

Table of Issues and Directives Associated with PRC-003-1			
Source	Directive Language (including pg #)	Disposition	Section and/or Requirement(s)
Fill in the Blank Team	368. Review PRC-003 and PRC-004 together to identify the specific requirements of the functional entities (include specific requirements for each functional entity).	PRC-003-1 will be retired, replaced by PRC-004-3. Responsibility to develop procedures has been reassigned to the Transmission Owner, Generation Owner, and Distribution Provider in revised standard PRC-004-3, and specific elements that are required to be in those procedures have been enumerated. The RRO has been deleted from the Applicability section.	PRC-004-3 Applicability section and Requirement R1.
Fill in the Blank Team	369. This is a North American Standard as written which places requirements on the regions to develop a procedure. However, PRC-004 requires functional entities to comply with the procedures the RROs develop. Craft a new PRC-003 as a North American standard.	Rather than place an obligation on the regions, this new standard requires specific procedural elements that must be implemented by the Functional Entities.	PRC-004-3 Applicability section and Requirement R1.
Fill in the Blank Team	370. Modify PRC-003 to include specific requirements for each functional entity. Each of the regional plans needs to be reviewed to determine what should be included in the North American standard. The current PRC-003 defines requirements for RROs. The drafting	The new standard includes a specific requirement for the Functional Entities. Prior work by the regions to develop uniform reporting requirements has been taken into account, and the standard incorporates these lessons learned.	PRC-004-3 Requirement R1 and the format specified by the ERO (referenced in Section 1.4 Additional Compliance

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			Information).
Version 0 Team	371. Need to define evidence	PRC-003-1 will be retired, replaced by PRC-004-3. Language of revised standard PRC-004-3 has greater clarity with respect to prior versions. Each Measure clearly identifies the kind of evidence necessary for compliance. Requirement R1 also contains Parts which specify the evidence required for drafting a Corrective Action Plan, action plan, or declaration.	PRC-004-3 Measures M1 through M7 and Requirement R1
Version 0 Team	372. Change wording to reporting instead of monitoring	PRC-003-1 will be retired, replaced by PRC-004-3. Revised standard PRC-004-3 language conveys a different context with greater clarity than prior versions. The words monitor, monitoring or reporting are not used in the standard requirements. The word report is used in revised standard PRC-004-3 Measure M2 (context: investigative report) and also PRC-004-3 Section 1.4 Additional Compliance Information requires functional entities to report Misoperations data quarterly.	PRC-004-3 Measure M2 and Section 1.4 Additional Compliance Information.

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Phase III/IV Team	373. Enhance the applicability section to clarify that the systems addressed by the requirements are limited to:	The team recognizes the definition of the BES is under development and does not want to preclude the efforts of that team with regards to the applicability of this standard. Adding specific limitations as suggested would possibly require extensive modification once the BES definition is completed. Additionally, the Phase II/IV team offers no justification for excluding elements of the BES form this standard.	PRC-004-3 Applicability section.
Phase III/IV Team	374. All transmission circuits 200 kV and above	The team recognizes the definition of the BES is under development and does not want to preclude the efforts of that team with regards to the applicability of this standard. Adding specific limitations as suggested would possibly require extensive modification once the BES definition is completed. Additionally, the Phase II/IV team offers no justification for excluding elements of the BES form this standard.	PRC-004-3 Purpose, Applicability Section, and Requirement R1 .
Phase III/IV Team	375. All transmission circuits 100 kV to 200 kV operationally significant circuits, as defined by the RROs	The team recognizes the definition of the BES is under development and does not want to preclude the efforts of that team with regards to the applicability of this standard. Adding specific limitations as suggested would possibly require extensive modification once the BES definition is completed. Additionally, the Phase	PRC-004-3 Purpose, Applicability Section, and Requirement R1 .

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		II/IV team offers no justification for excluding elements of the BES from this standard.	
Phase III/IV Team	376. Generator protection systems, whose misoperations impact the bulk electric system	The team recognizes the definition of the BES is under development and does not want to preclude the efforts of that team with regards to the applicability of this standard. Adding specific limitations as suggested would possibly require extensive modification once the BES definition is completed.	PRC-004-3 Applicability section and Requirement R1 .
Phase III/IV Team	377. The RRO should be required to demonstrate that the requirements developed in accordance with R1 produce the desired result.	The standard now removes the ability of an RRO to develop a deficient procedure. Instead, it specifically enumerates several procedural elements that, if implemented, will produce the desired result.	PRC-004-3 Applicability section, Requirement R1, and VSLs.
Phase III/IV Team	378. In R1.2 change format to content	Revised standard PRC-0004-3 language conveys a different context with greater clarity than prior versions. The revised standard does not include the words format or content.	N/A

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NERC	659. Modify standard to conform to the latest version of NERCs Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure	PRC-003-1 will be retired, replaced by PRC-004-3. The revised standard PRC-004-3 is based on the new RBS format with development work based on the latest version of the NERC Standard Drafting Team Guidelines and ERO Rules of Procedure.	Reliability standard PRC-004-3.
FERC Order 693	1077. Consider if greater consistency can be achieved in the standard as suggested by APPA.	Greater consistency has been provided by establishing the core elements that must be included in any entity's procedure for identifying and correcting Protection System Misoperations. Additionally, further consistency has been created by specifying the format for periodic compliance reporting.	PRC-004-3 Applicability section, Requirement R1 and Section 1.4 Additional Compliance Information.

Table of Issues and Directives Associated with PRC-004

Source	Directive Language (including pg #)	Disposition	Section and/or Requirement(s)
Fill in the Blank Team	379. Review PRC-003 and PRC-004 together to identify the specific requirements of the functional entities.	<p>PRC-003-1 will be retired. PRC-003-1 assigned responsibility to the RRO to maintain procedures for identification through resolution of BES Misoperations. Responsibility has been reassigned to the Transmission Owner, Generation Owner, and Distribution Provider in revised standard PRC-004-3 which requires a review of all events to identify all BES Misoperations. The RRO has been deleted from the Applicability section.</p> <p>PRC-004-2 essentially requires the Transmission Owner, Generator Owner, and Distribution Provider to identify and correct BES Misoperations per the RRO procedure and to also report BES Misoperation data to the RRO. Reference to the RRO procedure has been deleted and the co-mingled actions of Requirements R1 and R2 have been unbundled into 5 separate requirements in revised standard PRC-004-3. Requirement R3 is now the Periodic Data submittal language of Section 1.4 Additional Compliance Information in the latest version of PRC-004.</p>	PRC-004-3 Applicability section, Requirement R1 , and Section 1.4 Additional Compliance Information.

Table of Issues and Directives Associated with PRC-004

Source	Directive Language (including pg #)	Disposition	Section and/or Requirement(s)
Fill in the Blank Team	380. See notes for PRC-003-1.	Fill in the Blank Team comments 368-370 for PRC-003-1 have been considered with disposition drafted to reference PRC-003-1, PRC-004-2 and the revised standard PRC-004-3 as appropriate.	N/A
Fill in the Blank Team	381. Coordinate the revision of this standard with the revision to standard PRC-003. PRC-003 needs to be written as a North American standard with requirements for each functional entity as appropriate. Once PRC-003 is modified, the only changes needed to PRC-	Both PRC-003-1 and PRC-004-3 were reviewed. PRC-003 and not PRC-004 will be retired because PRC-003 assigns procedure responsibility to the RRO. It is more appropriate to incorporate the salient ideas of PRC-003 into the revised PRC-004 standard. The revised standard PRC-004-3 specifies the BES Misoperations obligations of the Transmission Owner, Generator Owner, and Distribution Provider. These functional entities are required to review of all events to identify all BES Misoperations	PRC-004-3 Applicability section and Requirement R1.
Version 0 Team	382. Levels of non-compliance need to be redefined	Revised standard PRC-004-3 Levels of non-compliance are defined consistent with the NERC VSL drafting guidelines	PRC-004-3 VSLs.

Table of Issues and Directives Associated with PRC-004

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Phase III/IV Team	383. This standard should apply to all protection systems on the Bulk Electric System (BES) not just those that 'impact' the BES	Revised standard PRC-004-3 Requirement R1 language includes the phrase, "all events involving BES Faults or BES Protection System operations associated with its Facilities" to identify and document all Misoperations. This language ensures that all events, whether initiated by a BES Protection System or not, are reviewed to determine if a Misoperation occurred.	PRC-004-3 Requirement R1,
NERC Audit Observation Team	587. Document the process	The revised standard PRC-004-3 identifies the specific procedural elements associated with identifying and correcting Misoperations.	PRC-004-3 Requirement R1
NERC Audit Observation Team	588. The Generator Owner shall analyze its generator protection system Misoperations and implement corrective action plans to avoid future Misoperations.	The revised standard PRC-004-3 Applicability section includes the Transmission Owner, Generator Owner, and Distribution Provider. The applicability section also includes a Facilities subsection that identifies Generator BES Protection Systems applicable to this reliability standard. Each Requirement makes reference to BES Protection Systems.	PRC-004-3 Applicability section and Requirement R1.

Table of Issues and Directives Associated with PRC-004

Source	Directive Language (including pg #)	Disposition	Section and/or Requirement(s)
Compliance	<p>667. Joel deJesus, June 2010 - Please review and update as necessary the data retention period. A number of standards provide for data retention periods that are shorter than the normal audit cycle either specifying that only the current document need be retained or that the data need only be retained for a time period (30-days, 60-days, 90-days, etc.) shorter than the normal 3-year or 6-year audit cycle. This inconsistency between data retention periods and audit periods creates an unintended inconsistency. Changes to the Compliance Monitoring and Enforcement Program (CMEP) that are being applied to the Regional Delegation Agreements (RDA) in 2010, provide for the following:</p> <p>The Registered Entity will be expected to demonstrate compliance for the entire period described above. However, if a Reliability Standard specifies a document retention period that does not cover the entire period described above, the Registered Entity will not be found in noncompliance solely on the basis of the lack of specific information that has rightfully not been retained based on the retention period specified in the Reliability Standard, with the Reliability Standard for failing to produce a document for a period earlier than</p>	<p>The revised standard PRC-004-3 Evidence Retention section requires a 6 calendar year evidence retention period.</p>	<p>PRC-004-3 Evidence Retention.</p>

Table of Issues and Directives Associated with PRC-004

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	<p>the start of the retention period specified in the Reliability Standard; However, in such cases, Compliance Audit team the Compliance Enforcement Authority will require the Registered Entity to demonstrate will test compliance through other means.</p> <p>Language in the standards regarding data retention should track this same thought. That would mean deleting any provision that requires only the retention of the current document, and by indicating that while other documents need only be retained for a short time(30-days, 60-days, 90-days, etc.), the standard should indicate that The Registered Entity will be expected to demonstrate compliance for the entire period described above.</p>		
FERC Order 693	1079. Consider ISO-NE’s suggestion that LSEs and transmission operators should be listed as applicable entities.	LSE and transmission operators do not own BES Protection Systems or apparatus. The owners of the equipment have been assigned responsibility for this standard.	PRC-004-3 Applicability section

Table of Issues and Directives Associated with PRC-004

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FERC Order 693	1080. The regional entity should develop procedures for corrective action plans.	The revised standard establishes specific elements that must be included in the procedure for identifying and correcting Protection System Misoperation. In so doing, the obligation for the Regional Entity to undertake this effort has been removed. Instead, consistent with the need for the Reliability Standards to apply to the users, owners, and operators of the BES, that obligation now resides with the entities themselves.	PRC-004-3 Requirement R1,
NERC	659. Modify standard to conform to the latest version of NERCs Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure	The revised standard PRC-004-3 is based on the new RBS format with development work based on the latest version of the NERC Standard Drafting Team Guidelines and ERO Rules of Procedure.	Reliability standard PRC-004-3.