

Addendum to Consideration of Comments on 4th Draft of PRC-002 and PRC-018

After reading the response to comments on PRC-002 and PRC-018 a commenter submitted the following comments to the VP, Director of Standards and asked for further clarification. The drafting team's responses follow each of the two comments. The commenter was provided with these responses.

PRC-002-1

The response to our comment did not address the issue we raised, which was the COMTRADE tool is used only for Fault and Dynamic disturbance data. Sequence data must be provided in ASCII table or CSV file. This clarification is needed in R4.4.

[Response: R4.4 states that there must be a provision for reporting Disturbance data in a format which is capable of being viewed, read and analyzed with a generic COMTRADE analysis tool.](#)

[Sequence of event data that is provided in plain text format is acceptable according to COMTRADE standard C37.111– meaning that data provided in a plain text format meets the intent of Requirement 4.4 in PRC-002. To be acceptable, the sequence of event file provided would have to have the standard file name with a 'txt' extension.](#)

PRC-018-1

We proposed that an additional requirement is needed in R1 to address data storage in no-volatile memory and the ability of the DME to function absent AC power to the installation site. This has happened to ITC where data was lost during the blackout because such a provision was not a standard. The response to our comment would leave an important requirement up to each Regional Entity. What is proposed is universal to all Transmission Owners and thus should be added to the standard.

[Response: PRC-018 Requirement 1.2 states that recorded data from each Disturbance shall be retrievable for ten days. Entities must take whatever steps necessary to ensure that data is retrievable.](#)