

Consideration of Comments

Project 2014-01 Applicability for Dispersed Generation Resources Standards

The Dispersed Generation Resources Drafting Team (DGR SDT) thanks all commenters who submitted comments on the Standards. These standards were posted for a 45-day public comment period from July 10, 2014 through August 25, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 29 sets of comments, including comments from approximately 106 different people from approximately 77 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](#).

This document contains the DGR SDT's response to all industry comments received during this comment period. The DGR SDT encourages commenters to review its responses to ensure all concerns have been addressed. The DGR SDT notes that a significant majority of commenters agree with the DGR SDT's recommendations on these standards, but that several commenters expressed specific concerns. Some comments supporting the DGR SDT's recommendations are discussed below but in most cases are not specifically addressed in this response. Also, several comments in response to specific questions are duplicated in other questions, and several commenters raise substantively the same concerns as others. Therefore, the DGR SDT's consideration of all comments is addressed in this section in summary form, with duplicate comments treated as a single issue.

1. Summary Consideration

Industry overwhelmingly agrees with the DGR SDT's recommendations to make applicability changes to account for the unique characteristics of DGRs in the NERC PRC-004 standard as evidenced by the initial ballot results. However, there are some disagreements among stakeholders and typographical errors contained in and illuminated by industry comments. The DGR SDT has carefully reviewed and considered each stakeholder comment and has revised its recommendations where suggested changes are adequately supported by a technical justification, consistent with the DGR SDT's intent, and consistent with industry consensus. The DGR SDT's summary consideration of comments follows.

2. General Comments

Industry identified a number of typographical and formatting errors in each of the posted high-priority standards PRC-004-2.1a(X) and PRC-004-3(X). The DGR SDT also identified additional typographical and formatting errors during its most recent review. The DGR SDT has corrected each identified typographical and formatting error as reflected in the posted redlined standards.

At least one commenter notes that “As defined in the NERC Rules of Procedure, ‘Compliance Enforcement Authority’ means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.” According to the commenter, this does not take Canadian legislation into account. The commenter believes the clause should refer to the definition in the NERC Rules of Procedure or in the applicable legislation in a jurisdiction governed by legislation other than the NERC Rules of Procedure.

The language cited by the commenter is boilerplate language that is used in every standard, and revising the language is outside the authority of this drafting team. Therefore, the DGR SDT has referred this concern to NERC staff for consideration.

3. Recommended Applicability Changes to PRC-004

At least one commenter disagrees with the placement of applicability statements within the requirement commenting that such statements generally should be placed in section 4 of the Standard unless some overriding clarity issue can be identified. The commenter proposes inserting the following statements in section 4 to more effectively communicate the applicability of distributed generation: “4.3.1 Those Protection Systems designed to protect BES distributed generation or associated collection systems regardless of voltage at points where the aggregate nameplate capacity is greater than 75 MVA. 4.3.2 Those protection systems associated with Bulk Electric System distributed generation where the aggregate nameplate capacity is equal or less than 75 MVA is not applicable.” The commenter also is not clear on why the Bulk Electric System (BES) definition must be noted in the Standard, or why parallel usage of “dispersed power producing resources” should be followed. The commenter states that “distributed generation” is well understood and can be used while preserving the intent and clarity of the BES definition, and placement of applicability statements in this Standard is better suited in section 4.

The DGR SDT integrated applicability into the requirements section of PRC-004-2.1a(X), as it was deemed that creating a facilities section in PRC-004.2.1a would also require addressing what facilities were included as well as excluded, which would involve non-dispersed power producing resources. As the DGR SDT is focused on addressing dispersed power producing resources, this additional classification of non-dispersed power producing resources was deemed to be out of scope for this project. The DGR SDT believes that the proposed language as it exists adequately describes the treatment of dispersed power producing resources, a position that is supported by clear industry consensus.

The DGR SDT included reference to the BES definition to specifically link the proposed changes to the BES definition. The DGR SDT has fielded numerous comments that would be addressed through such a direct reference to the BES definition which provides a definition and basis for the definition of dispersed power producing resources.

At least one commenter agrees with the specific revisions concerning only the changes to distributed generation but does not agree with the ongoing revisions through Project 2010-05.1 that are included in this revision, such as the owner of the BES interrupting device being required to initiate review in all scenarios as opposed to the entity that initiated the interrupting device's action. Therefore, the commenter indicates that it intends to vote negative, as this revision includes language from Project 2010-05.1 that the commenter does not find agreeable.

Other commenters note other disagreements with substantive portions of the Standard that do not specifically pertain to DGR applicability. For example, some commenters note that there are a lot of protective relays that protect one element that sense the same parameter. For example, the Generator has a Generator differential relay, an overall differential relay, an overcurrent relay. If the Generator differential fails to actuate but the overall differential relay or the overcurrent actuates, does that this means the Composite Protection System did not misoperate? The commenter also recommends deleting "Paglow" in various locations.

The scope of the DGR SDT is to specifically address Standards applicability to dispersed power producing resources identified under Inclusion I4 of the BES definition. Therefore, these comments will be provided to NERC staff and to the Project 2010-5.1 SDT to the extent it remains active on these issues, as the DGR SDT believes these issues should be addressed on a broader and technology-neutral scope.

Some commenters note that the Effective Date sections in the implementation plan and the standard are not consistent. The DGR SDT has corrected language in the implementation plan and referenced the implementation plan in the standard to correct errors and eliminate redundancy.

At least one commenter notes that "Protection System" is a NERC Glossary term and should be capitalized in PRC-004. Second, the commenter believes the DGR SDT should clarify what they mean by "affected" by changing the word "affected" to "outaged."

The DGR SDT agrees with the recommendation to use the NERC Glossary term "Protection System" in PRC-004 and has therefore made these corrections in the posted versions. The use of the term "affected" instead of "outaged" was intended to address the situation in which a Protection System failed to trip a generator(s) and create an outage. This situation is also a "Misoperation" and would not be addressed by the use of "tripped" or "outaged."

At least one commenter notes that in the Rationale Box for Applicability, reference is made several times to BES reliability, then in the seventh line the emphasis switches over to the BPS. The commenter prefers the references to the BES since the proposed change is being brought about by

changes to the BES definition, and recommends the DGR SDT use BES in these references for consistency.

The DGR SDT referenced Bulk Power System reliability in an effort to include applicability to non-BES elements/components of a facility. However, In light of this comment the DGR SDT has reevaluated its use of BES and BPS and determined that it may be appropriate to reference only the BES. The DGR SDT therefore adopts the commenter's suggestion and has made changes to the redlined standards accordingly.

At least one commenter believes that in Requirements R2 and R3 of PRC-004-2.1a(X) and section 4.2.1.3 of PRC-004-4, "75 MVA" should be changed to "20 MVA" to make it comparable to I2 generators. The commenter believes that although the change to 20 MVA would have this standard apply to non-BES assets, many standards do likewise. The commenter notes that "Protection Systems," which are the subject of this standard, are non-BES. As written, according to the commenter, a reliability gap would be created between I4 generators and I2 generators. The commenter believes that the proposed change violates Section 303 of the NERC Rules of Procedure, paragraph 1 that states: "Competition - A Reliability Standard shall not give any market participant an unfair competitive advantage."

In order to provide consistent requirements for all generation, the DGR SDT believes it is necessary to assess applicability on individual units greater than 20 MVA and aggregate generation greater than 75 MVA, which are thresholds that have been explicitly recognized and approved by FERC as an appropriate threshold for these types of facilities consistent with the revised BES definition. The DGR SDT therefore does not believe it would be appropriate to use different aggregation thresholds absent a robust technical justification to do so. Moreover, the DGR SDT does not believe that a reliability gap is created, nor any unfair competitive advantages are given as a result.

At least one commenter believes that in PRC-004-2.1a(X) and PRC-004-3 (X) Rationale for Applicability, the sentence that says "Misoperations occurring on the Protection Systems of individual generation...", is misleading because by definition (I4), the individual resources are BES, therefore misoperations occurring on the Protection Systems of individual resources would have an impact on BES reliability, while noting that "material impact" is not defined.

The DGR SDT carefully considered this issue and believes its explanation in the rationale section is clear. Based on industry consensus on this issue and a lack of a clear technically justified reason supporting alternative language, the DGR SDT respectfully declines to adopt the commenter's suggestion.

At least one commenter notes that Requirements R2 and R3 of PRC-004-2.1a(X) and the Facilities section 4.2.1.3 of PRC-004-4 reference "individual" dispersed generator Protection Systems and the "total" aggregate, which the commenter believes is still creating some confusion. According to the

commenter, it appears that focus is on the “total” aggregate location not individual resources. The commenter questions whether it is correct to assume if there are multiple resource owners who each have less than 75 MVA but the multiple resources aggregate at a “utility” bus, the bus is the aggregate point and would only need to be reported if at this aggregate point the loss of the aggregate is greater than 75 MVA. The commenter also is concerned that several non-dispersed generator resources that may not be required to be registered that aggregate to greater than 75 MVA will have to be reported by utilities who do not own the equipment.

The applicability of these requirements for dispersed power producing resources is when an event occurs and affects a total of greater than 75 MVA nameplate rating. In this situation, misoperation analysis of the protection systems must be done at the individual generator level for each of the generators affected. If an event occurs and 75 MVA nameplate of generation or less is affected then no analysis is required. In the case of multiple owners of resources that aggregate to greater than 75 MVA nameplate at a “utility bus”, the DGR SDT notes that if the site as a whole meets the criteria for being designated as BES (regardless of how many individual owners own portions of the site) each one of these owners should be registered as a generator owner/operator. These individual resource owners would then be responsible for performing a misoperation analysis on the individual generators they own IF the misoperation occurred on the generators themselves and the event affected greater than 75 MVA of nameplate generation at the site level (from the BES perspective, it does not matter if the generation is owned by one or multiple resource owners). Regarding inclusion of non-dispersed power producing resources, the DGR SDT believes that the appropriate generators were addressed with the proposed changes through the reference to “resources identified under Inclusion I4 of the BES Definition...”, as the scope of the DGR SDT was limited to address dispersed power producing resources only.

A. PRC-004-2.1a(X)

At least one commenter notes that in Requirements R2 and R3, the words “or could have affected” were initially added but then deleted. The commenter believes those words should not have been deleted because the DGR PRC subteam had indicated that those words would be included. The deleted words addressed the commenter’s concern it expressed during the comment period for the Dispersed Generation White Paper. Specifically, the commenter stated that it does not agree with limiting the analysis requirement to a trip of greater than 75 MVA because that only accounts for very large occurrences that could be unusual. The commenter believes that smaller occurrences, however, may predict an unusual large occurrence that could impact reliability, and that the deleted words were in fact included in the “Standards Applicability Guidelines” that were circulated for comment but were ultimately not issued.

The DGR SDT considered all industry comments on this issue and determined that the use of “could have affected” was too vague, and that proving or disproving whether an event or a single

misoperation could have affected 75 MVA would be overly burdensome. The use of “affected” was determined to still be broad enough to include misoperations that did not result in an actual trip of the associated generator, for instance the situation in which a protection system failed to trip 75 MVA of nameplate generation when a trip should have occurred. Note that the proposed language revision does not refer to the actual generation of the site at the time of the event, but rather what the generators that experienced the misoperation(s) are capable of producing at nameplate rating. The DGR SDT believes that this addresses the concerns raised and therefore respectfully declines to adopt the commenter’s suggestion.

At least one commenter believes Requirements R2 and R3 should be approached in PRC-004-2.1a(X) the same as the exclusions in PRC-004-4. Rather than state that it is excluded at the end of the sentence, the commenter believes the Standard should simply state it on the front end, i.e. as follows: “This requirement does not apply to Misoperations occurring on the protection systems of individual dispersed generation power producing resources identified under Inclusion I4 of the BES definition where the Misoperations affected or could have affected an aggregate nameplate rating of less than or equal to 75 MVA of BES facilities.”

The DGR SDT considered the suggested approach; however, it was deemed that creating a similar facilities section in PRC-004.2.1a(X) would also require addressing what facilities were included as well as excluded, which would involve non-dispersed power producing resources. As the DGR SDT is limited to addressing dispersed power producing resources, this additional classification of non-dispersed power producing resources was deemed to be out of scope for this project. The DGR SDT considered industry comments on this issue and believes that the proposed language as it exists adequately describes the treatment of dispersed power producing resources.

At least one commenter believes that in order to clearly state that analysis of misoperations is exempted for dispersed generation within a group that meets the I4 criteria, the sub bullets under R2 and R3 should be revised to: “For Misoperations occurring on the protection systems of individual dispersed power producing resources identified under Inclusion I4 of the BES definition.” Another commenter suggests that the language should be revised to “For Misoperations occurring on a portion of a dispersed generation collection of total aggregate rating greater than 75 MVA (and therefore a BES facility), if the aggregate rating of the portion of dispersed generation where the misoperation occurs is less or equal to 75 MVA, then this requirement does not apply.”

The DGR SDT believes the current language clearly addresses the concern, as it is not the intent of the DGR SDT to exclude the Protection Systems on the individual dispersed power producing resources, but rather to define in which scenarios this analysis would need to be performed. Therefore, the DGR SDT respectfully declines to adopt the commenter’s suggestion.

At least one commenter observes that based on a FERC informational filing previously communicated to FERC by NERC, the commenter believes that the clause on R2 and R3 should be “numbered” rather than “bulleted,” as numbers imply it is required whereas bullets imply that there is an option from the list. The commenter notes that this may be moot since there is only one option but for consistency with the filing and other NERC standards, the commenter believes the bullet should be a sub-part of the requirement and replaced with a number.

In a standard, parts of a requirement that are set off with bullets are implied to be “OR” and parts that are numbered are “AND.” In this instance, there is only one bulleted item, so “OR” or “AND” qualifiers are not necessary. The DGR SDT consulted with NERC staff and determined that use of bullets in Requirements R2 and R3 is acceptable and consistent with previous uses. Therefore, the DGR SDT respectfully declines to modify the format of Requirements R2 and R3.

B. PRC-004-4

At least one commenter notes that the redlined standard posted on the project page is the redlined to an obsolete version of PRC-004-3, which was previously developed by the Project 2010-5.1 SDT. The commenter also notes that the rationale box for the Introduction states that the only revisions to this posting are to Section 4.2 Facilities, yet there are revisions indicated throughout the entirety of the posted standard. The commenter suggests taking the clean version of the final ballot passed PRC-004-3 and redline the Applicability Section changes only for entities to have a clear picture of what the standard is going to be.

The DGR SDT recognizes the concerns raised by the commenter and notes that proposed PRC-004-4 addresses these concerns.

At least one commenter notes that PRC-004-3 Application Guidelines, under Definitions on page 20, includes a note to add an example which includes various terms. It appears this was an internal note and meant to be deleted. The DGR SDT has removed the internal notes under the definitions section on page 20.

At least one commenter believes proposed Applicability 4.2.1.3 may be lead to misunderstanding. According to the commenter, if failure (or slow trip) of a Protection System of an individual dispersed power producing resource, identified under Inclusion I4 of the BES definition, affects the aggregate nameplate rating of over 75 MVA of BES Facilities, it seems like that Protection System operation would be applicable to the standard. If so, according to the commenter, clarification may be needed in the Application Guidelines, or the Applicability may need to be reworded, to help avoid a misunderstanding in which an entity thinks that the Protection System is not applicable to the standard.

The DGR SDT believes that the proposed language adequately describes the applicability and that addressing specific instances could potentially be more confusing as defining every specific instance would be a significant undertaking and that the applicability of specific instances which are not mentioned would then be questioned. However, in the case described in the comment the Protection System operation would be applicable.

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 Director of Standards, Valerie Agnew, at 404-446-2566 or at valerie.agnew@nerc.net . In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

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	Michael Lowman	Duke Energy	X		X		X	X																								
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Doug Hills</td> <td></td> <td>RFC</td> <td>1</td> </tr> <tr> <td>2. Lee Schuster</td> <td></td> <td>FRCC</td> <td>3</td> </tr> <tr> <td>3. Dale Goodwine</td> <td></td> <td>SERC</td> <td>5</td> </tr> <tr> <td>4. Greg Cecil</td> <td></td> <td>RFC</td> <td>6</td> </tr> </tbody> </table>				Additional Member	Additional Organization	Region	Segment Selection	1. Doug Hills		RFC	1	2. Lee Schuster		FRCC	3	3. Dale Goodwine		SERC	5	4. Greg Cecil		RFC	6										
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2. Lee Schuster		FRCC	3																														
3. Dale Goodwine		SERC	5																														
4. Greg Cecil		RFC	6																														
2.	Group	Kaleb Brimhall	Colorado Springs Utilities	X		X		X	X																								
N/A																																	
3.	Group	Guy Zito	Northeast Power Coordinating Council										X																				
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> </tbody> </table>				Additional Member	Additional Organization	Region	Segment Selection																										
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Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
1. Alan Adamson	New York State Reliability Council, LLC	NPCC 10												
2. David Burke	Orange and Rockland Utilities Inc.	NPCC 3												
3. Greg Campoli	New York Independent System Operator	NPCC 2												
4. Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC 1												
6. Gerry Dunbar	Northeast Power Coordinating Council	NPCC 10												
7. Mike Garton	Dominion Resources Services, Inc.	NPCC 5												
9. Michael Jones	National Grid	NPCC 1												
10. Mark Kenny	Northeast Utilities	NPCC 1												
11. Helen Lainis	Independent Electricity System Operator	NPCC 2												
12. Alan MacNaughton	New Brunswick Power Corporation	NPCC 9												
13. Bruce Metruck	New York Power Authority	NPCC 6												
14. Silvia Parada Mitchell	NextEra energy, LLC	NPCC 5												
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC 10												
16. Ben Wu	Orange and Rockland Utilities Inc.	NPCC 1												
17. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC 1												
18. David Ramkalawan	Ontario Power Generation, Inc.	NPCC 5												
19. Brian Robinson	Utility Services	NPCC 8												
20. Ayesha Sabouba	Hydro One Networks inc.	NPCC 1												
21. Brian Shanahan	National Grid	NPCC 1												
22. Wayne Sipperly	New York Power Authority	NPCC 5												
4. Group	Janet Smith	Arizona Public Service Company	X		X		X	X						
N/A														
5. Group	Connie Lowe	Dominion	X		X		X	X						
Additional Member Additional Organization Region Segment Selection														
1. Mike Garton		NPCC 5												
2. Louise Slade		RFC 5, 6												
3. Randi Heise		SERC 1, 3, 5, 6												
4. Chip Humphrey		SERC 5												
5. Jeffrey Bailey		NPCC 5												
6. Larry Nash		SERC 1, 3, 5												
6. Group	Joe DePoorter	MRO NERC Standards Review Forum	X	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.	Amy Casucelli	Xcel Energy	MRO	1, 3, 5, 6									
2.	Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5									
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6									
4.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6									
5.	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6									
6.	Jodi Jensen	WAPA	MRO	1, 6									
7.	Joseph Depoorter	Madison Gas & Electric	MRO	3, 4, 5, 6									
8.	Ken Goldsmith	Alliant Energy	MRO	4									
9.	Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5, 6									
10.	Marie Knox	MISO	MRO	2									
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6									
12.	Randi Nyholm	Minnesota Power	MRO	1, 5									
13.	Scott Nickels	Rochester Public Utilities	MRO	4									
14.	Terry Harbour	MidAmerican Energy	MRO	1, 3, 5, 6									
15.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6									
16.	Tony Eddleman	Nebraska Public Utilities District	MRO	1, 3, 5									
7.	Group	David Greene	SERC Protection and Controls Subcommittee										
Additional Member		Additional Organization	Region	Segment Selection									
1.	Paul Nauert	Ameren											
2.	David Greene	SERC											
3.	Steve Edwards	Dominion											
4.	John Miller	Georgia Transmission Corporation											
5.	Charlie Fink	Entergy											
8.	Group	Greg Campoli	IRC Standards Review Committee		X								
Additional Member		Additional Organization	Region	Segment Selection									
1.	Ali Miremadi	CAISO	WECC	2									
2.	Ben Li	IESO	NPCC	2									
3.	Charles Yeung	SPP	SPP	2									
4.	Cheryl Moseley	ERCOT	ERCOT	2									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
5. Lori Spence	MISO	MRO 2												
6. Matt Goldberg	ISONE	NPCC 2												
7. Stephanie Monzon	PJM	RFC 2												
9.			Southern Company: Southern Company Services, Inc; Alabama Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing											
Group	Pamela Hunter		X		X		X	X						
N/A														
10.	Group	Andrea Jessup	Bonneville Power Administration		X		X		X					
Additional Member			Additional Organization		Region Segment Selection									
1.	Ron Sporseen	Planning & Asset Management	WECC	1										
11.	Group	Jason Marshall	ACES Standards Collaborators							X				
Additional Member			Additional Organization		Region Segment Selection									
1.	Bob Solomon	Hoosier Energy	RFC	1										
2.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5										
3.	John Shaver	Southwest Transmission Cooperative	WECC	1										
4.	Scott Brame	North Carolina Electric Membership Corporation	SERC	3, 4, 5										
5.	Ginger Mercier	Prairie Power	SERC	3										
6.	Ellen Watkins	Sunflower Electric Power Corporation	SPP	1										
7.	Michael Brytowski	Great River Energy	MRO	1, 3, 5, 6										
12.	Group	Kathleen Blacxk	DTE Electric				X	X	X					
Additional Member			Additional Organization		Region Segment Selection									
1.	Kent Kujala	NERC Compliance	RFC	3										
2.	Daniel Herring	NERC Training & Standards Development	RFC	4										
3.	Mark Stefaniak	Merchant Operations	RFC	5										
13.	Group	Dianne Gordon	Puget Sound Energy		X		X		X					
N/A														
14.	Group	Shannon V. Mickens	SPP Standards Review Group			X								
Additional Member			Additional Organization		Region Segment Selection									
1.	Louis Guidry	Cleco Power LLC	SPP	1, 3, 5, 6										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
2.	Karl Diekevers	Nebraska Public Power District MRO	1, 3, 5																	
3.	Stephanie Johnson	Westar Energy	SPP	1, 3, 5, 6																
4.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6																
5.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6																
6.	Wes Mizell	Westar Energy	SPP	1, 3, 5, 6																
7.	Mike Kidwell	Empire District Electric	SPP	1, 3, 5																
8.	James Nail	City of Independence, MO	SPP	3, 5																
9.	Ron Losh	Southwest Power Pool	SPP	2																
10.	Shannon Mickens	Southwest Power Pool	SPP	2																
11.	Robert Rhodes	Southwest Power Pool	SPP	2																
15.	Individual	Brett Holland	Kansas City Power and Light		X		X		X	X										
16.	Individual	Joshua Andersen	Salt River Project		X		X		X	X										
17.	Individual	Richard Vine	California ISO			X														
18.	Individual	Anthony Jablonski	ReliabilityFirst																	X
19.	Individual	Maryclaire Yatsko	Seminole Electric Cooperative, Inc.		X		X	X	X	X										
20.	Individual	Russell A. Noble	Public Utility District No. 1 of Cowlitz County, WA				X	X	X											
21.	Individual	Marc Donaldson	Tacoma Power		X		X	X	X	X										
22.	Individual	David Jendras	Ameren		X		X		X	X										
23.	Individual	Thomas Foltz	American Electric Power		X		X		X	X										
24.	Individual	Jonathan Meyer	Idaho Power Co.		X															
25.	Individual	John Pearson / Matt Goldberg	ISO New England			X														
26.	Individual	John Miller	Georgia Transmission Corporation		X															
27.	Individual	John Seelke	Public Service Enterprise Group		X		X		X	X										
28.	Individual	Jason Marshall	New England States Committee on Electricity (NESCOE)																	
29.	Individual	Jo-Anne Ross	Manitoba Hydro		X		X		X	X										

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration: The DGR SDT thanks all commenters for their comments and refers the reader to the summary response above.

Organization	Agree	Supporting Comments of "Entity Name"
Colorado Springs Utilities	Agree	Public Service Enterprise Group (PSEG)
California ISO	Agree	ISO/RTO Council Standards Review Committee
Ameren	Agree	Ameren agrees with and supports the SERC PCS comments for Project 2014-01 Dispersed Generation Resources - PRC-004.

1. Do you agree with the revisions made in proposed PRC-004-2.1a(X) to clarify applicability of PRC-004-2.1a to dispersed power producing resources included in the BES through Inclusion I4 of the BES definition? If not, please provide technical rationale for your disagreement along with suggested language changes.

Summary Consideration: The DGR SDT thanks all commenters for their comments and refers the reader to the summary response above.

Organization	Yes or No	Question 1 Comment
SERC Protection and Controls Subcommittee	No	Requirements 2 and 3 reference “individual” dispersed generator Protection Systems and the “total” aggregate which is still creating some confusion. It appears that focus is on the “total” aggregate location not individual resources. Is it correct to assume if there are multiple resource owners who each have less than 75 MVA but the multiple resources aggregate at a “utility” bus, the bus is the aggregate point and would only need to be reported if at this aggregate point the loss of the aggregate is greater than 75MVA? There is also a concern that several non dispersed generator resources that may not be required to be registered that aggregate to greater than 75 MVA will have to be reported by utilities who do not own the equipment. Wording clarification and supporting Figures may need to be revised to clarify these requirements.
IRC Standards Review Committee	No	In order to clearly state that analysis of misoperations is exempted for dispersed generation within a group that meets the I4 criteria, the sub bullets under R2 and R3 should be revised to:”For Misoperations occurring on the protection systems of individual dispersed power producing resources identified under Inclusion I4 of the BES definition.”

Organization	Yes or No	Question 1 Comment
Puget Sound Energy	No	Technically this is ok, but is somewhat unclear. If we understand correctly, we recommend revising the wording as follows:"For Misoperations occurring on a portion of a dispersed generation collection of total aggregate rating greater than 75 MVA (and therefore a BES facility), if the aggregate rating of the portion of dispersed generation where the misoperation occurs is less or equal to 75 MVA, then this requirement does not apply."
SPP Standards Review Group	No	In the Rationale Box for Applicability reference is made several times to BES reliability. Then in the 7th line the emphasis switches over to the BPS. We prefer the references to the BES since the proposed change is being brought about by changes to the BES definition. We recommend the SDT use BES in these references for consistency.
ISO New England	No	: In R2 and R3, the words "or could have affected" were initially added but then they were deleted. Those words should not have been deleted. The PRC subteam had indicated to us that those words would be included. The deleted words addressed the concern we expressed during the comment period for the Dispersed Generation White Paper. Specifically, we stated that we do not agree with limiting the analysis requirement to a trip of greater than 75 MVA because that only accounts for very large occurrences that could be unusual. Smaller occurrences, however, may predict an unusual large occurrence that could impact reliability. The deleted words were in fact included in the "Standards Applicability Guidelines" that were circulated for comment but were ultimately not issued. The deleted words "or could have affected" should be added back in.
Georgia Transmission Corporation	No	R2 and R3 should be approached in 004-2.1a the same as the exclusions in 004-3. Rather than state that it is excluded at the end of the sentence, simply state it on the front end.i.e. as follows:This requirement does not

Organization	Yes or No	Question 1 Comment
		apply to Misoperations occurring on the protection systems of individual dispersed generation power producing resources identified under Inclusion I4 of the BES definition where the Misoperations affected or could have affected an aggregate nameplate rating of less than or equal to 75 MVA of BES facilities.
Public Service Enterprise Group	No	In R2 and R3, “75MVA” should be changed to “20MVA.” This would make it comparable to I2 generators. Although the change to 20MVA would have this standard apply to non-BES assets, many standards do likewise. In fact “Protection Systems,” which are the subject of this standard, are non-BES. As written, a reliability gap would be created between I4 generators and I2 generators. The proposed change violates Section 303 of the NERC Rules of Procedure, paragraph 1 that states: “Competition - A Reliability Standard shall not give any market participant an unfair competitive advantage.” If alternative language was proposed that required the same 75MVA threshold for I2 generators, PSEG would be fine with that. But the proposed non-comparable treatment of generators is not acceptable.
Duke Energy	Yes	
Northeast Power Coordinating Council	Yes	The definition of the BES will lead to additional costs imposed on renewable generation that could inhibit the development of these resources. In New England in particular, states have enacted aggressive renewable energy polices and are actively working to implement them cost-effectively. The SDT’s efforts recognize the unique design and operating characteristics of dispersed generation resources such as wind and solar facilities. At the same time, as expressed in the SDT’s April 14, 2014 Draft White Paper, any revisions are intended to ensure that they do not “create a reliability gap.” These are critical considerations. The SDT is appropriately evaluating how the obligations imposed on these asset owners and operators translate to reliability benefits, which is consistent with larger efforts within NERC to

Organization	Yes or No	Question 1 Comment
		incorporate cost-effectiveness analyses into the standards development process. As is the case with all standards, the revisions here would be subject to ongoing evaluation of further changes in light of experience and, in this case, the likely increased integration of dispersed power resources. The initiation of this project is beneficial to industry and this SDT's advancement of the objectives set forth in the Draft White Paper. To provide the owners and operators of dispersed generation resources (and potential future developers) with an expectation of their compliance obligations and associated costs, this effort should move forward as expeditiously as possible.
Arizona Public Service Company	Yes	
Dominion	Yes	
MRO NERC Standards Review Forum	Yes	
Southern Company: Southern Company Services, Inc; Alabama Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	Looks good - removing the speculative "could have" language is helpful.
Bonneville Power Administration	Yes	
ACES Standards Collaborators	Yes	(1) We agree with the conceptual changes but believe some refinements are necessary. First, protection system is a NERC glossary term and should be capitalized. Second, the SDT should clarify what they mean by "affected." Does this mean that amount of generation that was actually outaged as a result of the Misoperation? Or would this include an evaluation of the other potential Misoperations that could have occurred if

Organization	Yes or No	Question 1 Comment
		<p>the same conditions were experienced at other locations within the dispersed generation site? We believe that the answer should be the former rather than the latter. To make this clear, we suggest changing the word “affected” to “outaged.” (2) Based on a FERC informational filing previously communicated to the Commission by NERC, we believe that the clause on R2 and R3 should be “numbered” rather than “bulleted.” Numbers imply it is required where as bullets imply that there is an option from the list. This may be moot since there is only one option but for consistency with the filing and other NERC standards, we believe the bullet should be a sub-part of the requirement and replaced with a number.</p>
DTE Electric	Yes	
Kansas City Power and Light	Yes	
Salt River Project	Yes	
ReliabilityFirst	Yes	<p>ReliabilityFirst votes in the affirmative because we believe the changes adequately address the concerns involving individual dispersed generation power producing resources. ReliabilityFirst provides the following comments for consideration:1. The term “protection system” is used in the newly added language but ReliabilityFirst believes this term should be capitalized since it is a NERC Defined Term (i.e., “Protection System”).</p>
Seminole Electric Cooperative, Inc.	Yes	
Public Utility District No. 1 of Cowlitz County, WA	Yes	<p>Cowlitz PUD agrees with the outcome, but disagrees with the format. Please refer to the last question.</p>
Tacoma Power	Yes	

Organization	Yes or No	Question 1 Comment
American Electric Power	Yes	
Idaho Power Co.	Yes	
New England States Committee on Electricity (NESCOE)	Yes	<p>The New England States Committee on Electricity (NESCOE) appreciates the work of the Dispersed Generation Resources Standard Drafting Team (SDT) in moving forward important clarifications regarding the applicability of certain standards to dispersed power producing resources. NESCOE supports the specific revisions reflected in the identified PRC standards, as well as the general intent of this Project. In comments on the first draft of the proposed BES definition, NESCOE cautioned that the definition might lead to unnecessary costs imposed on renewable generation that could inhibit the development of these resources. That remains a concern in New England, where states have enacted aggressive renewable energy policies and are actively working to implement them cost-effectively. The SDT's efforts recognize the unique design and operating characteristics of dispersed generation resources such as wind and solar facilities. At the same time, as expressed in the SDT's April 14, 2014 Draft White Paper, any revisions are intended to ensure that they do not "create a reliability gap." These are critical considerations. The SDT is appropriately evaluating how the obligations imposed on these asset owners and operators translate to reliability benefits, which is consistent with larger efforts within NERC to incorporate cost-effectiveness analyses into the standards development process. As with all standards, the revisions here would be subject to ongoing evaluation of further changes in light of experience and, in this case, the likely increased integration of dispersed power resources. NESCOE appreciates the initiation of this project and this SDT's advancement of the objectives set forth in the Draft White Paper. To provide the owners and operators of dispersed generation resources (and potential future developers) with an expectation of their compliance obligations and</p>

Organization	Yes or No	Question 1 Comment
		associated costs, NERC should work to move this effort forward as expeditiously as possible. Thank you for your consideration of these comments.
Manitoba Hydro	Yes	D 1.1 states: “As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards” This does not take Canadian legislation into account. The clause should refer to the definition in the NERC Rules of Procedure or in the applicable legislation in a jurisdiction governed by legislation other than the NERC Rules of Procedure.
Colorado Springs Utilities		

2. Do you agree with the revisions made in proposed PRC-004-3(X) to clarify applicability of PRC-004-3 to dispersed power producing resources included in the BES through Inclusion I4 of the BES definition? If not, please provide technical rationale for your disagreement along with suggested language changes

Summary Consideration: The DGR SDT thanks all commenters for their comments and refers the reader to the summary response above.

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	Refer to the response to Question 1. In addition, the redlined standard posted on the project page is the redlined Draft 4: January 17, 2014 of PRC-004-3 (Project 2010-5.1). There have been two drafts of PRC-004-3 after that and the latest Draft 6 has passed its final ballot. The Rationale Box for the Introduction (the Rationale Box does not have a title) states that the only revisions to this posting are to Section 4.2 Facilities, yet there are revisions indicated throughout the entirety of the posted standard. There are some important changes that have been approved in Draft 6 that are missing in the redlined version posted for Project 2014-01. Suggest taking the clean version of the final ballot passed PRC-004-3 and redline the Applicability Section changes only for entities to have a clear picture of what the standard is going to be. You cannot have two different versions of the same standard being balloted under different projects. The similar comment applies to the posted PRC-004-2.1a(X). The untitled Rationale Box for the Introduction states that the only revisions are to R2 and R3, yet there is redlining throughout the standard.
SERC Protection and Controls Subcommittee	No	Facilities section 4.2.1.3 references “individual” dispersed generator Protection Systems and the “total” aggregate which is still creating some confusion. It appears that focus is on the “total” aggregate location not individual resources. Is it correct to assume if there are multiple resource owners who each have less than 75 MVA but the multiple resources aggregate at a “utility” bus, the bus is the aggregate point and would only need to be reported if at this aggregate point the loss of the aggregate is

Organization	Yes or No	Question 2 Comment
		greater than 75MVA? There is also a concern that several non-dispersed generator resources that may not be required to be registered that aggregate to greater than 75 MVA will have to be reported by utilities who do not own the equipment. Wording clarification and supporting Figures may need to be revised to clarify these requirements.
IRC Standards Review Committee	No	The comment is the same as the one providedT above in response to question 1.
SPP Standards Review Group	No	Similar to the comment provided in response to Question 1 above, the Rationale box for Applicability contains references to both BES and BPS reliability. We recommend making all references to BES reliability. The definition of the new term ‘Composite Protection System’ needs to be mention in this draft standard for clarity.
Seminole Electric Cooperative, Inc.	No	Seminole agrees with the specific revisions concerning only the changes to distributed generation, however, Seminole does not agree with the ongoing revisions through Project 2010-05.1 that are included in this revision, such as the owner of the BES interrupting device being required to initiate review in all scenarios as opposed to the entity that initiated the interrupting device’s action. Therefore, Seminole must vote negative as this revision includes language from Project 2010-05.1 that Seminole does not find agreeable.
Tacoma Power	No	Proposed Applicability 4.2.1.3 may be lead to misunderstanding. If failure (or slow trip) of a Protection System of an individual dispersed power producing resource, identified under Inclusion I4 of the BES definition, affects the aggregate nameplate rating of over 75 MVA of BES Facilities, it seems like that Protection System operation would be applicable to the standard. If so, clarification may be needed in the Application Guidelines, or the Applicability may need to be reworded, to help avoid a misunderstanding in which an entity thinks that the Protection System is not applicable to the standard.

Organization	Yes or No	Question 2 Comment
ISO New England	No	: In R2 and R3, the words “or could have affected” were initially added but then they were deleted. Those words should not have been deleted. The PRC subteam had indicated to us that those words would be included. The deleted words addressed the concern we expressed during the comment period for the Dispersed Generation White Paper. Specifically, we stated that we do not agree with limiting the analysis requirement to a trip of greater than 75 MVA because that only accounts for very large occurrences that could be unusual. Smaller occurrences, however, may predict an unusual large occurrence that could impact reliability. The deleted words were in fact included in the “Standards Applicability Guidelines” that were circulated for comment but were ultimately not issued. The deleted words “or could have affected” should be added back in.
Public Service Enterprise Group	No	In 4.2.1.3, “75MVA” should be changed to “20MVA.” This would make it comparable to I2 generators. Although the change to 20MVA would have this standard apply to non-BES assets, many standards do likewise. In fact “Protection Systems,” which are the subject of this standard, are non-BES. As written, a reliability gap would be created between I4 generators and I2 generators. The proposed change violates Section 303 of the NERC Rules of Procedure, paragraph 1 that states: “Competition - A Reliability Standard shall not give any market participant an unfair competitive advantage.” If alternative language was proposed that required the same 75MVA threshold for I2 generators, PSEG would be fine with that. But the proposed non-comparable treatment of generators is not acceptable.
Duke Energy	Yes	
Arizona Public Service Company	Yes	
Dominion	Yes	

Organization	Yes or No	Question 2 Comment
MRO NERC Standards Review Forum	Yes	
Southern Company: Southern Company Services, Inc; Alabama Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	Looks good - focusing on "Misoperations that affected > 75 MVA" is appropriate.
Bonneville Power Administration	Yes	
ACES Standards Collaborators	Yes	(1) We agree with the conceptual changes to the Facilities section. However, the SDT should clarify what they mean by "affected." Does this mean that amount of generation that was actually outaged as a result of the Misoperation or would this include an evaluation of the other potential Misoperations that could have occurred if the same conditions were experienced at other locations within the dispersed generation site? We believe that the answer should be the former rather than the latter. To make this clear, we suggest changing "affected" to "outaged."(2) Additionally, there seems to be some other unrelated changes that would exceed the scope of the changes in the project SAR. While we do not see them as problematic, we question where they are coming from.
DTE Electric	Yes	
Puget Sound Energy	Yes	
Kansas City Power and Light	Yes	Page 21 Example: There are a lot of protective relays that protect one element that sense the same parameter. For example, the Generator has a Generator differential

Organization	Yes or No	Question 2 Comment
		relay, an overall differential relay, an overcurrent relay. If the Generator differential fails to actuate but the overall differential relay or the overcurrent actuates, does that this means the Composite Protection System did not misoperate?.Also recommend deleting Paglow: in various locations.
Salt River Project	Yes	
Public Utility District No. 1 of Cowlitz County, WA	Yes	Cowlitz PUD agrees with the outcome, but disagrees with the format. Please refer to the last question.
American Electric Power	Yes	
Idaho Power Co.	Yes	
Georgia Transmission Corporation	Yes	The statement is made at the beginning of 4.2.1 "with the following exclusions:". That makes the I4 statement much clearer than the wording in 004-2.1a.
New England States Committee on Electricity (NESCOE)	Yes	See comments above.
Manitoba Hydro	Yes	The Effective Date sections in the implementation plan and the standard at section 6 are not consistent. The standard section distinguishes Western Interconnection as having a different Effective Date from others. The Implementation plan makes no reference to this. The standard references dates of twelve months or twenty-four months after the date the standard is adopted or as otherwise provided for in that jurisdiction but the implementation plan does not make reference to these durations. As a Canadian entity, Manitoba Hydro may not be affected by this inconsistency but revision would provide clarity to the section. PRC-004-3 Application Guidelines:a) Under Definitions on page 20, it includes a note to add an example which includes various terms. It appears this was an internal note and meant to be deleted. b) On

Organization	Yes or No	Question 2 Comment
		<p>page 21 the standard states: Example: There are a lot of protective relays that protect one element that sense the same parameter. For example, the Generator has a Generator differential relay, an overall differential relay, an overcurrent relay. If the Generator differential fails to actuate but the overall differential relay or the overcurrent actuates, does that mean the Composite Protection System did not misoperate? This example does not appear to be answered thus the purpose and clarity of the example is in question.c) Also on page 21 the standard states: Paglow: A breaker failure operation does not, in itself, constitute a Misoperation On page 24 the standard states: Paglow: If the coordination error was at the remote terminal (set too fast), then it is an "Unnecessary Trip" at the remote location. If the coordination error was at the local terminal (set too slow), then it is a "Slow Trip" at the local location. What does "Paglow" refer to? It appears this was an internal note and meant to be deleted.d) On page 27 under the heading "Requirement 1" and on page 28 under the heading "Requirement 3" the standard states: The intent of the standard is to classify an operation as a Misoperation if the available information leads to that conclusion. The standard also allows an entity to classify an operation as a Misoperation if entity is not sure, it may decide to identify the operation as a Misoperation and continue its investigation until the entity determines otherwise. If the continued investigative actions are inconclusive, the entity may declare no cause found and end its investigation. It is redundant to add the same statement of intent in both of the Requirements. If the statement of intent must be stated in the Application Guidelines, it should appear once prior to the commencement of the Requirements sections.</p>

3. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?

Summary Consideration: The DGR SDT thanks all commenters for their comments and refers the reader to the summary response above.

Organization	Question 3 Comment
Public Utility District No. 1 of Cowlitz County, WA	Cowlitz PUD disagrees with the placement of applicability statements within the Requirement. Such statements generally should be placed in Section 4 of the Standard unless some overriding clarity issue can be identified. After review of the proposed reasons for the Standard revision, no discussion was found to explain why applicability statements were inserted into Requirements R2 and R3 rather than in Section 4. This commenter looked at the possible clarity issue at hand, but can't find justification for this construct. Inserting the following statements in Section 4 would more effectively communicate the applicability of distributed generation: "4.3.1 Those Protection Systems designed to protect BES distributed generation or associated collection systems regardless of voltage at points where the aggregate nameplate capacity is greater than 75 MVA. 4.3.2 Those protection systems associated with BES distributed generation where the aggregate nameplate capacity is equal or less than 75 MVA is not applicable." Of note, this commenter is not clear why the BES definition must be noted in the Standard, or why parallel usage of "dispersed power producing resources" should be followed. Cowlitz PUD respectfully submits that "distributed generation" is well understood and can be used while preserving the intent and clarity of the BES definition, and placement of applicability statements in this Standard is better suited in Section 4.
Duke Energy	Duke Energy would like to take this opportunity to thank the SDT for considering and implementing the recommendations we made. We believe these recommendations adequately address our initial concerns.

Organization	Question 3 Comment
Kansas City Power and Light	N/A
DTE Electric	No additional comments.
Southern Company: Southern Company Services, Inc; Alabama Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No.
Bonneville Power Administration	No.
Dominion	<p>PRC-004-3 (x) o M2; since the subparts have been updated, 2.3 needs to be removed in M2. o Guidelines and Technical Basis section-Definitions; Protection System Definition - 4th bullet should be revised to remove the word “station” as this word is not in the currently approved definition of Protection System in the NERC glossary of terms. In the PRC-004-3 (X) implementation plan, under the effective date section, there is no mention of the differences/exception listed in this standard for the Western Interconnection effective dates, this should be updated. PRC-004-2.1a(X) and PRC-004-3 (X) Rationale for Applicability - The sentence that says “Misoperations occurring on the Protection Systems of individual generation...”, is misleading because by definition (I4), the individual resources are BES, therefore misoperations occurring on the Protection Systems of individual resources would have an impact on BES reliability, while noting that “material impact” is not defined.</p>
Northeast Power Coordinating Council	<p>Regarding RC-004-3 (x): o M2; since the subparts have been updated, 2.3 needs to be removed in M2. o Guidelines and Technical Basis section-Definitions; Protection System Definition - 4th bullet should be revised to remove the word “station” from within the parentheses to be consistent with the currently approved definition of Protection System in the Glossary of Terms Used in NERC Reliability Standards. In the PRC-004-3 (X) Implementation Plan, under the effective date section, there is no mention of the differences/exceptions listed in this standard for the Western</p>

Organization	Question 3 Comment
	<p>Interconnection effective dates. This should be updated.PRC-004-2.1a(X) and PRC-004-3 (X) Rationale for Applicability - The sentence that says “Misoperations occurring on the Protection Systems of individual generation...”, is misleading because by definition (I4), the individual resources are BES, therefore misoperations occurring on the Protection Systems of individual resources would have an impact on BES reliability, while noting that “material impact” is not defined. In PRC-005-2(X), suggest adding the term “non-dispersed” to the wording of Part 4.2.5 to read “Protection Systems for the following non-dispersed BES generator facilities”The same suggestion for PRC-005-3(X).There is confusion surrounding the concurrent development of PRC-004-2.1a(X) and PRC-004-3(X). Is the intent to have both these versions merged into one? If so, that should be made clear. If not, then the numbering for one or the other should be changed. The NERC Standards Numbering System stipulates that the “one-digit numeral identifying the version of that standard” is the last number in the standards number. PRC-004-2.1a(X) and PRC-004-3(X) deal with different topics.</p>
<p>SERC Protection and Controls Subcommittee</p>	<p>The comments expressed herein 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>Tacoma Power</p>	<p>The implementation plans for PRC-004-2.1a(X) and PRC-004-3(X) do not tie the effective date of the standard revision to the effective date of the BES definition. This seems incongruent with the implementation plans for PRC-005-2(X), PRC-005-3(X), and PRC-005-X(X).</p>
<p>MRO NERC Standards Review Forum</p>	<p>The NSRF wishes to thank the SDT for including a very well written and industry needed Application Guidelines section of the proposed Standard. This should be mandatory for reviewed Standards.</p>

Organization	Question 3 Comment
New England States Committee on Electricity (NESCOE)	While the deadline for providing comments on proposed revisions to PRC-005 and VAR-002 under this Project 2014-01 has passed, NESCOE supports these proposed changes for the same reasons discussed above and offers the following minor suggestions for clarity: o PRC-005-2(X) - suggest adding the term “non-dispersed” to the wording of 4.2.5 to read “Protection Systems for the following non-dispersed BES generator facilities” o PRC-005-3(X) - same suggestion.
SPP Standards Review Group	Yes.In the 1st line of the Rationale Boxes in the Implementation Plans for PRC-004-2.1a(X) and PRC-004-3(X), change ‘include’ to ‘includes’.We have a concern in reference to the name plate rating for dispersed generation and the value of 75 MVA. The exemption in both standards applies to anything below 75MVA aggregate. For consistency, we would ask that all other generation resources below 75 MVA be included in the exemption.In both Implementation Plans (PRC-004-2.1a(X) and PRC-004-3(X)), Balancing Authority shows up in the applicability sections. It should be deleted in both places.