

Implementation Plan for PRC-002-02

Background

In developing the implementation plan, the Standard Drafting Team considered the following:

1. The requirements set forth in the proposed standard are more stringent than the existing requirements in the FERC approved standard PRC-018-1 and any regional requirements resulting in the implementation of PRC- 002-1.
2. The timeframe required by nuclear plants to be compliant will be dependent upon the period between refueling outages, which typically is around 24 months.
3. Any implementation plan will be impacted by the resource availability and approval processes that the Transmission Owners and Generator Owners have to go through every year.
4. PRC-018-1 as approved by FERC in June 2007 contained requirements that were to be included in Regional Reliability Organizations' (RRO) procedures, e.g. Requirement 1.1 regarding time synchronization. PRC-002-1, a fill-in-the-blank standard, contained a list of subject matter that was to be addressed in the RRO procedures in addition to the RRO procedure related requirements from PRC-018. Although not approved by FERC for monetary enforcement, PRC-002-1 was characterized as a good utility practice standard that warrants continued monitoring. In addition, some items such as time synchronization were the subject of blackout recommendations.

The intended effective date of the PRC-002-1 requirements for the development of RRO procedures assumed that nine months from the NERC Board approval on August 2, 2006, the RRO procedures would have been issued, namely May 2007. Full compliance implementation of requirements such as time synchronization would be achieved by June 2011. The SDT proposes an effective date for requirements previously contained in PRC-018, which do not have fill-in-the-blank characteristics, such as R1.1, of 18 months following regulatory approval. In this manner, such requirements will continue to be on the same time table for full compliance implementation as intended by PRC-018-1. This includes approximate times to complete the proposed standard and obtain NERC and regulatory approval.

All other requirements in this proposed continent wide draft standard effectively become the previous RRO fill-in-the-blank requirements. Since these requirements are not necessarily identical to any current or proposed regional procedures, the SDT believes that it is appropriate to provide the same preparatory time margin, namely four years for full compliance implementation from the time of regulatory approval, as was intended in PRC-002-1 & PRC-018-1 when issuance of an approved RRO procedure was referenced.

Effective Dates for PRC-002-2 Requirements R1 through R11

1. The first day of the first calendar quarter four years after applicable Regulatory Approval, or in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter two years after Board of Trustees adoption:
 - a. Each Responsible Entity shall be at least 50% compliant on monitored equipment
2. The first day of the first calendar quarter four years after applicable Regulatory Approval, or in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter four years after Board of Trustees adoption:
 - a. Each Responsible Entity shall be 100% compliant on monitored equipment.

Effective Dates for PRC-002-2 Requirements R12 and R13 (PRC-018-1 R1.1 and R1.2):

1. The first day of the first calendar quarter eighteen months after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter eighteen months after Board of Trustees adoption.