

## Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:	Modifications to PRC-005-6		
Date Submitted:	7/27/2021		
SAR Requester			
Name:	Brian Kasmarzik, Chair		
Organization:	Project 2019-04 Modifications to PRC-005-6 SAR Drafting Team		
Telephone:	314-554-4315	Email:	BKasmarzik@ameren.com
SAR Type (Check as many as apply)			
<input type="checkbox"/>	New Standard	<input type="checkbox"/>	Imminent Action/ Confidential Issue (SPM Section 10)
<input checked="" type="checkbox"/>	Revision to Existing Standard	<input type="checkbox"/>	Variance development or revision
<input checked="" type="checkbox"/>	Add, Modify or Retire a Glossary Term	<input type="checkbox"/>	Other (Please specify)
<input type="checkbox"/>	Withdraw/retire an Existing Standard		
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input type="checkbox"/>	Regulatory Initiation	<input type="checkbox"/>	NERC Standing Committee Identified
<input type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input checked="" type="checkbox"/>	Industry Stakeholder Identified
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
<p>PRC-005 will be revised to provide clarity that the BES protective functions<sup>1</sup> enabled within excitation systems<sup>2</sup> (including analog/digital Automatic Voltage Regulators (AVRs)), and BES protective functions enabled within control systems, that respond to measured BES electrical quantities<sup>3</sup> and trip BES elements either directly or via lockout or auxiliary tripping relays are within the scope of the project. Control systems that do not contain BES protective functions that respond to measured BES electrical quantities are not within the scope of this project. The clarifying changes would apply to the Facilities as defined in PRC-005-6. The clarity that is needed is regarding protective functions inside excitation systems and control systems which are not stand-alone relays, but otherwise perform as a BES Protection System. Without clear applicability, the industry is struggling with how to implement PRC-</p>			

<sup>1</sup> Please refer to [PRC-005-6 Supplementary Reference and FAQ – October 2015](#) pages 38 and 39

<sup>2</sup> Please refer to [Standards Committee answer to the Request for Interpretation \(RFI\) of PRC-005-6 Requirement R1 - 2016](#)

<sup>3</sup> Please refer to [PRC-005-6 Supplementary Reference and FAQ – October 2015](#) pages 106 to 108, figure 1, figure 2 and Figure 1 & 2 Legend – Components of Protection Systems

### Requested information

005 and what testing is acceptable to meet the required maintenance activities prescribed by PRC-005. The lack of clarity presents a reliability gap in the application of PRC-005.

Additionally, there are Protection System station direct current (DC) supply technologies that do not currently have maintenance activities established in PRC-005. The standard needs to address battery-based station DC technologies that are not covered by PRC-005 and consider other alternative technologies, both battery-based and non-battery-based.

This project would modify Reliability Standard PRC-005 to be consistent with the Federal Energy Regulatory Commission (FERC)-approved changes to registration as part of the Risk Based Registration (RBR) initiative by specifying Underfrequency Load Shedding (UFLS)-only Distribution Providers (DPs) in the Applicability Section.

**Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):**

Provide clear, unambiguous applicability of PRC-005 to protective functions and provide the specificity needed for the industry to consistently identify and implement the required maintenance activities.<sup>4</sup>

Provide for the use of alternative Protection System station DC supply technologies, battery-based and non-battery-based, and ensure that they are subject to maintenance requirements.

This project would modify Reliability Standard PRC-005 to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

**Project Scope (Define the parameters of the proposed project):**

Modify PRC-005 to provide clarity that the BES protective functions enabled within analog/digital AVRs, excitation systems, and BES protective functions enabled within control systems that respond to measured BES electrical quantities and trip BES elements either directly or via lockout or auxiliary tripping relays are within the scope of the standard. Only those control systems that contain BES protective functions that respond to measured BES electrical quantities are within the scope of this project. Modifications to PRC-005 could also include defining terms, revising applicability, modifying maintenance activities and intervals, or other appropriate modifications needed to provide clarity. In addition, modify the PRC-005 Supplementary Reference and FAQ to align with revisions to PRC-005.

<sup>4</sup> Based on the industry comments and NAGF original PRC-005-6 SAR, the SAR SDT considers that PRC-005-6 needs to be clarify. In 2016, theStandards Committee answered a Request for Interpretation (RFI) of PRC-005-6 Requirement R1 stating that *“The generator excitation systems and voltage regulators described in Xcel Energy’s RFI are capable of monitoring electrical quantities, such as voltage or current, and responding to those quantities, by causing a trip of the generator in response to these signals. Therefore, it is clear that these embedded protective functions, if enabled, would be included in the scope of Reliability Standard PRC-005-6 as set out in the Applicability section of the standard.”* From the comments received, there is no consensus in the industry that generator excitation systems and voltage regulators are applicable to PRC-005-6. The SDT needs to provide a quality standard that is technology neutral. With rapid technology evolution, the SAR SDT added the wording *“control systems”* in the SAR scope to enable the SDT to provide clarity, if needed, on the applicability of PRC-005-6 to any device that are capable of monitoring BES electrical quantities, such as voltage or current, and responding to those quantities, by causing a trip of BES element in response to these signals.

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The clarifying changes would apply to the Facilities as defined in PRC-005-6. Protection Systems for the individual generators identified through inclusion I4 of the BES definition are to remain outside the scope of the project.

Modify PRC-005 to establish maintenance requirements for Protection System DC supply technologies that are not currently covered.

This project would modify Reliability Standard PRC-005 to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification<sup>5</sup> which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):

The North American Generator Forum (NAGF) received feedback from members indicating that there was confusion regarding the applicability of protective functions inside synchronous generator excitation systems to PRC-005. The primary cause of confusion is the use of the NERC term "Protection System," which specifies "relays" but not the protective functions that are typically (but not always) associated with relays. Excitation systems may measure and utilize similar quantities as protective relays and may perform similar functions as protective relays applicable to PRC-005. For this reason, the SAR drafting team agrees that the aforementioned protective functions within excitation systems and control systems need to be clearly and explicitly applicable to PRC-005.

PRC-005 will be modified to provide clarity on the inclusion of BES protective functions enabled within excitation systems (analog/digital AVRs), and BES protective functions enabled within control systems, that respond to measured BES electrical quantities and trip BES elements either directly or via lockout or auxiliary tripping relays. The clarifying changes would apply to the Facilities as defined in PRC-005-6. Protection Systems for the individual generators identified through inclusion I4 of the BES definition are to remain outside the scope of the project.

The SAR drafting team recommends considering the specification of American National Standards Institute (ANSI) Standard Device Numbers for the applicability to PRC-005 as outlined in the Applicability Section 4.2. Other options to provide clarity include: developing standard-specific definitions, developing or revising existing terms in the NERC Glossary of Terms, or making other modifications to the Applicability section.

The maintenance tables should be updated to include the aforementioned BES protective functions enabled within control systems, and the associated maintenance activities and intervals.

<sup>5</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

### Requested information

Additionally, the maintenance tables should be updated to include new DC supply technologies for Protection System(s) not currently captured.

Entities registered as ULFS-Only (DPs) have PRC-005 applicable Protection Systems, but are not expressly listed as Applicable Entities in Section 4.1 UFLS-Only DPs should be added to the Applicability Section to avoid any confusion and to be consistent with the FERC-approved RBR registration changes.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

The SAR drafting team is seeking industry input regarding cost impact.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):

The clarifying changes would apply to the facilities as defined in PRC-005-6.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Generator Owner (GO), Transmission Owner (TO), Distribution Provider (DP), Underfrequency Load Shedding (UFLS)-only DP

Do you know of any consensus building activities<sup>6</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

The NAGF and the NEI worked together to generate the initial SAR and communicated the issue in advance to NERC.

The SAR drafting team held team meetings, vetted comments received by industry, and edited the original SAR based on industry comments. The SAR drafting team posted the draft SARs for formal comment periods. The SAR drafting team conducted an industry webinar during SAR development and conducted additional outreach activities with EEI and NAGF.

This project would modify Reliability Standard PRC-005 to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

Options to provide clarity for PRC-005 include: developing standard-specific definitions, developing or revising existing terms in the NERC Glossary of Terms, or making other modifications to the Applicability section. In the event of developing or revising existing terms in the NERC Glossary of Terms, review of the effects on other standards must be performed.

<sup>6</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

### Requested information

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

### Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles ([Reliability Interface Principles](#))? Please check all those that apply.

<input checked="" type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input checked="" type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

### Market Interface Principles

Does the proposed standard development project comply with all of the following [Market Interface Principles](#)?

	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

### Identified Existing or Potential Regional or Interconnection Variances

Region(s)/ Interconnection	Explanation
e.g., NPCC	None

## For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input checked="" type="checkbox"/> Draft SAR reviewed by NERC Staff <input checked="" type="checkbox"/> Draft SAR presented to SC for acceptance <input checked="" type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> Final SAR endorsed by the SC <input type="checkbox"/> SAR assigned a Standards Project by NERC <input type="checkbox"/> SAR denied or proposed as Guidance document

### Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer