

## **Consideration of Comments on Regional Reliability Standard PRC-002-NPCC-1 — Disturbance Monitoring**

The Regional Reliability Standards Working Group thanks all commenters who submitted comments on the proposed regional reliability standard PRC-002-NPCC-1— Disturbance Monitoring. This standard was posted for a 45-day public comment period from October 1, 2009 through November 16, 2009. The stakeholders were asked to provide feedback on the standard through a special Electronic Comment Form. There were 4 sets of comments, including comments from 6 different people from 4 companies representing 5 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/regional\\_standards/regional\\_reliability\\_standards\\_under\\_development.html](http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html)

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, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

## Index to Questions, Comments, and Responses

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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

|   |             | Commenter       | Organization                                    | Industry Segment |   |   |   |   |   |   |   |   |    |  |
|---|-------------|-----------------|---|------------------|---|---|---|---|---|---|---|---|----|--|
|   |             |                 |   | 1                | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |  |
| 1.  | Individual  | Saurabh Saksena | National Grid                                   | X                |   | X |   |   |   |   |   |   |    |  |
| 2.  | Individual  | Martin Bauer    | US Bureau of Reclamation                        |                  |   |   |   | X |   |   |   |   |    |  |
| 3.  | Individual  | Dan Rochester   | Independent Electricity System Operator         |                  | X |   |   |   |   |   |   |   |    |  |
| 4.  | Group       | Jalal babik     | Electric Market Policy - Dominion Resources Inc |                  |   | X |   | X | X |   |   |   |    |  |
| <b>Additional Member Additional Organization Region Segment Selection</b> |             |                 |   |                  |   |   |   |   |   |   |   |   |    |  |
| 1.  | Mike Garton |                 | NPCC  | 5                |   |   |   |   |   |   |   |   |    |  |
| 2.  | Louis Slade |                 | RFC   | 6                |   |   |   |   |   |   |   |   |    |  |

**1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?**

**Summary Consideration:**

| Organization  | Yes or No | Question 1 Comment  |
|---|-----------|---|
| National Grid   | Yes       |   |
| US Bureau of Reclamation  | Yes       |   |
| Independent Electricity System Operator   | Yes       |   |
| Electric Market Policy - Dominion Resources Inc   | No        | <p>The third draft NPCC Regional Reliability Standard PRC-002-NPCC-1, Disturbance Monitoring, was posted on the NPCC website on September 9, 2009 for comments through October 24, 2009. Subsequently, on October 1, 2009, the second draft of the NPCC regional standard was posted on the NERC website for industry review through November 16, 2009. The concurrent (i.e., NPCC and ERO) posting of a third draft regional reliability standard is not specifically allowed by the NPCC Regional Reliability Standards Development Procedure (RRSDP). In fact, Step 6 (Solicit Public Comment on Draft Standards) specifically states “Final draft standards will be concurrently posted on the ERO website for comments.” One could argue that a regional reliability standard still in the NPCC open process comment phase until October 24, 2009, is not a final draft standard and posting on NERC’s website is premature and violates fair due process.</p> |
| <p><b>Response:</b> Electric Market Policy - Dominion Resources Inc.--The NERC posting of the standard’s version prior to the final draft was to solicit industry comment for the Drafting Team to consider for the final draft. Agreed that this posting goes beyond what’s stipulated in the NPCC RRSDP. It was intended to be constructive, and there will be another NERC posting after the NPCC process is completed when the final draft is posted for pre-ballot review, and subsequent ballot. The process used requires at least one posting. NPCC will submit to NERC for a second posting.</p> |           |   |

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

**Summary Consideration:**

| Organization                                    | Yes or No | Question 2 Comment |
|---|-----------|--------------------|
| National Grid                                   | No        |                    |
| US Bureau of Reclamation                        | No        |                    |
| Independent Electricity System Operator         | No        |                    |
| Electric Market Policy - Dominion Resources Inc | No        |                    |

**3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?**

**Summary Consideration:**

| Organization                                    | Yes or No | Question 3 Comment |
|---|-----------|--------------------|
| National Grid                                   | No        |                    |
| US Bureau of Reclamation                        | No        |                    |
| Independent Electricity System Operator         | No        |                    |
| Electric Market Policy - Dominion Resources Inc | No        |                    |

**4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?**

**Summary Consideration:**

| Organization  | Yes or No | Question 4 Comment   |
|---|-----------|--|
| National Grid   | No        |  |
| US Bureau of Reclamation  | Yes       | The use of transfer path criteria implies that any transfer path higher than 1% will have an impact on the BES. The impact should be based on the criticality of the path. Facilities that are not currently registered may require registration even though they have no impact on the reliability of the BES. The reliability activities are very costly and since there would be no burden on the reliability, the costs would unnecessary. |
| <p><b>Response: U.S. Bureau of Reclamation</b>--The Standard applies to Bulk Electric System equipment. The reference to the 1% transfer path appears to be an inappropriate use of the draft “bright-line” methodology. Transfer path is not used in the Standard. The Purpose of the Standard is to: “Ensure that adequate disturbance data is available to facilitate Bulk Electric System event analyses. All references to equipment and facilities herein unless otherwise noted will be to Bulk Electric System (BES) elements.” The Standard will apply to BES equipment and generation registered under the NERC registration criteria, and NPCC Compliance Guidance Statement which outlines generator materiality.</p> |           |  |
| Independent Electricity System Operator   | No        |  |
| Electric Market Policy - Dominion Resources Inc   | No        |  |

**5. Does the proposed regional reliability standard meet at least one of the following criteria?**

- The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
- The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard
- The proposed regional difference is necessitated by a physical difference in the bulk electric system.

**Summary Consideration:**

| Organization  | Yes or No | Question 5 Comment  |
|---|-----------|---|
| National Grid   | Yes       |   |
| US Bureau of Reclamation  | No        | The definition should start by recognizing that Reliability First ensured that non-qualifying generation would be included in the exclusion. The basic premise is that generation is excluded if it does not impact the reliability of the BES as determined by studies. Along with non-qualifying generation would be those facilities that do not materially impact the reliability of the BES. The criteria should be that a facility shall be deemed to have a material impact if it is demonstrated through dynamic simulation the loss of the facility will cause cascading outages. This may also be demonstrated through analysis of system stability for fault studies. Facilities are considered to have a material impact if systems that exhibit marginal stability as a result of delayed clearing time for a BES element at the facility or loss of generation from the facility. |
| <p><b>Response:</b> U.S. Bureau of Reclamation--The monitoring of any disturbance on the Bulk Electric System provides data that can be used to improve its reliability. Deliberately monitoring only those facilities that have been shown through study to cause cascading outages or marginal system stability as a result of delayed clearing or loss of generation is overly restrictive, and will not enable the collection of data for the analysis of more "common" events, evaluations of which would lead to more realistic system reliability improvements. The Standard will apply to BES equipment and generation registered under the NERC registration criteria, and NPCC Compliance Guidance Statement which outlines generator materiality. Disturbance Monitoring for a generator that's material to reliability is important in order to understand its contribution to a wide-area event.</p> |           |   |
| Independent Electricity System Operator   | Yes       |   |
| Electric Market Policy - Dominion Resources Inc   | Yes       | In FERC Order No. 693, the Commission expressed concern regarding the potential for the fill-in-the-blank standards to undermine uniformity. The Commission further notes, "the ERO should consider whether greater consistency can be achieved in this Reliability Standard." While the proposed standard does meet at   |

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| Organization  | Yes or No | Question 5 Comment  |
|---|-----------|---|
|   |           | <p>least one of the criteria, Dominion is of the opinion that NERC is potentially creating needless regional differences by not having a national standard on DME in place before the regional standard debate on DME is opened. We recognize that NERC is developing a continent-wide reliability standard per Project 2007-11 PRC-002-2, Disturbance Monitoring and Reporting Requirements. Unfortunately, this standard has not gotten the priority within NERC that it deserves. Hence, the development of a regional reliability standard seems premature at this point and Dominion believes that it would better serve the industry to wait until the continent-wide standard is fully vetted via the open process. NERC would have better served its constituents if it had rescinded BOT approval of those standards that FERC didn't approve or remand in Order 693. At least then entities would not feel compelled to meet the requirements of those standards. Dominion requests that the NERC BOT rescind approval of those standards that FERC did not approve or remand in Order 693.</p> |
| <p><b>Response:</b> Electric Market Policy - Dominion Resources Inc.--Because of the delays being encountered in developing the continent-wide standard, NPCC believes it important to develop the regional standard to properly expedite the installation of sufficient disturbance monitoring equipment to improve system reliability, and enhance post-disturbance analysis. Ultimately PRC-002-NPCC-01 will be compared with the FERC approved NERC standard, and any redundancies edited from the NPCC version. NPCC Criteria A-15 <u>Disturbance Monitoring Equipment Criteria</u> will be retired after PRC-002-NPCC-01 is approved.</p> |           |   |