Please use this form to submit comments on the proposed SAR for Project 2007-17 — Protection System Maintenance and Testing. Comments must be submitted by **July 10, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Protection Maintenance" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Thad K. Ness	
Organization:	American Electric Power (AEP)	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region		**Registered Ballot Body Segment**
☒ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☐	3 — Load-serving Entities
☐ **NPCC**	☐	4 — Transmission-dependent Utilities
☒ **RFC**	☒	5 — Electric Generators
☐ **SERC**	☒	6 — Electricity Brokers, Aggregators, and Marketers
☒ **SPP**	☐	7 — Large Electricity End Users
☐ **WECC**	☐	8 — Small Electricity End Users
☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

This SAR proposes to merge the requirements from the following standards into a single standard to reduce the costs of compliance while also improving efficiencies:

- PRC-005-1 — Transmission and Generation Protection System Maintenance and Testing
- PRC-008-0 — Underfrequency Load Shedding Equipment Maintenance Programs
- PRC-011-0 — UVLS System Maintenance and Testing
- PRC-017-0 — Special Protection System Maintenance and Testing

The SAR also proposes to address the FERC directives in Order 693 and to address a number of technical short comings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the "Standard Review Guidelines." The goal is to provide a set of requirements that will support reliable performance when responding to abnormal system conditions.

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject "Protection Maintenance SAR" by **July 10, 2007**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☐ Yes

   ☒ No

   Comments: AEP has not had an event, due to deficiencies in protection maintenance, in it's long existence that jeopardized the reliability or availability of Bulk Power transfers. Simply combining multiple standards into one, does nothing for improving reliability.

2. Do you agree with the proposed scope of this SAR?

   ☐ Yes

   ☒ No

   Comments: On the surface, the premise of reducing costs and improving efficiencies by combining multiple standards sounds excellent. Having to only keep up with one standard instead of four will not generate significant savings due to the fact that the maintenance will still have to be performed. But what lies hidden, is the fact that prescribed maximum allowable maintenance intervals will result from the revisions. They may require more frequent testing to be performed. Is there evidence that increasing the interval frequency results in a measurable increase in reliability and availability? Development of prescribed maximum intervals that are vastly different than the utility's existing practices may actual increase their O&M costs and reduce efficiencies.

   The function of the protective system needs to be taken into account. The purpose of the line protection is very different than the purpose of UFLS/UVLS and SPS's. The UFLS program is there as the last line of defense against a decaying system after all other measures have failed. The combination of all the different relaying systems places them on equal ground. Shouldn't the reliability and dependablilty for one be more important than the others?

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

Regional Variance: None
Comments: None

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice: Possibly
   Comments: AEP and other utilities, with many years of experience serving customers and supporting the electric grid, have voluntarily integrated maintenance and testing programs into the core of their work practices and processes. AEP fully supports improvements if they truly foster reliability and availability benefits to bulk power transfers. More Standards, Requirements and Business Practices are not always better. If Standards create burdens on a utility's physical resources and budgets, then some mechanism must be available to allow for the needed changes.

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: The standard should not use the term Bulk Electric System, but should instead specify a voltage threshold for impacts to bulk system transfers - specifically; 'Facilites operated 200 kV and above and Regionally-defined, Operationally Significant facilities operated greater than 100 kv, but less than 199 kV'. The term 'affects' also needs to be clarified. Inclusion of all facilities greater than 100 kV does not benefit the reliability of national bulk power transfers. For example, the loss or misoperation of a 138 kV line serving a localized load center would not be detremental to bulk power transfers multiple busses away.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Dean Bender	
Organization:	Bonneville Power Administration	
Telephone:	(360) 418-2040	
E-mail:	dabender@bpa.gov	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☒	3 — Load-serving Entities
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

This SAR proposes to merge the requirements from the following standards into a single standard to reduce the costs of compliance while also improving efficiencies:

- PRC-005-1 — Transmission and Generation Protection System Maintenance and Testing
- PRC-008-0 — Underfrequency Load Shedding Equipment Maintenance Programs
- PRC-011-0 — UVLS System Maintenance and Testing
- PRC-017-0 — Special Protection System Maintenance and Testing

The SAR also proposes to address the FERC directives in Order 693 and to address a number of technical short comings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the "Standard Review Guidelines." The goal is to provide a set of requirements that will support reliable performance when responding to abnormal system conditions.

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject "Protection Maintenance SAR" by **July 10, 2007**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance:
   Comments: No known regional variance

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice:
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: In the "Detailed Description" section of the SAR, it states:
   "Part of the stated purpose in PRC-017 is: "To ensure that maintenance and testing programs are developed and misoperations are analyzed and corrected." The phrase "and misoperations are analyzed and corrected" is not clearly appropriate in a maintenance and testing standard. That is the purpose is more appropriate in PRC-003

and PRC-004, which relate to the analysis and mitigation of protection system misoperations. Analysis of correct operations or misoperations may be an integral part of condition-based maintenance processes, but need not be mandated in a maintenance standard."

The analysis of SPS misoperations is handled in PRC-016 (SPS Misoperations) and PRC 012 (SPS review Procedure) not in PRC-003 or PRC-004. Therefore, if the phrase is removed from PRC-017, it does not need to be added to PRC-003 or PRC-004.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Nancy C. Denton	
Organization:	Consumers Energy Company	
Telephone:	517-788-1310	
E-mail:	ncdenton@cmsenergy.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☐	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance: N/A
   Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice: N/A
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: None.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☐	1 — Transmission Owners
☐ **FRCC**	☒	2 — RTOs and ISOs
☐ **MRO**	☐	3 — Load-serving Entities
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance:
   Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice:
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments:

   1. The IESO commends NERC, the SDT and the SPCTF for providing clarity and for efforts to reduce the costs of compliance.

2 In the Standard PRC-008-0, Generation Owners were not included in the applicable entities. Generation Owners may have underfrequency tripping devices for protection of their units. Hence, it would be appropriate to include these devices for maintenance and testing requirements also.

3. There is need to specify which types of relays will be covered by the new standard. The SAR Team needs to focus on better defining the Generator Protection Schemes ("GPS") that are critical to bulk power system operation, as distinct from generator operation. For example, a single generating unit may experience contingency events that would not result in any significant adverse impacts outside the local area in which the single generating unit is located. As a result, there remains a need to subject those GPSs that are important to the Bulk Power System, such as generator underfrequency trip settings, to the maintenance testing intervals to be derived in these standards.

4. Certain unavoidable delays like the inability to schedule outages for reliability reasons, labor disputes, or force-majeure conditions could affect testing period requirements. These factors should be considered and certain latitude needs to be provided for delays in the testing process.

5. However, the SAR team needs to also consider, as part of its scope, assurance that the asset owner has taken all appropriate steps to ensure that required outages are appropriately planned, can be reasonably accommodated, and approved by the TOP or RC.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☐	1 — Transmission Owners
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Public Service Commission of South Carolina

Lead Contact: Phil Riley

Contact Organization: Public Service Commission of South Carolina

Contact Segment: 9

Contact Telephone: 803-896-5154

Contact E-mail: philip.riley@psc.sc.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of SC	SERC	9
Elizabeth B. "Lib" Fleming	Public Service Commission of SC	SERC	9
G. O'Neal Hamilton	Public Service Commission of SC	SERC	9
John E. "Butch" Howard	Public Service Commission of SC	SERC	9
Randy Mitchell	Public Service Commission of SC	SERC	9
C. Robert "Bob" Moseley	Public Service Commission of SC	SERC	9
David A. Wright	Public Service Commission of SC	SERC	9

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance:
   Comments: N/A

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice:
   Comments: N/A

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: N/A

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Mike Gentry	
Organization:	Salt River Project	
Telephone:	602-236-6408	
E-mail:	Mike.Gentry@srpnet.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance:
   Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice:
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: None.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
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Group Comments (Complete this page if comments are from a group.)

Group Name: SERC EC Protection & Control Subcommittee (PCS)

Lead Contact: Jay Farrington

Contact Organization: Alabama Electric Cooperative, Inc.

Contact Segment: 1

Contact Telephone: (334) 427-3225

Contact E-mail: jay.farrington@powersouth.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Robert Rauschenbach	Ameren	SERC	1
Charlie Fink	Entergy	SERC	1
Jammie Lee	Entergy	SERC	1
Tom Seeley	E.ON-U.S.	SERC	1
Steve Waldrep	Georgia Power Company	SERC	1
Hong-Ming Shuh	Georgia Transmission Corporation	SERC	1
Neal Jones	Georgia Transmission Corporation	SERC	1
Jerry Blackley	Progress Energy Carolinas	SERC	1
Pat Huntley	SERC Reliability Corp.	SERC	10
Marion Frick	South Carolina Electric & Gas Co.	SERC	1
Bridget Coffman	South Carolina Public Service Authority	SERC	1
George Pitts	Tennessee Valley Authority	SERC	1
Meyer Kao	Tennessee Valley Authority	SERC	1
Phil Winston	Georgia Power Company	SERC	1
Ernesto Paon	Municipal Electric Authority of Georgia	SERC	1

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Background Information

This SAR proposes to merge the requirements from the following standards into a single standard to reduce the costs of compliance while also improving efficiencies:

- PRC-005-1 — Transmission and Generation Protection System Maintenance and Testing
- PRC-008-0 — Underfrequency Load Shedding Equipment Maintenance Programs
- PRC-011-0 — UVLS System Maintenance and Testing
- PRC-017-0 — Special Protection System Maintenance and Testing

The SAR also proposes to address the FERC directives in Order 693 and to address a number of technical short comings identified by stakeholders and the System Protection and Control Task Force and to bring the standard into conformance with the "Standard Review Guidelines." The goal is to provide a set of requirements that will support reliable performance when responding to abnormal system conditions.

Please review the SAR and then answer the questions on the following page. Please e-mail your comments on this form to sarcomm@nerc.net with the subject "Protection Maintenance SAR" by **July 10, 2007**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments: Consolidation of the maintenance and testing standards is appropriate. Separate definitions for maintenance and testing are needed.

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance: none
   Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice: none
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: The SERC EC PCS supports the work of the NERC SPCTF in their assessments of these standards.

Comment Form — First Draft of SAR for Project 2007-17 — Protection System Maintenance and Testing

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☒	3 — Load-serving Entities
☐ **NPCC**	☐	4 — Transmission-dependent Utilities
☐ **RFC**	☐	5 — Electric Generators
☒ **SERC**	☐	6 — Electricity Brokers, Aggregators, and Marketers
☐ **SPP**	☐	7 — Large Electricity End Users
☐ **WECC**	☐	8 — Small Electricity End Users
☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Southern Company Transmission

Lead Contact: Roman Carter

Contact Organization: Southern Company Transmission

Contact Segment: 1

Contact Telephone: 205.257.6027

Contact E-mail: jrcarter@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Marc Butts	Southern Co. Transmission	SERC	1
JT Wood	Southern Co. Transmission	SERC	1
Jim Busbin	Southern Co. Transmission	SERC	1
Phil Winston	Georgia Power Co.	SERC	3

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance:
   Comments:

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice:
   Comments:

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: In the SAR you state "The revised PRC-005 standard should address the issues raised in the FERC Order 693". With the exception of mentioning the consolidation of the standards into one standard, the SAR drafting team didn't provide readers with the exact language from FERC that would be useful to know with respect to PRC-005 in the directive below:

The Commission directs the ERO to develop a modification to PRC-005-1 through the Reliability Standards development process that includes a requirement that maintenance and testing of a protection system must be carried out within a maximum allowable interval that is appropriate to the type of the protection system and its impact on the reliability of the Bulk-Power System. We further direct the ERO to consider FirstEnergy's and ISO-NE's suggestion to combine PRC-005-1, PRC-008-0, PRC-011-0 and PRC-017-0 into a single Reliability Standard through the Reliability Standards development process.

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☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Southwest Transmission Cooperative, Inc.

Lead Contact: E. William Riley

Contact Organization: Southwest Transmission Cooperative, Inc.

Contact Segment: 1

Contact Telephone: 520-586-5440

Contact E-mail: briley@swtransco.coop

Additional Member Name	Additional Member Organization	Region*	Segment*
Tom D. Spence, P.E	Southwest Transmission Coop., Inc.	WECC	1

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to improve the requirements in this set of standards?

   ☒ Yes

   ☐ No

   Comments: This SAR proposes to revise several standards to eliminate ambiguities and to provide requirements that are measurable. In addition, the SPCTF report "Assessment of PRC-005-1 – Transmission and Generation Protection System Maintenance and Testing; with implications for PRC-008-0, PRC-011-0, and PRC-017-0" indicates the need to differentiate between the different technologies used and insure the standard applies to all in the appropriate way (i.e. electromechanicals, microprocessor-based, solid-state). Southwest Transmission Cooperative, Inc. also recognizes this deficit in the existing standards.

2. Do you agree with the proposed scope of this SAR?

   ☒ Yes

   ☐ No

   Comments: Since most protection schemes are maintained and tested in a similar manner regardless of scheme type, we agree that combining the (4) PRC standards related to maintenance and testing of different types of systems into one standard will create a that is more streamlined and less burdensome standard with easily understood measurable compliance elements.

   The most exciting part of the proposed modifications is the inclusion of condition-based and performance-based maintenance and testing and not just time-based criteria. Presently Southwest Transmission Cooperative, Inc. uses this type of maintenance and testing criteria (maintenance data server) which is the current system protection industry technology.

3. Do you agree with the applicability of the proposed SAR (Transmission Owners, Generator Owners and Distribution Providers - Distribution Providers may own the devices that must be tested and maintained)?

   ☒ Yes

   ☐ No

   Comments:

4. If you know of a Regional Variance that should be developed as part of this SAR, please identify that for us. If not, please explain in the comment area.

   Regional Variance: N/A

Comments: Not aware of any Regional Variance requirements

5. If you are aware of a Business Practice that needs to be developed to support the proposed SAR, please identify that for us.

   Business Practice: N/A
   Comments: Not aware of any Business Practice needs

6. If you have any other comments on this SAR that you haven't provided above, please provide them here.

   Comments: N/A