

# Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the <u>NERC Help Desk</u>. Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information						
SAR Title: PRC-005-6 applicability to AVR protective functions						
Date Submitted: 6/8/2020						
SAR Requester						
Name: Brian Kasmarzik, Chair						
Organization: Project 2019-04 Modifications to PRC-005-6 SAR Drafting Team						
Telephone: 314-554-4315 Email: BKasmarzik@ameren.com						
SAR Type (Check	as many as a	apply)				
New Stand	lard			mn	ninent Action/ Confidential Issue (SPM	
🛛 🛛 Revision to	Existing Star	ndard		Se	ction 10)	
🛛 🖂 🛛 Add, Modi	fy or Retire a	Glossary Term	· ا	Vari	ance development or revision	
Withdraw/	retire an Exis	sting Standard		Эth	er (Please specify)	
Justification for	this propose	d standard developm	nent pro	jec <sup>.</sup>	t (Check all that apply to help NERC	
prioritize develo	pment)					
Regulatory	Initiation				C Standing Committee Identified	
Emerging Risk (Reliability Issues Steering Enhanced Periodic Review Initiated						
Committee) Ider	ntified					
Reliability Standard Development Plan       Industry Stakeholder Identified						
Industry Need (V	What Bulk Ele	ctric System (BES) re	eliability	ber	nefit does the proposed project provide?):	
		•	-		tive functions enabled within excitation	
					ors (AVRs)), and BES protective functions	
		•			cal quantities and trip BES elements either	
directly or via lockout or auxiliary tripping relays are within the scope of the standard. The clarity that is						
needed is regarding protective functions inside excitation systems and control systems which are not						
stand-alone relays, but otherwise perform as a BES Protection System. Without clear applicability, the						
industry is struggling with how to implement PRC-005 and what testing is acceptable to meet the						
required maintenance activities prescribed by PRC-005. The lack of clarity presents a reliability gap in						
the application of PRC-005.						
Additionally, there are Protection System station direct current (DC) supply technologies that do not						
• •						
currently have m	naintenance a	activities established	IN PRC-	005	. The standard needs to address battery-	1

based station DC technologies that are not covered by PRC-005 and consider other alternative technologies, both battery-based and non-battery-based.

#### Requested information

This project would modify Reliability Standard PRC-005to be consistent with the Federal Energy Regulatory Commission (FERC)-approved changes to registration as part of the Risk Based Registration (RBR) initiative by specifying Underfrequency Load Shedding (UFLS)-only Distribution Providers (DPs) in the Applicability Section.

Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):

Provide clear, unambiguous applicability of PRC-005 to protective functions and provide the specificity needed for the industry to consistently identify and implement the required maintenance activities.

Provide for the use of alternative Protection System station DC supply technologies, battery based and non-battery-based, and ensure that they are subject to maintenance requirements.

This project would modify Reliability Standard PRC-005to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

Project Scope (Define the parameters of the proposed project):

Modify PRC-005 to provide clarity that the BES protective functions enabled within analog/digital AVRs, excitation systems, and BES protective functions enabled within other control systems that respond to electrical quantities and trip BES elements either directly or via lockout or auxiliary tripping relays are within the scope of the standard. Modifications to PRC-005 could also include defining terms, revising applicability, modifying maintenance activities and intervals, or other appropriate modifications needed to provide clarity. In addition, modify the PRC-005Supplementary Reference and FAQ to align with revisions to PRC-005.

The clarifying changes would apply to BES Protection Systems and BES protective functions applied on generators, dispersed power-producing resources from the point of aggregation (greater than 75 MVA) to the point of Interconnection, static and synchronous condensers and other BES elements as defined.

Modify PRC-005 to establish maintenance requirements for Protection System DC supply technologies that are not currently covered.

This project would modify Reliability Standard PRC-005 to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

#### Requested information

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification<sup>1</sup> which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (*e.g.,* research paper) to guide development of the Standard or definition):

The North American Generator Forum (NAGF) received feedback from members indicating that there was confusion regarding the applicability of protective functions inside synchronous generator excitation systems to PRC-005. The primary cause of confusion is the use of the NERC term "Protection System," which specifies "relays" but not the protective functions that are typically (but not always) associated with relays. Excitation systems may measure and utilize similar quantities as protective relays and may perform similar functions as protective relays applicable to PRC-005. For this reason, the SAR drafting team agrees that the aforementioned protective functions within excitation systems and other control systems need to be clearly and explicitly applicable to PRC-005.

PRC-005 will be modified to provide clarity on the inclusion of BES protective functions enabled within excitation systems (analog/digital AVRs), and BES protective functions enabled within other control systems, that respond to electrical quantities and or trip BES elements either directly or via lockout or auxiliary tripping relays. The clarifying changes would apply to BES Protection Systems and BES protective functions applied on generators, dispersed power producing resources from the point of aggregation (greater than 75 MVA) to the point of Interconnection, static and synchronous condensers and other BES elements as defined.

The SAR drafting team recommends considering the specification of American National Standards Institute (ANSI) Standard Device Numbers for the applicability to PRC-005 as outlined in the Applicability Section 4.2. Other options to provide clarity include: developing standard-specific definitions, developing or revising existing terms in the NERC Glossary of Terms, or making other modifications to the Applicability section.

The maintenance tables should be updated to include the aforementioned BES protective functions enabled within other control systems, and the associated maintenance activities and intervals.

Additionally, the maintenance tables should be updated to include new DC supply technologies for Protection System(s) not currently captured.

Entities registered as ULFS-Only (DPs) have PRC-005applicable Protection Systems, but are not expressly listed as Applicable Entities in Section 4.1 UFLS-Only DPs should be added to the Applicability Section to avoid any confusion and to be consistent with the FERC-approved RBR registration changes.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

<sup>&</sup>lt;sup>1</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

#### Requested information

The SAR DT is seeking industry input regarding cost impact.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (*e.g.*, Dispersed Generation Resources):

The clarifying changes would apply to BES Protection Systems and BES protective functions applied on generators, dispersed power producing resources from the point of aggregation (greater than 75 MVA) to the point of Interconnection, static and synchronous condensers and other BES elements as defined. The items under consideration related to DC supply technologies would impact multiple facility owners.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (*e.g.*, Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Generator Owner (GO), Transmission Owner (TO), Distribution Provider (DP), Underfrequency Load Shedding (UFLS)-only DP

Do you know of any consensus building activities<sup>2</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

The NAGF and the NEI worked together to generate the initial SAR and communicated the issue in advance to NERC.

This project would modify Reliability Standard PRC-005 to be consistent with the FERC-approved changes to registration as part of the RBR initiative and to add UFLS-only DPs in the Applicability Section.

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

Options to provide clarity for PRC-005 include: developing standard-specific definitions, developing or revising existing terms in the NERC Glossary of Terms, or making other modifications to the Applicability section. In the event of developing or revising existing terms in the NERC Glossary of Terms, review of the effects on other standards must be performed.

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

Reliability Principles         Does this proposed standard development project support at least one of the following Reliability         Principles (Reliability Interface Principles)? Please check all those that apply.         Image: Standard bulk power systems shall be planned and operated in a coordinated manner					
Principles (Reliability Interface Principles)? Please check all those that apply.	Reliability Principles				
	Does this proposed standard development project support at least one of the following Reliability				
1. Interconnected bulk power systems shall be planned and operated in a coordinated manner	Interface Principles)? Please check all those that apply.				
	ted bulk power systems shall be planned and operated in a coordinated manner				
to perform reliably under normal and abnormal conditions as defined in the NERC Standards	reliably under normal and abnormal conditions as defined in the NERC Standards.				
2. The frequency and voltage of interconnected bulk power systems shall be controlled within	ncy and voltage of interconnected bulk power systems shall be controlled within				
defined limits through the balancing of real and reactive power supply and demand.	its through the balancing of real and reactive power supply and demand.				

<sup>&</sup>lt;sup>2</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

		Reliability Principles
	3.	Information necessary for the planning and operation of interconnected bulk power systems
		shall be made available to those entities responsible for planning and operating the systems
		reliably.
	4.	Plans for emergency operation and system restoration of interconnected bulk power systems
		shall be developed, coordinated, maintained and implemented.
$\square$	5.	Facilities for communication, monitoring and control shall be provided, used and maintained
		for the reliability of interconnected bulk power systems.
	6.	Personnel responsible for planning and operating interconnected bulk power systems shall be
		trained, qualified, and have the responsibility and authority to implement actions.
$\square$	7.	The security of the interconnected bulk power systems shall be assessed, monitored and
		maintained on a wide area basis.
	8.	Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles			
Does the proposed standard development project comply with all of the following Market Interface Principles?			
<ol> <li>A reliability standard shall not give any market participant an unfair competitive advantage.</li> </ol>	(yes/no) Yes		
<ol> <li>A reliability standard shall neither mandate nor prohibit any specific market structure.</li> </ol>	Yes		
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes		
<ol> <li>A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.</li> </ol>	Yes		

Identified Existing or Potential Regional or Interconnection Variances		
Region(s)/	Explanation	
Interconnection		
e.g., NPCC	None	

## For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<ul> <li>Draft SAR reviewed by NERC Staff</li> <li>Draft SAR presented to SC for acceptance</li> <li>DRAFT SAR approved for posting by the SC</li> </ul>	<ul> <li>Final SAR endorsed by the SC</li> <li>SAR assigned a Standards Project by NERC</li> <li>SAR denied or proposed as Guidance document</li> </ul>



### **Version History**

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer