

**Remedial Action Schemes** )  
**Reliability Standard** ) **Docket No. RM16-20-000**

<sup>1</sup> See *Remedial Action Schemes Reliability Standard*, 158 FERC ¶ 61,042 (2017), 82 Fed. Reg. 9702 (Feb. 8, 2017) (“NOPR”).

**I. The ISOs agree that PRC-012-2, as drafted, does not supersede or modify system performance requirements of TPL-001-4.**

In the NOPR, the Commission proposes to clarify that proposed Reliability Standard PRC-012-2 will not modify or supersede any system performance obligations under Reliability Standard TPL-001-4. The Commission seeks comment on this proposal.<sup>2</sup>

The ISOs agree that PRC-012-2 does not supersede or modify the system performance requirements of TPL-001-4 because, under TPL-001-4, responsible entities assume that all RAS operate correctly<sup>3</sup> and they are required to ensure that non-consequential load loss be less than 75 MW when a RAS operates.<sup>4</sup> Thus, neither PRC-012-2 nor a “limited impact” RAS designation affects the system performance requirements of TPL-001-4, including the performance requirement that Non-Consequential Load Loss may not exceed 75 MW for certain Category P1, P2, or P3 contingencies. For this reason, no clarification to the standard is necessary. However, if the Commission determines that some clarification may be helpful, the Commission may wish to confirm in the final rule on PRC-012-2 that, under TPL-001-4, responsible entities can assume that all RAS operate as designed.

Notably, as the Commission states, PRC-012-2 supplements TPL-001-4 and “enhances reliability by addressing all aspects of RAS in a single, continent-wide Reliability Standard and by assigning specific RAS responsibilities to appropriate functional entities.”<sup>5</sup> With respect to limited impact RAS, PRC-012-2 affirms that a “RAS designated as limited impact cannot, by

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<sup>2</sup> NOPR at P 16.

<sup>3</sup> See TPL-001-4, Table 1 – Steady State & Stability Performance Planning Events, P5 “Delayed Fault Clearing due to the failure of a non-redundant relay protecting the Faulted element to operate as designed...” and Footnote 13 “Applies to the following relay functions or types: pilot (#85), distance (#21), differential (#87), current (#50, 51, and 67), voltage (#27 & 59), directional (#32, & 67), and tripping (#86, & 94).”

<sup>4</sup> See TPL-001-4, Footnote 12.

<sup>5</sup> NOPR at 15.

inadvertent operation or failure to operate, cause or contribute to BES Cascading, uncontrolled separation, angular instability, voltage instability, voltage collapse, or unacceptably damped oscillations.”<sup>6</sup> The design and implementation requirements imposed on limited action RAS—including exemption from the single component malfunction analysis otherwise mandated for RAS by PRC-012-2 Requirement 4.1.4—are commensurate with the lesser risk they pose to the BES. In addition, in New England, retrofitting existing limited impact RASs to make them fully redundant would add unnecessary costs to the system without a commensurate increase in system reliability. Further, as described in greater detail in NERC’s Comments on the NOPR, additional regional controls are in place for evaluation of Type III RAS and Local Area Protection Schemes (“LAPS”). The ISOs believe that, combined, these existing regional processes and PRC-012-2 provide an appropriate level of oversight for RAS, including limited impact RAS.

**II. The ISOs do not believe it is necessary to include a definition of “limited impact RAS” in the NERC Glossary of Terms Used in NERC Reliability Standards.**

In the NOPR, the Commission requests comment on whether the term “limited impact RAS” should be defined in the NERC Glossary of Terms Used in NERC Reliability Standards (“NERC Glossary”).<sup>7</sup> The ISOs do not believe a Glossary Revision is necessary at this time. “Limited impact RAS” does not appear elsewhere as a defined term in other Reliability Standards; thus, the additional utility of a NERC Glossary definition is minimal. The performance criteria described in PRC-012-2, Requirement 4.1.3, Footnote 1 provide an

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<sup>6</sup> PRC-012-2, Requirement 4.1.3, Footnote 1.

<sup>7</sup> NOPR at P 17.

adequate level of guidance to fulfill the Planning Coordinator and Reliability Coordinator obligations associated with limited action RAS.

### **III. Conclusion**

The ISOs respectfully request that the Commission consider its comments on proposed Reliability Standard PRC-012-2. Respectfully submitted,

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