A. Introduction

1. Title: Analysis and Mitigation of Transmission and Generation Protection System Misoperations

2. Number: PRC-004-2.1(i)a

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. Effective Date: See the Implementation Plan for this Standard.

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.

   • For Misoperations occurring on the Protection Systems of individual dispersed power producing resources identified under Inclusion I4 of the BES definition where the Misoperations affected an aggregate nameplate rating of less than or equal to 75 MVA of BES facilities, this requirement does not apply.

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.

   • For Misoperations occurring on the Protection Systems of individual dispersed power producing resources identified under Inclusion I4 of the BES definition where the Misoperations affected an aggregate nameplate rating of less than or equal to 75 MVA of BES facilities, this requirement does not apply.

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

       As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

   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.

F. Associated Documents

   None.
## Version History

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Action</th>
<th>Change Tracking</th>
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<tbody>
<tr>
<td>0</td>
<td>April 1, 2005</td>
<td>Effective Date</td>
<td>New</td>
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</tbody>
</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. 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 |
| 1a      | February 17, 2011 | Added Appendix 1 - Interpretation regarding applicability of standard to protection of radially connected transformers | Project 2009-17 interpretation |
| 1a      | February 17, 2011 | Adopted by the Board of Trustees | |
| 1a      | September 26, 2011 | FERC Order issued approving the interpretation of R1 and R3 (FERC’s Order is effective as of September 26, 2011) | |
| 2a      | September 26, 2011 | Appended FERC-approved interpretation of R1 and R3 to version 2 | |
| 2.1a    |         | Errata change: Edited R2 to add “…and generator interconnection Facility…” | Revision under Project 2010-07 |
| 2.1a    | February 9, 2012 | Errata change adopted by the Board of Trustees | |
| 2.1a    | September 19, 2013 | FERC Order issued approving PRC-004-2.1a (approval becomes effective November 25, 2013). | |
| 2.1(i)a | November 13, 2014 | Adopted by the Board of Trustees | Applicability revised in Project 2014-01 to clarify application of Requirements to BES dispersed power producing resources |
| 2.1(i)a | May 29, 2015 | FERC Letter Order in Docket No. RD15-3-000 approving PRC-004-2.1(i)a | |
Rationale:
During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

Rationale for Introduction:
The only revisions made to this version of PRC-004-2.1(i)a are revisions to Requirements R2 and R3 to clarify applicability of the Requirements of the standard at generator Facilities. These applicability revisions are intended to clarify and provide for consistent application of the Requirements to BES generator Facilities included in the BES through Inclusion I4 – Dispersed Power Producing Resources.

Rationale for Applicability:
Misoperations occurring on the Protection Systems of individual generation resources identified under Inclusion I4 of the BES definition do not have a material impact on BES reliability when considered individually; however, the aggregate capability of these resources may impact BES reliability if a number of Protection Systems on the individual power producing resources incorrectly operated or failed to operate as designed during a system event. To recognize the potential for the Protection Systems of individual power producing resources to affect the reliability of the BES, Requirement R2 and Requirement R3 reflect the threshold consistent with the revised BES definition. See paragraph 20 of FERC Order Approving Revised Definition in Docket No. RD14-2-000. The intent of Requirement R2 and Requirement R3 is to exclude from the standard requirements these Protection Systems for “common-mode failure” type scenarios affecting less than or equal to 75 MVA aggregated nameplate generating capability at these dispersed generating facilities.
### Requirement Number and Text of Requirement

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Text</th>
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<tbody>
<tr>
<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>
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<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.