Unofficial Comment Form

Project 2016-04 Modifications to PRC-025-1

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on **Reliability Standard PRC-025-2 – Generator Relay Loadability**. The electronic form must be submitted by **8 p.m. Eastern, Thursday, September 7, 2017.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2016-04-Modifications-to-PRC-025-1.aspx). If you have questions, contact Senior Standards Developer, Scott Barfield-McGinnis (via email), or at 404-446-9689.

## Background Information

Reliability Standard PRC-025-1 (Generator Relay Loadability), which was approved by the Federal Energy Regulatory Commission in Order No. 799 issued on July 17, 2014, became effective on October 1, 2014. Under the phased implementation plan, applicable entities have between five and seven years to become compliant with the standard depending on the scope of work required by the Generator Owner. In the course of implementing the standard, issues have been identified for specific Facility applications and load-responsive protective relays.

The revised PRC-025-2 standards addresses the concerns raised during implementation. In summary, those concerns include:

1. Prevent instances of non-compliance for conditions where the Generator Owner may be prevented from achieving the margin specified by the standard for dispersed power producing resources.
2. Prevent a lowering of reliability and potential non-compliance where the Generator Owner might apply a non-standard relay element application and undermine the goal of the standard.
3. Prevent a lowering of reliability where the Generator Owner might only apply part of the Table 1 application(s) thereby misapplying the loadability margins to relays for the stated application(s).
4. Prevent a lowering of dependability of protective relays directional toward the Transmission system at generating facilities that are remote to the transmission network.
5. Modify or eliminate the use of the term “pickup setting” and other terms or phrases that relate to initial measurements and specific detection methods, and instead, use a term or phrase that clearly aligns with the intent of the standard for relays to “not trip” based on the criteria in Table 1.
6. Miscellaneous considerations for clarifications to the standard, Attachment 1, and/or Application Guidelines.

## Questions

1. Do you agree that the proposed new Option 5b in PRC-025-2, Table 1 addresses cases where the applicable entity is unable to achieve the 130% threshold of Option 5a for overcurrent relays? See Figure A also. If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed revisions to PRC-025-2 – Attachment 1: Relay Settings (including Table 1) for applications involving overcurrent relays clarify that the IEEE device element 50 (i.e., instanteous) as well as low voltage trip designations commonly referred to as L (long time delay), S (short time delay), and I (instantaneous) by manufacturers are required to comply with the standard? If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed revisions in the “Application” column of Table 1 for Options 1 through 6 clarify that applicable protective relays associated with “all” listed Elements are to be set using the setting criteria of Table 1? If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the proposed revisions in Table 1 for Options 14 thorugh 16 address cases where generating facilities are remote to the transmission network by allowing setting criteria based on the simulation of field forcing in response to a 0.85 per unit voltage at the remote end of the line? If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the removal of the leading term “Pickup” in “Pickup Setting Criteria” in Table 1? If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the miscellaneous revisions made to the PRC-025-2 – Application Guidelines? If not, please explain why and provide an alternative proposal.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with implementation period of (1) 12 months for cases with equipment removal or replacement **is not** necessary, and (2) 36 months where equipment removal or replacement **is** necessary based on the considerations listed in the Implementation Plan? If not, please provide a justification for increasing or decreasing the proposed implementation periods.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirement in the proposed PRC-025-2? If not, please identify the need here.

[ ]  Yes

[ ]  No

Comments:

1. Do the revisions proposed in PRC-025 provide a cost effective solution to the issues? For example, the revisions (i.e., Options 14b, 15b, and 16b) addressing remote weak generating plants in comparison to a strong transmission system and using the resource capability curve (i.e., Option 5b) to demonstrate loadability over the current 130 percent setting criteria? If not, please identify other cost effective alternatives of the issues addressed in the project.

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of any conflicts between the proposed standard revisions and any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or agreement? If **yes**, please identify the conflict here.

[ ]  Yes

[ ]  No

Comments:

1. Are you aware of a need for a regional variance or business practice that should be considered with this project? If **yes**, please identify the need here.

[ ]  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: