

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Protection System Maintenance
Reliability Standard**

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Docket No. RM15-9-000

**COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

On April 16, 2015, the Federal Energy Regulatory Commission (“FERC” or the “Commission”) issued a Notice of Proposed Rulemaking (“NOPR”)¹ proposing to approve Reliability Standard PRC-005-4 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance), a new definition of Sudden Pressure Relaying, and four revised definitions (Protection System Maintenance Program, Component Type, Component, and Countable Event) submitted by the North American Electric Reliability Corporation (“NERC”) on December 18, 2014.² Proposed Reliability Standard PRC-005-4 requires applicable entities to document and implement programs for the maintenance of certain sudden pressure relays that affect the reliability of the Bulk Electric System.

NERC supports the Commission’s proposal to approve the proposed Reliability Standard, revised and new definitions, and associated implementation plan and VRFs and VSLs, as filed. As stated in the Petition, NERC developed Reliability Standard PRC-005-4 to satisfy concerns raised by the Commission in Order No. 758³ by improving upon the existing protection system

¹ *Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance Reliability Standard*, 151 FERC ¶ 61,026 (2015).

² Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standard PRC-005-4, Docket No. RM15-9-000 (Dec. 18, 2014) (“Petition”).

³ *Interpretation of Protection System Reliability Standard*, Order No. 758, 138 FERC ¶ 61,094 (“Order No. 758”), *order on reh’g*, 139 FERC ¶ 61,227 (2012).

maintenance program developed in PRC-005-2 and PRC-005-3⁴. NERC agrees with the Commission that the proposed Reliability Standard will enhance reliability by requiring applicable entities to include certain sudden pressure relays in the existing protection system maintenance program when these devices are used in a trip application, and by requiring entities to undertake minimum required maintenance activities at maximum defined maintenance intervals. NERC also agrees with the Commission's NOPR proposal to continue to work with FERC to explore misoperations of particular types of non-electrical sensing relays or devices, including devices noted by the Commission in paragraph 17 of the NOPR, to assess the impact of this equipment on the reliable operation of the Bulk-Power System.⁵

NERC looks forward to the Commission's final rule on Reliability Standard PRC-005-4 and respectfully requests that the Commission maintain its proposal to approve this standard as filed.

Respectfully submitted,

/s/ Andrew C. Wills

⁴ NERC notes that, at the time of filing the Petition, the Commission had not yet approved PRC-005-3. Since that date, the Commission has approved revisions to the protection system maintenance program made in PRC-005-3. *Protection System Maintenance Reliability Standard*, Order No. 803, 150 FERC ¶ 61,039 (2015).

⁵ *Id.* at P 17.

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Date: June 19, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 19th day of June, 2015.

/s/ Andrew C. Wills

Andrew C. Wills

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