A. Introduction

1. Title: Analysis and Mitigation of Transmission and Generation Protection System Misoperations
2. Number: PRC-004-2.1a
3. Purpose: Ensure all transmission and generation Protection System Misoperations affecting the reliability of the Bulk Electric System (BES) are analyzed and mitigated.
4. Applicability
   4.1. Transmission Owner.
   4.2. Distribution Provider that owns a transmission Protection System.
   4.3. Generator Owner.
5. (Proposed) Effective Date: In those jurisdictions where regulatory approval is required, all requirements become effective upon approval. In those jurisdictions where no regulatory approval is required, all requirements become effective upon Board of Trustees’ adoption.

B. Requirements

R1. The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Entity’s procedures.

R2. The Generator Owner shall analyze its generator and generator interconnection Facility Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Entity’s procedures.

R3. The Transmission Owner, any Distribution Provider that owns a transmission Protection System, and the Generator Owner shall each provide to its Regional Entity, documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Entity’s procedures.

C. Measures

M1. The Transmission Owner, and any Distribution Provider that owns a transmission Protection System shall each have evidence it analyzed its Protection System Misoperations and developed and implemented Corrective Action Plans to avoid future Misoperations of a similar nature according to the Regional Entity’s procedures.

M2. The Generator Owner shall have evidence it analyzed its Protection System Misoperations and developed and implemented Corrective Action Plans to avoid future Misoperations of a similar nature according to the Regional Entity’s procedures.

M3. Each Transmission Owner, and any Distribution Provider that owns a transmission Protection System, and each Generator Owner shall have evidence it provided documentation of its Protection System Misoperations, analyses and Corrective Action Plans according to the Regional Entity’s procedures.

D. Compliance

1. Compliance Monitoring Process
   1.1. Compliance Enforcement Authority
       Regional Entity.
1.2. **Compliance Monitoring Period and Reset Time Frame**

Not applicable.

1.3. **Compliance Monitoring and Enforcement Processes:**

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

1.4. **Data Retention**

The Transmission Owner, and Distribution Provider that own a transmission Protection System and the Generator Owner that owns a generation or generator interconnection Facility Protection System shall each retain data on its Protection System Misoperations and each accompanying Corrective Action Plan until the Corrective Action Plan has been executed or for 12 months, whichever is later.

The Compliance Monitor shall retain any audit data for three years.

1.5. **Additional Compliance Information**

The Transmission Owner, and any Distribution Provider that owns a transmission Protection System and the Generator Owner shall demonstrate compliance through self-certification or audit (periodic, as part of targeted monitoring or initiated by complaint or event), as determined by the Compliance Monitor.

2. **Violation Severity Levels (no changes)**

E. **Regional Differences**

None identified.

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**Version History**

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Action</th>
<th>Change Tracking</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>April 1, 2005</td>
<td>Effective Date</td>
<td>New</td>
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</table>
| 1       | December 1, 2005 | 1. Changed incorrect use of certain hyphens (-) to “en dash” (–) and “em dash (—).”  
|         |              | 2. Added “periods” to items where appropriate.  
<p>|         |              | Changed “Timeframe” to “Time Frame” in item D, 1.2.                 | 01/20/06        |
| 2       | August 5, 2010 | Modified to address Order No. 693 Directives contained in paragraph 1469. | Revised         |</p>
<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
<th>Details</th>
<th>Project/Revision</th>
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</thead>
<tbody>
<tr>
<td>February 17, 2011</td>
<td>Added Appendix 1 - Interpretation regarding applicability of standard to protection of radially connected transformers</td>
<td>2009-17 interpretation of the standard.</td>
<td></td>
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<tr>
<td>February 17, 2011</td>
<td>Adopted by the Board of Trustees</td>
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<tr>
<td>September 26, 2011</td>
<td>FERC Order issued approving the interpretation of R1 and R3 (FERC’s Order is effective as of September 26, 2011)</td>
<td>R1 and R3 interpretation and FERC Order.</td>
<td></td>
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<tr>
<td>September 26, 2011</td>
<td>Appended FERC-approved interpretation of R1 and R3 to version 2</td>
<td>Version 2 of the standard updated.</td>
<td></td>
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<tr>
<td>September 19, 2013</td>
<td>Errata change: Edited R2 to add “…and generator interconnection Facility…”</td>
<td>Revision under Project 2010-07.</td>
<td></td>
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<tr>
<td>February 9, 2012</td>
<td>Errata change adopted by the Board of Trustees</td>
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Appendix 1

<table>
<thead>
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<th>Requirement Number and Text of Requirement</th>
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<td><strong>R1.</strong> The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization’s procedures developed for Reliability Standard PRC-003 Requirement 1.</td>
</tr>
<tr>
<td><strong>R3.</strong> The Transmission Owner, any Distribution Provider that owns a transmission Protection System, and the Generator Owner shall each provide to its Regional Reliability Organization, documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Reliability Organization’s procedures developed for PRC-003 R1.</td>
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**Question:**

Is protection for a radially-connected transformer protection system energized from the BES considered a transmission Protection System subject to this standard?

**Response:**

The request for interpretation of PRC-004-1 Requirements R1 and R3 focuses on the applicability of the term “transmission Protection System.” The NERC Glossary of Terms Used in Reliability Standards contains a definition of “Protection System” but does not contain a definition of transmission Protection System. In these two standards, use of the phrase transmission Protection System indicates that the requirements using this phrase are applicable to any Protection System that is installed for the purpose of detecting faults on transmission elements (lines, buses, transformers, etc.) identified as being included in the Bulk Electric System (BES) and trips an interrupting device that interrupts current supplied directly from the BES.

A Protection System for a radially connected transformer energized from the BES would be considered a transmission Protection System and subject to these standards only if the protection trips an interrupting device that interrupts current supplied directly from the BES and the transformer is a BES element.

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1 When the request for interpretation was made, it was for a previous version of the standard. Although the interpretation references a previous version of the standard, because it is still applicable in this case, it is appended to this version of the standard.