

Comment Report

Project Name: 2021-05 Modifications to PRC-023 | Draft 1
Comment Period Start Date: 10/10/2022
Comment Period End Date: 12/5/2022
Associated Ballots: 2021-05 Modifications to PRC-023 PRC-023-6 | Implementation Plan IN 1 OT
2021-05 Modifications to PRC-023 PRC-023-6 IN 1 ST

There were 54 sets of responses, including comments from approximately 142 different people from approximately 97 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree that Reliability Standard PRC-023-4, Requirement R1 “....for all fault conditions...” covers the intent of Requirement R2 so that the Requirement R2 should be retired?**
- 2. Do you agree with the removal of Section 2.3 from Attachment A?**
- 3. Provide any additional comments for the standard drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC 2022	Charles Yeung	SPP	2	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISONE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Greg Campoli	NYISO	1	NPCC
					Elizabeth Davis	PJM	2	RF
Portland General Electric Co.	Daniel Mason	6		Portland General Electric Co.	Brooke Jockin	Portland General Electric Co.	1	WECC
					Adam Menendez	Portland General Electric Co.	3	WECC
					Ryan Olson	Portland General Electric Co.	5	WECC
					Daniel Mason	Portland General Electric Co.	6	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Amber Skillern	East Kentucky Power Cooperative	1	SERC

					Ryan Strom	Buckeye Power, Inc.	5	RF
					Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Patricia Ireland	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Public Utility District No. 1 of Chelan County	Meaghan Connell	5		PUD No. 1 of Chelan County	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Diane Landry	Public Utility District No. 1 of Chelan County	1	WECC
					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
					Meaghan Connell	Public Utility District No. 1 Chelan County	5	WECC
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC

					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					James Mearns	Pacific Gas and Electric Company	5	WECC
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
NPCC	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					John Hastings	National Grid	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
Quintin Lee	Eversource Energy	1	NPCC					

Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
Dan Kopin	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Michael Jones	National Grid	3	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC

					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	3		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC

				Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
				Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
				John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
				Tony Gott	KAMO Electric Cooperative	3	SERC
				Micah Breedlove	KAMO Electric Cooperative	1	SERC
				Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
				Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
				Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
				Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
				Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. Do you agree that Reliability Standard PRC-023-4, Requirement R1 “....for all fault conditions...” covers the intent of Requirement R2 so that the Requirement R2 should be retired?

Brian Lindsey - Entergy - 1

Answer No

Document Name

Comment

Agree that R2 is unnecessary but it is not the same as R1. R1 does not preclude out-of-stop blocking outside the 150% load region. R2 does. Therefore, they are not the same.

Likes 0

Dislikes 0

Response

Michael Brytowski - Great River Energy - 3

Answer No

Document Name

Comment

These comments were submitted incorrectly. Please ignore.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the retirement of Requirement R2 since the "... for all fault conditions..." in Requirement R1 covers the intent of R2.

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer Yes

Document Name

Comment

I agree that retirement R2 should be retired as R1 already covers the intent of R2.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy agrees that R1 covers the intent of R2 and therefore agrees with the retirement of R2

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Yes

Document Name

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

The requirement R2 and the attachment A 2.3 cause interpretation confusion and the proposal to remove both from the requirements would allow the normal functioning of the OOSB relays during power swing conditions

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer	Yes
Document Name	
Comment	
Portland General Electric Company supports the comments provided by EEI.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	

Comment

EEl agrees that the language in R1 that states that “for all fault conditions” is sufficient to cover the intent of Requirement R2, so that R2 can be retired.

Likes 0

Dislikes 0

Response**Alison MacKellar - Constellation - 5****Answer**

Yes

Document Name**Comment**

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer

Yes

Document Name**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.

Likes 0

Dislikes 0

Response**Randall Buswell - VELCO -Vermont Electric Power Company, Inc. - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - John Daho

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Loiacano - Arkansas Electric Cooperative Corporation - 1 - MRO,SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Do you agree with the removal of Section 2.3 from Attachment A?

Michael Brytowski - Great River Energy - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Constellation has no additional comments.
Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EEl supports the removal of Section 2.3 from Attachment A.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by EEl

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer Yes

Document Name

Comment

Portland General Electric Company supports the comments provided by EEI.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

The requirement R2 and the attachment A 2.3 cause interpretation confusion and the proposal to remove both from the requirements would allow the normal functioning of the OOSB relays during power swing conditions

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy agrees with the removal of Section 2.3 from Attachment A.	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes

Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the removal of Attachment A, Section 2.3 exclusion since it is related to Requirement R2 which is being retired.	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Yes

Document Name

Comment

No Comments

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Lindsey Mannion - ReliabilityFirst - 10****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Thomas Foltz - AEP - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Loiacano - Arkansas Electric Cooperative Corporation - 1 - MRO,SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - John Daho****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Randall Buswell - VELCO -Vermont Electric Power Company, Inc. - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

3. Provide any additional comments for the standard drafting team to consider, if desired.

Brian Lindsey - Entergy - 1

Answer

Document Name

Comment

No comments

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI's additional comment.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI's additional comments.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E wishes to thank the Standard Drafting Team (SDT) for their efforts on the modification work and has no additional comments.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Document Name

Comment

Consider comments provided by EEI.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer

Document Name

Comment

nothing further at this time

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Marc Sedor - Seminole Electric Cooperative, Inc. - 3

Answer

Document Name

Comment

Regarding the deletion of Requirement R2 if deleted from this PRC standard, it should be added to another PRC standard where the SDT may opine on its insertion subject to review by stakeholders before finalization of deletion from this Standard.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Document Name

Comment

- Section D1.2 (Data Retention): 1st paragraph, sentence should end with a period instead of a semi-colon.
- Please consider updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete.
- Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

No additional comments

Likes 0

Dislikes 0

Response

Josh Combs - Black Hills Corporation - 3

Answer

Document Name

Comment

1. Black Hills Corporation (BHP) agrees with EEI's additional comment.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

FirstEnergy supports EEI's comments which states:

Under Section B. (Associated Documents) the following document is Referenced: "Determination and Application of Practical Relaying Loadability Ratings," Version 1.0, June 2008." However, the hyperlink appears to be broken and the associated document has not been included in the documents to be reviewed by the industry, except for Appendix C. While Appendix C a portion of this document that is of greatest concern, the entire document should be revised, updated and attached for industry review.

The Compliance Section of PRC-023-6 does not appear to conform to the latest approved language that is to be used in new or revised Reliability Standards. Please update this section to conform to the current Compliance language for NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer

Document Name

Comment

- Section C1.2 (Data Retention): 1st paragraph, sentence should end with a period instead of a semi-colon.
- Please consider updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete.
- Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan.
- Section "Regional Variances" and "Associated Documents" should be sections D. and E. and not A. and B. as seen in the clean version. (Redlines are ok)

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI's additional comment.

Likes 0

Dislikes 0

Response

Darcy O'Connell - California ISO - 2

Answer

Document Name

Comment

CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE recommends using NERC Glossary terms where appropriate or defining terms that are not clearly defined in the NERC Glossary. For example, criteria numbers 8 and 9 under Requirement R1 use the term “highest operator established emergency transformer rating”, and criterion number 9 also uses the term “maximum applicable nameplate rating”. Neither of these terms exist in the NERC Glossary, though the terms Emergency Rating and Rating do exist in the NERC Glossary.

In Section C 1.2, Texas RE noticed the use of the term Data Retention. It appears that other proposed standards are using the term Evidence Retention as in proposed Reliability Standards CIP-012-2, VAR-002-5, MOD-026-2, IRO-010-5, and TOP-003-6.

Texas RE noticed that Section C 1.3 Compliance Monitoring and Enforcement Processes differs from Section C1.3 in other currently proposed standards, where it describes the Compliance Monitoring and Enforcement Program. Is this the SDT’s intent?

Texas RE has the following comments on Attachment B:

- The first bullet in “Circuits to evaluate” needs a space between “200” and “kv”
- Criteria B1 does not mention the ERCOT Interconnection. Is this the SDT’s intent?
- The footer page numbers need corrected (“Page 17 of 16”)
- Since Criterion B3 is referring to NUC-001, is “Transmission Entity” referring to Transmission Entity as described in section A 4 of NUC-001-4?

In the Implementation Plan, under Time Period to Address New Designations, correct “pursyant” to “pursuant”.

It is unclear what the “applicable effective date” is referencing since, presumably, a “New Designation” under PRC-023-6 would only occur after the effective date of PRC-023-6.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer

Document Name

Comment

Portland General Electric Company supports the comments provided by EEI.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Document Name

Comment

Exelon supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

Document Name

Comment

Exelon supports the comments submitted by EEI

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

EEI offers the following additional input for SDT consideration:

Under Section B. (Associated Documents) the following document is Referenced: "Determination and Application of Practical Relaying Loadability Ratings," Version 1.0, June 2008." However, the hyperlink appears to be broken and the associated document has not been included in the documents to be reviewed by the industry, except for Appendix C. While Appendix C a portion of this document that is of greatest concern, the entire document should be revised, updated and attached for industry review.

The Compliance Section of PRC-023-6 does not appear to conform to the latest approved language that is to be used in new or revised Reliability Standards. Please update this section to conform to the current Compliance language for NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer	
Document Name	
Comment	
<p>Change Data Retention Section 1.2 to:</p> <p>The Transmission Owner, Generator Owner, and Distribution Provider shall each retain documentation to demonstrate compliance with Requirements R1 through R5 since the last audit period.</p> <p>Section D1.2 (Data Retention): In 1st paragraph, the sentence should end with a period instead of a semi-colon.</p> <p>Please consider updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete.</p> <p>Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan.</p>	
Likes	0
Dislikes	0
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO	
Answer	
Document Name	
Comment	
<p>SPP recommend that the drafting team revise the current/future comment form to reflect the appropriate standard version so, it aligns with documentation posted to the NERC page. For example, the one stop shop details for PRC-023-4 shows that this standard became effective on April 1, 2017 with an inactive date of March 31, 2024. However, PRC-023-5 will becomes effective April 1, 2024. Our interpretation is that all proposed changes would be associated with PRC-023-5 instead of PRC-023-4 in which the background information and the comment form suggests on the project page. Additionally, the redline document suggests that PRC-023-5 is the appropriated document to be mentioned in the background information. From our perspective, this creates confusion on which document is being used to support the drafting teams efforts.</p> <p>Additionally, SPP recommends the drafting team further develop the physical document for the Technical Rationale associated with the PRC-023-6 Standard by including rationale for the legacy requirements. The link located in the "Associated Documents" sections of both PRC-023-5 (Project 2015-09) and PRC-023-6 (proposed) appears to not work properly to grant access to this data, which will create issues for industry. Moreover, there was a NERC project conducted to remove all Technical Rationale and Guidelines and Technical Basis from the back of all standards and put into structured independent formatted documentation. From our perspective, a link in the Associated Documents section of the standard in place of a separate Technical Rationale document doesn't align with NERCs intent for drafting teams and their development of quality independent documentation. The</p>	

proposed Technical Rationale document for PRC-023-6 should be updated to include the information that is associated with the link described above to be consistent with the current template for standards.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022

Answer

Document Name

Comment

The IRC SRC supports improvements to clarify requirements on how Out-of-Step Blocking protection schemes should work. The proposed changes will provide more certainty in how these schemes will perform to reduce exposure to islanding. We do ask NERC to consider the implementation schedule and need for these changes in the context of the numerous other standards being developed and anticipated to be adopted. As described in the Technical Rationale, situations where OOSB relays may have not been correctly coordinated have seen little direct impact on system reliability. If this initial ballot fails and industry needs to expend more resources to review changes to reach consensus, we ask NERC to consider the immediacy of these changes relative to other risks where PRC requirements revisions are needed. Industry protection schemes expertise should be focused on the greatest reliability threats.

Likes 0

Dislikes 0

Response