

Consideration of Comments

Project Name: 2016-04 Modifications to PRC-025-1 | Standards Authorization Request

Comment Period Start Date: 3/20/2017

Comment Period End Date: 4/3/2017

There were 16 sets of responses, including comments from approximately 69 different people from approximately 55 companies representing the 10 Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

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 Development, [Steve Noess](#) (via email) or at (404) 446-9691.

Questions

1. Do you agree with the revisions to Items 1-4 in response to comments from industry stakeholders on draft 1 of the SAR? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.
2. Do you agree with the additions of Items 5 and 6 in response to comments and discussions by the SAR drafting team? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.
3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Mark Ringhausen	Mark Ringhausen	3,4	SERC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Quintin Lee	Eversource Energy	1	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
Midwest Reliability Organization	Russel Mountjoy	10		MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Chuck Lawrence	American Transmission Company	1	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administratino	1,6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service	3,5,6	MRO
					Jeremy Volls	Basin Electric Power Coop	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent Independent	2	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						System Operator		
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Kevin Giles	Westar Energy	1	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE

1. Do you agree with the revisions to Items 1-4 in response to comments from industry stakeholders on draft 1 of the SAR? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

The SPP Review Group recommends that the drafting team provides clarity to why the term “Transmission” is capitalized in the phrase “Transmission system,” while the same term is not capitalized in the phrase “transmission network” which is associated with proposed language pertaining to item 4 (page 2) of the Standard Authorization Request (SAR). The review group has a concern that there are some inconsistencies in the combination and capitalization of particular NERC defined terms and phrases.

Likes 0

Dislikes 0

Response

Thank you for your comment. When “Transmission system” is used in the SAR, an emphasis is placed on the NERC defined term on how it is used within the standard and requirements. When it is lowercase as in “transmission network,” no association with the NERC defined term is intended and the general understanding of the term or phrase would be applied. For example, note the consistency with PRC-023-4 (Transmission Loadability) where “Transmission system” is used in the Applicability section and “transmission system” is used in Requirement R1. No change was made to the SAR.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name

Comment

Please see response to #3.

Likes	0
Dislikes	0
Response	
Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
<p>The NSRF agrees with items 1 – 4 but is concerned about confusing individual collector circuits with less than 75 MVA of aggregate individual dispersed power producing resources with the concept of a common mode design condition that could result in the loss of 75 MVA or more of aggregate generation at a single generating Facility.</p> <p>The NSRF suggests that the SAR clarify that the basis of inclusion for individual BES generators (individual wind turbines or solar panels) or individual collectors is the common mode loss of 75 MVA or more of generation.</p> <p>To support the above basis that its not individual BES generators (Elements) that are of concern, that it is common mode outage that results in the loss of 75 MVA or more of generating Elements at a BES generating Facility, the NSRF suggests that the NERC definitions of Element and Facilities be clarified. NERC Elements should refer to individual BES generators and NERC Facilities should refer to aggregating more that 75 MVA of BES generating Elements at a single Facility.</p> <p>NERC BES Element Definition: Any electrical device with terminals that may be connected to other electrical devices such as an individual generator or power producing resource, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components.</p> <p>NERC BES Facility Definition: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a a single shaft unit of greater than 20 MVA or aggregate individual dispersed power producing resources of more than 75 MVA, a shunt compensator, transformer, etc.)</p>	
Likes	0
Dislikes	0
Response	

1. Thank you for your comment. Regarding inclusion of collector circuits in dispersed power producing resources, the SAR team notes the following:
 - a. While 75 MVA aggregate capacity is utilized when determining whether a site meets the inclusion I4 criteria from the Bulk Electric System definition, this measurement is not intended to be utilized as a performance criteria or threshold within a standard. The goal of PRC-025-1 is to ensure that generating resources which are classified as Bulk Electric System generators (through whichever inclusions, bright-line criteria, etc.) have protection applied which allows those generators to provide the full amount of any dynamic (short term) and steady state real and reactive support to the transmission system for which these generators are capable (whatever that amount may be), not to ensure that a loss of 75 MVA or more of generation is avoided.
 - b. Inclusion of collector system feeders within the applicability of PRC-025-1 was always intended, but was not clear. Clarifying this is one of the goals of the SAR.
 - c. Based on the above factors, the SAR team believes changes to the BES Element and BES Facility definitions are not necessary, and believes the Applicability criteria within the standard are correct. No change was made to the SAR.

Thomas Foltz - AEP - 3,5

Answer Yes

Document Name

Comment

AEP has no objections to the revisions of Items 1 through 4 in the draft SAR.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

We agree with the proposal to provide clarification and align better with the intent of the standard for relays to "not trip" under load.

Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4	
Answer	Yes
Document Name	
Comment	
When applicable, would definite time elements (50DT) be addressed similar to instantaneous 50 elements?	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The standard does not contemplate consideration of setting time delays, time dials, etc. Within the context of ANSI device numbers, devices with suffixes are considered sub-functions of the parent device number. It is the current intent of the SAR to clarify that the instantaneous overcurrent elements of all types should be included and considered (also including devices that do not use ANSI device numbers but behave similarly), regardless of the time element applied. Consequently, a 50DT would be treated similar to a 50 element. No change was made to the SAR.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	

Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Connie Lowe - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Do you agree with the additions of Items 5 and 6 in response to comments and discussions by the SAR drafting team? If not, please explain why you do not agree and provide specific detail referencing the applicable SAR item that would make it acceptable to you.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name

Comment

Please see response to #3.

Likes 0

Dislikes 0

Response

Thank you for your comment, response is found in #3.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer	Yes
Document Name	
Comment	
We agree with the proposal to provide clarification and align better with the intent of the standard for relays to "not trip" under load.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Duke Energy suggests additional language be added to item c. of the Miscellaneous Items. As written, not entirely clear what the issue is, and what is meant by a "minimum criterion" in relation to the standard. More information about what the issue/concern is with this phrase would be helpful to understand the necessity of the revision.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The capability reported to the Transmission Planner is the minimum capability on which protection settings should be based. It should be acceptable to base protection settings on a higher capability. It is not required that protection settings be modified when the capability reported to the Transmission Planner may be lower to reflect seasonal variations or other deratings. In real-time operations, ambient conditions and other factors may drive greater maximum capability than what is "reported to the Transmission Planner" for generators with certain types of prime movers. No change was made to the SAR.	
Connie Lowe - Dominion - Dominion Resources, Inc. - 3,5,6	

Answer	Yes
Document Name	
Comment	
<p>On item #6, the language currently reads: "Clarify that a high unit capability may be used".</p> <p>Dominion suggests additional language in the detailed description under item 6(b) stating that "the generator nameplate rating can also be used for the real power output." in the final recommendation.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. The SAR team believes adding additional detail, such as, "the generator nameplate rating can also be used for the real power output" may increase confusion. The capability reported to the Transmission Planner is the minimum capability on which protection settings should be based. It should be acceptable to base protection settings on a higher capability, which could be any higher value including the nameplate value of the generator unit. It is not required that protection settings be modified when the capability reported to the Transmission Planner may be lower to reflect seasonal variations or other deratings. In real-time operations, ambient conditions and other factors may drive greater maximum capability than what is "reported to the Transmission Planner" for generators with certain types of prime movers. No change was made to the SAR.</p>	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	Yes
Document Name	
Comment	
<p>On item #6 , the language currently reads: "Clarify that a high unit capability may be used".</p> <p>Dominion suggests additional language in the detailed description under item 6(b)stating that "the generator nameplate rating can also be used for the real power output." in the final recommendation.</p>	
Likes 0	
Dislikes 0	

Response

Thank you for your comment. The SAR team believes adding additional detail, such as, “the generator nameplate rating can also be used for the real power output” may increase confusion. The capability reported to the Transmission Planner is the minimum capability on which protection settings should be based. It should be acceptable to base protection settings on a higher capability, which could be any higher value including the nameplate value of the generator unit. It is not required that protection settings be modified when the capability reported to the Transmission Planner may be lower to reflect seasonal variations or other deratings. In real-time operations, ambient conditions and other factors may drive greater maximum capability than what is “reported to the Transmission Planner” for generators with certain types of prime movers. No change was made to the SAR.

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 3,5	
Answer	
Document Name	
Comment	
While AEP has no objections to the inclusion of Items 5 and 6 into the draft SAR, we seek clarity on 6c as the proposed language could cause a communication barrier between the TP and GO fuctions regarding "reported to the Transmission Planner". For example, what specific reliability concern is it attempting to address, and exactly what is driving its proposed inclusion in the SAR?	
Likes 0	
Dislikes 0	

Response

Thank you for your comment. The capability reported to the Transmission Planner is the minimum capability on which protection settings should be based. It should be acceptable to base protection settings on a higher capability. It is not required that protection settings be modified when the capability reported to the Transmission Planner may be lower to reflect seasonal variations or other deratings. In real-time operations, ambient conditions and other factors may drive greater maximum capability than what is “reported to the Transmission Planner” for generators with certain types of prime movers. No change was made to the SAR.

3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here.

Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1

Answer

Document Name

Comment

We have no additional comments at this time.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Document Name

Comment

The review group recommends capitalizing the term “system” in the phrase “Transmission system” that’s associated with the proposed language (on page 2, 4, and 7) of the SAR. The group’s perspective is that both terms are defined in the NERC Glossary of Terms. Also, we recommend the drafting team consider collaborative efforts with The Alignment of Terms Drafting Team. The Alignment of Terms Drafting Team can provide some useful insight on how to address the inconsistencies of the combination and capitalization of particular NERC defined terms and phrases like “Transmission system.” Additionally, we recommend that the drafting team provides clarity on the meaning of the two phrases “Transmission system” and “transmission network.”

Likes 0

Dislikes 0

Response

Thank you for your comment. The defined term “System” was not used in the PRC-025-1 standard because it would unintentionally include distribution. The SAR drafting team does not agree that the term “System” should be capitalized to reference the NERC Glossary¹ as it would change the intent and applicable facilities. The SAR team additionally notes that use of the phrase “Transmission system” is consistent with PRC-023-4. No change was made to the SAR.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion

Answer

Document Name

Comment

We support the SAR for Project 2016-04 Modifications to PRC-025-1.

Likes 0

Dislikes 0

Response

¹ Glossary of Terms Used in NERC Reliability Standards (http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf)

Thank you for your comment.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have additional comments.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Document Name

Comment

The BES definition states that the individual resource should be included, however, many things within the way the standard is written can be argued otherwise. The first example is the wording taken directly from the standard :

“Asynchronous generating unit(s) (including inverter-based installations), **or** Elements utilized in the aggregation of dispersed power producing resources.”

The OR referenced in Attachment 1, Table, *(leading to Elements utilized in the aggregation of dispersed power producing re-sources)* offer a choice which could eliminate the obligation to analyze down to the turbine level.

Another point is that the device within the wind turbine isn’t a standard relay element 51 or 51V-R. The device in the turbine is a low voltage molded case circuit breaker. Even more specifically, the device ANSI representation is a 52 – AC Circuit Breaker. What makes this even more frustrating is that generator owners and engineers within have no control of how these wind turbines were designed and commissioned by the OEM. We did not provide the settings nor do we ever intend to change them from what the OEM originally placed.

The final point to make, if entities are required to comply down to the turbine level main circuit breaker then there will be many cases that the breakers cannot be adjusted to a current that is over 130% nameplate MVA rating. The Long time pickup is typically set slightly above nameplate with a “long” time delay (example 10 seconds). This is a perfectly appropriate way to operate the wind turbine as there are other faster operating over current elements enabled on the same breaker (Short time and Instantaneous) that will protect for more severe faults. The element of time delay isn’t specified in this standard which also adds issues.

Likes	0
Dislikes	0

Response

Thank you for your comments. The comment raised about the “OR” condition is the specific issue the SAR intends to resolve by addressing the “OR” conjunction used in the Applicability column of Table 1. This is addressed by item 3 in the SAR. No change made to the SAR. No change was made to the SAR.

The comment raised about the use of ANSI device numbers is an issue the SAR is addressing. Differences in ANSI device numbering is most apparent in low voltage protection of the dispersed power producing resources. See item 2 in the SAR concerning ANSI device numbering. No change was made to the SAR.

The comment raised about adjusting the resource breakers is an issue the SAR intends to resolve by providing one or more alternatives to the current Table 1 criteria for setting relays. See item 1 in the SAR concerning instances where manufacturer requirements or physical limitations of dispersed power producing resources and may result in an overly conservative relay setting. No change was made to the SAR.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer

Document Name

Comment

(1) We believe the authors need to identify that Requirement R1 is only applicable to the small subset of GOs, TOs, and DPs that apply load-responsive protective relays at the Element terminals listed under the standard’s applicability section. We recommend instructing the SDT to change the applicability of the requirement to “Responsible Entity” or “Functional Entity”.

(2) We question the overall urgency identified within the SAR, particularly since the current implementation plan does not require 100% compliance until 2019 or 2021 for retrofits. If there are concerns over current regional practices that exist, we believe pursuing interpretations or regional variances may be a better alternative.

(3) We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

1. The SAR drafting team does not agree that changing the applicable entities in Requirement R1 to “Responsible Entity” or “Functional Entity” adds any additional clarity. No change was made to the SAR.
2. There are no needs for any variances. The issues raised in the SAR impact a small number of entities and facilities; however, NERC is mindful of the time needed for industry input, approval, and subsequent regulatory approval prior to the set enforcement dates.
3. Thank you for your comments.

End of Report