Project 2007-09 - Generator Verification

Unofficial Comment Form

PRC-019

Please **DO NOT** use this form for commenting.  Please use the electronic comment form to submit comments on the proposed revisions to PRC-019-1.  Comments must be submitted by 8 p.m. ET **October 29, 2012**.  If you have questions please contact Stephen Crutchfield at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.October

### Background Information:

The GVSDT posted PRC-019-1 for a 45-day formal comment period with concurrent initial ballot from February 29 – April 16, 2012. Stakeholders provided feedback to make improvements to the standard and the GVSDT incorporated many of them in the standard.

A large majority of stakeholders agreed that the Applicability section as drafted was correct. A significant minority of stakeholders felt that the use of the term “Bulk Power System” was inappropriate and should be changed to “Bulk Electric System”. The SDT agreed and made that change. A number of stakeholders objected to the inclusion of synchronous condensers and black start units. The SDT did not find that valid technical arguments were presented to remove these units from the Applicability and did not make the change.

A large majority of the stakeholders agreed with the revisions made to the examples in Section G. Exelon objected that the wording in the examples implied that the Steady State Stability Limit had to be calculated based on a fixed field current. The SDT modified the wording so that the SSSL can be calculated either with fixed or variable field current. Luminant objected to the inclusion of phase distance relay characteristics on the example graphs. The SDT agreed to remove these parameters from the graphs. Dominion asked the SDT to further clarify that the coordination does not apply to all generator protective functions. The SDT revised the wording to further clarify that concept. PPL asked for an all inclusive list of limiters and protective functions to be coordinated. The SDT declined this request.

A significant number of stakeholders felt that the use of the term “Bulk Power System” was inappropriate and should be changed to “Bulk Electric System”. The SDT agreed and made that change. Several stakeholders objected to the 5-year interval for verifying coordination. The SDT felt the stakeholders did not present valid reasoning for extending the interval and did not change it. Several stakeholders argued that the risk associated with non-coordination did not warrant a “High” VRF. The SDT felt the arguments were valid and revised the VRF level for both Requirements R1 and R2 to “Medium”. Several stakeholders felt the VSL language did not match the requirements, or questioned the tardiness intervals. The SDT agreed that the wording in the VSL’s needed revision and made the suggested changes. The SDT did not change the tardiness increments in the VSL’s since they come directly from NERC guidelines. Some stakeholders objected that the Effective Date section was too restrictive for entities with a small number of units. The SDT agreed and modified the first step of implementation to extend to two years instead of one and cover 40% of the applicable units.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. **The GVSDT revised the VRFs to “Medium” based on stakeholder feedback. Do you agree with the proposed revision? If not, please provide an alternative and supporting information in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **The GVSDT revised the VSLs for each requirement based on stakeholder feedback. Do you agree with the proposed revisions? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you have any other comment, not expressed in questions above, for the GVSDT?**

Comments: