Unofficial Comment Form

Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS)

PRC-012-2 and Proposed Definition of “Special Protection System”

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on draft 2 of **PRC-012-2 – Remedial Action Schemes** and the **Proposed Definition of “Special Protection System”**. The electronic comment form must be submitted by **8 p.m. Eastern, Friday, January 8, 2016.**

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2010-05_3-Remedial-Action-Schemes_Phase-3-of-Protection-Systems.aspx). If you have questions, contact Standards Developer, Al McMeekin (via email), or at (404) 446-9675.

## Background Information

This project is addressing all aspects of Remedial Action Schemes (RAS) and Special Protection Systems (SPS) contained in the RAS/SPS-related Reliability Standards: PRC-012-1, PRC-013-1, PRC-014-1, PRC-015-1, and PRC-016-1. The maintenance of the Protection System components associated with RAS (PRC-017-1 Remedial Action Scheme Maintenance and Testing) are already addressed in PRC-005. PRC-012-2 addresses the testing of the non-Protection System components associated with RAS/SPS and the overall performance of the RAS.

In FERC Order No. 693 (dated March 16, 2007), the Commission identified PRC-012-0, PRC-013-0, and PRC-014-0 as “fill-in-the-blank” standards and did not approve or remand them. These standards are applicable to the Regional Reliability Organizations (RROs), assigning the RROs the responsibility to establish regional procedures and databases, and to assess and document the operation, coordination, and compliance of RAS/SPS. The deference to regional practices precludes the consistent application of RAS/SPS-related Reliability Standard requirements.

The proposed draft of PRC-012-2 corrects the applicability of the fill-in-the-blank standards by assigning the requirement responsibilities to the specific users, owners, and operators of the Bulk-Power System; and incorporates the reliability objectives of all the RAS/SPS-related standards.

On February 3, 2015, NERC submitted a petition for approval of a revised definition of “Remedial Action Scheme” to add clarity and to ensure proper identification of Remedial Action Schemes and a more consistent application of related Reliability Standards. As explained in the petition, “[t]he defined terms ‘Special Protection System’ and ‘Remedial Action Scheme’ are currently used interchangeably throughout the NERC Regions and in various Reliability Standards, including prior versions of the Proposed Reliability Standards.” Along with this proposed revised definition, NERC submitted revisions to various Reliability Standards by replacing the term “Special Protection System” and replacing it with the newly revised “Remedial Action Scheme.” As NERC stated, “use of only one term in the NERC Reliability Standards will ensure proper identification of these systems and application of related Reliability Standards.” The petition also anticipated future revision to the definition of “Special Protection System” to cross-reference the newly revised and proposed definition of “Remedial Action Scheme.” This coordination, which would be achieved by implementing the new definition of “Special Protection System” simultaneously with the Commission approval of the revised definition for “Remedial Action Scheme,” will ensure that all references to “Special Protection System” and “Remedial Action Scheme” refer to the same revised definition. On June 18, 2015, the Commission issued a Notice of Proposed Rulemaking (“NOPR”) proposing to accept the revisions to the RAS definition and associated standards, and on November 19, 2015, the Commission issued a Final Order approving the RAS definition and associated standards.

**45-day Formal Comment Period**

The drafting team made numerous changes to Reliability Standard PRC-012-2 and its implementation plan based on stakeholder comments from the previous posting. The team appreciates the feedback you provided and considered all of your suggestions. The responses to your comments and a summary of the changes are located in the Consideration of Comments document posted on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2010-05_3-Remedial-Action-Schemes_Phase-3-of-Protection-Systems.aspx). The drafting team is soliciting stakeholder comments and feedback on the second draft of PRC-012-2 and its implementation plan.

Additionally, the drafting team is soliciting comments and feedback on the revised definition of “Special Protection System” and its implementation plan which are posted for an initial ballot.

**Questions**

1. **Limited impact designation:** Within the RAS review process of PRC-012-2, the drafting team included a provision that RAS can be designated as “limited impact” if the RAS cannot, by inadvertent operation or failure to operate, cause or contribute to BES Cascading, uncontrolled separation, angular instability, voltage instability, voltage collapse, or unacceptably damped oscillations. A RAS implemented prior to the effective date of this standard that has been through the regional review process and designated as Type 3 in NPCC, Type 2 in ERCOT, or LAPS in WECC will be recognized as limited impact. When appropriate, new or functionally modified RAS implemented after the effective date of this standard will be designated as limited impact by the Reliability Coordinator during the RAS review process. Do you agree with the provision that RAS can be designated as “limited impact”? If no, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. **Implementation Plan for PRC-012-2:** The drafting team revised the Implementation Plan to provide clarity and to lengthen the implementation period to thirty-six months to provide the responsible entities adequate time to establish the new working frameworks among functional entities. Do you agree with the revised Implementation Plan? If no, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. **Revised Definition of “Special Protection System” and its Implementation Plan:** The drafting team revised the definition of “Special Protection System” to cross-reference the revised definition of “Remedial Action Scheme”. The Implementation Plan for the revised definition of “Special Protection System” aligns with the effective date of the revised definition of “Remedial Action Scheme”. Do you agree with the proposed definition and its implementation plan? If no, please provide the basis for your disagreement and an alternate proposal.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments that you haven’t already provided in response to the above questions, please provide them here.

Comments: