

Compliance Application Notice – 0026

MRO NSRS Comments

05/10/11

CAN-0026 ---- TOP-006 R3 Protection Relays

R3 is not applicable to GOP so they should not be included in the primary interest group.

This CAN provides clarification that the operations personnel of an applicable Registered Entity's area (RC, TOP, BA) must be provided the appropriate technical information concerning the functions of all protective relays within their areas, as well as any other protective relay outside their ownership that may impact that entity. Requirement TOP-006 R3 is also very similar to PRC-001 R1 in requiring familiarity with protection system schemes, and we are concerned with possible overlap.

It is our belief that the CAN goes too far in its clarification. We believe the scope should be limited to the Registered Entity's Functional area only. It is reasonable for the operating personnel to understand the characteristics of relays within its footprint for the protection relays it owns. It is not reasonable to expect them to understand the characteristics of essentially all protective relays in the BES, which is how the CAN could easily be interpreted.

We recommend the following changes to CAN-0026:

- In the **Providing Evidence of Compliance** Section:
 - 1a should be revised to say “the protective relays that are applied in the RC, TOP, or BA's area per the Functional Model requirements.”
- It is also our recommendation that the CAN clarify that the “appropriate technical information” is for the general knowledge and application of the different types of protective relays within the Registered Entity's area and not a detailed knowledge of the individual application of every protective relay within its area.

We believe that with the changes recommended above the intent of the standard is very clear, measurable and reasonable.

It is NSRS's position that NERC should not be using the CAN process to modify the intent of the standard by placing additional compliance burden on Registered Entities.

A strict reading of the requirement only obligates entities to make “appropriate technical information” available to its operating personnel. Entities have no authority or ability to force or require neighboring entities to require their system protection experts to provide “appropriate technical information”. In addition, the NSRS was not able to identify any NERC standard which required this obligation.

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(NOTE: The CAN itself did not reference any NERC requirements to entities to make their system protection experts provide this information.)

The NSRS also wishes to point out that the Standard does not provide any measure which would support the purpose of this CAN's Reliability Objective.

The NSRS believes that the CAN should simply state that entities shall provide appropriate technical information (as defined by that entity) to their operating personnel. A way this can be achieved is by having system protection personnel available to their operating personnel to discuss and provide appropriate technical information.

We believe that with the changes recommended above the intent of the standard is very clear, measurable and reasonable.