Unofficial Comment Form

Project 2010-05.3 Phase 3 of Protection Systems:
Remedial Action Schemes (RAS)

PRC-012-2

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on draft 1 of **PRC-012-2 – Remedial Action Schemes**. The electronic comment form must be submitted by **8 p.m. Eastern, Wednesday, May 20, 2015.**

For this informal posting, the drafting team is soliciting stakeholder feedback on the scope and work product developed thus far. The drafting team will use the informal feedback to finalize the preliminary draft of PRC-012-2. Stakeholders may communicate additional feedback directly to the drafting team through its open meetings leading up to the first formal posting. The next meeting is scheduled for June 8-11, 2015. Meeting details will be posted to the NERC calendar early May 2015.

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2010-05_3-Remedial-Action-Schemes_Phase-3-of-Protection-Systems.aspx). If you have questions, contact Standards Developer, Al McMeekin (via email), or at (404) 446-9675.

## Background Information

This project is addressing all aspects of Remedial Action Schemes (RAS) and Special Protection Systems (SPS) contained in the RAS/SPS-related Reliability Standards: PRC-012-1, PRC-013-1, PRC-014-1, PRC-015-1, and PRC-016-1. The maintenance of the Protection System components associated with RAS (PRC-017-1 Remedial Action Scheme Maintenance and Testing) are already addressed in PRC-005-2. PRC-012-2 addresses the testing of the non-Protection System components associated with RAS/SPS.

In FERC Order No. 693 (dated March 16, 2007), the Commission identified PRC-012-0, PRC-013-0, and PRC-014-0 as “fill-in-the-blank” standards and did not approve or remand them because they are applicable to the Regional Reliability Organizations (RROs), assigning the RROs the responsibility to establish regional procedures and databases, and to assess and document the operation, coordination, and compliance of RAS/SPS. The deference to regional practices precludes the consistent application of RAS/SPS-related Reliability Standard requirements.

The proposed draft of PRC-012-2 corrects the applicability of the fill-in-the-blank standards by assigning the requirement responsibilities to the specific users, owners, and operators of the Bulk-Power System; and incorporates the reliability objectives of all the RAS/SPS-related standards.

**Questions**

Requirements R1, R2, and R3 pertain to the submittal of Attachment 1 information to the Reliability Coordinator (RC) for the review of RAS, the RC using Attachment 2 as a guide for performing the RAS review, and the RC approving the RAS prior to the RAS being placed in-service. Questions 1-4 are relevant for these activities.

1. **RAS review and approval:** Do you agree that RAS should be reviewed and approved by an independent party prior to placing the RAS in-service? If no, please state the basis for your disagreement and an alternative approach.

[ ]  Yes

[ ]  No

Comments:

1. **Information listed in Attachment 1:** Do you agree that the RAS information required in Attachment 1 is a comprehensive list? If no, please identify what other information you think is necessary for a thorough RAS review.

[ ]  Yes

[ ]  No

Comments:

1. **Choice of Reliability Coordinator (RC):** Do you agree with the RC being the functional entity designated to review the RAS? If no, please provide the basis for your disagreement, your choice of functional entity to conduct the reviews, and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

1. **Checklist in Attachment 2:** Do you agree that the checklist in Attachment 2 provides a comprehensive guide for the RC to facilitate a thorough RAS review? If no, please identify what other reliability-related considerations should be included in Attachment 2 and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

Requirement R4 mandates the Transmission Planner perform a technical evaluation (planning analyses) of each RAS at least once every 60 full calendar months to verify the continued effectiveness and coordination of the RAS, as well as the BES performance following an inadvertent operation of the RAS.

The drafting team considered the RAS classification systems used by several Regions to be rooted in PRC-012, Requirement R1, R1.4. which reads: *“Requirements to demonstrate that the inadvertent operation of a RAS shall meet the same performance requirement (TPL-001-0, TPL-002-0, and TPL-003-0) as that required of the contingency for which it was designed, and not exceed TPL-003-0.”* Although, the drafting team is not proposing to use formal RAS classifications, the intent of PRC-012, Requirement R1, R1.4. is retained in Requirement 4 and Attachment 1.

Questions 5 and 6 pertain to these topics.

1. **Choice of Transmission Planner (TP):** Do you agree with the TP being the functional entity designated to evaluate the RAS? If no, please provide the basis for your disagreement, your choice of functional entity to conduct the evaluations, and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

1. **No RAS Classification:** Do you agree that the language of Requirement R4, its Parts, and Attachment 1 accomplish the objectives of RAS “classification” without having a formal RAS classification system in the standard? If no, please provide the basis for your disagreement and describe an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

Requirement R6 mandates each RAS-owner analyze each RAS operation or failure of a RAS to operate to identify performance deficiencies. Question 7 pertains to Requirement R6.

1. **RAS Operational Analyses:** Do you agree that the application of Requirement R6 and its Parts would identify performance deficiencies in RAS? If no, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

Requirements R5 and R7 pertain to the submittal of Corrective Action Plans (CAPs) to the Reliability Coordinator (RC) for review, and Requirement R8 mandates the implementation of each CAP. Question 8 addresses these requirements.

1. **Corrective Action Plans:** Do you agree that the application of Requirements R5, R7, and R8 would address the reliability objectives associated with CAPs? If no, please provide the basis for your disagreement and describe an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

Requirement R9 mandates each RAS-owner periodically perform a functional test of each RAS to verify the overall RAS performance and the proper operation of non-Protection System components. Question 9 pertains to Requirement R9.

1. **Functional Testing of RAS:** Do you agree that functional testing of each RAS would verify the overall RAS performance and the proper operation of non-Protection System components? If no, please provide the basis for your disagreement and describe an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

Requirements R10 and R11 pertain to the RAS database, Attachment 3, and the sharing of RAS information for reliability-related needs. Questions 10 11, 12, and 13 pertain to these topics.

1. **Choice of Reliability Coordinator (RC):** Do you agree with the RC being the functional entity designated to maintain the RAS database in Requirement R10? If no, please provide the basis for your disagreement, your choice of functional entity, and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

1. **Information listed in Attachment 3:** Do you agree that the RAS information required in Attachment 3 (Requirement R10) provides the RC with enough detail of each RAS to meet its reliability-related needs? If no, please identify what other reliability-related information should be included in Attachment 3 and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

1. **Requirement R11:** Do you agree that there a reliability benefit to Requirement R11? Please provide the rationale for your answer.

[ ]  Yes

[ ]  No

Comments:

1. **Choice of RAS-entity:** Do you agree with the RAS-entity being the entity designated to provide the detailed RAS information to other registered entities with a reliability-related need in Requirement R11? If no, please provide the basis for your disagreement, your choice of entity, and the rationale for your choice.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments that you haven’t already provided in response to the above questions, please provide them here.

Comments: