Unofficial Comment Form
Project 2007-06 System Protection Coordination
3rd Draft of PRC-027-1

Please **DO NOT** use this form for commenting. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=807c0bbf21a64294ab06edb72e002634) to submit comments on the 3rd draft of the standard PRC-027-1: Protection System Coordination for Performance During Faults. Comments must be submitted by **8 p.m. Eastern July 3, 2013**. If you have questions please contact Al McMeekin or by telephone at 803-530-1963.

<http://www.nerc.com/pa/Stand/Pages/Project-2007-06-System-Protection-Coordination.aspx>

**Background Information:**

The Project 2007-06 System Protection Coordination Standard Drafting Team (SPCSDT) posted an initial draft of the Standard PRC-001-2 on September 11, 2009 for comments. In that draft, the SPCSDT 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 SPCSDT 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. The Project 2007-03 drafting team retired Requirements R2, R5, and R6 of PRC-001-1 because they addressed data and data requirements that are now included in Reliability Standard TOP-003-2. The NERC Board of Trustees adopted Reliability Standards TOP-003-2 and PRC-001-2 on May 9, 2012.

The SPCSDT has also revised PRC-001-2. Revisions include the removal of Requirements R2 and R3 (formerly Requirements R3 and R4 of PRC-001-1). These two legacy requirements are being retired because the aspects of coordination they address are incorporated in the proposed Reliability Standard PRC-027-1, Protection System Coordination for Performance During Faults. The SPCSDT believes the training aspects of Requirement R1 would be more appropriately addressed by the PER group of Reliability Standards. Consequently, the drafting team has recommended via the NERC Issues Database that the future drafting team charged with revising PER-005-1 incorporate the reliability objective of Requirement R1 into the revised standard. Until that occurs, Requirement R1 of PRC-001-2 must remain in the standard. In an effort to improve PRC-001-2 until it can be fully retired, the drafting team has provided a measure to accompany Requirement R1. The Applicability section was also updated to clarify which Protection Systems are applicable to Requirement R1. (The ‘Facilities’ portion of the Applicability section is identical to the new stakeholder-approved and NERC Board of Trustees-adopted PRC-005-2.)

The SPCSDT has responded to stakeholder comments and incorporated pertinent suggestions into the third draft of PRC-027-1 for stakeholder review and comment. PRC-001-3 is also presented for your review.

**Questions**

For questions 1 – 7, please provide specific comments related to the individual question. For question 8, please provide general comments not related to questions 1 – 7.

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. Based on stakeholder comments, the drafting team modified the Purpose of this standard to:

 “To coordinate Protection Systems for Interconnected Elements, such that Protection System components operate in the desired sequence during Faults.”

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

[ ]  Yes

[ ]  No

Comments:

1. The drafting team modified the proposed definition of **Interconnected Element** to read as follows:

**Interconnected Element:** A BES Element that electrically joins facilities owned by:
a) separate Registered Entities, or
b) the same Registered Entity that represents multiple functional entity responsibilities (Distribution Provider, Generator Owner, or Transmission Owner).

Do you agree with the revised definition? If not please provide specific suggestions for improvement in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R1, the drafting team modified the time frame to allow entities 60 months to have a documented Protection System Coordination Study (PSCS) completed for each Interconnected Element if no PSCS exists. Note, the drafting team has allowed inclusion of all previously performed PSCS whose summary of results include, at a minimum, the Protection Systems reviewed, the associated Fault currents used, any issues identified, and any revisions or actions proposed.

Do you agree with this revised time frame? If not, please provide specific suggestions for change in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R2, the drafting team modified the time frame to 60 months for either conducting a Fault current review or provide a technical justification as to why a Fault current review is not necessary.

Do you agree with this revision to Requirement R2? If not, please provide specific suggestions for improvement in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. In Requirement R4, the drafting team has clarified the expectation of what a response to a review of the summary results of a Protection System Coordination Study should include. The options are as follows:
* Accepting the results, or
* Rejecting the results and suggesting modifications to resolve any identified coordination issues.

Do you agree with this revision to Requirement R4? If not, please provide specific suggestions for improvement in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The drafting team revised the Applicability section of PRC-001-2 to clarify which Protection Systems are applicable to Requirement R1. (The ‘Facilities’ portion of the Applicability section is identical to the new stakeholder-approved and NERC Board of Trustees-adopted PRC-005-2.) Do you agree with this revision to the Applicability? If not, please provide specific suggestions for improvement in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The drafting team provided a measure to accompany Requirement R1 of PRC-001-2. (The language in the measure was modeled after the existing language in the RSAW for PRC-001-2.) Do you agree with this measure? If not, please provide specific suggestions for improvement in the comment area.

[ ]  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: