Unofficial Comment Form
1st Draft of PRC-005-3: Protection System and Automatic
Reclosing Maintenance (Project 2007-17.2)

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=ade8812d8eff467cab99b878a029667a) to submit comments on the 1st draft of the standard PRC-005-3 for Protection System and Automatic Reclosing Maintenance. The electronic comment form must be completed by 8 p.m. ET May 6, 2013.

If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963.

[2007-17.2 Project Page](http://www.nerc.com/filez/standards/Project_2007-17.2_Protection_System_Maintenance_and_Testing_Phase_2_Reclosing_Relays.html)

**Background Information**

On February 3, 2012, the Federal Energy Regulatory Commission (FERC or Commission) issued Order No. 758 approving an interpretation of NERC Reliability Standard PRC‐005‐1, Transmission and Generation Protection System Maintenance and Testing. In addition to approving the interpretation, the Commission directed that concerns identified in the preceding Notice of Proposed Rulemaking (NOPR) be addressed within the reinitiated PRC‐005 revisions. The concerns raised in the NOPR pertain to automatic reclosing (autoreclosing) relays that are either “used in coordination with a Protection System to achieve or meet system performance requirements established in other Commission‐approved Reliability Standards, or can exacerbate fault conditions when not properly maintained and coordinated,” in which case “excluding the maintenance and testing of these reclosing relays will result in a gap in the maintenance and testing of relays affecting the reliability of the Bulk‐Power System.” To address these concerns, the Commission concludes that “specific requirements or selection criteria should be used to identify reclosing relays that affect the reliability of the Bulk‐Power System.”

In response to Order No. 758, the Protection System Maintenance and Testing Standard Drafting Team (SDT) drafted a Standard Authorization Request (SAR) to modify PRC-005 to include the maintenance and testing of reclosing relays that can affect the reliable operation of the Bulk-Power System. On May 10, 2012, the NERC Standards Committee (SC) accepted the SAR and authorized that it be posted for information only along with the 3rd draft of PRC-005-2. The NERC SC noted that PRC-005-2 was in the final stages of the development process, having passed a successive ballot with 79 percent approval on June 27, 2012 and was scheduled to be presented for approval at the November 2012 NERC Board of Trustees meeting. Consequently, in recognition of the consensus achieved, the NERC SC determined that the drafting team should complete the development of PRC-005-2 and immediately thereafter begin work on PRC-005-3 which would reflect the necessary revisions to address reclosing relays.

The SDT also requested the NERC Planning Committee (PC) provide the technical input necessary to develop the appropriate revisions to PRC-005. The NERC PC instructed the NERC System Analysis and Modeling Subcommittee (SAMS) and System Protection and Control Subcommittee (SPCS) to jointly perform a technical study to determine which reclosing relays should be addressed within PRC-005 and provide advice regarding the appropriate maintenance intervals and activities for those relays. The final report was approved by the NERC PC on November 14, 2012 and provided to the SDT for guidance in developing PRC-005-3.

In Order No. 758, the Commission also directed NERC to file, by July 30, 2012, either a completed project, or an informational filing providing “a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.” On July 30, 2012, NERC submitted an informational filing in compliance with Order No. 758 with a proposed schedule for addressing reclosing relays. The project number and name is as follows: Project 2007-17.2 Protection System Maintenance and Testing - Phase 2 (Reclosing Relays)

On January 17, 2013, the NERC SC authorized the draft SAR be posted for formal industry comment concurrent with project development.

The PSMTSDT is presenting Draft 1 of PRC-005-3 for a 30-day formal comment period beginning April 5, 2013 and ending May 6, 2013.

**Questions**

You do not have to answer any questions. Enter All Comments in Simple Text Format. Bullets, numbers, and special formatting will not be retained. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

**NOTE: The Standards Authorization Request specifically limits this project to modifying PRC-005-2 to address the addition of reclosing relays which can affect the reliability of the BES, and specifically precludes general improvements to PRC-005-2.**

1. The drafting team modified PRC-005-2 and its associated Supplementary Reference and FAQ document to address Automatic Reclosing as directed in FERC Order No. 758. Do you agree with these changes? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. The drafting team developed an Implementation Plan for PRC-005-3 based on the Implementation Plan for PRC-005-2 to address the addition of Automatic Reclosing. Do you agree with the implementation plan regarding Automatic Reclosing? If not, please provide specific suggestions for improvement.

[ ]  Yes

[ ]  No

Comments: