

## Comments Received Report

<b>Name</b>	2007-17.4 Order 803 Directive   PRC-005 SAR
<b>Start Date</b>	3/12/2015
<b>End Date</b>	4/11/2015

**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

<b>Full Name</b>	<b>Entity Name</b>	<b>Segment(s)</b>	<b>Region</b>	<b>Group Name</b>	<b>Group Member Name</b>	<b>Group Member Organization</b>	<b>Group Member Region</b>
Jason Marshall	ACES Power Marketing	6	MRO,WECC,TRE,SERC,SPP,RF C	ACES Standards Collaborators	Bob Solomon	Hoosier Energy	RFC
					Matt Caves	Western Farmers Electric Cooperative	SPP
					Ellen Watkins	Sunflower Electric Power Corporation	SPP
					Bill Hutchison	Southern Illinois Power Cooperative	SERC
					Ginger Mercier	Prairie Power	SERC
					Scott Brame	North Carolina Electric Membership Corporation	SERC
					Chip Koloini	Golden Spread Electric Cooperative	SPP
					Kevin Lyons	Central Iowa Power Cooperative	MRO
					Ryan Strom	Buckeye Power	RFC
Randi Heise	Dominion - Dominion	5		Dominion - RCS	Larry Nash	Dominion Virginia Power	SERC

	Resources, Inc.				Louis Slade	Dominion Resources, Inc.	SERC
					Connie Lowe	Dominion Resources, Inc.	RFC
					Randi Heise	Dominion Resources, Inc,	NPCC
Michael Lowman	Duke Energy	1,3,5,6	FRCC,SERC,RFC	Duke Ballot Body Members	Doug Hils	Duke Energy	RFC
					Lee Schuster		FRCC
					Dale Goodwine		SERC
					Greg Cecil		RFC
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO
					Amy Casucelli	Xcel Energy	
					Chuck Lawrence	American Transmission Company	
					Chuck Wicklund	Otter Tail Power Company	
					Dan Inman	Minnkota Power Cooperative, Inc	
					Dave Rudolph	Basin Electric Power Cooperative	

					Kayleigh Wilkerson	Lincoln Electric System	
					Jodi Jenson	Western Area Power Administration	
					Larry Heckert	Alliant Energy	
					Mahmood Safi	Omaha Public Utility District	
					Marie Knox	Midwest ISO Inc.	
					Mike Brytowski	Great River Energy	
					Randi Nyholm	Minnesota Power	
					Scott Nickels	Rochester Public Utilities	
					Terry Harbour	MidAmerican Energy Company	
					Tom Breene	Wisconsin Public Service Corporation	
					Tony Eddleman	Nebraska Public Power District	
	Northeast Power	10	NPCC		Alan Adamson	New York State	NPCC

Lee Pedowicz	Coordinating Council			NPCC--RSC-- 2014-04		Reliability Council, LLC	
					David Burke	Orange and Rockland Utilities Inc.	
					Greg Campoli	New York Independent System Operator	
					Sylvain Clermont	Hydro-Quebec TransEnergie	
					Kelly Dash	Consolidated Edison Co. of New York, Inc.	
					Gerry Dunbar	Northeast Power Coordinating Council	
					Kathleen Goodman	ISO - New England	
					Mark Kenny	Northeast Utilities	
					Helen Lainis	Independent Electricity System Operator	
					Alan MacNaughton	New Brunswick Power Corporation	

					Paul Malozewski	Hydro One Networks Inc.
					Bruce Metruck	New York Power Authority
					Lee Pedowicz	Northeast Power Coordinating Council
					Robert Pellegrini	The United Illuminating Company
					Si Truc Phan	Hydro-Quebec TransEnergie
					David Ramkalawan	Ontario Power Generation, Inc.
					Brian Robinson	Utility Services
					Wayne Sipperly	New York Power Authority
					Ben Wu	Orange and Rockland Utilities Inc.
					Peter Yost	Consolidated Edison Co. of New York, Inc.
					Michael Jones	National Grid
					Brian Shanahan	National Grid

					Connie Lowe	Dominion Resources Services, Inc.	
					Silvia Parada Mitchell	NextEra Energy, LLC	
Jeni Renew	SERC Reliability Corporation	10	SERC	SERC PCS	David Greene	SERC	SERC
					John Miller	GTC	
					Joel Masters	SCE&G	
					Charlie Fink	Entergy	
					Ryland Revelle	TVA	
					Steve Edwards	Dominion	
Pamela Hunter	Southern Company - Southern Company Services, Inc.	1,3,5,6	SERC	Southern Company	Robert A. Schaffeld	Southern Company Services, Inc.	SERC
					R. Scott Moore	Alabama Power Company	
					William D. Shultz	Southern Company Generation	
					John J. Ciza	Southern Company Generation and Energy Marketing	
Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP

					Karl Diekevers	Nebraska Public Power District	MRO
					Stephanie Johnson	Westar Energy Inc	SPP
					Bo Jones	Westar Energy Inc	SPP
					Tiffany Lake	Westar Energy Inc	SPP
					Steve Shipps	Westar Energy Inc	SPP
					James Nail	City of Independence , Missouri	SPP
					Kayleigh Wilkerson	Lincoln Electric System	MRO
					Jason Smith	Southwest Power Pool Inc	SPP



## Survey Questions

See the *Unofficial Comment Form* on the [Project Page](#) for additional background information.

*If you would like to bypass taking the survey, scroll down to submit.*

*This will allow you to view Social Survey and agree/disagree with an already posted comment using the "thumbs up/thumbs down" feature.*

*Submitting a "thumbs up/thumbs down" on another entity's comment enables a negative vote to count in the calculation of consensus.*

*I want to bypass taking the survey.*

**1. Do you agree that the scope and objectives of the revised SAR address the directive in Order No. 803? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.**

Yes

No

**2. The PSTMSDT has proposed revising the definition of "Automatic Reclosing" and "Component Type" to address the FERC directive in Order 803. Do you agree that the proposed revisions to defined terms as shown above address the directive? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.**

Yes

No

---

## Responses By Question

See the *Unofficial Comment Form* on the [Project Page](#) for additional background information.

### Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

### John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 1 - TRE**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

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**Dislikes:** 0

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**Andrew Puztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer:

**Answer Comment:**



**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

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**Dislikes:** 0

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**Dan Bamber - ATCO Electric - 1 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

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**Likes:** 0

**Dislikes:** 0

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**Andy Bolivar - NextEra Energy - Florida Power and Light Co. - 1 - FRCC,TRE,NPCC**

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**Jeni Renew - SERC Reliability Corporation - 10 - SERC**

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**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

**Dislikes:** 0

---

**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

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**Dislikes:** 0

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**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

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**Likes:** 0

**Dislikes:** 0

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**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Gowder - Florida Municipal Power Agency - 3,4,5,6 - FRCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Fair - Colorado Springs Utilities - 6 -**

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**Document Name:**

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**Dislikes:** 0

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**Dislikes:** 0

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**Thomas Foltz - AEP - 5 -**

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**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

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**Dislikes:** 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

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**Dislikes:** 0

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**David Jendras - Ameren - Ameren Services - 3 -**

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**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

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**Dislikes:** 0

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**Andrew Puztai - American Transmission Company, LLC - 1 -**

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**Likes:** 0

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---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC**

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**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.



Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Phan Si Truc

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

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**Dislikes:** 0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

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**Dislikes:** 0

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**Likes:** 0

**Dislikes:** 0

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**Andy Bolivar - NextEra Energy - Florida Power and Light Co. - 1 - FRCC,TRE,NPCC**

Selected Answer:

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

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**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

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**Likes:** 0

**Dislikes:** 0

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**Likes:** 0

**Dislikes:** 0

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**Chris Gowder - Florida Municipal Power Agency - 3,4,5,6 - FRCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Fair - Colorado Springs Utilities - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***1. Do you agree that the scope and objectives of the revised SAR address the directive in Order No. 803? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.***

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Gul Khan - Oncor Electric Delivery - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



---

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

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**Document Name:**

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**Dislikes:** 0

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**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

Selected Answer: No

**Answer Comment:**

Entergy support comments of the SERC Protection and Control Subcommittee (PCS).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

AEP believes the overall scope and objectives of the revised SAR are appropriate, however as discussed below, a definition needs to be drafted for “supervisory relay” so that it is clear exactly which devices are, and are-not, supervisory relays. As such, the SAR should be modified to accommodate the addition of this definition.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

The consideration of the applicability of generator station service transformers, and possible inconsistency with PRC-025-1, is not mentioned anywhere in FERC

Order No. 803, contradicts the BES Definition application process, exceeds the scope of the mandate, and should be removed from the SAR. The NSRF believes that this may have been left in this version of the SAR since the original SAR has been updated for this Project.

There is no conflict with PRC-025-1. The Applicability section of PRC-025-1 only capitalizes "Facilities" as a subsection heading, not to indicate BES Element per the defined term. "The following Elements associated with Bulk Electric System (BES) generating units..." proves this, as Element is defined as any electrical device, not necessarily BES. The Elements are only associated with BES Elements, otherwise Section 3.2 would just read "The following BES Elements...". FERC Order No. 733, paragraph 104, directs NERC to address Unit Auxiliary Transformers in PRC-025; there is no equivalent direction in Order No. 803 for PRC-005.

These are no BES Elements per the BES Definition. Per the NERC Bulk Electric System Definition Reference Document, April 2014, page 12: "The presence of a system service, a station service, or a generator auxiliary transformer does not affect the application of Inclusion I2. Transformers associated with system service, station service, or generator auxiliaries are evaluated under the core definition and Inclusion I1." They do not meet I1: "Transformers with the primary terminal and at least one secondary terminal operated at 100 kV or higher...", are not BES Elements, and do not belong in PRC-005.

We understand this paragraph is legacy wording from the previous recycled SAR. It would be best to remove it before this SAR is finalized.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

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**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer: Yes

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**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer: Yes

**Answer Comment:**

Ingleside Cogeneration LP (ICLP) agrees that the project team has captured FERC's language and intent in the SAR for Project 2007-17.4. However, we agree with a number of respondents to Order 803 that the reliability costs do not match the expected benefit. As a result, we would like to see the project team solicit this kind of information from stakeholders for further analysis. We believe that this supports the Risk-based processes that NERC has been moving toward – realizing that scarce resources expended on low-value initiatives takes attention away for more pressing ones (e.g.; cyber security and frequency response.)

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer: Yes

**Answer Comment:**

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**Likes:** 0

**Dislikes:** 0

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**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

a) The Directive does not specifically require the addition "Voltage and Current Sensing Devices associated with the supervisory".

b) Although we do not disagree that the appropriate voltage needed to determine 'hot vs dead line' and 'synch check' associated with reclosing schemes should be verified at the appropriate input to the supervisory relays, the devices themselves should not be included. See suggested solution in 2c.

- c) The SAR should be fresh and not drag along with it the original PRC-005-4 SAR wording – that previous SAR has already been vetted, voted, and the work resulting from it is already pending FERC approval.
- d) The SAR indicates various versions of the standards as the finished product – these conflicts should be resolved (won't the product of this drafting work be -6?)
- e) The SAR should be clean and only address the FERC Order 803. The red text at the bottom of page 3 of the SAR should be the content of the Industry Need section.
- f) The second paragraph of the Purpose or Goal section of the SAR is not needed.
- g) In the Detailed Description paragraph, suggest changing Item 2 from "Revise the implementation plans of PRC-005-2, PRC-005-3, ... to assure consistent and systematic implementation." to "Revise the implementation plans of PRC-005-3, .... to assure practically possible implementation." [note that PRC-005-2 has been removed and words have been changed].

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT references and supports the comments provided by the ISO/RTO Standards



Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

The Objective section on page 4 of the SAR should be revised to stipulate the revisions that will be needed for Automatic Reclosing, and Component Type that are listed in the Definitions Used in this Standard section of PRC-005-3. (The Proposed Methodology - PRC-005 Directive states on its page 2 that "This version of PRC-005 uses PRC-005-5 being developed under Project 2014-01 as the starting point for revisions to address the directive.") Suggest revising the Objectives section in the SAR to read "Provide clear, unambiguous requirements, standard specific definitions, and standard(s)..."

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Phan Si Truc

**Dislikes:** 0

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**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Selected Answer:** No

**Answer Comment:**

Hydro-Quebec TransEnergie supports comments from RSC-NPCC

**Document Name:**

**Likes:**

0

**Dislikes:**

0

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**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer:

Yes

**Answer Comment:**

**Document Name:**

**Likes:**

0

**Dislikes:**

0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer:

Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dan Bamber - ATCO Electric - 1 - WECC**

Selected Answer: No

**Answer Comment:**

Supervisory relay and voltage and current sensing devices are required on elements that need true synchronization. The sync-check required elements are at generating sites or on interconnecting elements that tie two transmission systems together.

Elements within a transmission system have limited sync-check functionality that can be by-passed. Does required maintenance in Table 4-3 actually enhance reliability on the BES? Can the maintenance cost out-weight the reliability benefits?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

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**Andy Bolivar - NextEra Energy - Florida Power and Light Co. - 1 - FRCC,TRE,NPCC**

Selected Answer: Yes

**Answer Comment:**

*NHT is in general agreement with the revised scope/objective included in this SAR regarding the addition of Supervisory type relays and voltage/current sensing devices. However, this revision when combined with the terminology "control circuitry associated with the reclosing relay or supervisory relay" (as stated in **Proposed Methodology** PRC-005 Directive bullet 4) may lead to misinterpretation by end users. Use of the terminology provided in the SAR may imply that circuit breaker"control circuit" testing will need to include formal "close (circuit) checks" to verify integrity of the entire close circuit. This may lead to unnecessary cycling/wear and tear of circuit breakers. Recommend that "bullet 4" be entirely eliminated or consider modifying the language in bullet 4 to "close circuitry **interconnections** associated with the reclosing relay or supervisor relay"*

**Document Name:**

Likes: 0

Dislikes: 0

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**Jeni Renew - SERC Reliability Corporation - 10 - SERC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

1) The Directive specifically required the addition of the "Supervisory relay that

monitors BES quantities (such as voltage, frequency, or voltage angle) and supervises operation of the reclosing relay” but does not require the addition of the “Voltage and Current Sensing Devices associated with the supervisory”. The addition of the “Voltage and Current Sensing Devices” seems to be an increase in scope relative to the original Directive.

To make the language acceptable, remove all requirements for Voltage and Current Sensing Devices associated with supervisory relays.

**Document Name:**

**Likes:** 1 SCANA - South Carolina Electric and Gas Co., 1,3,5,6, Shumpert RoLynda

**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

The proposed language is an expansion of scope beyond the directive in that it includes “Voltage and Current Sensing Devices associated with supervisory relays”, which is not a requirement of the directive. To make this language acceptable,

please remove all requirements for "Voltage and Current Sensing Devices associated with supervisory relays".

As currently proposed, the scope of this SAR is not clear. The cover page suggests that version 4 is being proposed by this SAR, while other edits suggest we are considering version 6. Superfluous information has been retained from the issue of this document as the SAR for PRC-005-4. Consequently, the "Industry Need" section is unnecessarily muddled. From the third paragraph forward, this section discusses Sudden Pressure relays rather than auto-reclosing schemes, and also addresses BA obligations, inconsistency with PRC-025-1, developments that followed PRC-005 versions 2 or 3, and the 24-year record retention requirements. These issues were supposedly addressed in the SAR for PRC-005-4 dated 2/12/2014. Were they not resolved in version 4?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

**Selected Answer:** No

**Answer Comment:**

The Revised SAR should recognize that definitions would also require revision in order to address the FERC directive in Order 803. We suggest the following addition on Page 4 of the Revised SAR: *"Provide clear, unambiguous requirements, **definitions**, and standard(s)..."*.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

(1) First, we are disappointed in NERC's response to the NOPR. We found it to be inappropriately specific in prescribing modifications to the standard. We believe the comments more appropriately would have simply agreed to address the Commission's concerns through the use of the standards development process. We believe NERC's very specific response was inconsistent with the purpose and intent of the standards development process, and that , in essence, NERC's action constitutes developing a standard outside the standards development process. We do note that the careful wording of the Commission directive does not appear to require NERC to implement the changes exactly as NERC proposed in its response. The Commission simply indicated that they find NERC's proposed changes acceptable, but there is no language ordering those changes to be implemented. The Commission directive is to "include supervisory devices," and not to implement NERC's proposed changes. This would be consistent with previous Commission guidance regarding reliability standards directives in which the Commission allows equally efficient and effective alternatives that meet the directive to be used.

(2) We believe a new clean SAR should be issued. The SAR appears to append the inclusion of supervisory relays in a Automatic Reclosing scheme to the previous

SAR which authorized adding sudden pressure relaying to PRC-005. However, the scope of the previous SAR has been completed since the sudden pressure relaying project will be presented to the NERC Board of Trustees for adoption in May.

(3) We are not opposed conceptually to the approach of including important supervising relays in the standard. However, our main concerns are around the process utilized as expressed above.

**Document Name:**

**Likes:** 1 Florida Municipal Power Agency, 3,4,5,6, Gowder Chris

**Dislikes:** 0

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**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris Gowder - Florida Municipal Power Agency - 3,4,5,6 - FRCC**

**Selected Answer:** No

**Answer Comment:**

It is FMPPA's opinion that the effort to address the FERC directive in Order No. 803



should be initiated by a new SAR, and not by a revision to an existing SAR, especially one that has been completed. The revised SAR contains a number of artifacts referring to development of PRC-005-4, which as already been adopted by the BOT and filed with FERC. The proposed methodology for addressing the directive states that PRC-005-5 will be used as the starting point for revisions, however, there is no mention of PRC-005-5 in the revised SAR.

The revised SAR states that the “SDT will develop requirement(s)”, but the proposed methodology being presented states that no revisions to Requirements are being proposed. The statement “(t)he SDT may elect to propose revisions to the standard regarding the scope of supervisory devices” is confusing to FMPA since NERC has already told FERC in its NOPR comments what the industry’s position is without consulting the industry through the standard development process. It seems to FMPA that NERC has already determined what standard revisions are to be made, and the SDT does not have any leeway to elect to do anything other than accept the scope of devices proposed by NERC.

FMPA is also confused as to why Balancing Authority has been selected as an applicable functional entity.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Shannon Fair - Colorado Springs Utilities - 6 -**

Selected Answer: No

**Answer Comment:**

1. We disagree with the findings of the NERC System Protection and Control Subcommittee technical paper in regards to sudden pressure relays being critical to the Reliability of the BES. Therefore including sudden pressure relays is not meeting the FERC directive in Order No. 803.

Sudden pressure relays, which do trip some transformers, are not important in preventing "instability, cascading, or separation." CSU believes that the inclusion of sudden pressure relays in the NERC Standards will not improve

The reliability of the BES, and are outside the FPA Section 215 jurisdiction. The following are some additional notes on this topic:

- Many transformers are not protected using sudden pressure relays. In fact, due to the sensitivity of sudden pressure relays to vibration, some areas of the country purposefully do not use sudden pressure relays for transformer protection.

- Many transformers that are protected using sudden pressure relays use a guarded trip scheme. For example, in order for the sudden pressure relay to trip the transformer there must also be another condition present such as an over current or differential trip.

- There is not a consistent application of sudden pressure relays in the industry, many transformers do not utilize these relays for protection, and no requirements exist to have sudden pressure relays. CSU believes that including them in a standard will discourage their use and/or encourage those that

currently use them to remove them from their protection scheme. Sudden pressure relays when applied correctly can be an asset in transformer protection, but are not important in preventing “instability, cascading, or separation.

2. We also dis-agree with including a requirement that the BA be required to provide largest unit information. This will happen upon request and does not need a requirement .

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***2. The PSTMSDT has proposed revising the definition of “Automatic Reclosing” and “Component Type” to address the FERC directive in Order 803. Do you agree that the proposed revisions to defined terms as shown above address the directive? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.***

**Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Oliver Burke - Entergy - Entergy Services, Inc. - 1 -**

Selected Answer: No

**Answer Comment:**

Entergy supports comments of the SERC Protection and Control Subcommittee (PCS).

**Document Name:**

**Likes:** 0

Dislikes: 0

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Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

Since there is no universally accepted definition of supervisory relays, simply adding “supervisory relays” as a qualifier to the definition of Automatic Reclosing would not be sufficient, as it is not clear which devices would or would-not be considered a supervisory relay. AEP recommends that clarity be provided as to the exact meaning of “supervisory relay”, as well as the team’s intent in including it, to remove any ambiguity in its potential application. AEP would like to clarify that the inclusion of the supervisory relay function pertains only to those functions which are automatic in nature. The following is what AEP would consider the difference between automatic supervisory relays (which we believe the team wishes to include) and manual supervisory relays (which we believe should be excluded from the proposed definition).

#### Automatic Supervisory Relay

An automatic supervisory relay uses a combination of one or more signal inputs, as listed below, within a predefined logic to initiate action on a certain component/circuit. Typically, this is done to verify proper operation/function.

- Voltage/Potential
- Current
- Frequency
- Communication signal from another device

#### Manually Operated Supervisory Relay

A manually operated supervisory relay is a static device that permits an operator/user to initiate action on a certain component/circuit. This can be done both:

- Locally - Allows local operators/users, on-site, to initiate action on a certain component/circuit.

- Remotely – Allows remote operators, typically in a dispatch center, to initiate action on a certain component/circuit.

AEP would also like to seek clarity on the maintenance activities applicable to supervisory relays. For example, the testing and calibration of supervisory relays as opposed to simply verifying their operation.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**David Jendras - Ameren - Ameren Services - 3 -**

Selected Answer: No

**Answer Comment:**

**Related to the third bullet: Please delete 'and Current Sensing' from “Voltage and Current Sensing Devices”. No Automatic Reclosing technologies use Current Sensing because current is not yet flowing. Both the ‘hot vs dead line’ and the ‘synch check’ are voltage functions.**



**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer: Yes

**Answer Comment:**

ICLP believes the language that has been proposed for the standard is technically accurate and consistent with other NERC Glossary terms. However, we are concerned that it does not directly match that used in the FERC Order. This will not be a problem if the rationale is provided in the initial posting of PRC-005-TBD, and clearly captured in the Supplementary Reference and RSAW. We assume that is the intent – but want to reinforce the reality that any ambiguity will be almost certainly be interpreted in the most all-encompassing manner; even penalizing those who are doing their best to comply with FERC's directives.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrew Puztai - American Transmission Company, LLC - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

- a) Related to the third bullet:
  - 1. If it remains note that 'relay' is missing after supervisory in third bullet.
  - 2. Please explain the need for 'Current Sensing Devices since both the 'hot vs dead line' and the 'synch check' are voltage functions.
- b) Our specific recommendation is as follows:
  - 1. Make relay potentially plural in the first and forth bullet: 'relay(s)'
  - 2. Remove the third bullet from the SAR language. Note: If it remains, add 'relay' after supervisory
  - 3. Change 'four' to 'three' in bullet sixth bullet.
- c) In order to address the voltage inputs to the Supervisory Relays, we recommend a similar approach that was done with the UFLS distributed relays. As such, add a Maintenance Activity associated with the Supervisory Relays to "Verify acceptable measurement of power system input values".

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**David Kiguel - David Kiguel - 8 -**

Selected Answer: No

**Answer Comment:**

The proposed definition of "Automatic Reclosing" should not be restricted to "Supervisory relay that monitors **BES** quantities ." The definition should be sufficiently general to include all supervisory relays that monitor **electrical quantities** (such as voltage, frequency, or voltage angle). The applicability to Supervisory relays that **monitor BES quantities** should then appear in the PRC-005 standard itself.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -**

Selected Answer: No

**Answer Comment:**

Tacoma Power generally supports the revised definitions, but has two comments. First, "Voltage and Current Sensing Devices associated with the supervisory" should be changed to "Voltage and current sensing devices associated with the supervisory relay." Second, clarification will be needed for what is intended by "Control circuitry associated with the...supervisory relay."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

ERCOT references and supports the comments provided by the ISO/RTO Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

“Any one of the two specific elements of Sudden Pressure Relaying.” does not appear in the posted PRC-005-3, but it does appear in PRC-005-4, PRC-005-5. Sudden Pressure Relaying should only be capitalized if it is formally defined. It is assumed that the two specific elements of sudden pressure relaying are the actuating device and the associated control wiring.

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Phan Si Truc

**Dislikes:** 0

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**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Selected Answer:** No

**Answer Comment:** Hydro-Quebec supports comments from RSC-NPCC

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mike Smith - Manitoba Hydro - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

**Duke Energy suggests the following revisions to Automatic Reclosing:**

**A. In bullet 2, replace “BES quantities” with “AC quantities”. We believe that “BES quantities” is undefined, unmeasurable, and vague. We believe this revision clarifies the components that are contained within an Automatic Reclosing scheme. For example, personnel performing the testing would actually be testing and/or verifying AC quantities and not BES quantities. Finally, any BES Element subject to the family of PRC-005 revisions would already be encompassed as part of the Applicability Section.**

**B. In bullet 3 we suggest changing “associated with the supervisory” with “associated with the supervisory relay” for consistency.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dan Bamber - ATCO Electric - 1 - WECC**

**Selected Answer:** No

**Answer Comment:**

Is the terminology "BES quantities" correctly used here? BES is usually refers to elements such as lines, transformers, etc.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Randi Heise - Dominion - Dominion Resources, Inc. - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

Minor comment; neither of the links provided in the SAR work (Roster, IERP report).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andy Bolivar - NextEra Energy - Florida Power and Light Co. - 1 - FRCC,TRE,NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**



Likes: 0

Dislikes: 0

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**Jeni Renew - SERC Reliability Corporation - 10 - SERC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

1) Related to the third bullet: if "Voltage and Current Sensing Devices" remains, please explain the need for 'Current Sensing Devices' since both the 'hot vs dead line' and the 'synch check' are voltage functions.

**The comments expressed herein represent a consensus of the views of the above-named members of the SERC PCS only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.**

**Document Name:**

Likes: 1 SCANA - South Carolina Electric and Gas Co., 1,3,5,6, Shumpert RoLynda

Dislikes: 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

To our knowledge, current sensing devices cannot be used to supervise reclosing. This needs correcting in the proposed language.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Paul Malozewski - Hydro One Networks, Inc. - 3 -**

Selected Answer: Yes

**Answer Comment:**

Sudden pressure relays are not included in the NERC Glossary of Terms. We recommend de-capitalizing the term "Sudden Pressure Relays".

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We would suggest to the drafting team to include in the standard a definition for the term 'Supervisory Devices' to make sure that there is no confusion on how this term will be used in reference to Automatic Reclosing Components.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Chris Gowder - Florida Municipal Power Agency - 3,4,5,6 - FRCC**

Selected Answer: Yes

**Answer Comment:**

FMPA does not agree that the addition of supervisory devices to PRC-005 is necessary to ensure the reliable operation of the Bulk Electric System. However, FMPA recognizes such additions have been directed by FERC, and agrees that the proposed revisions accomplish that goal.

The third bullet under Automatic Reclosing appears to be incomplete, and should have " relay." added to the end.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Fuchsia Davis - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Fair - Colorado Springs Utilities - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Additional Comments**

**ISO RTO Council Standards Review Committee**

**Charles Yeung**

1. Do you agree that the scope and objectives of the revised SAR address the directive in Order No. 803? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Yes

No

Comments:

The SRC is uncertain regarding the meaning of the first bullet shown in the “Detailed Description” section. First, this bullet seems to provide the SDT the ability to modify PRC-005 in perpetuity with the addition of the phrase “...subsequent versions of the standard”. Second, the SRC recommends that any additional directives that would result in revisions to PRC-005 and that are outside Order No. 803 should be subject to a new SAR. This phrase should be deleted from the “Detailed Description”.

1. Consider modifications as needed to address any FERC directives or guidance that may result from the Commission’s consideration of PRC-005-4 or subsequent versions of the standard.
2. The PSTMSDT has proposed revising the definition of “Automatic Reclosing” and “Component Type” to address the FERC directive in Order 803. Do you agree that the proposed revisions to defined terms as shown above address the directive? If not, please provide specific comments regarding the revision and any suggestions for alternatives to address the directive.

Yes

No