Unofficial Comment Form

Project 2016-04 Modifications to PRC-025-1
Standards Authorization Request

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the **Project 2016-04 Modifications to PRC-025-1 (Generator Relay Loadability) Standards Authorization Request (SAR)**. The electronic form must be submitted by **8 p.m. Eastern, Monday, April 3, 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

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, four specific issues have been identified in Draft 1 of the SAR that was posted for industry comment from September 16, 2016 through October 18, 2016.

**Summary**

Draft 1 of the SAR proposed that the PRC-025-1 standard be revised to provide: (1) an alternative loadability margin for dispersed generation resources; (2) an inclusion or exclusion of the 50 overcurrent element, (3) clarification on whether the Elements in the “Application” column of Table 1 of PRC-025-1 that have two applications separated by an “or” conjunction should both be included or may one or the other be selected; and (4) alternative or additional Option(s) (e.g., calculation or method) for determining loadability settings for relays that are directional toward the transmission. This scoping has not change substantively.

In addition to the above four items, Draft 2 of the SAR proposes the following items in summary form: (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; and (6) Miscellaneous clarifications, which include:

a. Consider the use of references to the American National Standards Institute (ANSI) device numbers given that some equipment may not use traditional nomenclature.

b. Consider whether it is clear and appropriate when resources are described with the following terms in the Standard: asynchronous, synchronous, inverter-based and dispersed power producing resources.

c. Clarify that a high unit capability may be used other than the value “reported to the Transmission Planner,” which is a minimum capability.

d. Clarify that CB103 relay is applicable to the standard.

## Questions

1. Do you agree with the revisions to Items 1-4 in response to comments from industry stakeholders on draft 1 of the SAR? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the additions of Items 5 and 6 in response to comments and discussions by the SAR drafting team? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.

[ ]  Yes

[ ]  No

Comments:

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

Comments: