

# Meeting Notes

## Project 2021-04 Modifications to PRC-002

### Standard Drafting Team Meeting

November 16, 2022 | 1:00 – 3:00 p.m. Eastern

#### Introduction and Chair's Remarks

Chair M. Patel called the meeting to order at 1:00 p.m. Eastern. The Chair provided the Standard Drafting Team (SDT) with opening remarks and welcomed members and guests. See **Attachment 1** for those in attendance.

#### NERC Antitrust Compliance Guidelines and Public Announcement

The NERC Antitrust Compliance Guidelines, NERC Participant Conduct Policy, and the Public Announcement were presented and reviewed by the secretary.

#### Agenda Items

##### 1. Prior Action Items

- a. The proposed agenda was reviewed and approved by unanimous consent.

##### 2. Phase one Comment and Initial Ballot

- a. The SDT reviewed the ballot results and industry comments. The industry approved the revised Standard with over 96% approval. SDT decided to go to the final ballot from here after making very minor changes.

Action items:

- Update Compliance Language in Section C of the standard.
- There is an error in the Project 2015-09 Implementation Plan, shown below. The "Transmission Operator" highlighted in yellow should be "Transmission Owner". Should NERC amend the Project 2015-09 Implementation Plan?

*PRC-002-3 Requirements R2, R3, R4, R6, R7, R8, R9, R10, R11: Time Period to Address New Designations:*

- Entities shall be 100 percent compliant with new BES Elements identified in Requirement R1 or R5 within three (3) years following the notification by the **Transmission Operator** or the Reliability Coordinator.

Will address this during phase two of this project.

- Please seek response to following comment from Compliance/Legal: The SDT should also consider possible mis-interpretations of “three (3) calendar years”. Based on the *ERO Enterprise CMEP Practice Guide: Implementation of “Annual” and “Calendar Month(s)” in the Reliability Standards* (dated April 19, 2019), a Calendar Year is considered as “beginning on January 1 and ending on December 31”. If a notification is received in December, would the second calendar year begin on the adjacent January?

Answer: If the notification is received in December (e.g., December 5, 2022), the entity would get three full years (i.e. December 5, 2025), and then under the “calendar year” rule, until December 31, 2025.

- The requirement R8 uses following: “prior to the effective date of this standard.” This was added in “-2” version of the standard. With subsequent revisions, what is the meaning of this phrase? Does this phrase refer to latest version of the standard? OR Refer backs to “-2” version? Please check with Legal/Compliance.

Answer: Let’s use “effective date of the Reliability Standard PRC-002-2<sup>FN</sup>”

FN: The effective date of the Reliability Standard PRC-002-2 in the U.S. was July 1, 2016. The effective date may be different for other jurisdictions.

### **3. Other**

- a. Next Meeting: None
- b. Other: None

### **4. Adjournment**

Chair adjourned the meeting at 3:16 p.m. Eastern by consent.

## Attachment 1

Name	Company	Member/Observer	Date
Manish Patel	Southern Company Services	Chair	11/16/2022
Ben Wu	NERC	Secretary	11/16/2022
Bret Garner Burford	American Electric Power	Member	11/16/2022
Tracy Kealy	Bonneville Power Administration	Member	11/16/2022
Jacob Magee	Entergy	Member	11/16/2022
Amy Key	MidAmerican Energy Company	Member	11/16/2022
Dominique Thompson	NERC	NERC Staff	11/16/2022
Don Burkart (Con Edison)	ConEd	Member	11/16/2022
Chris Milan	CrestCura	Vice Chair	11/16/2022
Dennis Fuentes-Pedrosa	FERC	Observer	11/16/2022
Mark Garza	First Energy Corp.	Observer	11/16/2022
Scott Barfield	NERC	NERC Staff	11/16/2022
Mike Brytowski	GREnergy	Observer	11/16/2022
Daniel Woldemariam	FERC	Observer	11/16/2022
Robert Hirschak (Cleco)	CLECO	Observer	11/16/2022
Gordon Joncic	Center Point Energy	Observer	11/16/2022
John Savage	PGE	Observer	11/16/2022
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Andrew Gallo	ERCOT	Observer	11/16/2022