Unofficial Comment Form

Project 2007-17.3 Protection System Maintenance and Testing – Phase 3 (Sudden Pressure Relays)

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=7596be655a1c496880ad95026d08551c) to submit comments on the draft PER-005-2 standard. The electronic comment form must be completed by 8:00 p.m. ET on **Friday, June 2, 2014**.

If you have questions please contact Jordan Mallory 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

Project 2007-17.3 (PRC-005-X) 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 the attached 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. 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.

**PRC-005-X Revisions for draft 1:**

The Standard Drafting Team has made several significant revisions to PRC-005-3 in establishing this draft of PRC-005-X.

1. In response to Order 758, the Standard Drafting Team (SDT) added Sudden Pressure Relaying by:
	1. Defining a new term
	2. Modified Protection System Maintenance Program (PSMP) definition to add Sudden Pressure Relaying
	3. Revising the Applicability elements
	4. Adding Table 5 to address minimum maintenance activities and maximum maintenance intervals
	5. Revising the previous Implementation Plan
2. The SDT reconsidered its position on including Balancing Authorities to PRC-005-4; therefore, the SDT:
	1. Added the Balancing Authority to the Applicability
	2. Added a requirement that Balancing Authorities notify their Transmission Owners, Generator Owners, and Distribution Providers of the largest BES generating unit within the Balancing Authority Area.
	3. Revised Requirements R3 and R4 to address the obligations previously expressed in the Implementation Plan regarding initial maintenance of Automatic Reclosing that becomes newly applicable at future times, and removed these elements from the Implementation Plan.
3. The SDT, seeing the concerns of the U.S. Office of Management and Budget and consulting with NERC Compliance Operations, reduced the required Data Retention.
4. The SDT made changes to the Supplementary Reference and FAQ Document to reflect the changes in the Standard.

## Question

1. Do you have any comments regarding the addition of Sudden Pressure Relaying to PRC-005-X?

[ ]  Yes

[ ]  No

Comments:

1. Do you have any comments regarding the addition of Balancing Authority to PRC-005-X?

[ ]  Yes

[ ]  No

Comments:

1. Do you have any comments regarding the change in data retention to PRC-005-X?

[ ]  Yes

[ ]  No

Comments:

1. Do you have any comments regarding the changes made to the Supplementary Reference and FAQ Document to reflect the changes to PRC-005-X?

[ ]  Yes

[ ]  No

Comments:

1. Do you have any additional comments not addressed by one of the previous questions?

[ ]  Yes

[ ]  No

Comments: