



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Standards Announcement

Successive Formal Comment Period Open

September 13 – October 12, 2010

Now available at:

http://www.nerc.com/filez/standards/Protection_System_Maintenance_Project_2007-17.html

Project 2007-17: Protection System Maintenance and Testing

A formal comment period for the revised definition of “Protection System” is now open **until 8 p.m. Eastern on October 12, 2010.**

This is the fourth draft of the proposed definition. As envisioned, the definition, once approved, will apply to PRC-005-1 approximately twelve months following regulatory approval. The new definition will replace the existing definition of “protection system.” The existing definition has some identified deficiencies that result in a reliability gap, where some protection system owners do not consider components such as battery chargers associated with protective functions as components of a protection system, and do not include the maintenance of these components in their protection system maintenance programs.

Transition from Reliability Standards Development Procedure Version 7 – to Standard Processes Manual

Under the Reliability Standards Development Procedure Version 7, consensus was built with successive formal comment periods, followed by a 30-day pre-ballot review, followed by an initial ballot, and then a recirculation ballot. The intent was to use stakeholder views submitted through the formal comment periods to achieve consensus, and then to confirm that consensus during the balloting. This process did not allow a drafting team to make any changes to a standard (or definition) between ballots, which incented teams to avoid making improvements once a standard (or definition) had gone through an initial ballot. If a team made a change between ballots, then the standard (or definition) was required to be posted for a new comment period and then another pre-ballot review and another initial ballot, and finally if there were no more changes made to the standard (or definition), a recirculation ballot was conducted to confirm consensus.

Under the new Standard Processes Manual, consensus is achieved through parallel comment and ballot periods. Successive comment and ballot periods are conducted until there is consensus – and then a recirculation ballot is conducted to confirm that consensus. There is no 30-day pre-ballot review period, and drafting teams are encouraged to make revisions to the standard between successive ballots to improve the quality of the standard (or definition).

Instructions

Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page:

http://www.nerc.com/filez/standards/Protection_System_Maintenance_Project_2007-17.html

Next Steps

During the last 10 days of the 30-day formal comment period a successive ballot will be conducted for 10 days. All members of the ballot pool must cast a new ballot – the votes and comments from the last ballot will not be carried over. The drafting team will consider all comments (those submitted with a comment form, and those submitted with a ballot) and will determine whether to make additional changes to the definition. The team will post its response to comments and, if the definition has only minor changes, will post the definition and conduct a 10-day recirculation ballot.

Project Background

When the Board of Trustees was asked to approve an interpretation of PRC-005-1 that was written by the Protection System and Maintenance Standard Drafting Team, the board acknowledged the reliability gap identified by the drafting team caused by the definition of "protection system" and directed that work to close this reliability gap should be given "priority." The Standards Committee directed the team to advance the definition of Protection System in parallel with the development of PRC-005-2.

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Standards Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,
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