Unofficial Comment Form

Project 2007-11 Disturbance Monitoring

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=38196164fb3d4c1cb680af122bc74496) to submit comments on **PRC-002-2 - Disturbance Monitoring and Reporting Requirements**. The electronic comment form must be completed by **8 p.m. Eastern on Monday, June 23, 2014**.

If you have questions please contact Stephen Crutchfield via email or by telephone at 609-651-9455.

Click here for the [Project Page](http://www.nerc.com/pa/Stand/Pages/Project_2007-11_Disturbance_Monitoring.aspx).

## Background Information

Project 2007-11 Disturbance Monitoring was initiated to replace the existing fill-in-the-blank Standard PRC-002-1 Define Regional Disturbance Monitoring and Reporting Requirements with a more comprehensive standard. (Fill-in-the-blank standards are those standards that depend on regional criteria or procedures not currently contained within certain Reliability Standards, but which are needed to provide additional requirements for implementing the standards within the Regions.) The Disturbance Monitoring Standard Drafting Team (DMSDT) posted a draft standard for a 45-day comment/ballot period November 1- December 16, 2013. Based on the comments received from stakeholders, the DMSDT has revised the standard. The revisions to the standard are summarized in the paragraphs below.

In response to numerous comments, the SDT has agreed to remove the proposed definitions from the draft standard. The SDT received a comment to revise and use the existing term Disturbance Monitoring Equipment (DME) instead. The SDT has developed the standard to focus on data rather than equipment. The SDT considered revising or retiring the defined term, DME. The SDT reviewed the body of NERC Standards and found the only reference to DME is in PRC-002-1 and PRC-018-1 which will both be replaced by PRC-002-2 upon its approval, and decided to leave the definition as is. The draft standard includes requirements for sequence of events recording (SER) data, fault recording (FR) data and dynamic disturbance recording (DDR) data.

The comments received regarding the methodology in Attachment 1 were directed at Requirements R1 and R2, and Attachment 1. Comments were specifically addressed at explaining “location”, station configurations, and equipment ownership. The SDT intended that the bus location be the bus location identified in a system study, and further identifies it in Attachment 1 as “For the purposes of this standard, a single BES bus includes physical buses connected at the same voltage level within the same physical location sharing a common ground grid. These buses may be modeled or represented by a single node in fault studies. For example, ring bus or breaker-and-a-half bus configurations are considered to be a single bus.” There are cases where buses contain Elements that the Transmission Owner does not own. In these instances, the Transmission Owner identifies the bus and then notifies the owners of any Elements that it does not own.

Comments were received on the selection of the Entities identified in the Applicability Section. The Planning Coordinator (PC) and Reliability Coordinator (RC) are included because they have an overall view of the BES to be what BES Elements need to be included for DDR. Responsible Entity was used by the SDT to reflect the fact that the PC and RC have different functions across the continent. Comments were received that pointed to the hardware for capturing data. This standard is not about “how” the data is captured, but “what” data is captured. The need for generator data was questioned. During wide-area or slowly evolving disturbances, generator reaction is crucial to the reconstruction and understanding of an event.

The comments received regarding Requirement R6 (now R5) indicated that stakeholders believed the requirement demanded DDR data capture on an excessive number of BES Elements. The SDT revised the requirement to address these comments by:

• Instead of monitoring all Elements of IROLs, monitor one or more

• Instead of monitoring all Elements of permanent Flowgates and transmission interfaces, monitor “Any one BES Element associated with major transmission interfaces…”

The Parts/sub-Parts of what is now Requirement R5 were rearranged for clarity.

The concerns of most of the comments received regarding the Implementation Plan were directed at the length of time required for implementation of Requirements R3 (now R2), R4 (now R3), R5 (now R4), R8 (now R6), R9 (now R7), R10 (now R8), R11 (now R9), R12 (now R10), and R13 (now R11). The schedule for implementation is now to be at least 50% compliant within three (3) years following notification of the list, and 100% compliant within five (5) years following notification of the list. Entities that own only one (1) identified BES bus location, Element, or generating unit shall be 100% compliant within five (5) years following notification of the list.

Based on stakeholder comments, the DMSDT made significant revisions to PRC-002-2 including:

• Combined Requirements R1 and R2.

• Combined Requirements R6 and R7.

• Removed references to “equipment” and specified data requirements for FR, SER and DDR.

• Removed references to “locations” and replaced “bus” with “BES bus”

• Updated rationales with clarifications and more general information for each requirement.

• Revised Requirement R6 (now R5) for more clarity regarding DDR data requirements.

• Revised the VSLs to conform to the revised requirement language.

• Added language to the Guidelines and Technical Basis section of the standard.

*\*Please use the* [*electronic comment form*](https://www.nerc.net/nercsurvey/Survey.aspx?s=38196164fb3d4c1cb680af122bc74496) *to submit your final comments to NERC.*

**Questions**You do not have to answer all questions. Enter all comments in simple text format. Bullets, numbers, and special formatting will not be retained. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. The DMSDT merged the notification requirement of Requirement R2 into Requirement R1. The DMSDT also merged notification requirement of Requirement R7 into Requirement R6 (new R5). Do you support these new requirements? If not, please explain why and provide suggested changes.

[ ]  Yes

[ ]  No

Comments:

2. The DMSDT revised the requirements for dynamic disturbance recording data based on stakeholder comments. Do you agree with the BES Elements requiring dynamic disturbance recording data listed in Requirement R5? If not, please provide technical justification.

[ ]  Yes

[ ]  No

Comments:

3. If you have any other comments that you haven’t already mentioned above, please provide them here:

 Comments: