

Name (12 Responses)
Organization (12 Responses)
Group Name (12 Responses)
Lead Contact (12 Responses)
Contact Organization (12 Responses)
IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (1 Responses)
Comments (24 Responses)
Question 1 (21 Responses)
Question 1 Comments (23 Responses)
Question 2 (20 Responses)
Question 2 Comments (23 Responses)
Question 3 (21 Responses)
Question 3 Comments (23 Responses)
Question 4 (0 Responses)
Question 4 Comments (23 Responses)

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| Dominion |
| Louis Slade |
| NERC Compliance Policy |
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| No |
| The SAR goes beyond the directive in that it appears to indicate that all reclosing relays must operate properly in order to maintain BES reliability. The fact is that, in a majority of applications, these relays exist primarily to decrease outage times. The SAR should be limited to only those reclosing relays whose failure to operate correctly could adversely impact reliable operation of the BES. Dominion therefore recommends revising the sentence that reads "The Applicability section of the Standard must be modified to describe explicitly those devices that entities are to maintain in accordance with the revised standard." To read "The Applicability section of the Standard must be modified to describe explicitly those reclosing relays that entities are to maintain in accordance with the revised standard." |
| No |
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| No |
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| Having reviewed, and generally agree with, the technical study performed jointly by the NERC System Analysis and Modeling Subcommittee (SAMS) and System Protection and Control Subcommittee (SPCS) and subsequently approved by the NERC Planning Committee. We therefore support the OPTIONAL approach shown near the bottom of the SAR as we believe would revise the standard in a way that applies new requirements only to those elements of |

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| the protection system where reclosing is applied it been demonstrated to that an adverse impact on the BES could occur if those element(s) are not included in one or more reliability standard requirements. |
| Duke Energy |
| Colby Bellville |
| Duke Energy |
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| Yes |
| However we are concerned that the SAR includes possible revision of the definition of Protection System. We don't believe attempting to revise that definition is necessary or advisable. |
| No |
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| No |
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| The SAR includes statements under "Goals" and "Detailed Description" that the defined term Protection System might be revised as part of this project. Those statements should be removed from the SAR. We strongly believe that the issue of maintenance and testing of any reclosing relays which can affect reliable operation of the BES, can be addressed without attempting to modify the definition of Protection System. |
| Nazra Gladu |
| Manitoba Hydro |
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| Yes |
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| No |
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| No |
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| (1) Brief Description of Proposed Standard Modifications/Actions - for completeness, add '(BES)' after Bulk Electric System. (2) Need - capitalize 'misoperation' because it appears in the Glossary of Terms. (3) Need - remove the words "Bulk Electric System" to leave only the acronym, BES because this is the second instance of BES in the document. |
| John Bee |
| Exelon and its Affiliates |
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| Yes |
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| No |

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| Yes |
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| FirstEnergy |
| Larry Raczkowski |
| FirstEnergy Corp |
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| Yes |
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| No |
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| No |
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| FE supports the referenced SAR as stated. |
| Bill Fowler |
| City of Tallahassee |
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| Yes |
| |
| No |
| |
| No |
| |
| None |
| PacifiCorp |
| Ryan Millard |
| PacifiCorp |
| |
| Yes |
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| No |
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| No |
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| Chris Mattson |

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| Tacoma Power |
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| Yes |
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| No |
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| No |
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| Thomas Foltz |
| American Electric Power |
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| No |
| AEP supports the efforts of the drafting team, but is concerned by pursuing a version 3 of this standard before the second version has been approved by FERC. There is significant content within version 3 that was new to version 2, so proper implementation of version 3 would rely on the eventual approval of version 2 in its entirety. The content of version 3 has apparently been drafted with this in mind, however, it over-complicates the implementation plan of version 3 by basing it in-part on the previous and not-yet-approved version, and leaving it vulnerable in the event version 2 does not pass. In addition, it is not clear exactly which sort of automatic reclosing behavior(s) the proposed changes are attempting to prevent. Accidental reclosing? Failure to reclose? Providing clarity on this fundamental question will help industry in providing sound comments and feedback regarding PRC-005-3. |
| No |
| AEP is not aware of any regional variances that would be needed as a result of this project. |
| Yes |
| AEP believes that it is likely that some of its business practices would need to at least be modified as a result of this project |
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| Pepco Holdings Inc & Affiliates |
| David Thorne |
| Pepco Holdings Inc |
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| Yes |
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| No |
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| No |
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| Brad Harris |
| CenterPoint Energy |
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| Yes |
| Business practices will be needed to: 1. Document and monitor the generating plant capacity at all Company owned generation interconnection facilities 2. Document and monitor the largest generating unit located in the Balancing Authority 3. Document and monitor the Company owned stations meeting the Applicability attributes described in 4.2.6 of PRC-005-3. |
| Page 2, Paragraph 2 of the "Need" section of the SAR includes a parenthetical "(installed to meet performance goals of approved NERC Standards)". Recommend deleting this parenthetical statement as the SAMS/SPCS paper concluded on page 2 that "SAMS and SPCS have not identified an application in which auto reclosing is used in coordination with a protection system to meet the system performance requirements in a NERC Reliability Standard or in establishing an IROL". |
| Kenn Backholm |
| Public Utility District No.1 of Snohomish County |
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| Yes |
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| No |
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| No |
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| The Public Utility District No.1 of Snohomish County has reviewed and supports this Standard Authorization Request and concluded that the revisions and modifications do not seem impractical or technically unreasonable. |
| SPP Standards Review Group |
| Robert Rhodes |
| Southwest Power Pool |
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| Yes |
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| No |
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| No |
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| None |
| Andrew Z. Puztai |
| American Transmission Company |
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| Yes |
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| No |
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| No |
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| Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing |
| Marcus Pelt |
| Southern Company Operations Compliance |
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| Yes |
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| No |
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| No |
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| It seems out of order to be posting a draft SAR for informal comment at the same time that the revised standard which is the topic of the SAR is posted for a formal comment period. Further, FERC has not approved PRC-005-2 yet. Any changes required by FERC would affect the draft of PRC-005-3. The proposed standard modification seems premature given that PRC-005-3 SAR is still in draft that PRC-005-2 is not yet approved. |
| Anthony Jablonski |
| ReliabilityFirst |
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| No |
| No, the scope of the SAR only lists three bullet items. It should as a minimum include a lead in sentence similar to the following: PRC-005-2 has been revised to include the maintenance and testing of reclosing relays that can affect the reliable operation of the Bulk Power System. The bullet items do not include the changes made to the Definitions of Terms, Requirements or Compliance sections. |
| No |
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| No |
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| Can the SDT clarify whether high-speed automatic reclosing is covered within the scope of the SAR? |
| Tennessee Valley Authority |
| Brandy Spraker |
| Transmission Reliability Engineering and Controls |
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| 1. Are reclosing relays considered "protective relays"? 2. Are reclosing relays considered part of the "protective system"? 3. Is Table 1-3 applicable to CCVTs that feed only reclosing relays? 4. Does a "reclosing relay" include all relays used to perform all type of automatic reclosing actions, i.e. sync check, dead line, dead bus, and blind reclosing? |
| Kevin Luke |
| Georgia Transmission Corporation |
| Agree |
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| Florida Municipal Power Agency |
| Frank Gaffney |
| Florida Municipal Power Agency |
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| Yes |
| |
| No |
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| Yes |
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| Jonathan Meyer |
| Idaho Power Company |
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| Yes |
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| No |
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| No |

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| ACES Standards Collaborators |
| Jason Marshall |
| ACES |
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| Yes |
| (1) While we agree the SAR addresses the regulatory directive, we question the value of modifying this standard further when the newest version has yet to be approved. If FERC issues significant directives, the directives could ultimately impact the direction that drafting team should take with modifying the standard to include reclosing relays. Furthermore, because PRC-005 is historically one of the most violated standards primarily because of the zero-defect approach to compliance, we question the value of adding another relay type to the list of relays subject to zero-defect compliance. We are concerned there will be another step function in potential violations that do not ultimately support reliability but detract from reliability because they are focused on documentation. (2) We believe that there are other equally-effective options to address the FERC directives, such as issuing an industry guidance document. If the standard ultimately needs to be modified, a guidance document could allow the drafting team to wait until FERC rules on the PRC-005 to determine if there will be any impacts on adding reclosing relays to the standard. |
| No |
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| No |
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| (1) We understand that NERC is obligated by law to address all FERC directives issued to them. However, not all FERC directives require the development or revision of a reliability standard. FERC has been clear that other alternatives may be used as long as they are equally effective and efficient. NERC and the drafting team need to consider other alternatives that would produce an equally effective method of ensuring that auto-reclosing relays will be maintained and tested. The drafting team should consider a survey of all registered entities subject to the current PRC-005 standard to see if they include auto-reclosers in their PSMT program. This issue goes back to compliance – whether the entity needs to maintain documentation for each of these devices. A guidance document may be an appropriate solution to handle this FERC directive. (2) Thank you for the opportunity to comment. |
| Northeast Power Coordinating Council |
| Guy Zito |
| Northeast Power Coordinating Council |
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| Yes |
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| Scott Langston |
| City of Tallahassee |
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| Yes |
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| No |
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| No |
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| None |
| Bonneville Power Administration |
| Jamison Dye |
| Transmission Reliability Program |
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| Yes |
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| No |
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| No |
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