

CAN Comment Form

Compliance Application Notice – 0043

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

Name: Joseph DePoorter

Phone Number: 608-252-1581

Email Address: jdepoorter@mge.com

Entity Represented: MRO NSRF represented by: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American Transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region: MRO

Primary Interest Groups

Are you suggesting a change to the groups mentioned? **No**

If yes, explain what change and why:

Issue

Are you suggesting a change to the issue statement of the CAN? **No**

If yes, explain what change and why:

Background

Are you suggesting a change to the background statement of the CAN? **Yes**

If yes, explain what change and why:

There is no section labeled 'Background' on this CAN. The CAN Comment form should be updated.

Compliance Application

Are you suggesting a change to the compliance application section of the CAN? **Yes**

If yes, explain what change and why:

Please add a section for “Evidence of non-Continuous Monitoring”. Foot note 4 states “may be continuously monitored”, it is requested that NERC simply explain what is required for non-continuously monitored equipment.

Under Commissioning Tests the CAN states:

CEAs are to use commissioning test records to verify compliance with PRC-005 R2. These records establish an origin for testing and maintenance intervals (R2.1), as well as the date each Protection System device was last tested and maintained (R2.2).

Commissioning test should be an option as evidence for complying with these Requirements.

CAN-0043 should clearly state that *Commissioning Tests* is but one form of evidence to satisfy R2.1 and R2.2. Please clarify that commissioning test are one form of evidence. The Measure for R2 only states: “...shall have evidence it provided documentation of its associated Protection System maintenance and testing program and the implementation of its program as defined in Requirement 2”.

With the 2012 CMEP breakout of Tier 1 through Tier 3 “risk” related Requirements, NERC should add that entities should use statistical sampling (as stated in NERC’s Sampling Methodology Guidelines and Criteria) as one method to review evidence to reasonable assure continual compliance.

Please note that CAN-0011 and CAN-0043 have possible issues. CAN-0043 duplicates CAN-0011 regarding Commissioning tests. The footnote in CAN-0043 equates Commissioning tests to pre-operational testing.

Then CAN-00 11 States: “As soon as the entity conducts its pre-operational testing, the interval begins for its maintenance and testing program. The completion of the pre-operational testing, not the initiation of the pre-operational testing, is the point in time that the registered entity is aware of the operating condition of the equipment. **Thus the completion date of the pre-operational testing is the date that should be used as the start date for the equipment’s maintenance and testing interval.** As pre-operational testing may occur over a period of time, the CEA is to verify the date that the pre-operational testing was completed for the equipment at issue.”

Please clarify this issue of pre-operational testing.

Historical Evidence as Basis for Testing and Maintenance Intervals and Basis for Time Allowances for Intervals

The requirement for statistical analysis or historical evidence should be removed from the CAN. Most entities will logically use their long experience in maintaining their equipment as the basis for what they test and how often they test it. If these maintenance activities and intervals are reasonably well aligned with manufacture recommendations and standard industry practice as delineated in EPRI surveys or NERC Protection System Maintenance Technical Reference, this should be adequate to establish a basis for their program. Additionally, PRC-004 corrective action plans can result in modification of an entity's maintenance program in the event that maintenance deficiencies are a contributing factor to Protection System Misoperations. The requirement for

entities to provide additional statistical analysis or historical evidence is excessive and does not contribute to reliability. Please clarify what the reliability benefit is for maintaining such historical evidence? Entities can only be held accountable for evidence of actual testing from the 18 June 2007 date of Enforceable Standards.

Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **Yes**

If yes, explain what change and why:

Each CAN should have an associated implementation date. Entities do not have the ability to “flick a switch” and assure that the CAN guidance is incorporated into their processes and procedures upon NERC issuing each CAN.

Evidence of Compliance

Are you suggesting a change to the evidence of compliance mentioned in the CAN? **No**

If yes, explain what change and why: