Unofficial Comment Form for 1st Draft of PRC-027-1: Protection System Coordination for Performance During Faults

Project 2007-06

Please **DO NOT** use this form to submit comments on the 1st draft of the standard for Protection System Coordination for Performance During Faults. Comments must be submitted by **July 5, 2012**. If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963. Please submit comments [here.](https://www.nerc.net/nercsurvey/Survey.aspx?s=59424d5ab14649d4904abd6710a2b51f)

<http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html>

**Background Information:**

The Project 2007-06 – System Protection Coordination Standard Drafting Team (SPC SDT) posted an initial draft of the Standard PRC-001-2 on September 11, 2009 for comments. In that draft, the SPC SDT attempted to address the planning and non-operational issues identified in the assessment of PRC-001-1 performed by the NERC System Protection and Control Task Force (SPCTF) as well as the operating time frame issues identified in FERC Order 693. These operating time frame requirements involved detecting Protection System failures, informing operators and taking quick corrective actions; consequently, the SPC SDT transferred the Order 693 directives associated with Requirements R2, R5 and R6 to Project 2007-03 Real-time Operations for inclusion in the revisions of the appropriate operating standards associated within that project. Additionally, the SPC SDT determined that Requirement R1 in PRC-001-1 (a requirement for the Transmission Operator, Balancing Authority and Generator Operator to “be familiar with the purpose and limitations of protection system schemes applied in its area”) is unrelated to coordination of protection systems and belongs in another project. The two remaining requirements, Requirements R3 and R4 of PRC-001-1 address the coordination of new and existing protective systems. These aspects of coordination are incorporated in the proposed standard PRC-027-1 Protection System Coordination for Performance during Faults.

The SPC SDT responded to the comments from the initial posting of PRC-001-2 and incorporated pertinent suggestions into the second draft of the standard in the first quarter of 2010. This second draft went through a NERC quality review in December 2010, which resulted in substantial changes to the standard. After informal consultations with industry stakeholders, as well as NERC and FERC staffs, the drafting team members decided to focus their knowledge and expertise on developing a new results-based standard with the stated purpose completely within the scope of the original SAR: “To coordinate Protection Systems for Interconnected Facilities, such that those Protection Systems remove from service only those Elements required to isolate Faults, while meeting the system performance specified within requirements established in other approved NERC Reliability Standards.”

The SPC SDT is presenting the first draft of PRC-027-1 for stakeholder review and comment.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. The SDT established the following Purpose for this standard: “To coordinate Protection Systems for Interconnected Facilities, such that those Protection Systems remove from service only those Elements required to isolate Faults, while meeting the system performance specified within requirements established in other approved NERC Reliability Standards.”

Do you agree with this Purpose? If not, please provide specific suggestions for changes to the purpose in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The SDT assigned the Applicability of PRC-027-1 to Transmission Owners, Generator Owners and Distribution Providers that own the Protection Systems applied at the Interconnected Facilities that require coordination for isolating generation and Transmission Faults. Are you aware of other functional entities that should be included in the Applicability? If so, please provide specific suggestions in the comment area and the reason for including those functional entities.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R1, the SDT allowed a responsible entity 36 months to have a documented Protection System Study completed for each Interconnected Facility if the responsible entity does not already have a Protection System Study for that Interconnected Facility performed on or subsequent to June 18, 2007 (the effective date of PRC-001-1). Do you agree with this time frame? If not, please provide specific suggestions for change in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R2, the SDT established a +/- 10 % change in an Interconnected Facility’s Fault current value as a criterion for notifying interconnected entities to give the interconnected entity a “heads up” that a review of the existing documented Protection System Study may be warranted.

Do you agree with the +/- 10 % Fault current threshold for initiating this review? If not, please provide an alternative means along with a technical justification for determining a threshold.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R3, the SDT included a list of proposed changes that impact the coordination of Protection Systems and would initiate a need to inform other entities. Do you agree that this is an appropriate and inclusive list? If not, please provide specific suggestions for additions or deletions with your reasoning(s) in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R4, the SDT required that agreement must be reached prior to implementation of proposed Protection System changes except under the conditions identified in Requirement 3, Part 3.3. Do you agree with this need? If not, please specify reasons in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R4, the SDT established a 90 day time frame for responding to a request for agreement with a Protection System Study. Do you agree with this time frame? If not, please provide specific suggestions with your reasoning(s) in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The team included VRFs, VSLs, and Time Horizons with this posting. Do you agree with the assignments? If not, please provide specific suggestions for change.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments **that you** **have NOT provided in response to the above questions**, please provide them here. (Please do not repeat comments that you provided elsewhere.)

Comments: