Unofficial Comment Form

Project 2010-13.3 – Relay Loadability: Stable Power Swings

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=2a2461b06dd34edc8207ac7a04dc264b) to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. Eastern Monday, June 9, 2014.

If you have questions please contact Scott Barfield-McGinnis, Standards Developer via email or by telephone at (404) 446-9689.

The project page may be accessed by clicking [here](http://www.nerc.com/pa/Stand/Pages/Project2010133Phase3of-RelayLoadabilityStablePowerSwings.aspx)

## Background Information

This posting is soliciting formal comment.

This is Phase 3 of a three-phased standard development that is focused on developing a new Reliability Standard, PRC-026-1 – Relay Performance During Stable Power Swings, to address protective relay operations due to stable power swings. The March 18, 2010, FERC Order No. 733, approved Reliability Standard PRC-023-1 – Transmission Relay Loadability. In this Order, FERC directed NERC to address three areas of relay loadability that include modifications to the approved PRC-023-1, development of a new Reliability Standard to address generator protective relay loadability, and a new Reliability Standard to address the operation of protective relays due to stable power swings. This project’s SAR addresses these directives with a three-phased approach to standard development.

Phase 1 focused on making the specific modifications to PRC-023-1 and was completed in the approved Reliability Standard PRC-023-2, which became mandatory on July 1, 2012. Phase 2 focused on developing a new Reliability Standard, PRC-025-1 – Generator Relay Loadability, to address generator protective relay loadability; Phase 2 is currently awaiting regulatory approval. This Phase 3 of the project focuses on developing a new Reliability Standard, PRC-026-1 – Relay Performance During Stable Power Swings, to address protective relay operations due to stable power swings. This Reliability Standard will establish requirements aimed at preventing protective relays from tripping unnecessarily due to stable power swings by requiring the Transmission Owners and Generator Owners to assess the security of protective relay systems that are susceptible to operation during power swings, and take actions to improve security for stable power swings where such actions would not compromise dependable operation for faults and unstable power swings.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

*\*Please use the* [*electronic comment form*](https://www.nerc.net/nercsurvey/Survey.aspx?s=2a2461b06dd34edc8207ac7a04dc264b) *to submit your final comments to NERC.*

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

Please note that the official comment form ***does not*** retain formatting (even if it appears to transfer formatting when you copy from the unofficial Word version of the form into the official electronic comment form). If you enter extra carriage returns, bullets, automated numbering, symbols, bolding, italics, or any other formatting, that formatting will not be retained when you submit your comments.

* Separate discrete comments by idea, e.g., preface with (1), (2), etc.
* Use brackets [] to call attention to suggested inserted or deleted text.
* Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.
* **Do not use** formatting such as extra carriage returns, bullets, automated numbering, bolding, or italics.
* **Please do not repeat other entity’s comments**. Select the appropriate item to support another entity’s comments. An opportunity to enter additional or exception comments will be available.
* If supporting other’s comments, be sure the other party submits comments.

## Questions

1. Do you agree with the focused approach using the criteria (see R1 & R2) which came from recommendations in the PSRPS technical document[[1]](#footnote-2) (pg. 21 of 61)? If not, please explain why or why not (e.g., the approach should be more narrow or more broad, and if so, the basis for a different approach).

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the Planning Coordinator, Reliability Coordinator, and Transmission Planner are the appropriate entities to identify the Elements that meet the criteria in Requirement R1? If not, please explain why an entity is not appropriate and/or suggest an alternative that should identify the Elements according to the criteria.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the Generator Owner and Transmission Owner are the appropriate entities to identify the Elements that meet the criteria in Requirement R2? If not, please explain why an entity is not appropriate and/or suggest an alternative that should identify the Elements according to the criteria.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the approach in Requirement R3 to ensure that load-responsive protective relays do not trip in response to stable power swings during non-Fault conditions for an identified Element? If not, please explain.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed Violation Risk Factors (VRF) and Violation Severity Levels (VSL) for the proposed requirements? If not, please provide a basis for revising a VRF and/or what would improve the clarity of the VSLs.

[ ]  Yes

[ ]  No

Comments:

1. Does PRC-026-1, Application Guidelines and Technical Basis provide sufficient guidance, basis for approach, and examples to support performance of the requirements? If not, please provide specific detail that would improve the Guidelines and Technical Basis.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with implementation period of the proposed standard based on the considerations listed in the Implementation Plan? If not, please provide a justification for changing the proposed implementation period.

[ ]  Yes

[ ]  No

Comments:

1. If you are aware of any conflicts between the proposed standard and any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or agreement please identify the conflict here:

[ ]  Yes

[ ]  No

Comments:

1. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here:

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this Standard that you haven’t already mentioned above, please provide them here:

Comments:

1. NERC System Protection and Control Subcommittee, Protection System Response to Power Swings, August 2013

<http://www.nerc.com/comm/PC/System%20Protection%20and%20Control%20Subcommittee%20SPCS%2020/SPCS%20Power%20Swing%20Report_Final_20131015.pdf> [↑](#footnote-ref-2)