

# Consideration of Comments

## Project 2014-01 Standards Applicability for Dispersed Generation Resources

The Project 2014-01 Drafting Team thanks all commenters who submitted comments on the standard. The standard was posted for a 45-day public comment period from December 8, 2014 through January 22, 2015. Stakeholders were asked to provide feedback on the standard and associated documents through a special electronic comment form. There were 17 sets of comments, including comments from approximately 64 different people from approximately 50 companies representing all 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 Project 2014-01 Standards Applicability for Dispersed Generation Resources (DGR) standard drafting team's (SDT) 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 the standards, but that specific concerns were expressed. 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. Any comments made on another standard are addressed in the DGR SDT's response to comments on that standard.

### 1. Summary Consideration

Based on the results from the recent comment and ballot period, it appears that industry overwhelmingly agrees with the DGR SDT's recommendations on applicability changes to PRC-005-5 to account for the unique characteristics of dispersed power producing resources<sup>1</sup> in the standard. However, there are some disagreements among stakeholders and suggestions for language revisions contained in industry comments. To the extent that there are comments beyond the scope of this SDT, those comments will be communicated to the appropriate team for consideration.

The DGR SDT has carefully reviewed and considered each stakeholder comment and has revised its recommendations where suggested changes improve clarity and are consistent with DGR SDT intent

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<sup>1</sup> The terms "dispersed generation resources" and "dispersed power producing resources" are used interchangeably in Project 2014-01 because the former term was used in the Standards Authorization Request for the project, while the latter term is in line with terminology used in the revised definition of the BES.

and apparent industry consensus. Several commenters suggested non-substantive language changes for standard language as well as explanatory language, such as language in particular rationale boxes. The DGR SDT has carefully considered each comment and has implemented non-substantive revisions to further clarify the language included in section 4.2.5 based on comments received. The DGR SDT is not changing the intent of the standard modification.

All recommended changes are non-substantive as contemplated by the NERC Standard Processes Manual and therefore do not require an additional ballot. The DGR SDT's consideration of all comments follows.

## **2. General Comments**

Multiple commenters recommended clarifying the language in 4.2.5. The DGR SDT agrees and has therefore made non-substantive revisions to the terms to clarify the intent of the DGR SDT.

One commenter recommended clarifying the language in 4.2.6.1. The DGR SDT agrees and has therefore made clarifying changes as appropriate.

One commenter noted that the Implementation Plan stated the date PRC-005-4, with its associated Implementation Plan, was adopted by the Board of Trustees was incorrect. The DGR SDT agrees that the date was stated incorrectly and has corrected.

## **3. PRC-005**

At least one commenter suggested combining Sub-Parts 4.2.6 and 4.2.6.1 into one sub-Part. The DGR SDT thanks the commenter for the suggestion; however, the suggested revision does not account for the limitation to applicability as--the point where those resources aggregate to greater than 75 MVA to a common point of connection at 100 kV or above.

At least one commenter recommend that a statement specifically excluding individual generating units be added in Section 4.2.6.1. It is the position of the DGR SDT that 4.2.6.1. adequately excludes the individual generators as written.

More than one commenter noted that there appeared to be a "stranded paragraph" under section 4.2.5.2 and questioned whether the paragraph should be numbered as 4.2.5.3. The SDT has made the formatting and clarifying changes as appropriate.

One commenter noted that PRC-019-2, PRC-024-2, and PRC-006-2 apply to the individual dispersed generator if the protection applies to the individual unit, (in addition to or rather than the 75MVA aggregate), and advocated that PRC-005-5 should require maintenance of those Protection Systems on those individual units.

It is the DGR SDT's position that the proposed revisions to the standard adequately support reliability as written. Therefore, the DGR SDT declines to adopt this suggestion.

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](mailto:valerie.agnew@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>2</sup>

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<sup>2</sup> The appeals process is in the Standard Processes Manual: [http://www.nerc.com/comm/SC/Documents/Appendix\\_3A\\_StandardsProcessesManual.pdf](http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf)

- 1. **Do you agree with the revisions proposed in PRC-005-5 to clarify applicability of PRC-005-4 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. ....10**
- 2. **Do you have any additional comments to assist the DGR SDT in further developing its recommendations?.....13**

**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	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region	Segment Selection										
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										
5.	Kelly Dash	Consolidated Edison Co. of New York, Inc.		NPCC	1										
6.	Gerry Dunbar	Northeast Power Coordinating Council		NPCC	10										
7.	Kathleen Goodman	ISO - New England		NPCC	2										
8.	Michael Jones	National Grid		NPCC	1										
9.	Mark Kenny	Northeast Utilities		NPCC	1										
10.	Helen Lainis	Independent Electricity System Operator		NPCC	2										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment												
			1	2	3	4	5	6	7	8	9	10			
11. Connie Lowe	Dominion Resources Services, Inc.	NPCC 5													
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. Robert Pellegrini	The United Illuminating Company	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. Paul Malozewski	Hydro One Networks Inc.	NPCC 1													
21. Brian Shanahan	National Grid	NPCC 1													
22. Wayne Sipperly	New York Power Authority	NPCC 5													
23. Ben Wu	Orange and Rockland Utilities Inc.	NPCC 1													
24. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC 3													
2.	Group	Don Hargrove	OG&E Compliance	X		X		X	X						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Terri Pyle	Oklahoma Gas and Electric Co.	SPP	1											
2.	Don Hargrove	Oklahoma Gas and Electric Co.	SPP	3											
3.	Leo Staples	Oklahoma Gas and Electric Co.	SPP	5											
4.	Jerry Nottnagel	Oklahoma Gas and Electric Co.	SPP	6											
3.	Group	Phil Hart	Associated Electric Cooperative, Inc.	X		X		X	X						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Central Electric Power Cooperative		SERC	1, 3											
2.	KAMO Electric Cooperative		SERC	1, 3											
3.	M & A Electric Power Cooperative		SERC	1, 3											
4.	Northeast Missouri Electric Power Cooperative		SERC	1, 3											
5.	N.W. Electric Power Cooperative, Inc.		SERC	1, 3											
6.	Sho-Me Power Electric Cooperative		SERC	1, 3											
4.	Group	Robert Rhodes	SPP Standards Review Group		X										
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Kevin Foflygen	City Utilities of Springfield	SPP	1, 4											

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
2.	Stephanie Johnson	Westar Energy	SPP	1, 3, 5, 6																
3.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6																
4.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6																
5.	Shannon Mickens	Southwest Power Pool	SPP	2																
6.	James Mizell	Westar Energy	SPP	1, 3, 5, 6																
7.	James Nail	City of Independence, MO	SPP	3, 5																
8.	Jason Smith	Southwest Power Pool	SPP	2																
9.	Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4																
5.	Group	Connie Lowe	Dominion		X		X		X	X										
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Randi Heise	NERC Compliance Policy	NPCC	5																
2.	Louis Slade	NERC Compliance Policy	RFC	5, 6																
3.	Larry Nash	Electric Transmission Compliance	SERC	1, 3, 5, 6																
6.	Group	Michael Lowman	Duke energy		X		X		X	X										
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Doug Hils		RFC	1																
2.	Lee Schuster		FRCC	3																
3.	Dale Goodwine		SERC	5																
4.	Greg Cecil		RFC	6																
7.	Group	Kathleen Black	DTE Electric Co.				X	X	X											
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Kent Kujala	NERC Compliance	RFC	3																
2.	Daniel Herring	NERC Training & Standards Development	RFC	4																
3.	Mark Stefaniak	Merchant Operations	NPCC	5																
4.	David Szulczewski	DE-EE Relay Eng Supv																		
5.	Chris Divney	Relay Performance																		
8.	Individual	Reena Dhir	Manitoba Hydro		X		X		X	X										
9.	Individual	David Kiguel	David Kiguel															X		
10.	Individual	Jeremy Voll	Basin Electric Power Cooperative		X		X		X									X		
11.	Individual	Craig Jones	Idaho Power																	

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
12.	Individual	Thomas Foltz	American Electric Power	X		X		X	X				
13.	Individual	Marc Donaldson	Tacoma Power	X		X	X	X	X				
14.	Individual	William English	Consumers Energy Company			X	X	X					
15.	Individual	Sergio Banuelos	Tri-State Generation and Transmission Association, Inc.	X		X		X					
16.	Individual	Mike Smith	Manitoba Hydro	X		X		X	X				
17.	Individual	David Jendras	Ameren	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).

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. Do you agree with the revisions proposed in PRC-005-5 to clarify applicability of PRC-005-4 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.

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	No	Sub-Parts 4.2.6 and 4.2.6.1 can be combined into one sub-Part 4.2.6 to read:4.2.6 Protection Systems and Sudden Pressure Relaying for BES dispersed power producing Facilities identified through Inclusion I4 of the BES definition.
SPP Standards Review Group	No	The structure of 4.2.5 under Applicability is awkward and unclear. We suggest revising 4.2.5 to read 'Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES but not included through Inclusion I4 of the BES definition, including:'
DTE Electric Co.	No	We recommend that a statement specifically excluding individual generating units be added in Section 4.2.6.1. Section 4.2.5 should be restated to clarify its meaning, especially the phrase "for generators not identified through Inclusion I4 of the BES definition".
David Kiguel	No	The meaning of the phrase "for generators not identified through Inclusion I4 of the BES definition," inserted in Section 4.2.5 of PRC-005-5 is not clear. If the intent is to include protections for generators that are not BES because they are not captured by Inclusion I4 of the BES definition, I suggest inserting the word "and" so the applicability is clearly stated as "Protection Systems and Sudden Pressure Relaying for (a) generator Facilities that are part of the BES, and (b) generator Facilities that are not identified through Inclusion I4 of the BES definition."
American Electric Power	No	Facilities Section4.2.5:There appears to be a “stranded paragraph” under section 4.2.5.2 “Protection Systems and Sudden Pressure Relaying for

Organization	Yes or No	Question 1 Comment
		<p>station service or excitation transformers connected to the generator bus of generators which are part of the BES, that act to trip the generator either directly or via lockout or tripping auxiliary relays.” Should this paragraph instead be classified as 4.2.5.3?</p> <p>4.2.6: The word “facilities” should be removed from 4.2.6.1 so that it reads “Protection Systems and Sudden Pressure Relaying used in aggregating...”. We suspect its inclusion may have been unintentional, but if not, we request that the drafting team explain its inclusion.</p>
Consumers Energy Company	No	I agree with the proposed changes to 4.2 Facilities, however the Standard is missing the label 4.2.5.3 at the bottom of page 3. The Standard should not be approved until this error is corrected.
Ameren	No	PRC-019-2, PRC-024-2, and PRC-006-2 apply to the individual dispersed generator if the protection applies to the individual unit, (in addition to or rather than the 75MVA aggregate). Thus, we advocate that PRC-005-5 should require maintenance of those Protection Systems on those individual units.
OG&E Compliance	Yes	
Associated Electric Cooperative, Inc.	Yes	Although AECEI agrees with the intent of the language, applicability section 4.2.5 could use some clarity. Suggested language: "Protection Systems and Sudden Pressure Relaying for generator Facilities that are included within the BES definition, but not identified through Inclusion I4, including:"
Dominion	Yes	
Duke energy	Yes	Duke Energy would like to thank the SDT for its effort on this project and agrees with the changes made to PRC-005-5.

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	Yes	
Basin Electric Power Cooperative	Yes	
Idaho Power	Yes	
Tacoma Power	Yes	
Tri-State Generation and Transmission Association, Inc.	Yes	<p>Tri-State G&amp;T believes the language in the Facilities Section 4.2.5 "Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including:" is confusing as it is currently written. We believe the intent was in the right place in trying to exclude the individual dispersed generating units. We would suggest possibly using language such as "Protection System and Sudden Pressure Relaying for generator Facilities that are part of the BES, with the exception of those generator units identified through Inclusion I4 of the BES definition, including:".</p>
Manitoba Hydro	Yes	

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

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	
SPP Standards Review Group	No	
Dominion	No	
Duke energy	No	
DTE Electric Co.	No	No Comments
Manitoba Hydro	No	
David Kiguel	No	
Idaho Power	No	
Consumers Energy Company	No	
Tri-State Generation and Transmission Association, Inc.	No	
Manitoba Hydro	No	
Ameren	No	

Organization	Yes or No	Question 2 Comment
OG&E Compliance	Yes	The language in 4.2.5 is a little confusing until you read 4.2.6, and still it does not read clearly. We suggest modifying the language as follows. It doesn't change the meaning, but makes it easier to understand. CURRENT - 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including: SUGGESTED - 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES and not identified through Inclusion I4 of the BES definition, including:
Basin Electric Power Cooperative	Yes	Section 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including: The inclusion of the "for generators not identified through Inclusion I4 of the BES definition" is worded in a way that makes it sound like all generators that are not BES also need to be subject to this standard. This is the wrong approach to the standard as it would then make every generator applicable to PRC-005. This should be removed from the applicability section.
American Electric Power	Yes	AEP supports the overall efforts of the drafting team, and agree in principle with the apparent purpose and intent of the standard. Our negative vote is driven solely by the inclusion of the word "facilities" in 4.2.6.1 of the Applicability section.
Tacoma Power	Yes	The Implementation Plan states, "Reliability Standard PRC-005-4, with its associated Implementation Plan, was adopted by the Board of Trustees on November 7, 2013." Version 4 of PRC-005 was adopted later than November 7, 2013.

END OF REPORT