Unofficial Comment Form

Project 2007-17.3 Phase 3 of Protection System Maintenance and Testing (Sudden Pressure Relays)  
Standard Authorization Request for PRC-005-4

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=c4ba3f35d9214a17a46397824de6d3e7) to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by **8 p.m. ET, March 14, 2014.**

If you have questions please contact [Jordan Mallory](mailto:jordan.mallory@nerc.net) via email or by telephone at 404-446-9733.

The project page may be accessed by [clicking here](http://www.nerc.com/pa/Stand/Pages/Project-2007-17_3-Protection-System-Maintenance-and-Testing-Phase-3.aspx).

## Background Information

This posting is soliciting informal comment.

Project 2007-17.3 (PRC-005-4) will address a directive from FERC Order No. 758, which accepted NERC’s proposal to develop a technical document, in lieu of a prescriptive FERC directive, that will provide the following information:

(1)  Describe the devices and functions (to include sudden pressure relays which trip for fault conditions) that should address FERC’s concern; and

(2)  Propose minimum maintenance activities for such devices and maximum maintenance intervals, including the technical basis for each.

In Order No. 758, the Commission accepted NERC’s proposal, by stating as follows:

NERC states that these technical documents will address those protective relays that are necessary for the reliable operation of the Bulk-Power System and will allow for differentiation between protective relays that detect faults from other devices that monitor the health of the individual equipment and are advisory in nature (e.g., oil temperature). Following development of the above-referenced document(s), NERC states that it will "propose a new or revised standard (e.g. PRC-005) using the NERC Reliability Standards development process to include maintenance of such devices, including establishment of minimum maintenance activities and maximum maintenance intervals." Accordingly, NERC proposes to "add this issue to the Reliability Standards issues database for inclusion in the list of issues to address the next time the PRC-005 standard is revised."

The Commission accepts NERC's proposal, and directs NERC to file, within sixty days of publication of this Final Rule, a schedule for informational purposes regarding the development of the technical documents referenced above, including the identification of devices that are designed to sense or take action against any abnormal system condition that will affect reliable operation. NERC shall include in the informational filing a schedule for the development of the changes to the standard that NERC stated it would propose as a result of the above-referenced documents. NERC should update its schedule when it files its annual work plan.

As a follow-up to this Commission ruling, the Planning Committee studied sudden pressure relays and issued a technical report, which recommends moving ahead with a Standard. Specifically, the System Protection and Control Subcommittee (SPCS) completed a technical report recommending that a standard drafting team modify PRC‐005 to explicitly address maintenance and testing of the actuator device of the sudden pressure relay when applied as a protective device that trips a facility described in the applicability section of the Reliability Standard. The Sudden pressure Relays and Other Devices that Respond to Non-Electrical Quantities Technical Report may be accessed by [clicking here](http://www.nerc.com/comm/PC/System%20Protection%20and%20Control%20Subcommittee%20SPCS%2020/SPCS_Order%20758%20Sudden%20Pressure%20Report_Final.pdf). Additionally, the standard drafting team (SDT) intends to consider changes to the standard that provide consistency and alignment with other Reliability Standards. Lastly, the standards drafting team intends to modify the standard to address any directives issued by FERC related to the approval of PRC-005-3, which is pending filing with FERC.

## Questions

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. Do you have any specific questions or comments relating to the scope of the proposed SAR?

Yes

No

Comments:

1. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here.

Yes

No

Comments:

1. If you have any other comments on this SAR that you haven’t already mentioned, please provide them here:

Comments: