

## Comment Form — Proposed Relay Loadability SAR

This form is to be used to submit comments on the proposed Relay Loadability SAR Standards. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Relay Loadability SAR Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE. IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

**DO:**     **Do** enter text only, with no formatting or styles added.  
           **Do** use punctuation and capitalization as needed (except quotations).  
           **Do** use more than one form if responses do not fit in the spaces provided.  
           **Do** submit any formatted text or markups in a separate WORD file.

**DO NOT:**   **Do not** insert tabs or paragraph returns in any data field.  
               **Do not** use numbering or bullets in any data field.  
               **Do not** use quotation marks in any data field.  
               **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities



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### Background Information:

Protective relays have often contributed to system disturbances including the Northeast Blackout of 1965, and the Blackout of August 14, 2003. During the 2003 blackout, relay loadability was found to have played a pivotal role in accelerating and spreading the early part of the cascade in Ohio and Michigan. Although the U.S.-Canada Power System Outage Task Force focused on the role played by “zone 3” relays, it was later found that other phase-distance and overcurrent relays also contributed to the cascade.

The purpose of the proposed Standard Authorization Request (SAR) is to ensure that protection systems and settings shall not limit transmission loadability, nor contribute to cascading outages. This transmission relay loadability SAR is submitted in response to the NERC Blackout Recommendation 8a, *Improve System Protection to Slow or Limit the Spread of Future Cascading Outages*, as included in the document approved by the NERC Board of Trustees on February 10, 2004.

The available [working paper](#) includes a proposed draft Transmission Relay Loadability Standard that codifies the relay loadability criteria prescribed in the NERC and U.S.-Canada Power System Outage Task Force recommendations on relaying. This working paper was prepared to assist the SAR and/or standards drafting team in the development of the proposed standard.

The requestor would like to receive industry comments on this SAR and to obtain the input of the industry prior to determining the final scope of the SAR. Although a proposed draft is provided in the working paper, *please limit your comments to the subject SAR* realizing there will be future opportunity to comment on any proposed standard. Accordingly, we request your comments be included on this form and emailed with the subject “Relay Loadability SAR Comments” by February 15, 2006 to [sarcomm@nerc.com](mailto:sarcomm@nerc.com)

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**1. Do you agree there is a reliability need for a standard addressing relay loadability?**

**If not, please explain in the comment area.**

Yes

No

Comments: The MRO believes that the Relay Loadability is a serious concern and the NERC System Protection and Control Task Force (SPCTF) is to be commended on developing a good GUIDELINE for determining relay loadability settings. Based on the information contained in the Working Paper on a Proposed Transmission Relay Loadability the MRO has reservations on the appropriateness of the working paper becoming a Reliability Standard. The MRO believes that this issue could be adequately addressed through additions to existing standards to consider relay loadability. The highly prescriptive nature of the working paper is not suitable for a Reliability Standard.

**2. Do you agree with the proposed scope of the SAR?**

**If not, please explain in the comment area.**

Yes

No

Comments: The MRO is disappointed to see marked up version of the SAR posted on the NERC website. SARs should be in their final format prior to being posted.

The MRO questions whether the role of the NERC Reliability Standards is to codify technical solutions. We request that the NERC-SAC clarify this role. Codifying technical solutions seems inconsistent with the intent of standards process which is to focus on WHAT is required to maintain reliability not on how to do it (i.e., technical solutions).

The suggested draft Working Paper on a Proposed Transmission Relay Loadability Standard is a good GUIDELINE for determining relay loadability settings not a Reliability Standard. The draft requirements are overly prescriptive and focus on HOW to set relays not what is required to maintain reliability, i.e., that each Transmission Planner, Planning Authority, Reliability Coordinator, and Transmission Operator should optimize their system's ability to slow or stop an uncontrolled cascading failure of the power system. The MRO believes that this optimization is best addressed through existing standards such as the TPL standards. This provides for a complete and integrated response which Transmission System Protection Owner's (TPSO) can not provide.

**3. Do you agree with the proposed applicability of the SAR?**

**If not, please explain in the comment area.**

Yes

No

Comments: Nothing in the SAR explains why this should apply to the RRO or Distribution Provider.

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4. Are you aware of any commercial considerations that might require a concurrent NAESB action associated with the proposed SAR?

If yes, please explain in the comment area.

Yes

No

Comments:

**5. Should the scope of the proposed SAR include relays associated with generators?**

**Please explain in the comment area.**

Yes

No

Comments: The working paper should not be turned into a Standard.

**6. Are you aware of any regional differences that should be identified as part of the development of the standard?**

**If yes, please explain in the comment area.**

Yes

No

Comments: Without specific information about the content of the standard it is difficult to determine the necessity for Regional Differences.

**7. Do you have any additional comments on this SAR you would like to include?**

**If yes, please elaborate in the comment area.**

Yes

No

Comments: Based on the draft standard that is included as a working paper the MRO would support a SAR of more limited scope if it focused on adding additional language to existing standards such as TPL-004 related to optimizing a system's ability to slow or stop an uncontrolled cascading failure of the power system.