Unofficial Comment Form

Project 2010-05.1 Protection System Misoperations

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=a3937f3ed98e42ab9389c8e751b1288b) to submit comments on the PRC-004-3 Standard. The comment form must be completed by **February 20, 2013**.

If you have questions please contact Al McMeekin at [al.mcmeekin@nerc.net](mailto:al.mcmeekin@nerc.net) or by telephone at 803-530-1963.

<http://www.nerc.com/filez/standards/Project2010-05_Protection_System_Misoperations.html>

## Background Information

This posting is soliciting formal comment.

The second draft of PRC-004-3 was posted for a 45-day formal comment period with concurrent initial ballot from July 25 – September 7, 2012. Stakeholders from approximately 145 companies representing 9 of the 10 Industry Segments provided feedback. The Protection System Misoperation Standard Drafting Team (PSM SDT) has responded to all commenters and developed a third draft of the standard for Protection System Misoperation Identification and Correction based on stakeholder input. Changes to the standard include:

* Revisions to the definition of Protection System Misoperation.
* Revisions to the Applicability ‘Facilities’ section.
* Revisions to the Requirements and Measures.
* Modifications to the VSLs to reflect the changes in the requirements.
* Revisions to the Implementation Plan including extending the Effective Date from six months to twelve months following applicable regulatory approvals.
* Removal of the Misoperations reporting aspects from the standard.
* Modifications to the Guidelines and Technical Basis section to include more explanation and examples.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. Based on stakeholder input, the drafting team revised the definition of a Misoperation. The categories as well as the introductory sentence of the definition were modified for clarity. The introductory sentence indicates that a Misoperation pertains to ‘the failure of an Element’s composite Protection System to operate as intended.’ Do you agree with the revised definition? If not, please provide specific suggestions for improvement.

Yes

No

Comments:

1. Requirement R1 was revised to to provide more clarity regarding the responsibilities of the BES interrupting device owner and the Protection System owner (if they are different entities) when a Protection System operation occurs. Do you agree with these changes? If not, please provide specific suggestions for improvement.

Yes

No

Comments:

1. The Measures and VSLs were revised to reflect changes to the requirements. Do you agree with these changes? If not, please provide specific reasons why not and alternative recommendations and justifications.

Yes

No

Comments:

1. The drafting team modified the Guidelines and Technical Basis section to provide more supporting discussions, explanations, and examples for the various aspects of the standard. Do you have any specific suggestions for further improvements?

Yes

No

Comments:

1. If you have any other comments on this Standard that you haven’t already mentioned above, please provide them here:

Comments: