A. Introduction

- 1. Title: Analysis and Mitigation of Transmission and Generation Protection System Misoperations
- **2. Number:** PRC-004-1a
- **3. Purpose:** Ensure all transmission and generation Protection System Misoperations affecting the reliability of the Bulk Electric System (BES) are analyzed and mitigated.
- 4. Applicability
 - 4.1. Transmission Owner.
 - **4.2.** Distribution Provider that owns a transmission Protection System.
 - **4.3.** Generator Owner.
- 5. Effective Date: To be determined

B. Requirements

- **R1**. The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for Reliability Standard PRC-003 Requirement 1.
- **R2.** The Generator Owner shall analyze its generator Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1.
- **R3.** The Transmission Owner, any Distribution Provider that owns a transmission Protection System, and the Generator Owner shall each provide to its Regional Reliability Organization, documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Reliability Organization's procedures developed for PRC-003 R1.

C. Measures

- M1. The Transmission Owner, and any Distribution Provider that owns a transmission Protection System shall each have evidence it analyzed its Protection System Misoperations and developed and implemented Corrective Action Plans to avoid future Misoperations of a similar nature according to the Regional Reliability Organization procedures developed for PRC-003 R1.
- M2. The Generator Owner shall have evidence it analyzed its Protection System Misoperations and developed and implemented Corrective Action Plans to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1.
- **M3.** Each Transmission Owner, and any Distribution Provider that owns a transmission Protection System, and each Generator Owner shall have evidence it provided documentation of its Protection System Misoperations, analyses and Corrective Action Plans according to the Regional Reliability Organization procedures developed for PRC-003 R1.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

One calendar year.

1.3. Data Retention

The Transmission Owner, and Distribution Provider that own a transmission Protection System and the Generator Owner that owns a generation Protection System shall each retain data on its Protection System Misoperations and each accompanying Corrective Action Plan until the Corrective Action Plan has been executed or for 12 months, whichever is later.

The Compliance Monitor shall retain any audit data for three years.

1.4. Additional Compliance Information

The Transmission Owner, and any Distribution Provider that owns a transmission Protection System and the Generator Owner shall demonstrate compliance through selfcertification or audit (periodic, as part of targeted monitoring or initiated by complaint or event), as determined by the Compliance Monitor.

2. Levels of Non-Compliance for Transmission Owners and Distribution Providers that own a Transmission Protection System:

- **2.1.** Level 1: Documentation of Misoperations is complete according to PRC-004 R1, but documentation of Corrective Action Plans is incomplete.
- **2.2.** Level 2: Documentation of Misoperations is incomplete according to PRC-004 R1 and documentation of Corrective Action Plans is incomplete.
- **2.3.** Level 3: Documentation of Misoperations is incomplete according to PRC-004 R1 and there are no associated Corrective Action Plans.
- **2.4.** Level 4: Misoperations have not been analyzed and documentation has not been provided to the Regional Reliability Organization according to Requirement 3.

3. Levels of Non-Compliance for Generator Owners

- **3.1. Level 1:** Documentation of Misoperations is complete according to PRC-004 R2, but documentation of Corrective Action Plans is incomplete.
- **3.2.** Level 2: Documentation of Misoperations is incomplete according to PRC-004 R2 and documentation of Corrective Action Plans is incomplete.
- **3.3.** Level 3: Documentation of Misoperations is incomplete according to PRC-004 R2 and there are no associated Corrective Action Plans.
- **3.4.** Level 4: Misoperations have not been analyzed and documentation has not been provided to the Regional Reliability Organization according to R3.

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	December 1, 2005	 Changed incorrect use of certain hyphens (-) to "en dash" (-) and "em dash (-)." Added "periods" to items where appropriate. Changed "Timeframe" to "Time Frame" in item D, 1.2. 	01/20/06
1	February 7, 2006	Adopted by the Board of Trustees	
1a	February 17, 2011	Added Appendix 1 - Interpretation regarding applicability of standard to protection of radially connected transformers	Project 2009-17 interpretation
1a	February 17, 2011	Adopted by the Board of Trustees	
1a	September 26, 2011	FERC Order issued approving the interpretation of R1 and R3 (FERC's Order is effective as of September 26, 2011)	

Appendix 1

Requirement Number and Text of Requirement

- **R1.** The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for Reliability Standard PRC-003 Requirement 1.
- **R3**. The Transmission Owner, any Distribution Provider that owns a transmission Protection System, and the Generator Owner shall each provide to its Regional Reliability Organization, documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Reliability Organization's procedures developed for PRC-003 R1.

Question:

Is protection for a radially-connected transformer protection system energized from the BES considered a transmission Protection System subject to this standard?

Response:

The request for interpretation of PRC-004-1 Requirements R1 and R3 focuses on the applicability of the term "transmission Protection System." The NERC Glossary of Terms Used in Reliability Standards contains a definition of "Protection System" but does not contain a definition of transmission Protection System. In these two standards, use of the phrase transmission Protection System indicates that the requirements using this phrase are applicable to any Protection System that is installed for the purpose of detecting faults on transmission elements (lines, buses, transformers, etc.) identified as being included in the Bulk Electric System (BES) and trips an interrupting device that interrupts current supplied directly from the BES.

A Protection System for a radially connected transformer energized from the BES would be considered a transmission Protection System and subject to these standards only if the protection trips an interrupting device that interrupts current supplied directly from the BES and the transformer is a BES element.