

Unofficial Comment Form for 4th Draft of PRC-005-2 – Protection System Maintenance [Project 2007-17]

Please **DO NOT** use this form to submit comments on the 4th draft of the standard for Protection System Maintenance and Testing. Comments must be submitted by **May 12, 2011**. If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963.

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

Background Information:

The Protection System Maintenance and Testing Standard Drafting Team (PSMT SDT) has made substantial changes to the fourth posting of PRC-005-2 based on comments received from industry. The changes include:

- Removal of the requirements from the previous draft that addressed calibration tolerances (R1 part 1.5, R4 part 4.2, and the related Measures and VSLs)
- Removed Requirement R2 (which was redundant to Requirement R1 Part 4) and the related Measure and VSL.
- Removed system-connected station auxiliary transformers from the Applicability of the Standard (4.2.5.5)
- Restructured and revised Table 1-4 addressing station dc supply, including removal of requirements relating to “state of charge”.
- Removed the FAQ and incorporated the topics within the Supplementary Reference Document
- Revised the Implementation Plan

The PSMT SDT would like to receive industry comments on this standard.

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

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. The SDT has restructured the Table for Station DC Supply, separating it into six sub-tables individually addressing the various different technologies. Do you agree that the restructured tables provide more clarity? If not, please provide specific suggestions for improvement.

Yes

No

Comments: Yes, however, in the “Supplemental reference and FAQ” document on page 65 this is one area of concern. Page 65, paragraph 4

“... the type of test equipment used to establish the baseline **must** be used for any future trending of the cells internal ohmic measurements because of variances in test equipment and the type of ohmic measurement used by different manufacturer’s equipment.”

While we understand the importance of creating a baseline, it's not feasible to expect the test equipment to be the same as the manufacturer's test equipment or even the same test equipment over the life of the battery. The expected life of a battery may be in excess of **15** years and it is not feasible to expect that the type of test equipment will not change during this period. **We suggest changing the wording to read that consistent test equipment should be used to provide consistent/comparable results.**

2. The SDT has modified the Implementation Periods within the Implementation Plan.. Do you agree with the changes? If not, please provide specific suggestions for improvement.

Yes

No

Comments:

3. The SDT has modified the VSLs, VRFs and Time Horizons with this posting. Do you agree with the changes? If not, please provide specific suggestions for improvement.

Yes

No

Comments:

4. The SDT has incorporated the FAQ document into the "Supplementary Reference" document and has provided the combined document as support for the Requirements within the standard. Do you have any specific suggestions for further improvements?

Yes

No

Comments: N/A

5. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

Comments:

In the checkbox for Requirement R3 please change the wording to read, "Maintenance Correctable Issue - Failure of a component to operate within design parameters such that it cannot be restored to functional order by repair or calibration during performance of the **initiating** on-site activity. Therefore this issue requires follow-up corrective action."