Unofficial Comment Form

Project 2008-02.2 Phase 2 UVLS: Misoperations

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the standards. The formal comment period is **open through 8 p.m. Tuesday, April 7, 2015**.

If you have questions, contact Scott Barfield-McGinnis, Standards Developer at [scott.barfield@nerc.net](mailto:scott.barfield@nerc.net?subject=Unofficial%20Comment%20(PRC-026-1)%20Draft%203) or by telephone at 404-446-9689.

[Project 2008-02.2 – Phase 2 Undervoltage Load Shedding: Misoperations](http://www.nerc.com/pa/Stand/Pages/Project-2008-02_2-Phase-2-Undervoltage-Load-Shedding-UVLS-Misoperations.aspx)

**Project Development Background**

The undervoltage load shedding (UVLS) standard drafting team (SDT) was tasked with addressing Misoperation of UVLS equipment during the development of version one of PRC-010 and version three of PRC-004 in Project 2010-05.1 (i.e., Misoperation). This project has been named phase 2 of Project 2008-02 (i.e., UVLS) for clarity purposes. Each SDT for these two projects outlined work necessary to address Misoperation of UVLS equipment. This work was deferred, at the time, because both PRC-010-1 and PRC-004-3 contained dependencies with other projects requiring their completion. This phase two is a continuation of the work performed under the Standards Authorization Request (SAR) for Project 2008-02.

The revisions proposed in Reliability Standard PRC‐010‐2 meet the following objectives:

* Address the UVLS Misoperation the remaining work due to the retirement of PRC-022-1 (*Undervoltage Load Shedding Program Performance*) during the development of PRC-010-1 (*Undervoltage Load Shedding*)
* Ensure UVLS equipment (i.e., operation or non-operation) within the UVLS Program is assessed and mitigated

**Basis for Revision**

Originally, Misoperation of UVLS equipment was planned to be appended to a future version of PRC-004 (*Protection System Misoperation Identification and Correction*). The SDT is proposing a two-prong approach by revising both PRC-004 and PRC-010 to address the concern of identifying Misoperations of UVLS equipment in PRC-022-1.

First, the SDT proposes an addition to the Applicability section of PRC-004 to include UVLS that is intended to trip one or more Bulk Electric System (BES) Elements. This is consistent with previous communication to industry about addressing Misoperation of UVLS equipment.[[1]](#footnote-2) Entities will be required to address UVLS that trips a BES Element similarly to other Protection Systems in PRC-004. While the revision to PRC-004 consistent with the communicated approach, the SDT determined that the proposed revision fails to address the performance (operation or non-operations) of UVLS Program equipment not covered by the strict processes of PRC-004.

Second, the SDT is proposing clarifying revisions in PRC-010-2, Requirements R4 and R5 to address UVLS Program equipment performance. These revisions are not requiring UVLS entities to address UVLS protective relays not covered by the strict processes of PRC-004; however, PRC-010-2 is requiring UVLS entities to address the deficiencies (e.g., Misoperations) identified in the assessment performed by Planning Coordinator or Transmission Planner in Requirement R4. Deficiencies include the performance (operation or non-operation) issues of UVLS Program equipment. These deficiencies, if any, are addressed by the UVLS entities through a Corrective Action Plan (CAP) developed in Requirement R5 and executed by the UVLS entities in Requirement R2 of PRC-010.

The term “Misoperation” as defined by the *Glossary of Terms Used in NERC Reliability Standards* is not used within the Requirements of PRC-010; however, the term is used in the Guidelines and Technical Basis section of the standard to provide clarity that UVLS Program equipment deficiencies include Misoperations that are to be corrected by UVLS entities. The PRC-010-2 Reliability Standard mandates that UVLS entities are to correct the deficiencies identified by the Planning Coordinator or Transmission Planner, such as Misoperation of UVLS equipment. Deficiencies are identified through either the periodic assessment or an assessment performed following an event and included in a CAP to the UVLS entity. The structure used by the SDT allows the Planning Coordinator and Transmission Planner to assess UVLS equipment for Misoperation under PRC-010 rather than the Generator Owner, Transmission Owner, and Distribution Provider applicable to the strict processes of PRC-004.

The two-pronged approach ensures that any UVLS Program equipment containing a deficiency is identified and corrected under PRC-010 and UVLS that trips a BES Element under is corrected under PRC-004 to address the requirements in the retired PRC-022-1.

## Question

1. Do you agree that the Misoperation identification and correction of UVLS equipment as retired by PRC-022-1, Requirements R1 and R1.5 is addressed by the proposed revisions of PRC-004-5 and PRC-010-2? If not, please provide comments and suggestions to improve clarity.

Yes

No

Comments:

1. Refer to Implementation Plan for PRC-010-1 (http://www.nerc.com/pa/stand/Pages/PRC0101RI.aspx) and PRC-010-1 (http://www.nerc.com/pa/Stand/Pages/ReliabilityStandards.aspx), Introduction in the Guidelines and Technical Basis, last paragraph. [↑](#footnote-ref-2)