

Unofficial Comment Form

Project 2021-04 Modifications to PRC-002-2

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2021-04 Modifications to PRC-002-2 Standard Authorization Request (SAR)**. Comments must be submitted by **8 p.m. Eastern, Tuesday, July 13, 2021**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Ben Wu](#) (via email), or at 404-446-9618.

Background Information

Requirement R1, Part 1.2 infers that the notified BES Element owner is required to have FR data without regard to the identified BES bus owner having a connected BES Element for which FR data would be required for an applicable transformer or transmission line. By virtue of this notification, the transformer or transmission line BES Element owner is burdened with an obligation to have FR data and implicitly obligates these transformer or transmission line BES Element owners to either:

1. work with other BES Element (i.e., circuit breaker) owners to provide the data and data recording specification for which the transformer or transmission line owners must rely on for compliance, or
2. the transformer or transmission line BES Element owner must install its own equipment that is duplicative to the identified BES Bus recording equipment.

The goal of the proposed project is to clarify the necessary notifications in Requirement R1, Part 1.2 relative to FR data, and clearly identify the BES Element owners that need to have FR data for transformers and transmission lines with the associated identified bus.

Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

- Yes
 No

Comments:

The NAGF agrees with the proposed scope to clarify the notification and data responsibility requirements in PRC-002 R1 and R3. The BES Elements identified for monitoring should be defined as “a physical bus with breakers connected at the same voltage level within the same physical location sharing a common ground grid” to avoid including BES Elements that are remote to the identified BES bus (e.g. transmission lines and their remote terminal equipment).

Where the intent is to ensure that the SER and FR data is available at the identified buses, the connected BES Elements should be limited to BES Elements local to the identified BES buses and not include transmission lines and their remote breakers.

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments:

PRC-002 R1.2 should be further clarified to reduce needless administrative burden and state that notifications are only required when the Transmission Owner at the local bus needs data from the owner of the connected BES Element. Notifications stating that no data is required are an unnecessary administrative burden for the sender and recipient.

The NAGF notes that the existing PRC-002-2 Rational section regarding R3 states that an FR exception exists for “Generator step-up transformers (GSUs) and leads that connect the GSU transformer(s) to the Transmission System that are used exclusively to export energy directly from a BES generating unit or generating plant”. This needs to be clarified with regard to PRC-002-2 Requirement 1. TOs should be required to send separate SER and FR notifications, taking into account the exception for generator interconnection facilities.