Unofficial Comment Form

Project 2021-04 Modifications to PRC-002

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2021-04 Modifications to PRC-002** by **8 p.m. Eastern, November 9, 2022.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2021-04-Modifications-to-PRC-002-2.aspx). If you have questions, contact Senior Standards Developer, [Ben Wu](mailto:ben.wu@nerc.net) (via email), or at 404-446-9618.

## Background Information

Requirement R1, Part 1.2 infers that the notified BES Element owner is required to have FR data without regard to the identified BES bus owner having a connected BES Element for which FR data would be required for an applicable transformer or transmission line. By virtue of this notification, the transformer or transmission line BES Element owner is burdened with an obligation to have FR data and implicitly obligates these transformer or transmission line BES Element owners to either:

1. Work with other BES Element (i.e., circuit breaker) owners to provide the data and data recording specification for which the transformer or transmission line owners must rely on for compliance, or
2. Install its own equipment that is duplicative to the identified BES Bus recording equipment.

The goal of the proposed project is to clarify the necessary notifications in Requirement R1, Part 1.2 relative to FR data, and clearly identify the BES Element owners that need to have FR data for transformers and transmission lines with the associated identified bus.

## Questions

1. Do you agree with the revisions to Requirement 1?

Yes

No

Comments:

1. Do you agree with including the implementation plan information in proposed Requirement R13?

Yes

No

Comments:

1. Provide any additional comments for the Standard Drafting Team to consider, if desired.

Comments: