

April 12, 2012

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**RE: Informational Filing in Compliance with Order No. 758 – Interpretation of Protection System Reliability Standard, FERC Docket No. RM10-5-000**

Dear Ms. Bose,

On February 3, 2012, the Federal Energy Regulatory Commission (“FERC” or the “Commission”) issued Order No. 758 approving the North American Electric Reliability Corporation (“NERC”) interpretation of Requirement R1 of Commission-approved Reliability Standard PRC-005-1 — Transmission and Generation Protection System Maintenance and Testing.<sup>1</sup> In addition, the Commission accepted, in part, NERC’s commitments to address the concerns in the Protection System Maintenance and Testing standard that were identified by the Commission’s Notice of Proposed Rulemaking (“NOPR”) dated December 16, 2010<sup>2</sup> within the Reliability Standards development process, and directed NERC to file, within sixty days of publication of the order, a schedule for informational purposes regarding the development of certain technical documents including the identification of devices that are designed to sense or take action against any abnormal system condition that will affect reliable operation.<sup>3</sup> Further, the Commission directed NERC to 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.<sup>4</sup>

This informational filing is submitted in compliance with Order No. 758. On February 25, 2011, NERC filed comments in response to the Commission’s NOPR.<sup>5</sup> In its comments NERC proposed:

<sup>1</sup> *Interpretation of Protection System Reliability Standard*, 138 FERC ¶ 61,094 (2012) (“Order No. 758”).

<sup>2</sup> *Interpretation of Protection System Reliability Standard*, 133 FERC ¶ 61,233 (2010).

<sup>3</sup> Order No. 758 at P 15.

<sup>4</sup> *Id.*

<sup>5</sup> *Interpretation of Protection System Reliability Standard*, Comments of the North American Electric Reliability Corporation, Docket No. RM10-5-000 (February 25, 2011).

to develop, either independently or in association with other technical organizations such as IEEE, one or more technical documents which:

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.<sup>6</sup>

NERC's System Protection and Control Subcommittee ("SPCS") is responsible for the development of the technical documents described above. The SPCS is currently reviewing devices described in step 1 (above) in order to determine the appropriate maintenance procedures for those devices in step 2. Attached (Attachment A) is a schedule for activities related to this Order. NERC intends to proceed in accordance with this schedule.

Sincerely,

*/s/ Andrew M. Dressel*

Andrew M. Dressel

Attorney

*North American Electric Reliability Corporation*

cc: Gerry Cauley, NERC President and Chief Executive Officer  
David Cook, NERC Senior Vice President and General Counsel  
Holly Hawkins, NERC Assistant General Counsel  
Official service lists in Docket No. RM10-5-000

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<sup>6</sup> *Id.* at P 7.

## **ATTACHMENT A**

### **NERC System Protection and Control Subcommittee Tentative Schedule for Activities Related to Paragraph 15 of FERC Order No. 758**

February 2012 – May 2012	Develop a list of devices to be addressed in a subsequent revision of PRC-005 (use the IEEE device list as a reference of possible devices to be considered)  Document devices considered and recommendations for which items are/are not to be included
May 2012 – May 2013	Work with IEEE Power System Relaying Committee and IEEE Transformer Committee regarding minimum maintenance activities and maximum intervals for those devices recommended for inclusion in PRC-005  Review manufacturer’s literature and recommended maintenance practices  Conduct a survey, possibly through the Transmission Forum, of maintenance practices for identified devices
May 2013 – September 2013	Develop a report to NERC Planning Committee
September 2013 – December 2013	NERC Planning Committee review and approval
First Quarter 2014	Submit technical document(s) to NERC Standards Committee

Prepared by the NERC System Protection and Control Subcommittee

March 15, 2012