

**Summary Consideration:**

The drafting team did not make any changes to PRC-002 and PRC-018 as a result of the comments submitted with the first ballot. Most comments suggested modifications that are outside the scope of work assigned to this drafting team.

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 Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Process Manual:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

**Kenneth A. Goldsmith, Alliant Energy - TP ALT**

**Comment:**

1. Since PRC-002 is a “fill-in-the-blank” standard voting should be deferred until resolution with FERC on its status. The Effective Date for implementation should be increased for both standards to allow the Regions to efficiently schedule their workload.
2. On PRC-002, we question the philosophy of referencing an unapproved standard (requirement 4.5). This is an open ended commitment that is not defined, and there may be financial penalties associated with the requirement.
3. On PRC-018, we do not believe a Level 4 Non-Compliance is appropriate. DME is important, but by not having it in place will not cause a cascade event or prevent one, in real-time.

**Response:**

1. PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Improving the ability to capture disturbance data is a blackout recommendation and pushing the implementation further out would be very difficult to justify.

The fill-in-the-blank aspect of PRC-002 is already being addressed.

2. The ballot body is being formed for the IEEE standard. Footnote 3 in the proposed NERC standard states that entities are not required to comply with this requirement until the IEEE standard is approved.
3. Not having data to analyze a disturbance can have a far-reaching impact on reliability because it has a negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances.

**Verne Ingersoll II, Carolina Power & Light Company CPL**

**Comment:**

PRC-018 — The time extension for the percent compliance is needed due to logistical issues surrounding compliance with the regional requirements to be developed by the Regions. If the regional requirements are issued 9 months after BOT approval, in May of 2007, it is assumed capital expenditures and projects for new DMEs will be required for compliance. With the regional requirements not being issued until as late as May 2007, and the budget year for most companies starting in Jan 2007, no work can start until Jan 2008. This effectively reduces the 50% compliance timeframe to one year which isn't realistic when DME projects have to be balanced against other capital reliability projects that require engineering and construction resources. Required changes: — 50% compliant three years — 75% compliant four years — 100% compliant five years  
Would have approved PRC-002 if balloted separately.

**Response:**

PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Nine months should be sufficient for the new requirements. The proposed effective dates were highlighted in the implementation plan that was posted for comment and most stakeholders agreed with the proposed effective dates.

The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Entities are required to be fully compliant with the other requirements in PRC-018 within 6 months of BOT adoption. These other requirements address the provision of data and maintenance of equipment, and most entities should already be compliant with these requirements. Entities do not have to wait to start upgrading their equipment. Improving the ability to capture disturbance data was one of the critical blackout recommendations and the drafting team does not support extending the effective dates. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.

PRC-002 and PRC-018 contain requirements that are inter-dependent and need to be balloted as a single set.

**Ronald Schellberg, Idaho Power Company IPCO**

**Comment:**

PRD-002 R3.2.2 is too prescriptive. Sampling rate requirements are technology dependant. Devices sampling raw AC data would require sampling rates greater than 960 samples per second. Devices recording RMS quantities do not require such a high sampling rate.

**Response:**

Sampling rate requirements are technology-dependent. Devices sampling raw AC data usually work at over 960 samples per second, and the rate of 960 samples per second is a minimum that was stated in the standard. If RMS quantities are developed, they do not need to be stored at such a high rate, therefore the 'data record rate' of at least 6 records per second. The RMS calculated value is a by-product of the sampling.

**Alan Boesch, Nebraska Public Power District NPPD**

**Comment:**

PRC-002-1: The SDT should reconsider some sort of grandfathering for existing DMEs that do not meet these new performance requirements. Replacing the installed base of existing DMEs represents a significant outlay of resources for an unmeasurable benefit, and could delay the installation of other needed DMEs.

PRC-018-1: A Level 4 Non-Compliance associated with DME does not seem appropriate. DME is important to have, but in comparison to other standards the bulk electric system will not go black due to a lack of DME in the operating or planning timeframes.

**Response:**

Note that the requirements are only applicable to the subset of DMEs that are identified by the region.

The requirements in this set of standards were established to ensure that when there is a significant disturbance, there will be equipment installed that will collect the data needed to quickly analyze that disturbance. If existing equipment were grandfathered, then when there is another disturbance, the disturbance analysis team could be faced with the same problems faced following the August 2003 blackout – data that isn't time synchronized making the event very difficult to reconstruct.

**David D Little, Nova Scotia Power NSPI**

**Comment:**

NSPI maintains a collection of Disturbance Monitoring Devices that are time synchronized from a central location via fiber optic SONET rings. The inherent delay in light propagation and SONET switching could exceed the maximum synchronization window of 2 ms required by R1.1 of PRC-018, but we feel that our system's accuracy is sufficient for all practical purposes.

**Response:**

Note that the requirements are only applicable to the subset of DMEs that are identified by the region. The idea is to have local time synchronization at the point of observation. The SONET rings would not produce local time synchronization. The standard requires **consistently** less than 2 ms accuracy and the SONET rings do not meet this requirement.

The requirements in this set of standards were established to ensure that when there is a significant disturbance, there will be equipment installed that will collect the data needed to quickly analyze that disturbance. If existing equipment were grandfathered, then when there is another disturbance, the disturbance analysis team could be faced with the same problems faced following the August 2003 blackout – data that isn't time synchronized making the event very difficult to reconstruct.

**Allen Klassen, Westar Energy WR**

**Comment:**

Our protection engineers recommended a NO vote with the following comments. PRC-002-1 R3.2.2 The required sample rate and rate of recording RMS values are not yet supported by many vendors of continuous DDRs.

PRC-002-1 R4.4 COMTRADE is not designed to handle DDR type events.

**Response:**

Most vendors do support the required sample rate and rate of recording RMS values specified in the standard's requirements. Note that the recording rate and sampling rates are different.

Comtrade is capable of analyzing disturbance data from DDRs.

**William J. Head, Midwest Reliability Organization**

**Comment:**

1. PRC-002-1: As this is one of the “fill-in-the-blank” standards voting on this standard should be deferred until this issue is resolved with FERC, and by extension this also applies to PRC-018-1.
2. Effective date should be increased from 9 months to a year after BOT adoption as the Regions have a heavy workload already for 2006. The SDT has discounted the issue of workload related to other standards, ERO filings, and that the MRO has to merge MAPP, MAIN, and Canadian Utility practices into a new regional disturbance monitoring program.
3. The SDT should reconsider some sort of grandfathering for existing DME that do not meet these new performance requirements. Replacing the installed base of existing DME represents a significant outlay of resources versus the benefits, and could delay the installation of other needed DME.
4. The MRO questions the standards philosophy of referring to other unapproved standards, IEEE or otherwise, as a Requirement (R4.5). How is the Ballot Body supposed to approve an open-ended commitment to any standard not defined when financial penalties may be associated with not meeting it?

PRC-018-1:

5. Effective date for having a maintenance and testing program for already installed DME should be increased from six months to a year after BOT adoption. The SDT has discounted the issue that entities may require a longer transition period to develop such a program if they do not have one already, and ASSUMES that six months is achievable with no basis for the assumption or consideration of workload.
6. A Level 4 Non-Compliance associated with DME is not appropriate. DME is important to have, but in comparison to other standards the bulk electric system will not go black due to a lack of DME in the operating or planning timeframes.

**Response:**

1. PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Improving the ability to capture disturbance data is a blackout recommendation and pushing the implementation further out would be very difficult to justify.

The fill-in-the-blank aspect of VAR-001 is already being addressed outside the work of this drafting team.

2. PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Nine months should be sufficient for the new requirements. The proposed effective dates were highlighted in the implementation plan that was posted for comment and most stakeholders agreed with the proposed effective dates.

The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.

3. Note that the requirements are only applicable to the subset of DMEs that are identified by the region. The requirements in this set of standards were established to ensure that when there is a significant disturbance, there will be equipment installed that will collect the data needed to quickly analyze that disturbance. If existing equipment were grandfathered, then when there is another disturbance, the disturbance analysis team could be faced with the same problems faced following the August 2003 blackout — data that isn't time synchronized making the event very difficult to reconstruct. Entities do not have to wait to start upgrading their equipment.
4. The ballot body is being formed for the IEEE standard. Footnote 3 in the proposed NERC standard states that entities are not required to comply with this requirement until the IEEE standard is approved.
5. Entities are required to be fully compliant with the data provision and maintenance and testing requirements in PRC-018 within 6 months of BOT adoption. Most entities should already be compliant with these requirements. Improving the ability to capture disturbance data was one of the critical blackout recommendations and the drafting team does not support extending the effective dates. Not having data to analyze a disturbance can have a far-reaching impact on reliability because it has a negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances. Note that the drafting team did collect comments on the proposed effective dates and most commenter agreed that 6 months would be sufficient time to achieve compliance with these requirements.
6. Not having data to analyze a disturbance can have a far-reaching impact on reliability because it has a negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances.

**David Lapinski, Consumers Energy CETR**

**Comment:**

For PRC-018, there is concern that the phased implementation for adding time sync and bringing the installation of disturbance monitoring equipment into full compliance (50% in 2 years, 75% in 3 years, 100% in 4 years) may be a bit aggressive for some entities. This leads to a concern that it may result in Regions having less stringent requirements than they might have if given a more practicable schedule.

For PRC-018, R1.2, there is concern that this may prevent digital relays from being used for disturbance monitoring. This requirement states that data shall be retrievable for 10 days, and, if many events are happening quickly, the memory in digital relays may be overwritten with new events within this time frame. This concern hasn't been specifically addressed, but this may cause a non-compliance for entities dependent on digital relays for disturbance monitoring. Such a non-compliance may even be a level 4 if digital relays

are used in 30% of more of the required locations, and they aren't found to be able to retain data adequately.

**Response:**

Note that the phased-in effective dates for equipment start after the issuance of regional requirements – and the regions have 9 months from the date of the BOT adoption to issue those requirements. The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.

Note that the requirements are only applicable to the subset of DMEs that are identified by the region. There are technical solutions that would enable you to continue to use digital relays for disturbance monitoring. For example, a server could be used to store the data from the relays. The requirements in this set of standards were established to ensure that when there is a significant disturbance, there will be equipment installed that will collect the data needed to quickly analyze that disturbance. If existing equipment were grandfathered, then when there is another disturbance, the disturbance analysis team could be faced with the same problems faced following the August 2003 blackout — data that isn't time synchronized making the event very difficult to reconstruct.

**Lee G Schuster, Florida Power Corporation FPC**

**Comment:**

The time extension for percent compliance is needed due to logistical issues surrounding compliance with the regional requirements to be developed by regions. If the regional requirements are issued 9 months after BOT approval, in May of 2007, it is assumed capital expenditures and projects for new DMEs will be required for compliance. With the regional requirements not being issued until as late as May 2007, and the physical year for most companies starting in January, no work can start until January 2008. This effectively reduces the 50% compliance timeframe to one year which isn't realistic when DME projects have to be balanced against other capital reliability projects that require engineering and construction resources.

**Response:**

The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region. Entities should already have a very good idea of what will be needed to meet compliance and there is no need to wait 2 years to begin ordering equipment.

**Bruce E Merrill, Lincoln Electric System LES**

**Comment:**

1. PRC-002-1: As this is one of the "fill-in-the-blank" standards, voting on this standard should be deferred until this issue is resolved with FERC, and by extension this also applies to PRC-018-1.

2. Effective date should be increased from 9 months to a year after BOT adoption, as the Regions already have a heavy workload already for 2006. The SDT has discounted the issue of workload related to other standards, ERO filings, and that the MRO has to merge MAPP, MAIN, and Canadian Utility practices into a new regional disturbance monitoring program.
3. The SDT should reconsider some sort of grandfathering for existing DME that do not meet these new performance requirements. Replacing the installed base of existing DME represents a significant outlay of resources versus the benefits, and could delay the installation of other needed DME.
4. The MRO questions the standards philosophy of referring to other unapproved standards, IEEE or otherwise, as a Requirement (R4.5). How is the Ballot Body supposed to approve an open-ended commitment to any standard not defined when financial penalties may be associated with not meeting it?
5. PRC-018-1: Effective date for having a maintenance and testing program for already installed DME should be increased from six months to a year after BOT adoption. The SDT has discounted the issue that entities may require a longer transition period to develop such a program if they do not have one already, and ASSUMES that six months is achievable with no basis for the assumption or consideration of workload.
6. A Level 4 Non-Compliance associated with DME is not appropriate. DME is important to have, but in comparison to other standards the bulk electric system will not go black due to a lack of DME in the operating or planning timeframes.

**Response:**

1. The fill-in-the-blank aspect of VAR-001 is already being addressed and the unique geographic differences for the location of DMEs aspects of this standard make it likely that this will remain a 'fill-in-the blank standard.
2. PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Nine months should be sufficient for the new requirements. The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.
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disturbance analysis team could be faced with the same problems faced following the August 2003 blackout — data that isn't time synchronized making the event very difficult to reconstruct. Entities do not have to wait to start upgrading their equipment.

4. The ballot body is being formed for the IEEE standard. Footnote 3 in the proposed NERC standard states that entities are not required to comply with this requirement until the IEEE standard is approved.
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6. Not having data to analyze a disturbance can have a far-reaching impact on reliability because it has a negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances.

**Thomas C. Mielnik, MidAmerican Energy Company MEC**

**Comment:**

An extended transition period is required for the standard given the work involved to become compliant. Existing DMEs that do not meet the standard should be grandfathered in. Replacing these requires a significant outlay of resources with small benefits.

**Response:**

Note that the requirements are only applicable to the subset of DMEs that are identified by the region. The requirements in this set of standards were established to ensure that when there is a significant disturbance, there will be equipment installed that will collect the data needed to quickly analyze that disturbance. If existing equipment were grandfathered, then when there is another disturbance, the disturbance analysis team could be faced with the same problems faced following the August 2003 blackout — data that isn't time synchronized making the event very difficult to reconstruct. Entities do not have to wait to start upgrading their equipment.

**David Frank Ronk, Consumers Energy CETR**

**Comment:**

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**Response:**

Note that the phased-in effective dates for equipment start after the issuance of regional requirements – and the regions have 9 months from the date of the BOT adoption to issue those requirements. The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.

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**Dennis Florom, Lincoln Electric System LES**

**Comment:**

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2. Effective date should be increased from 9 months to a year after BOT adoption, as the Regions already have a heavy workload already for 2006. The SDT has discounted the issue of workload related to other standards, ERO filings, and that the MRO has to merge MAPP, MAIN, and Canadian Utility practices into a new regional disturbance monitoring program.
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supposed to approve an open-ended commitment to any standard not defined when financial penalties may be associated with not meeting it?

5. PRC-018-1: Effective date for having a maintenance and testing program for already installed DME should be increased from six months to a year after BOT adoption. The SDT has discounted the issue that entities may require a longer transition period to develop such a program if they do not have one already, and ASSUMES that six months is achievable with no basis for the assumption or consideration of workload.
6. A Level 4 Non-Compliance associated with DME is not appropriate. DME is important to have, but in comparison to other standards the bulk electric system will not go black due to a lack of DME in the operating or planning timeframes.

**Response:**

1. The fill-in-the-blank aspect of VAR-001 is already being addressed and the unique geographic differences for the location of DMEs aspects of this standard make it likely that this will remain a 'fill-in-the blank standard.
2. PRC-002 is a Version 0 standard that is being modified. Regions should already be compliant with the requirements that were associated with the original Version 0 standard. Nine months should be sufficient for the new requirements. The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements — and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Note that the requirements are only applicable to the subset of DMEs that are identified by the region.
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negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances. Note that the drafting team did collect comments on the proposed effective dates and most commenter agreed that 6 months would be sufficient time to achieve compliance with these requirements.

6. Not having data to analyze a disturbance can have a far-reaching impact on reliability because it has a negative impact on the ability to substantiate the need for changes in operations and planning that will prevent similar disturbances.

**Wayne Lewis, Progress Energy — Carolinas**

**Comment:**

It is recommended that NERC in the future provide the opportunity to vote on the individual standards instead of bundling the standards together within a single vote. Progress Energy would have voted “Yes” to PRC-002-1 if we had been given the opportunity to separately submit our vote on that standard.

PRC-018-1 Comment: The time extension for percent compliance is needed due to logistical issues surrounding compliance with the regional requirements to be developed by regions. If the regional requirements are issued 9 months after BOT approval, in May of 2007, it is assumed capital expenditures and projects for new DMEs will be required for compliance. With the regional requirements not being issued until as late as May 2007, and the physical year for most companies starting in January, no work can start until January 2008. This effectively reduces the 50% compliance timeframe to one year which isn't realistic when DME projects have to be balanced against other capital reliability projects that require engineering and construction resources.

PRC-018 Marked changes to text follow:

5. (Proposed) Effective Dates: Phased in over four years after BOT adoption:  
Requirements R1 and R2: 50% compliant two three years after initial issuance of regional requirements per Reliability Standard PRC-002  
Requirement 5: 75% compliant three four years after initial issuance of regional requirements per Reliability Standard PRC-002  
R5 100% compliant four five years after initial issuance of regional requirements per Reliability Standard PRC-002 R5.  
Requirements R3 through R6:

**Response:**

PRC-002 and PRC-018 contain requirements that are inter-dependent and need to be balloted as a single set.

The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Entities are required to be fully compliant with the other requirements in PRC-018 within 6 months of BOT adoption. These other requirements address the provision of data and maintenance of equipment, and most entities should already be compliant with these requirements. Entities do not have to wait to

start upgrading their equipment. Improving the ability to capture disturbance data was one of the critical blackout recommendations and the drafting team does not support extending the effective dates. Note that the requirements are only applicable to the subset of DMEs that are identified by the region. Entities should already have a very good idea of what will be needed to meet compliance and there is no need to wait 2 years to begin ordering equipment.

**James Eckelkamp, Carolina Power & Light Company CPL**

**Comment:**

It is recommended that NERC in the future provide the opportunity to vote on the individual standards instead of bundling the standards together within a single vote. Progress Energy would have voted “Yes” to PRC-002-1 if we had been given the opportunity to separately submit our vote on that standard.

PRC-018-1 Comment: The time extension for percent compliance is needed due to logistical issues surrounding compliance with the regional requirements to be developed by regions. If the regional requirements are issued 9 months after BOT approval, in May of 2007, it is assumed capital expenditures and projects for new DMEs will be required for compliance. With the regional requirements not being issued until as late as May 2007, and the physical year for most companies starting in January, no work can start until January 2008. This effectively reduces the 50% compliance timeframe to one year which isn't realistic when DME projects have to be balanced against other capital reliability projects that require engineering and construction resources.

**Response:**

PRC-002 and PRC-018 contain requirements that are inter-dependent and need to be balloted as a single set.

The effective dates for PRC-018 are phased with the assumption that most entities will already have some DMEs that will meet the standard's requirements – and gives entities 2 years following the issuance of the region's requirements to become 50% compliant with the requirements that address the installation of equipment. Entities are required to be fully compliant with the other requirements in PRC-018 within 6 months of BOT adoption. These other requirements address the provision of data and maintenance of equipment, and most entities should already be compliant with these requirements. Entities do not have to wait to start upgrading their equipment. Improving the ability to capture disturbance data was one of the critical blackout recommendations and the drafting team does not support extending the effective dates. Note that the requirements are only applicable to the subset of DMEs that are identified by the region. Entities should already have a very good idea of what will be needed to meet compliance and there is no need to wait 2 years to begin ordering equipment.