Unofficial Comment Form

Project 2007-17.4 PRC-005 Order No. 803 Directive
PRC-005-6

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on **PRC-005-6 – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance** Reliability Standard. The electronic form must be submitted by **8:00 p.m. Eastern, Wednesday, September 16, 2015.**

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project_2007-17_4_PRC-005_FERC_Order_No_803_Directive.aspx). If you have questions contact Senior Standards Developer, Stephen Crutchfield (via email) or at (609) 651-9455.

## Background Information

In Order No. 803, FERC approved Standard PRC-005-3 and, in Paragraph 31, directed NERC to:

"...direct that, pursuant to section 215(d)(5) of the FPA, NERC develop modifications to PRC-005-3 to include supervisory devices associated with auto-reclosing relay schemes to which the Reliability Standard applies. Further, we clarify that NERC’s proposal regarding the scope of supervisory devices is an acceptable approach to satisfy the Commission directive. Specifically, NERC proposed in its NOPR comments, and we find acceptable, that the scope of the supervisory devices to be encompassed in the Reliability Standard are those providing voltage supervision, supervisory inputs associated with selective auto-reclosing, and sync-check relays that are part of a reclosing scheme covered by PRC-005-3."

The Protection System Maintenance and Testing Standard Drafting Team (PSMTSDT) posted a revised Standard Authorization Request (SAR) and associated documents June 11 – July 10, 2015. Based on comments received during this posting, the PSMTSDT made the following revisions:

* Remove Balancing Authority as an applicable entity under the SAR.
* Removed reference to PRC-005-2(i) from the SAR since it has already been approved by FERC.
* Revised the second bullet of the definition of “Automatic Reclosing” to include “function(s)” as shown above.
* Added a note to Tables 4-2a, 4-2b and 4-3 of PRC-005-6 similar to that on Table 5: “Note: In cases where Components of Sudden Pressure Relaying are common to Components listed in Table 1-5, the Components only need to be tested once during a distinct maintenance interval.”
* Made revisions to the Implementation Plan to consolidate the language regarding the implementation of PRC-005-2.
* Corrected typographical errors in the Supplementary Reference and FAQ document as well as other minor revisions.
* Removed recently added language on page 26 of the Supplementary Reference and AFQ document regarding R1, Part 1.2.

The Protection System Maintenance and Testing Standard Drafting Team (PSMTSDT) proposed revision of the standard specific defined terms “Automatic Reclosing” and “Component Type” as follows:

**Automatic Reclosing** –Includes the following Components:

* Reclosing relay
* Supervisory relay(s) or function(s) – relay(s) or function(s) that perform voltage and/or sync check functions that enables or disables operation of the reclosing relay
* Voltage sensing devices associated with the supervisory relay(s)
* Control circuitry associated with the reclosing relay or supervisory relay(s)

**Component Type** –

* Any one of the five specific elements of a Protection System.
* Any one of the ~~two~~ four specific elements of Automatic Reclosing.
* Any one of the two specific elements of Sudden Pressure Relaying.

The Rationales for “Automatic Relaying” and “Component Type” were also revised to reflect the proposed revisions to the defined terms above. Tables 4-1 and 4-2 were updated by adding “supervisory relay(s)” as appropriate. A new Table 4-3 was added to address maintenance activities and intervals for Automatic Reclosing with supervisory relays. No substantive revisions are being proposed for the Requirements of the standard. The only revisions to Requirements R1 and R3 included updating the Table numbering to reflect the addition of Table 4-3. The VSLs were updated to reflect the Requirement language for R1 and R3. All references to table numbering throughout the standard have also been corrected to reflect the addition of Table 4-3. This version of PRC-005 used PRC-005-5 developed under Project 2014-01 as the starting point for revisions to address the directive.

The PSMTSDT has proposed combining the Implementation Plans for previous versions of PRC-005 (including PRC-005-3, PRC-005-3i, PRC-005-3ii, PRC-005-4 and PRC-005-5). The team believes that the proposed Implementation Plan for PRC-005-6 alleviates the burden of multiple revisions of the Protection System Maintenance Program (PSMP) by aligning the effective dates of all of these version of PRC-005 while minimizing risk to the Bulk Electric System.

The PSMTSDT posted a revised SAR and associated documents June 11 – July 10, 2015. Based on comments received during this posting, the PSMTSDT made the following revisions:

* Remove Balancing Authority as an applicable entity under the SAR.
* Removed reference to PRC-005-2(i) from the SAR since it has already been approved by FERC.
* Revised the second bullet of the definition of “Automatic Reclosing” to include “function(s)” as shown above.
* Added a note to Tables 4-2a, 4-2b and 4-3 of PRC-005-6 similar to that on Table 5: “Note: In cases where Components of Sudden Pressure Relaying are common to Components listed in Table 1-5, the Components only need to be tested once during a distinct maintenance interval.”
* Made revisions to the Implementation Plan to consolidate the language regarding the implementation of PRC-005-2.
* Corrected typographical errors in the Supplementary Reference and FAQ document as well as other minor revisions.

Due to the expected volume of comments, the PSMTSDT asks that commenters consider consolidating responses and endorsing comments provided by another.

## Questions

1. The PSMTSDT has proposed revising the definition of “Automatic Reclosing” and “Component Type” to address the FERC directive in Order 803. Do you agree that the proposed revised definitions? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.

[ ]  Yes

[ ]  No

Comments:

1. The PSMTSDT has added Table 4-3 to address maintenance activities and intervals for voltage sensing devices associated with supervisory relays. Do you agree with the proposed table? If not, please provide specific comments regarding the table and any suggestions for alternative language.

[ ]  Yes

[ ]  No

Comments:

1. The PSMTSDT has made revisions to the Supplementary Reference and FAQ Document. Do you agree with the proposed revisions? If not, please provide specific comments regarding the revisions and any suggestions for alternative language.

[ ]  Yes

[ ]  No

Comments:

1. The PSMTSDT has proposed combining the Implementation Plans for previous versions of PRC-005 (including PRC-005-3, PRC-005-3i, PRC-005-3ii, PRC-005-4 and PRC-005-5). Do you agree with the proposed Implementation Plan? If not, please provide specific comments regarding the Implementation Plan and any suggestions for alternative language.

[ ]  Yes

[ ]  No

Comments: