**Unofficial Comment Form**Regional Reliability Standard – Retirement

PRC-004-WECC-2

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the proposed retirement of the Regional Reliability Standard **PRC-004-WECC-2 –** **Protection System and Remedial Action Scheme Misoperation**. The electronic form must be submitted by **8 p.m. Eastern, Monday, December 18, 2017.**

Documents and information about this project are available on the [WECC’s Standards Under Development](https://www.wecc.biz/Standards/Pages/Default.aspx)page. If you have questions, contact Standards Developer, Mat Bunch (via email) or at (404) 446-9785.

**Background Information**

During its five-year update, the WECC standard drafting team concluded that retirement of the standard can be made without incurring a negative impact on reliability due to the following:

* The reliability concern is now specifically covered in FAC-003-4;
* The Applicability section is overly narrow and included in other existing NERC Standards;
* Requirement R1 is covered in other NERC Standards;
* Requirement R2 is covered in other NERC Standards, conflicts with existing NERC Standards, and its application can lessen reliability as opposed to enhancing it;
* Requirement R3 is entirely administrative in nature and should be retired under FERC P81 criteria; and
* The language of the standard does not meet the FERC Order 672 criteria in that it fails to assign the reliability task directly to an entity included in the NERC Functional Model.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Regional Reliability Standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. Regional reliability standards, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC reliability standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process, if adversely affected.

**Balanced** — Regional reliability standards shall have a balance of interests and shall not be dominated by any two-interest categories and no single-interest category shall be able to defeat a matter.

**Due Process** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

Review the revised the Regional Reliability Standard regional standard and answer the following questions.

1. Do you agree the development of the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments: