

Consideration of Comments

Project 2010-13.2 – Phase II Relay Loadability SAR for PRC-023-3

The Project 2010-13.2 Drafting Team thanks all commenters who submitted comments on the Standard Authorization Request (SAR) for PRC-023-3. The supplemental SAR was posted for a 45-day public comment period from January 25, 2013 through March 11, 2013. Stakeholders were asked to provide feedback on the SAR and associated documents through a special electronic comment form. There were 20 sets of comments, including comments from approximately 89 different people from approximately 54 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Summary Consideration

There were no changes to the posted supplemental SAR in response to comments. Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1.

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

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6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here: 33

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Brandy Spraker	Tennessee Valley Authority	X		X		X	X					
Additional Member Additional Organization Region Segment Selection														
1.	Marjorie Parsons		SERC	6										
2.	Tom Vandervort		SERC	5										
3.	Annette Dudley		SERC	5										
4.	Paul Palmer		SERC	5										
5.	Lee Thomas		SERC	5										
6.	Daniel McNeely		SERC	1										
7.	Wayne Talley		SERC	1										
2.	Group	Guy Zito	Northeast Power Coordinating Council											X
Additional Member Additional Organization Region Segment Selection														
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10										
2.	Carmen Agavriloi	Independent Electricity System Operator	NPCC	2										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
3.	Greg Campoli	New York Independent System Operator	NPCC	2																
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1																
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
8.	Kathleen Goodman	ISO - New England	NPCC	2																
9.	Michael Jones	National Grid	NPCC	1																
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1																
11.	Christina Koncz	PSEG Power LLC	NPCC	5																
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9																
13.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																
14.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
15.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
16.	Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
17.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																
18.	Brian Robinson	Utility Services	NPCC	8																
19.	Brian Shanahan	National Grid	NPCC	1																
20.	Wayne Sipperly	New York Power Authority	NPCC	5																
21.	Bruce Metruck	New York Power Authority	NPCC	6																
22.	Donald Weaver	New Brunswick System Operator	NPCC	2																
23.	Ben Wu	Orange and Rockland Utilities	NPCC	1																
24.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																
3.	Group	Brenda Hampton	Luminant										X							
Additional Member		Additional Organization		Region Segment Selection																
1.	Rick Terrill	Luminant Generation Company LLC	ERCOT	5																
4.	Group	Jonathan Hayes	Southwest Power Pool Standards Development Team		X	X	X	X	X	X										
Additional Member		Additional Organization		Region Segment Selection																
1.	Jonathan Hayes	Southwest Power Pool	SPP	NA																

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																		
			1	2	3	4	5	6	7	8	9	10									
2.	Robert Rhodes	Southwest Power Pool	SPP	NA																	
3.	John Allen	City Utilities of Springfield	SPP	1, 4																	
4.	Chandler Brown	Sunflower Electric	SPP	1																	
5.	Anthony Cassmeyer	Western Farmers Electric Cooperative	SPP	1, 3, 5																	
6.	Gary Condict	Sunflower Electric	SPP	1																	
7.	Karl Diekevers	NPPD	MRO	1, 3, 5																	
8.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6																	
9.	Valerie Pinamonti	AEP	SPP	1, 3, 5																	
10.	Paul Reynolds	Sunflower Electric	SPP	1																	
11.	Jerry White	Cleco	SPP	1, 3, 5																	
12.	Don Schmit	NPPD	MRO	1, 3, 5																	
13.	Paul Von Hersenberg	Westar Energy	SPP	1, 3, 5, 6																	
14.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6																	
15.	Lynn Schroeder	Westar Energy	SPP	1, 3, 5, 6																	
5.	Group	Ben Engelby	ACES Standards Collaborators									X									
Additional Member		Additional Organization		Region		Segment		Selection													
1.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1																	
2.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6																	
3.	Tom Alban	Buckeye Power, Inc.	RFC	3, 4																	
4.	Mark Ringhausen	Old Dominion Electric Cooperative	SERC	3, 4																	
5.	Chris Bradley	Big Rivers Electric Corporation	SERC																		
6.	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1																	
6.	Group	Mike Garton	Dominion			X		X		X	X										
Additional Member		Additional Organization		Region		Segment		Selection													
1.	Louis Slade	Dominion Resources Services, Inc.	RFC	5, 6																	
2.	Randi Heise	Dominion Resources Services, Inc.	MRO	5, 6																	
3.	Connie Lowe	Dominion Resources Services, Inc.	NPCC	5, 6																	
4.	Michael Crowley	Virginia Electric and Power Company	SERC	1, 3, 5, 6																	
7.	Group	Stephen J. Berger	PPL Corporation NERC Registered Affiliates			X		X	X		X										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment												
			1	2	3	4	5	6	7	8	9	10			
Additional Member		Additional Organization	Region	Segment Selection											
1.	Brenda L. Truhe	PPL Electric Utilities Corporation	RFC	1											
2.	Brent Ingebrigtson	LG&E and KU Services Company	SERC	3											
3.	Annette M. Bannon	PPL Generation, LLC on behalf of its Supply NERC Registered Entities	RFC	5											
4.			WECC	5											
5.	Elizabeth A. Davis	PPL EnergyPlus, LLC	MRO	6											
6.			NPCC	6											
7.			SERC	6											
8.			SPP	6											
9.			RFC	6											
10.			WECC	6											
8.	Group	David Greene	SERC Protection and Controls Subcommittee												
Additional Member		Additional Organization	Region	Segment Selection											
1.	Paul Nauert	Ameren													
2.	Bridget Coffman	Santee Cooper													
3.	Steve Edwards	Dominion													
4.	Russ Evans	SCE&G													
5.	John Miller	Georga Transmission													
6.	Phil Winston	Southern Co													
7.	David Greene	SERC													
9.	Group	Jamison Dye	Bonneville Power Administration		X		X		X	X					
Additional Member		Additional Organization	Region	Segment Selection											
1.	Dean Bender	Technical Svcs	WECC	1											
10.	Individual	Bob Steiger	Salt River Project		X		X		X	X					
11.	Individual	Ryan Millard	PacifiCorp		X		X		X	X					
12.	Individual	Oliver Burke	Entergy Services, Inc. (Transmission)		X										

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
13.	Individual	Thad Ness	American Electric Power	X		X		X	X				
14.	Individual	Ed Croft	Puget Sound Energy	X		X		X					
15.	Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X				
16.	Individual	Michael Falvo	Independent Electricity System Operator		X								
17.	Individual	Timothy Brown	Idaho Power Co.	X									
18.	Individual	Dale Fredrickson	Wisconsin Electric Power Company			X	X	X					
19.	Individual	Travis Metcalfe	Tacoma Power	X		X	X	X	X				
20.	Individual	Bradley Collard	Oncor Electric Delivery LLC	X									

1. Do you agree with this scope? If not, please explain.

Summary Consideration:

Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1.

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	No	<p>The Industry Need statement, as written, implies that the burden of the overlap between PRC-023-3 and PRC-025-1 rests with the Generator Owner as the owner of the protection for the elements that connect the generator to the transmission system. The intent of the drafting teams for PRC-023-3 and PRC-025-1 is to segregate the standards so that load-responsive relays used for generator protection are in one standard (PRC-025-1) and load-responsive relays used to protect transmission are in another (PRC-023-3).</p> <p>The Applicability section of PRC 025-1 refers to generator interconnected Facilities which can be construed to mean Generator Owners are responsible for this protection and the terminals at each end. There are Transmission Owners that own protection assets on some, if not all of the terminals for a generator’s interconnection. Terminal responsibility needs clarification. The wording places emphasis on asset ownership.</p>

Response: The drafting team thanks you for your comments. Responsibility is placed on the owner of load-responsive protective relays. The Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the

Organization	Yes or No	Question 1 Comment
		<p>Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>
<p>ACES Standards Collaborators</p>	<p>No</p>	<p>(1) In order to have a clear “bright line,” the generator owner should not apply to PRC-023. Remove all reference to GO from PRC-023, and then the SAR will satisfy the intent of avoiding double jeopardy.</p>
		<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>
<p>Dominion</p>	<p>No</p>	<p>Dominion believes the Industry Need as indicated in the SAR could be better stated. We believe the intent of the drafting teams for PRC-023 and PRC-025 is to segregate the standards so that load-responsive relays used for generator protection are in one standard (PRC-025) and load-responsive relays used to protect the bulk power system (Transmission as defined in the NERC Glossary; An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is</p>

Organization	Yes or No	Question 1 Comment
		<p>transformed for delivery to customers or is delivered to other electric systems.) are in another (PRC-023).</p> <p>The SAR as written appears to infer that, in all cases, the GO owns the protection system that contains the load-responsive relays that protect Transmission (as defined in the NERC Glossary) from faults that occur on the element(s) that make up the Facility used to connect the generator to Transmission.</p> <p>PRC 025 refers to generator interconnected Facilities (ie generator leads..some refer to this as GSU leads) which implies Generator Owners are responsible for this protection and the terminals at each end. There are TOs that own “lead” assets either on both ends or possibly one end of the leads. This is an area that needs further clarification when referring to terminal responsibility. Appears now that wording places emphasis on asset ownership?</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
PPL Corporation NERC Registered Affiliates	No	The PPL Companies do not agree that addition of the phrase includes the specificity needed to ensure “double jeopardy” for generation. As stated by the North American Generators Forum standards review

Organization	Yes or No	Question 1 Comment
		<p>team:</p> <p>Load-responsive protective relays installed on the high side terminals of the Generator Step-up transformer looking towards the Transmission system appear to be clearly in scope for PRC-23-3 but are not clearly excluded from being applicable to PRC-025-1.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Bonneville Power Administration	No	<p>The difference between “applied to circuits defined in 4.2.1” and “applied at the terminals of the circuits defined in 4.2.1” is not clear. If there is any difference, it is subtle, and probably not worth revising PRC-023-2 for. The bigger problem is that transmission lines over 200kV that attach generating facilities to the BES seem to be covered by both PRC-023 and PRC-025. PRC-025 applies to Generation interconnection Facilities, but there is no definition of this term. It seems that a 230kV line that connects a GSU transformer to a substation would be considered to be a Generation interconnection facility, and subject to both standards. Therefore, there are two very different requirements that apply to the relays on such a line. A definition of Generator interconnection Facilities is needed, and clarification of which standard the example given above would be covered by is needed.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Manitoba Hydro	No	<p>(1) Similar to PRC-025, the phrase “while maintaining reliable protection of the BES” is vague. There are no objective criteria specified for this determination, nor is it clear whether this element will be audited in some fashion. If this element of the requirement cannot be audited, it should be deleted. At a minimum, it should specify that the Responsible Entity makes this determination in its sole discretion.</p>
<p>Response: The drafting team agrees. The term, “while maintaining reliable fault protection” describes that the responsible entity is to comply with this standard while achieving their desired protection goals. This phrase is already approved language in PRC-023-2. No change made.</p>		
Wisconsin Electric Power Company	No	<p>Adding this phrase does little to remove the confusion as to applicability to Generator Owners.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. No change made.</p>		
Tacoma Power	No	<p>The phrase “at the terminals of the” does not seem to mitigate the</p>

Organization	Yes or No	Question 1 Comment
		<p>potential overlap between PRC-023 and PRC-025. Should not the distinction be drawn for generation interconnection Facility(ies)? In other words, it seems that transmission lines only connecting generation would be subject to PRC-025-1 and that transmission lines that are part of the more interconnected transmission system would be subject to PRC-023-3. If the Generator Relay Loadability Standard Drafting Team disagrees, additional clarification is requested as to how the phrase “at the terminals of the” mitigates the potential overlap.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Tennessee Valley Authority	Yes	
Luminant	Yes	
Southwest Power Pool Standards Development Team	Yes	
SERC Protection and Controls Subcommittee	Yes	

Organization	Yes or No	Question 1 Comment
PacifiCorp	Yes	
Salt River Project	Yes	
Entergy Services, Inc. (Transmission)	Yes	
American Electric Power	Yes	
Puget Sound Energy	Yes	
Independent Electricity System Operator	Yes	
Idaho Power Co.	Yes	
Oncor Electric Delivery LLC		Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Response: The drafting team thanks you for your participation.		

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

Summary Consideration:

Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1. Typographical errors raised in comments were addressed.

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	The Reliability Functions table has the Planning Coordinator checked. The Planning Coordinator by definition in the NERC Functional Model is “The functional entity that coordinates, facilitates, integrates and evaluates (generally one year and beyond) transmission facility and service plans, and resource plans within a Planning Coordinator area and coordinates those plans with adjoining Planning Coordinator areas.” The Planning coordinator does not get involved with generator and transmission relay loadability.
<p>Response: The drafting team thanks you for your comments. PRC-023-3, Requirement R6 assigns the responsibility to the Planning Coordinator. No change made.</p>		
ACES Standards Collaborators	No	(1) The purpose of the revised SAR is to remove the applicability of GOs for PRC-023-2. Therefore, we recommend unselecting the Generator Owner box in the supplemental SAR, as the revised standard would not apply to GOs.
<p>Response: The drafting team thanks you for your comments. Generator Owner has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. No change made.</p>		

Organization	Yes or No	Question 2 Comment
Dominion	No	Under 4.1.2 PRC 023-2 needs to be changed to PRC023-3.
<p>Response: The drafting team thanks you for your comments and has corrected the typographical error in the proposed PRC-023-3. Correction made in the proposed PRC-023-3 standard.</p>		
Bonneville Power Administration	No	<p>BPA believes there needs to be a clearer delineation between generator facilities and transmission facilities and PRC-023 and PRC-025 written so that there is no overlap between the two. Then the applicability of both PRC-023 and PRC-025 can be easily applied to the owners of the facilities covered by that standard, whether they are registered as a GO, TO, or DP. As PRC-025 is proposed, it only applies to GO's, but what if a TO owns the relays applied to a GSU transformer? These relays would presently not be covered by either PRC-023 or PRC-025.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Puget Sound Energy	No	<p>Possibly the GO (section 4.1.2) should be taken out. This function is covered in PRC-025. Taking the GO function out of PRC-023 (and any accompanying items) would further strengthen the brightline between PRC-023-3 and PRC-025-1.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of</p>		

Organization	Yes or No	Question 2 Comment
<p>network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Wisconsin Electric Power Company	No	The applicability of this standard should be removed from the Generator Owner.
<p>Response: The drafting team thanks you for your comments. Generator Owner has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. No change made.</p>		
Manitoba Hydro	Yes	No comment.
Tennessee Valley Authority	Yes	
Luminant	Yes	
Southwest Power Pool Standards Development Team	Yes	
PPL Corporation NERC Registered Affiliates	Yes	
SERC Protection and Controls Subcommittee	Yes	

Organization	Yes or No	Question 2 Comment
PacifiCorp	Yes	
Salt River Project	Yes	
Entergy Services, Inc. (Transmission)	Yes	
American Electric Power	Yes	
Independent Electricity System Operator	Yes	
Idaho Power Co.	Yes	
Tacoma Power	Yes	
Oncor Electric Delivery LLC		Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Response: The drafting team thanks you for your participation.		

3. Do the proposed changes in the draft PRC-023-3 – Transmission Relay Loadability create the necessary bright line between the draft PRC-025-1 – Generator Relay Loadability create the bright line between the two standards? If no, please explain what would make the bright line clearer.

Summary Consideration:

Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1. Typographical errors raised in comments were addressed.

Organization	Yes or No	Question 3 Comment
Tennessee Valley Authority	No	Though the line could be derived from reading the purpose of the standard, it may help avoid potential confusion to the generator owners by specifically excluding generator step-up units from 4.2.1.6 or the second bullet of Attachment B.
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Northeast Power Coordinating Council	No	The draft SAR and proposed standards PRC-023-3, PRC-025-1 fail to provide a clear distinction as to whether the standard is meant to apply to the owner of a protection system designed to protect transmission elements (which we believe is

Organization	Yes or No	Question 3 Comment
		<p>the intent of PRC-023-3), or the owner of a protection system designed to protect generation elements (which we believe is the intent of PRC-025-1). We believe this was the intent, but the applicability section of either of the proposed standards does not clearly articulate that intent.</p> <p>Suggest the SDT consider an approach similar to that used in PRC-006-1 where the SDT chose to create a ‘standard specific entity’; UFLS entities.</p> <p>Alternatively, the applicability could be modified to more closely match the intent indicated in the Applicability section of the Guideline and Technical Basis document, and in the wording of the Supplemental SAR for Project 2010-13.2 Relay Loadability Order 733 Phase 2 (Relay Loadability: Generation). The standard should be applied to the owner of the particular type of protection system, not applied to a particular function.</p> <p>We are aware of circumstances whereby an entity registered as Transmission Owner owns the protection system that protects for faults on the element(s) owned by an entity registered as a Generator Owner which are solely used to interconnect their generator to the bulk power system.</p> <p>We are also aware of circumstances whereby the Generator Owner owns both the element(s) which are solely used to interconnect their generator to the bulk power system as well as the protection system that protects for faults on those generator interconnection element(s).</p> <p>In both of these, the protection system is designed to protect the bulk power system from the fault, not the generator itself. Changes to proposed PRC 023-2 and PRC 025-1 attempt to establish a bright line, but the functional entity of Generator Owners is still included in PRC 023-3. This results in confusion as to what standard applies for the elements that connect the generator to the BES, as some Transmission Owners own GSU assets. The wording of PRC-025-1, and as</p>

Organization	Yes or No	Question 3 Comment
		stated in the Webinar, imply that “leads assets” will fall under PRC-025-1. There is still confusion in this area so a bright line still has not been established.
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Southwest Power Pool Standards Development Team	No	While we agree that the revision to PRC023-2 creates a bright line we feel that language should be included in PRC-25-1 to clearly state that the protection relays under PRC023-2 ,or -3 if the SAR is approved, would be not be applicable under PRC025-1.
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
ACES Standards Collaborators	No	See comments above. There should not be any references to generators in the transmission loadability standard.

Organization	Yes or No	Question 3 Comment
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
<p>Dominion</p>	<p>No</p>	<p>The draft SAR and proposed standards PRC-023-3, PRC-025-1 fail to provide a clear distinction as to whether the standard is meant to apply to the owner of a protection system designed to protect transmission elements (which we believe is the intent of PRC-023) or the owner of a protection system designed to protect generation elements (which we believe is the intent of PRC-025). We believe this was the intent of the SDT but we don't believe the applicability section of either of the proposed standards clearly articulates that intent.</p> <p>We suggest the SDT consider an approach similar to that used in PRC-006-1 where the SDT chose to create a 'standard specific entity'; UFLS entities.</p> <p>Alternatively, the applicability could be modified to more closely match the intent as indicated in the Applicability section of the Guideline and Technical Basis document and the Supplemental SAR for Project 2010-13.2 Relay Loadability Order 733 Phase 2 (Relay Loadability: Generation). We believe the standard should be applied to the owner of the particular type of protection system, not applied to a particular function.</p> <p>We are aware of circumstances whereby an entity registered as TO owns the protection system that protects for faults on the element(s) owned by an entity registered as a GO which are solely used to interconnect their generator to the</p>

Organization	Yes or No	Question 3 Comment
		<p>bulk power system.</p> <p>We are also aware of circumstances whereby the GO owns both the element(s) which are solely used to interconnect their generator to the bulk power system as well as the protection system that protects for faults on those generator interconnection element(s).</p> <p>In both of these, the protection system is designed to protect the bulk power system from the fault, not the generator itself. Changes to proposed PRC 023-2 and PRC 025-1 attempts to establish a bright line but the functional entity of Generator Owners is still included in PRC 023 so this results in confusion as to what standard applies for the elements that connect the generator to the BES as some Transmission Owners own GSU assets but the new standard and as stated on the Webinar it implies that “leads assets” will fall under PRC 025. There is still confusion in this area so a bright line still has not been established.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Bonneville Power Administration	No	<p>As described in comments 1 and 2, BPA believes there needs to be a definition of “Generator interconnection Facilities” if this term will be used in PRC-025. There needs to be a clear separation between facilities included in PRC-023 and those included in PRC-025, with no overlap.</p>

Organization	Yes or No	Question 3 Comment
		<p>The most likely place for this separation would be at the high-voltage terminal of the GSU transformer, with the GSU and everything between it and the generators included in PRC-025, and the line connecting the GSU to the BES included in PRC-023.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
American Electric Power	No	<p>AEP believes that the proposed changes in the draft PRC-023-3 create a bright line identifying the scope of PRC-023-3.</p> <p>However, the proposed draft of PRC-025-1 does not create a bright line identifying the scope of PRC-025-1. Load-responsive protective relays installed on the high side terminals of the Generator Step-Up transformer looking towards the Transmission system are clearly in scope for PRC-023-3 but are not clearly excluded from being applicable from PRC-025-1.</p> <p>AEP recommends including in PRC-025-1 verbiage clearly excluding load-responsive protective relays applicable to PRC-023-3 from PRC-025-1.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator</p>		

Organization	Yes or No	Question 3 Comment
<p>interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Puget Sound Energy	No	see answer to question 2
<p>Response: The drafting team thanks you for your comments; please refer to the above response(s) in question 2.</p>		
Manitoba Hydro	No	<p>(1) In section 4.1.1, 4.1.2 and 4.1.3, the redlined part “at the terminals of” should be changed to “at the Transmission Owner terminals of”, “at the generator owner terminals of” and “at the Distribution Owner terminals of”. Also, PRC-023-2 in section 4.1.2 should be changed to PRC-023-3.</p>
<p>Response: The drafting team has included additional explanation in the PRC-025-1 Guidelines and Technical Basis document and made several changes to both drafts of PRC-023-3 and PRC-025-1 to address these concerns and has corrected the typographical error from version -2 to version -3. Correction made to the proposed PRC-023-3 standard.</p>		
Wisconsin Electric Power Company	No	<p>Any requirements applicable to the Generator Owner should be in a single standard, PRC-025-1. When this standard is approved, Generator Owners that employ load-sensitive relaying on the high-voltage side of the generator step-up transformer, between the GSU and the interconnection with the Transmission system, will be subject to the PRC-025-1 requirements in 3.2.4 for Generator interconnection Facilities, and at that time the PRC-023 standard should have all applicability to Generator Owners removed.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective</p>		

Organization	Yes or No	Question 3 Comment
<p>relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Tacoma Power	No	<p>The phrase “at the terminals of the” does not seem to mitigate the potential overlap between PRC-023 and PRC-025. Should not the distinction be drawn for generation interconnection Facility(ies)? In other words, it seems that transmission lines only connecting generation would be subject to PRC-025-1 and that transmission lines that are part of the more interconnected transmission system would be subject to PRC-023-3. If the Generator Relay Loadability Standard Drafting Team disagrees, additional clarification is requested as to how the phrase “at the terminals of the” mitigates the potential overlap.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
PPL Corporation NERC Registered Affiliates	No	
Luminant	Yes	

Organization	Yes or No	Question 3 Comment
SERC Protection and Controls Subcommittee	Yes	
PacifiCorp	Yes	
Salt River Project	Yes	
Entergy Services, Inc. (Transmission)	Yes	
Independent Electricity System Operator	Yes	
Idaho Power Co.	Yes	
Oncor Electric Delivery LLC		Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Response: The drafting team thanks you for your participation.		

4. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance.

Summary Consideration:

No regional variances were identified.

Organization	Yes or No	Question 4 Comment
Manitoba Hydro	No	No comment.
Tennessee Valley Authority	No	
Northeast Power Coordinating Council	No	
Luminant	No	
Southwest Power Pool Standards Development Team	No	
ACES Standards Collaborators	No	
Dominion	No	
PPL Corporation NERC Registered Affiliates	No	
SERC Protection and Controls Subcommittee	No	

Organization	Yes or No	Question 4 Comment
Bonneville Power Administration	No	
PacifiCorp	No	
Salt River Project	No	
Entergy Services, Inc. (Transmission)	No	
American Electric Power	No	
Puget Sound Energy	No	
Independent Electricity System Operator	No	
Idaho Power Co.	No	
Wisconsin Electric Power Company	No	
Tacoma Power	No	
Oncor Electric Delivery LLC		Oncor is not registered as a Generator Owner, nor does it perform the functions of a Generator Owner. Thus, this question is not applicable to Oncor.
Response: The drafting team thanks you for your participation.		

5. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice.

Summary Consideration:

Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1. Typographical errors raised in comments were addressed including the re-inserting the Implementation Plan for the proposed PRC-023-3.

Organization	Yes or No	Question 5 Comment
SERC Protection and Controls Subcommittee	No	There may be owner issues that impact entity registration.
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2 PRC-023-3 standard.</p>		
Manitoba Hydro	No	No comment.
Idaho Power Co.	No	There will obviously be additional work to perform the analysis needed to be compliant with the standard. The only business practice that will need to be modified is to perform this analysis for any new or modified generators or

Organization	Yes or No	Question 5 Comment
		generator protective relays to ensure compliance.
Response: The drafting team thanks you for your comment.		
Tennessee Valley Authority	No	
Northeast Power Coordinating Council	No	
Luminant	No	
Southwest Power Pool Standards Development Team	No	
ACES Standards Collaborators	No	
Dominion	No	
PPL Corporation NERC Registered Affiliates	No	
Bonneville Power Administration	No	
PacifiCorp	No	
Salt River Project	No	
American Electric Power	No	

Organization	Yes or No	Question 5 Comment
Puget Sound Energy	No	
Independent Electricity System Operator	No	
Wisconsin Electric Power Company	No	
Tacoma Power	No	
Entergy Services, Inc. (Transmission)	Yes	Elimination of the table under number 5 of section A in PRC-023-2.
<p>Response: The drafting team thanks you for your comments and has re-inserted the Implementation Plan information under the proposed draft 2 of the PRC-023-3 standard, Section A, Item 5. Change made to the Implementation Plan.</p>		
Oncor Electric Delivery LLC		No Comment

6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Summary Consideration:

Commenters were unclear about the division of responsibilities between the Generator Owner and Transmission Owner. Changes were made to both standards to address these concerns. Please refer to the summary changes to the proposed draft 2 of PRC-023-3 in the Consideration of Comments for draft 2 of PRC-025-1. Typographical errors raised in comments were addressed including the re-inserting the Implementation Plan for the proposed PRC-023-3.

Organization	Yes or No	Question 6 Comment
SERC Protection and Controls Subcommittee		<p>- It needs to be clear that 'at the terminals' does not imply ownership. Entities may be responsible for protective relays on each end of the leads but may be in facilities where one end is owned by a TO and the other end facility is owned by a GO.</p> <p>Response: The drafting team agrees and the proposed PRC-023-3 standard makes this distinction clear. No change made.</p> <p>- The removal of the "Effective Dates" table needs to be reexamined. Among other things, this table included the timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they've been identified by the Planning Coordinator. This is an oversight that will cause confusion.</p> <p>Response: The drafting team thanks you for your comments and has re-inserted the implementation plan information under the proposed draft 2 of the PRC-023-3</p>

Organization	Yes or No	Question 6 Comment
		<p>standard, Section A, Item 5. Change made to the proposed PRC-023-3 Implementation Plan.</p> <p>The comments expressed herein (Questions 1-6) represent a consensus of the views of the above-named members of the SERC EC Protection and Control Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.</p>
<p>Response: The drafting team thanks you for your comments; please refer to the above response(s).</p>		
<p>ACES Standards Collaborators</p>		<p>(1) We disagree with including GOs as an applicable entity to PRC-023-2. In order to create a “bright line,” the drafting teams should have separate standards. Have PRC-023 apply to transmission and have PRC-025 apply to generators. It is a simple dividing line. If the team feels that any of the loadability criteria from the transmission loadability standard should be included in PRC-025, then do so, but do not leave any reference to GOs in PRC-023.</p> <p>(2) With the proposed PRC-023-3, there is overlap for GOs. The GO is listed in all six requirements in PRC-023 and in R1 of PRC-025. We recommend removing all references to GOs in PRC-023. If this cannot be accomplished, then update PRC-023-3 to include the aspects of PRC-025 and stop developing a duplicative standard.</p>
<p>Response: The drafting team thanks you for your comments. Generator Owner function has been retained in the Applicability of PRC-023-3 to address configurations where the Generator Owner owns load-responsive protective relays on the terminals of network transmission lines. In cases where the Distribution Provider or Transmission Owner owns load-responsive protective relays on the terminals of generator interconnection Facilities such as a generator step-up (GSU) transformer or generator interconnection Facility, the proposed draft 2 of PRC-023-3 Applicability has been revised to address Facilities the Distribution Provider or Transmission Owner may own relative to generating plants. The proposed draft 2 of the PRC-023-3 standard provides the criteria that the Distribution Provider or Transmission Owner shall use to set load-responsive protective relays. Change made to the proposed draft 2</p>		

Organization	Yes or No	Question 6 Comment
PRC-023-3 standard.		
American Electric Power		AEP believes there is a typo in PRC-023-3 Section 4.1.2. The statement references PRC-023-2 instead of the current standard revision.
<p>Response: The drafting team thanks you for your comment and has corrected the typographical error from version -2 to version -3. Correction made to the proposed PRC-023-3 standard.</p>		
Entergy Services, Inc. (Transmission)		<p>Comments to NERC on Proposed PRC-023-3 Standard</p> <p>It is understood that PRC-023-3 is intended to replace PRC-023-1 and PRC-023-2 in the near future. The changes proposed for PRC-023-3 in comparison with PRC-023-2 are mainly the removal of the table under number 5 of section A. The table being removed provides the effective dates of the requirements in the PRC-023-2 standard corresponding to the applicable Functional Entities and circuits. Entergy has concerns over the removal of the table as explained below.</p> <p>Our specific area of concern is on the effective date of PRC-023-3 which is defined in the standard as the “first day of the first calendar quarter beyond the date that this standard is approved by applicable regulatory authorities”. (See the bottom of page 1 of the proposed PRC-023-3 standard.)</p> <p>In the Implementation Plan for the proposed PRC-023-3 standard, it is stated that entities applicable to this standard shall be 100% compliant on the effective date of the standard. (See the last line on page 2 of the Implementation Plan.)</p> <p>In other words, the Implementation Plan considers a specific implementation period as not required based on the following two reasons. (See section General Considerations at the bottom of page 1 of the Implementation Plan.)</p> <ol style="list-style-type: none"> 1. No new entity or facilities are subject to compliance.

Organization	Yes or No	Question 6 Comment
		<p>2. The implementation plan and period for PRC-023-2 will have been achieved. Entergy sees some scenarios that do not agree with either or both of the above reasons. In such scenarios, the PRC-023-3 effective date and Implementation Plan become problematic.</p> <p>In short, PRC-023-3 proposes to retroactively eliminate the NERC-defined implementation time for ongoing PRC-023-2 compliance activities. A couple of scenarios are provided below for illustration purposes.</p> <p>The first scenario is related to the effective date of requirements R6 and R1 of PRC-023-2. PRC-023-2 became effective in the United States on July 1, 2012. (See the Background section on page 1 of the Implementation Plan for PRC-023-3.) However, PRC-023-2 gives various effective dates that are to be phased in over the period of more than four years. According to the table on pages 2-4 of the PRC-023-2 standard, R6 will become effective on 1/1/2014. For circuits identified by the Planning Coordinator pursuant to Requirement R6, R1 is to be effective 39 months following notification by the Planning Coordinator of their inclusion on a list of circuits subject to PRC-023-2 per application of Attachment B. It means that the applicable entity is given 39 months to develop and implement a plan to bring the applicable circuits to compliance. Therefore, the compliance date can be as late as 4/1/2017 or beyond depending on when the Planning Coordinator will send out its notification on applicable circuits.</p> <p>If PRC-023-3 becomes effective before such date, it will be problematic. For reference, the relevant effective dates for R6 and R1 as specified in PRC-023-2 (Please review Effective Dates as provided in table for NERC Standard PRC-023-2). The second scenario is about new circuits identified by Planning Coordinator during its assessments that are required to be conducted at least once each calendar year pursuant to R6 of PRC-023-3. (See the middle of page 4 of the PRC-023-3 standard.)</p> <p>When new circuits are identified as the result of the yearly assessment, applicable</p>

Organization	Yes or No	Question 6 Comment
		<p>entities will need reasonable amount of time to bring the circuit to compliance. This time period is necessary for budget reasons as well as project planning and construction reasons. While both PRC-023-1 and PRC-023-2 recognize such a need, the proposed standard PRC-023-3 does not. (See section 5.1.3 on page 1 of PRC-023-1 and effective date table on pages 2-4 of PRC-023-2.)</p> <p>Entergy suggests that a 39 months long period of time be given to applicable entities to comply with the PRC-023-3 standard for each facility that is added to the Planning Coordinator’s list. Please review the referenced NERC standard documents.</p> <ol style="list-style-type: none"> 1) NERC Standard PRC-023-1 2) NERC Standard PRC-023-2 3) NERC Proposed Standard PRC-023-3 (clean) 4) NERC PRC-023-3 Implementation Plan
<p>Response: The drafting team thanks you for your comments and has re-inserted the implementation plan information under the proposed draft 2 of the PRC-023-3 standard, Section A, Item 5. Change made to the proposed PRC-023-3 Implementation Plan.</p>		
Dominion		<p>It needs to be clear that at the terminals does not imply ownership. Entities may be responsible for protective relays on each end of the leads but may be in facilities where one end is owned by a TO and the other end facility is owned by a GO.</p> <p>Response: The drafting team agrees and the proposed PRC-023-3 standard makes this distinction clear. No change made.</p> <p>-The removal of the “Effective Dates” table needs to be reexamined. Among other things, this table included the timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications</p>

Organization	Yes or No	Question 6 Comment
		<p>before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they've been identified by the Planning Coordinator. This is an oversight that will cause confusion.</p> <p>Response: The drafting team thanks you for your comments and has re-inserted the implementation plan information under the proposed draft 2 of the PRC-023-3 standard, Section A, Item 5. Change made to the propose PRC-023-3 Implementation Plan.</p>
<p>Response: The drafting team thanks you for your comments; please refer to the above response(s).</p>		
<p>Northeast Power Coordinating Council</p>		<p>It needs to be made clear that owning the protection systems at the terminals does not imply ownership of the facility. Entities may be responsible for protective relays on each end of a "lead", but the leads but may be in facilities where one end is owned by a Transmission Owner, and the other end facility is owned by a Generator Owner.</p> <p>Response: The drafting team agrees and the proposed PRC-023-3 standard makes this distinction clear. No change made.</p> <p>The removal of the "Effective Dates" table needs to be re-examined. Among other things, this table included the timelines for meeting PRC-023 on sub-200kV Facilities. If a sub-200kV Facility is identified by the Planning Coordinator, pursuant to Requirement R6, Transmission Owners, Generator Owners, and Distribution Providers must be given a grace period in which to make protection modifications before PRC-023 is applicable to that Facility. PRC-023-2 included a 39-month window for modifying these Facilities once they've been identified by the Planning Coordinator. This is an oversight that will cause confusion.</p> <p>Response: The drafting team thanks you for your comments and has re-inserted the implementation plan information under the proposed draft 2 of the PRC-023-3</p>

Organization	Yes or No	Question 6 Comment
		<p>standard, Section A, Item 5. Change made to the proposed PRC-023-3 Implementation Plan.</p> <p>In PRC-023-3, in 4.1.2 PRC 023-2 needs to be changed to PRC-023-3.</p> <p>Response: The drafting team thanks you for your comment and has corrected the typographical error from version -2 to version -3. Correction made to the proposed PRC-023-3 standard.</p>
<p>Response: The drafting team thanks you for your comments; please refer to the above response(s).</p>		
Salt River Project		No Comment
Manitoba Hydro		No comment.
PacifiCorp		<p>Section 4.1 states that the Transmission Owner, Generator Owner, and Distribution Provider with load-responsive phase protection systems at the terminal of the circuits is responsible for ensuring compliance with PRC-023-3. PacifiCorp maintains that more clarification is needed with respect to who is ultimately responsible for ensuring compliance in instances where the circuit/transmission line has a different owner. Would the owner of the circuit/transmission line rely on the owner of the relays for ensuring compliance?</p>
<p>Response: The drafting team agrees and the proposed PRC-023-3 standard makes this distinction clear. The proposed PRC-023-3 standard (and proposed PRC-025-1) is based on ownership of the load-responsive protective relay, not the owner of the terminal or line. No change made.</p>		
Oncor Electric Delivery LLC		<p>The phase-in time for a newly declared critical circuit was removed from the draft PRC-023-3 Effective Dates section; the phase-in time needs to be added back to PRC-023-3. As written in PRC-023-2, R6 requires Planning Coordinators to conduct an</p>

Organization	Yes or No	Question 6 Comment
		<p>assessment of critical circuits on a periodic basis and provide “new circuits” to the appropriate registered entity. The Effective Dates section of PRC-023-2 states a registered entity will have 39 months to comply for newly declared critical circuits following declaration by the Planning Coordinator. This phase-in time period provides necessary time for a registered entity to budget and implement a project to meet PRC-023-2 compliance. The 39 month phase-in period was an acceptable and approved timeframe and should be added back to PRC-023-3.</p>
<p>Response: The drafting team thanks you for your comment and has re-inserted the Implementation Plan information under the proposed draft 2 of the PRC-023-3 standard, Section A, Item 5. Change made to the proposed PRC-023-3 Implementation Plan.</p>		

END OF REPORT