Unofficial Comment Form

**Guidance**: Standards Applicability for Dispersed Power Producing Resources | Draft available [here](http://www.nerc.com/pa/RAPA/Documents/Standards%20Applicability%20Guidance_draft_6-2-14_for_posting.pdf)

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=047d42ecde1a458f8ec7c170f539c9e7) to submit comments. The electronic comment form must be completed by **8 p.m. Eastern, June 13, 2013**.

If you have questions please contact Phil Tatro at phil.tatro@nerc.net or by telephone at 404-446-9645.

## Background Information

The definition of Bulk Electric System (BES) that becomes effective on July 1, 2014 includes the following inclusion criterion (Inclusion I4):

*I4. Dispersed power producing resources that aggregate to a total capacity greater than 75 MVA (gross nameplate rating), and that are connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage of 100 kV or above. Thus, the facilities designated as BES are:*

*a) The individual resources, and*

*b) The system designed primarily for delivering capacity from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above.*

Dispersed power producing resources included in the BES have certain technical characteristics that may be different from non-dispersed generation resources, and Project 2014-01 – Standards Applicability for Dispersed Generation Resources is reviewing standards applicable to Generator Owners and Generator Operators to determine which standards may require revisions to clarify the applicability of standards to these resources to ensure that standards are applied appropriately to support reliable planning and operation of the interconnected transmission system.

The Project 2014-01 standard drafting team (DGR SDT) has prepared a white paper with its analysis and technical justification for proposed applicability revisions. The DGR SDT has proposed three “high priority” standards for revision, and it has identified several other standards as medium priority, either requiring guidance or revisions to the applicability of the standards. Any revisions to the standards must proceed through the normal standards approval process (balloting, Board adoption, and approval by applicable governmental authorities). The most recent draft of the white paper is posted on the drafting team’s [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Standards-Applicability-for-Dispersed-Generation-Resources.aspx).

The objective of this guidance is to provide entities with certainty concerning how compliance will be monitored and enforced for certain standards in the interim period between the effective date of the definition (July 1, 2014) and the date that revised standards are approved. This guidance is intended to be entirely consistent with any revisions in progress in Project 2014-01, and is focused on those standards that do not either: i) already differentiate within the standard the applicability of required actions to either the aggregate or individual unit level; or ii) explicitly provide the registered entity latitude to decide whether to apply the requirements of the standard at the aggregate level versus the individual unit level.

This guidance addresses current and in-development versions of certain standards, and may be revised in the future to incorporate additional guidance, as needed to provide consistency and clarity.

## Questions

1. Do you support the draft guidance for PRC-004 as providing clarity concerning the applicability of the Requirements of the standard to dispersed power producing resources included in the BES through Inclusion I4? If not, please provide specific comments to improve the guidance.

[ ]  Yes

[ ]  No

Comments:

1. Do you support the draft guidance for PRC-005 as providing clarity concerning the applicability of the Requirements of the standard to dispersed power producing resources included in the BES through Inclusion I4? If not, please provide specific comments to improve the guidance.

[ ]  Yes

[ ]  No

Comments:

1. Do you support the draft guidance for PRC-019 as providing clarity concerning the applicability of the Requirements of the standard to dispersed power producing resources included in the BES through Inclusion I4? If not, please provide specific comments to improve the guidance.

[ ]  Yes

[ ]  No

Comments:

1. Do you support the draft guidance for PRC-024 and PRC-025 as providing clarity concerning the applicability of the Requirements of the standards to dispersed power producing resources included in the BES through Inclusion I4? If not, please provide specific comments to improve the guidance.

[ ]  Yes

[ ]  No

Comments:

1. Do you support the draft guidance for VAR-002 as providing clarity concerning the applicability of the Requirements of the standard to dispersed power producing resources included in the BES through Inclusion I4? If not, please provide specific comments to improve the guidance.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this guidance that you haven’t already mentioned above, please provide them here:

 Comments: