modified Reliability Standard as an additional Requirement with the appropriate violation risk factor and violation severity level.

• p. 264 . . . revise section 1 of Attachment A to include supervising relay elements on the list of relays and protection systems that are specifically subject to the Reliability Standard.

• p. 283 . . . modify the Reliability Standard to include an implementation plan for sub-100 kV facilities.

• p. 284 . . . remove the exceptions footnote from the “Effective Dates” section.

However, the directive below is not yet addressed, even though it is referenced within the draft standard text. It will be included in a subsequent posting of this draft standard.

• p. 69 . . . modify Requirement R3 of the Reliability Standard to specify the test that planning coordinators must use to determine whether a sub-200 kV facility is critical to the reliability of the Bulk-Power System.

To expedite the project to address the directives from FERC Order No. 733, the Standard Drafting Team is posting the draft modifications to PRC-023-1 for an informal comment period.

Please note that the posting of PRC-023-2 is an **INFORMAL** posting.

1. The Applicability Section (4.1.2 and 4.1.4) and Requirement R5 (previously Requirement R3) have been modified to address the directive in Paragraph 60 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R1 has been modified to address the directive in Paragraph 244 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R1, section 10 has been modified to address the directive in Paragraph 203 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R3 has been added to address the directive in Paragraph 186 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R4 has been added to address the directive in Paragraph 224 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Requirement R5 and part 5.1 (previously Requirement R3 and part 3.1) have been modified to establish the framework to address the directive in Paragraph 69 of Order no. 733, although the criteria itself (which will be Attachment B) is still being developed. Do you agree that this is an acceptable and effective method of meeting this directive considering that Requirement R5 is establishing the construct to insert the criteria at a future time in the form of Attachment B? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Attachment A has been modified to address the directive in Paragraph 264 of Order no. 733. Do you agree that this is an acceptable and effective method of meeting this directive? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the SDT has addressed the remaining directives: Paragraph 284 to remove the footnote and Paragraph 283 to modify the implementation plan for sub-100 kV facilities (by revising the Effective Date section of the standard)?

[ ]  Yes

[ ]  No

Comments:

**Questions 9-13 relate to the SAR**

1. Do you agree that the scope of the proposed standards action addresses the directive or directives?

[ ]  Yes

[ ]  No

Comments:

1. Can you identify an equally efficient and effective method of achieving the reliability intent of the directive or directives?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the scope of the proposed standards action?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any regional variances that we should consider with this SAR?

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any associated business practices that we should consider with this SAR?

[ ]  Yes

[ ]  No

Comments: