

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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|-----------------------------------------------------------------------------|---|-------------------------------|
| Protection System Maintenance |) | Docket Nos. RM14-8-000 |
| Reliability Standard |) | RD15-3-000 |
| |) | RM15-9-000 |
| North American Electric Reliability Corporation |) | |
| |) | |
| Protection System, Automatic Reclosing, and Sudden Pressure Relaying |) | |
| Maintenance Reliability Standard |) | |

MOTION TO DEFER IMPLEMENTATION AND REQUEST FOR SHORTENED RESPONSE PERIOD AND EXPEDITED ACTION

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. 385.212 (2015), the North American Electric Reliability Corporation (“NERC”) respectfully requests that the Commission defer the implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 from January 1, 2016¹ until after the Commission issues a final order on proposed Reliability Standard PRC-005-6, which is being filed concurrently with this motion.² For the reasons discussed below, NERC respectfully requests that the Commission shorten the period for responding to this motion to a period of seven (7) days and that the Commission consider this motion on an expedited timeframe, so that it may issue an order before December 14, 2015.

As noted, concurrently with this Motion, NERC is submitting for Commission approval a new version of the PRC-005 Reliability Standard: proposed Reliability Standard PRC-005-6.

¹ Under the approved PRC-005-4 implementation plan, PRC-005-4 will become effective on January 1, 2016, thereby retiring PRC-005-3 and PRC-005-3(i) before they ever become effective.

² In the alternative, as explained in that petition, NERC proposes approval of PRC-005-5, which reflects only those revisions necessary to ensure that the PRC-005 standard is applied consistently to dispersed generation resources in accordance with prior Commission-approved revisions to the PRC-005 standard.

NERC's proposed implementation plan for proposed Reliability Standard PRC-005-6 provides for the development of comprehensive Protection System Maintenance Programs that would address all new applicable systems in the approved and proposed versions of the PRC-005 Reliability Standards, thereby promoting reliability and the efficient use of ERO Enterprise and registered entity resources. Further, the proposed implementation plan would avoid uncertainty regarding the applicability of the PRC-005 standard to owners of dispersed generation resources following the January 1, 2016 effective date of PRC-005-4. NERC files the instant motion to avoid uncertainty and the patchwork implementation of requirements while the Commission considers PRC-005-6 and the proposed comprehensive implementation plan.

I. BACKGROUND

The PRC-005 Reliability Standard has been revised several times since its initial approval in Order No. 693³ to incorporate interpretations, clarify applicability, and respond to Commission directives. Version PRC-005-2 combined four standards that addressed maintenance and testing of protection and control systems into one comprehensive Reliability standard that included specific minimum maintenance activities and maximum time intervals of testing Protection System components.⁴ Version PRC-005-2(i), which revised PRC-005-2 to clarify the standard's applicability to dispersed generation resources, is the currently-enforceable version of the standard.⁵ The Commission has also approved revisions to the standard in PRC-005-3, to address Automatic Reclosing;⁶ PRC-005-3(i), to continue the dispersed generation

³ *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 ("Order No. 693"), *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

⁴ The Commission approved Reliability Standard PRC-005-2 on December 19, 2013 in Order No. 793. *Protection System Maintenance Reliability Standard*, Order No. 793, 145 FERC ¶ 61,253 (2013).

⁵ The Commission approved Reliability Standards PRC-005-2(i) and PRC-005-3(i) on May 29, 2015. Letter Order, *N. Am. Elec. Reliability Corp.*, 151 FERC ¶ 61,186 (2015).

⁶ The Commission approved Reliability Standard PRC-005-3 on January 22, 2015 in Order No. 803. *Protection System Maintenance Reliability Standard*, Order No. 803, 150 FERC 61,039 (2015).

resources applicability revisions in PRC-005-2(i); and PRC-005-4, to address Sudden Pressure Relaying.⁷ Additionally, proposed PRC-005-2(ii) and PRC-005-3(ii), which were developed as part of a larger project to revise the definition of “Remedial Action Scheme,” are pending Commission approval.⁸

Beginning with PRC-005-2, PRC-005 implementation plans have provided a phased implementation approach. Depending on the type of device and specific requirement, implementation is divided into phases, requiring registered entities to gradually ensure compliance of a percentage of their devices until they reach 100% compliance. In the PRC-005-3 and PRC-005-4 implementation plans, NERC carried forward this phased approach. However, recognizing that entities would need a reasonable period of time to incorporate Automatic Reclosing and Sudden Pressure Relaying into their Protection System Maintenance Programs, these implementation plans also provided a phased approach for compliance based on the date of regulatory approval for the standard version that introduced these systems. To demonstrate, in the implementation plan for PRC-005-4, entities would be required to calculate their compliance dates for their Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components from the regulatory approval dates of PRC-005-2, PRC-005-3, and PRC-005-4, respectively.

Since the approval date of these PRC-005 standard versions, the NERC Board of Trustees has approved, and NERC is concurrently submitting with this motion, the proposed Reliability Standard PRC-005-6 for Commission approval. The proposed standard brings supervisory

⁷ The Commission approved Reliability Standard PRC-005-4 on September 17, 2015 in Order No. 813. *Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance Reliability Standard*, Order No. 813, 152 FERC ¶ 61,199 (2015).

⁸ Proposed Reliability Standards PRC-005-2(ii) and PRC-005-3(ii) and the associated implementation plan for the revised definition of Remedial Action Scheme are currently pending before the Commission in Docket No. RM15-13-000.

devices associated with applicable Automatic Reclosing in the scope of the PRC-005 standard in response to a Commission directive in Order No. 803.⁹ Further, the proposed standard carries forward certain dispersed generation resources applicability revisions previously approved by the Commission in PRC-005-2(i) and PRC-005-3(i).

II. MOTION

NERC respectfully requests that the Commission defer implementation of approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 and the corresponding revised definitions of “Protection System Maintenance Program.”

As described above, multiple versions of the PRC-005 standard are now pending enforcement or Commission approval, creating a patchwork approach to implementation. Under the current approach, entities would be required to perform multiple successive revisions to their Protection System Maintenance Plans to address new in-scope systems introduced in each PRC-005 version. Updating these programs is expected to be a time consuming task for many entities, and there have been concerns regarding maintaining and auditing multiple program versions and compliance schedules.

NERC proposes to address these concerns by simplifying and streamlining the implementation of PRC-005 requirements for all newly-applicable systems in the proposed PRC-005-6 implementation plan. Specifically, the proposed PRC-005-6 implementation plan allows entities a reasonable period of time to develop comprehensive Protection System Maintenance Programs to address newly-applicable systems introduced in PRC-005-2(ii), PRC-005-3, PRC-005-3(i), PRC-005-3(ii), PRC-005-4, PRC-005-5, and PRC-005-6.¹⁰ This approach better

⁹ See Order No. 803 at P 31.

¹⁰ The proposed PRC-005-6 implementation plan incorporates by reference the existing implementation schedule for Protection System Components made applicable by PRC-005-2 and PRC-005-2(i).

promotes reliability by allowing for a comprehensive consideration of all new devices subject to PRC-005, resulting in fewer misidentified or missed devices. This approach also promotes the efficient use of ERO Enterprise and entity resources by eliminating the need to develop and audit multiple revisions to Protection System Maintenance Programs.

Further, the proposed PRC-005-6 implementation plan, which provides for a direct transition from currently-effective PRC-005-2(i) to proposed PRC-005-6, avoids an unintended consequence associated with the scheduled January 1, 2016 effective date of PRC-005-4. Specifically, in May 2015, the Commission approved a series of revisions designed to address the applicability of the PRC-005 standard to owners of dispersed generation resources. The Commission approved these revisions in currently-effective version PRC-005-2(i) and pending PRC-005-3(i) to ensure continuity in future versions of the PRC-005 Reliability Standard.¹¹ These dispersed generation resources applicability revisions are reflected with only minor clarifying modifications in proposed PRC-005-6. However, these revisions are not reflected in PRC-005-4.¹²

Should PRC-005-4 be allowed to become effective on January 1, 2016, there could be significant uncertainty regarding the applicability of the PRC-005 standard to the individual dispersed generation resources excluded under currently-effective PRC-005-2(i) and the proposed, successor versions of the PRC-005 standard. This uncertainty would run contrary to

¹¹ See *supra* n. 5 at n. 4 (“In the immediate proceeding, we approve the requested modifications to both the currently effective standard [PRC-005-2], and the approved but not yet effective version of the standard [PRC-005-3], to ensure continuity in the application of the provisions pertaining to dispersed generation.”)

¹² As NERC noted in its petition for approval of PRC-005-4, NERC was then in the process of developing corresponding changes to PRC-005-4 (through the development of PRC-005-5) to address applicability to dispersed generation resources. See *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standard PRC-005-4*, Dkt. No. RM15-9-000 (Dec. 18, 2014) at 2-3.

both the Commission and NERC's clear intent that these dispersed generation resources revisions be reflected in future versions of the PRC-005 standard.

To avoid this uncertainty and the patchwork implementation of requirements for new applicability, NERC requests that the Commission grant this motion to defer implementation of the approved but not yet effective PRC-005 standard versions. Further, in light of the pending January 1, 2016 effective date of PRC-005-4, NERC requests that the Commission shorten the period to respond to this motion to seven days and act in an expedited timeframe. Should the Commission ultimately approve proposed PRC-005-6, NERC respectfully requests that the Commission continue to defer implementation until the effective date of PRC-005-6 to allow the PRC-005-6 implementation plan to operate as intended. However, should the Commission not approve proposed PRC-005-6, NERC requests that the Commission defer implementation of PRC-005-3, PRC-005-3(i), and PRC-005-4 an additional six months from the effective date of the Commission's order remanding the proposed standard to allow entities a reasonable amount of time to come into compliance.

III. CONCLUSION

For the reasons stated above, NERC respectfully requests that the Commission:

- defer the implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 from January 1, 2016 until after the Commission issues a final order regarding proposed Reliability Standard PRC-005-6;
- shorten the period for responding to this motion to seven days; and
- consider this motion on an expedited timeframe, so that it may issue an order before December 14, 2015.

Respectfully submitted,

/s/ Lauren A. Perotti

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November 13, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 13th day of November, 2015.

/s/ Lauren A. Perotti

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