

Survey Report

Survey Details

Name 2014-01 Standards Applicability for Dispersed Generation Resources White Paper

Description

Start Date 6/12/2015

End Date 7/13/2015

Associated Ballots

Survey Questions

1. Do you agree with the accuracy of the technical content of the posted version of the White Paper? If not, please explain and offer alternative language.

Yes

No

Responses By Question

1. Do you agree with the accuracy of the technical content of the posted version of the White Paper? If not, please explain and offer alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Heather Morgan - EDP Renewables North America LLC - 5 -

Selected Answer: No

Answer Comment:

There is no technical basis for the SDT proposal to extend the applicability of FAC-008 to the individual solar cell and wind turbine. The application of the proposed approach would create significant work load without providing benefit to the planning or the reliable operation of the BES. More importantly - this proposal is inconsistent with the adopted applicability of other reliability standards that have already been revised based on the changes in the BES definition and define their applicability to equipment where the aggregated generation capability is equal (?) or above 75MVA .

The current application of FAC-008 should be retained.

FAC-008 is intended to ensure the availability of Facility Ratings essential for the determination of System Operating Limits based on technically sound principles. For this purpose, the only relevant datum is the amount of power a dispersed power producing resource can deliver to its POI.

System Operating Limits (SOLs) are based on the following operating criteria:

- - Facility Ratings
 - Transient Stability Ratings
 - Voltage Stability Ratings

- System Voltage Limits

- Only Facility Ratings apply to dispersed power producing resources. Their only impact on SOLs is their effect on thermal load on Facilities. Consequently the only relevant measure is the total power a dispersed power producing resource can inject.

The proposal is difficult to apply and will produce inconsistent results over time. However, the differences have no meaningful impact on the BES.

- Standard sample configurations cannot be used. The number of WTGs and the distances between them differ for each collector circuit, depending on numerous variables: terrain, wind patterns, soil conditions all affecting WTG locations. The same factors will affect the number of turbines on each collector circuit. Therefore, determining the rating for each element between individual generators and a collector bus would require unique calculations for every wind farm collector line.
- Replacing equipment also needs to be considered when calculating ratings under this proposal. Examples include replacing an entire WTG, or a WTG's Generator Step-up Transformer, or a new length of cable. All of these would need to be considered when making the proposed rating calculation, even though the impact on the BES is negligible.

The approach proposed for FAC-008 is inconsistent with the reasoning applied to the applicability of other standards. The technical basis for limiting PRC-005 applicability to facilities where generation aggregates to at least 75 MVA is that the impact of a fault at a WTG would not be discernible on interconnected transmission systems. Likewise, the Facility Rating for dispersed power producing resources should consider only facilities where generation aggregates to at least 75 MVA (nameplate).

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Information

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Voter Information

Voter	Segment
Emily Rousseau	1,2,3,4,5,6
Entity	Region(s)
MRO	MRO

Selected Answer: No

Answer Comment:

The NSRF has a number of comments which we will address under the headings of Errors, Cautions, CIP, and FAC-008-3 Issues & Recommendation.

Errors

FAC-008-3 Table A has a number of errors. The number of strings in the element descriptions for Sample Units #1 through #5 are overstated by a factor of 3, with corresponding errors in the Unit Rating and Rating. The preceding paragraphs correctly describe Figure A. Sample Unit #4 also needs to have “six” modules corrected to “eight.”

Cautions:

The consideration of RSAW revisions as an additional or appropriate method for clarifying the applicability of standards, as cited in the Executive Summary and Purpose, may not be appropriate in some cases. RSAW language revisions should not be used to substantially change a standard. RSAWs are primarily auditor tools to assess an entity’s compliance with standards. Entities must comply with standards, not RSAWs. Any change to the scope of an entity’s compliance obligation should be enacted through a revision to the standard.

CIP:

We request the SDT recommend to the CIP-003 SDT that applicability to dispersed power producing resources be limited as follows:

4.1.3 Generator Operator: For dispersed power producing resources identified through Inclusion I4 of the BES definition, the only BES Cyber Systems that meet the low criterion are any shared BES Cyber Systems at a single plant that could, within 15 minutes, shut down the plant from the point where those resources aggregate to greater than 75 MVA to a common point of connection at 100 kV or above.

4.1.4 Generator Owner: (same as above) For dispersed power producing resources identified through Inclusion I4 of the BES definition, the only BES Cyber Systems that meet the low criterion are any shared BES Cyber Systems at a single plant that could, within 15 minutes, shut down the plant from the point where those resources aggregate to greater than 75 MVA to a common point of connection at 100 kV or above.

FAC-008-3 Issues & Recommendation

The SDT has correctly identified an issue arising from the application of the revised BES definition to Requirement R1: “2. The use of the term “Facilities” in the phrase “...determining the Facility Ratings of its solely and jointly owned

generator Facility(ies) up to the low side terminals of the main step up transformer...” could potentially be interpreted to refer only to BES Facilities because the Glossary definition of “Facility” includes the term “Bulk Electric System Element.” For dispersed power producing facilities, that could leave out portions of the facility, specifically the collection system.”

The SDT errs in its use of the terms “could potentially be interpreted to refer” and “could leave out.” These phrases should be replaced by “refers” and “leaves out”, respectively. This is not a matter subject to interpretation; the SDT has identified the impact of the BES definition change on the requirement.

This is an issue that needs to be addressed. It does create omissions inconsistent with the determination of Facility Ratings. However, technical guidance contradicting NERC Glossary definitions and their clear application is not the appropriate method—the standard applicability or requirement wording should be revised.

We recommend the SDT adopt the recommendation and rationale provided for TOP-006, that the requirement be applied at the aggregate Facility level, by similar reasoning. The SDT cites Inclusion I2 of the BES definition, reasoning that if loss of less than 20 MVA would burden the BPS, the definition would have been less than 20 MVA. By the same argument, citing Inclusion I4, if dispersed power producing resources do not impact the BES until they aggregate to greater than 75 MVA, they will not impact the BES at less than 75 MVA.

This can be demonstrated by example. Consider a wind Facility with 26 MVA collector buses. It does not become a BES Facility until three such buses come on-line. If one, or both, are lost before the third comes on-line and makes it a BES Facility, it shouldn’t impact the BES. If there is no impact to the BES from the loss of individual collector buses before it becomes a Facility, there shouldn’t be any impact due to the same loss after designation as a Facility, so the Facility Ratings prior to the point of aggregation have no significant effect on reliability.

We recommend FAC-008-3 R1 be revised as follows:

Each Generator Owner shall have documentation for determining the Facility Ratings of its

solely and jointly owned generator Facility(ies):

- for generating resource(s) under Inclusion I2, from the generating resource(s) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up;

- for dispersed power producing resources under Inclusion I4, from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above.

Document Name:

Likes: 1 Berkshire Hathaway - PacifiCorp, 6, Ryan Brad

Dislikes: 0

John Seelke - PSEG - 1,3,5,6 - NPCC,RFC

Group Information

Group Name: PSEG

Group Member Name	Entity	Region	Segments
Joseph Smith	Public Service Electric and Gas	RFC	1
Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3
Tim Kucey	PSEG Fossil LLC	RFC	5
Stephen York	PSEG Energy Resources & Trade LLC	RFC	6

Voter Information

Voter	Segment
John Seelke	1,3,5,6
Entity	Region(s)
PSEG	NPCC,RFC

Selected Answer: No

Answer Comment:

First, each referenced standard MUST have a version number attached. Second, it should only reference standards that are adopted and which are NOT PROPOSED for changes. What the team may decide to do in the future regarding standard modifications will be evaluated by stakeholders at that time; the SDT's present opinion on those modifications should not be granted status as a "reference document" for standards that will be modified in the future. I have raised my concerns regarding the white paper's reference document status with the Standards Committee chair and with the SDT chair and NERC developer on the SDT. The attachment has additional information.

An example of the document's lack of clarity in the white paper is how it intends to address BES-excluded collector busses in standards such as MOD-025-2 and FAC-008-3. While I am interested in this issue, I will await the SDT's proposed modifications to debate it.

Document Name: White Paper posted for comment - Project 2014-01 Standards Applicability for Dispersed Generation Resources .pdf

Likes: 0

Dislikes: 0

Barbara Kedrowski - We Energies - Wisconsin Electric Power Co. - 3,4,5 - RFC

Selected Answer: No

Answer Comment:

1. Section 4.4.4 FAC-008 Facility Ratings, Guidelines and Technical Basis:

· 3rd paragraph: Please clarify the sentence that includes "...when the point of interconnection is before the GSU...". The SDT should avoid terms like "before" in reference to an element. Terms such as "before" or "after" depend on whether the subject element is viewed from the generator or the transmission system. Clarity is improved by using terms such as the low-voltage side of the GSU, the high voltage side of the GSU, etc.

· Item 2 should be removed from the paper. Since the BES Definition specifically excludes the collection system of a dispersed generation resource, this document should not try to get around it by putting it back in. The proper way to address this issue is to correct the error in the BES Definition by the appropriate standards process. The attempt to correct a NERC standards document by the language in this section violates the established NERC standards process. Since the additional discussion of sample units for solar and wind facilities is based on the attempt to include equipment that has been excluded from the BES by the new BES Definition as well, the usefulness of this entire section is questionable.

2. A NERC defined term should not be interpreted in some other way than the glossary definition. If NERC wants the term "Facility" to include more than BES elements then the definition should change.

3. Section 4.10.4 PRC-004-3, 1st paragraph: There are several references to Bulk Power System, or BPS, in this section. Since the PRC-004-3 standard being discussed does not use this term, the term "BPS" should be eliminated from this section.

4. The Whitepaper references RSAWs are being used to give guidance. RSAWs are not a guidance document and the team should not move away from the specific verbiage of the standard.

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Information

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
Tara Lightner	Sunflower Electric Power Corporation	SPP	1

Voter Information

Voter	Segment
Brian Van Gheem	6
Entity	Region(s)
ACES Power Marketing	NA - Not Applicable

Selected Answer: Yes

Answer Comment:

- 1) We appreciate the SDT's efforts on maintaining this White Paper and providing background and technical rationale for proposed and actual revisions to the applicability of appropriate Reliability Standards. We support the technical contents of the White Paper, as written.
- 2) However, we do have some general comments regarding the White Paper that we feel should be incorporated into this revision. Within the fourth paragraph of the Executive Summary, we feel the sentence "This necessity [applicability to dispersed power producing resources] is based on how each standard requirement, as written, would apply to dispersed power producing resources and the individual generating units at these facilities, considering the now currently effective BES definition" is cumbersome to read. We suggest rewording the sentence to read "This necessity is based on how each standard requirement, as

written, would apply to dispersed power producing resources and the individual generating units at these facilities, considering the current BES definition.”

3) The list of approval statuses listed under Section 3.3.1, Scope of Standards Reviewed, incorrectly references the status “Filed and Pending Regulatory Approval.” When comparing the contents of Appendix A provided by the SDT, the status should be updated to “Pending Regulatory Approval.”

4) The sixth bullet under Section 3.3.2 is taken directly from the NERC Standard Authorization Request (SAR) Form Template. We recommend keeping the language as it is listed on the template, which states, “Personnel responsible for planning and operating interconnected Bulk-Power Systems shall be trained, qualified, and have the responsibility and authority to implement actions.”

5) Under Section 3.3.3, the third bullet referenced for prioritizing recommendations in Appendix B should not capitalize “Applicability.” For clarity, we also suggest rewording to read “Recommendation to changing applicability of Reliability Standards and specific requirements.”

6) We believe the Guidelines and Technical Basis addition listed under section 4.4.4 is appropriate for this document. However, the first two paragraphs are redundant with the white paper. We suggest removing the first two paragraphs and start the Guidelines and Technical Basis addition with the phrase “The use of the term...”

7) We feel the last sentence in the third paragraph of Section 4.10.1 could be worded better. Consider this alternative language instead, “...Relay protection functions, such as underfrequency, overfrequency, undervoltage, and overvoltage, are independent of the interconnected utility’s protective relay settings, and are defined in PRC-024.”

8) Replace the “RRO” reference within Section 4.10.3 with “Regional Entity.”

9) We have concerns with the inclusion of the CIP V5 standards in this White Paper. The conclusions do not provide any additional guidance than what is already provided in CIP-002-5 to evaluate generation resources to determine applicability with CIP V5. There is not any disparate treatment to generation resources based on the type of generator. We recommend the removal of this section, as it only adds confusion to the implementation of CIP V5 standards.

Document Name:

Likes: 0

Dislikes: 0

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Information

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc.	NPCC	5

Voter Information

Voter	Segment
Randi Heise	5

Entity	Region(s)
Dominion - Dominion Resources, Inc.	

Selected Answer: No

Answer Comment: Comments: Dominion has the following comments based upon the posted redline version:

- Page 27 of 40 – PRC-005-4 was approved by the Board on 11/13/2014 and filed on 12/18/2014 according to the [NERC website](#).
- Pages 36/37 of 40 – While it is true that VAR-002-4 was approved by the Board on 11/13/2014 it might be more relevant to note that it has been approved by regulatory agencies and has an enforcement date of May 29, 2015.

Document Name:

Likes: 0

Dislikes: 0

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Information

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc.	NPCC	5

Voter Information

Voter	Segment
Randi Heise	5

Entity	Region(s)
Dominion - Dominion Resources, Inc.	

Selected Answer: No

Answer Comment:

- Comments: Dominion has the following comments based upon the posted redline version:
- Page 27 of 40 – PRC-005-4 was approved by the Board on 11/13/2014 and filed on 12/18/2014 according to the [NERC website](#).
- Pages 36/37 of 40 – While it is true that VAR-002-4 was approved by the Board on 11/13/2014 it might be more relevant to note that it has been approved by regulatory agencies and has an enforcement date of May 29, 2015.

Document Name:

Likes: 0

Dislikes: 0

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Information

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Voter Information

Voter	Segment
Randi Heise	5

Entity	Region(s)
Dominion - Dominion Resources, Inc.	

Selected Answer: No

Answer Comment:

Dominion has the following comments based upon the posted redline version:

1. Page 27 of 40 – PRC-005-4 was approved by the Board on 11/13/2014 and filed on 12/18/2014 according to the [NERC website](#).
2. Pages 36/37 of 40 – While it is true that VAR-002-4 was approved by the Board on 11/13/2014 it might be more relevant to note that it has been approved by regulatory agencies and has an enforcement date of May 29, 2015.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: No

Answer Comment:

On page 9 above the table it is mentioned that "...In cases where a change is recommended to a regional standard, the SDT will notify the affected region." Is it appropriate for the SDT to make this notification, and when will the notification be made?

Bulk Power System is used extensively on page 10, and not capitalized. If it is intended for its definition to be consistent with that listed in the NERC Glossary, it should be capitalized. Also, from the NERC Glossary, it should be Bulk Power System.

In Section 3.3.3 Prioritization Methodology, for high priority could exceptions be issued for entities to avoid the pitfalls of rushing changes to standards? Exceptions should be considered for medium and low priorities as well. In the medium priority bullet "appreciable reliability benefit" is used. What is considered an "appreciable reliability benefit"? There are operating conditions where the loss of 5MW can put the Bulk Power System in an Emergency condition.

The Appendix A Source incorrectly lists PRC00201 as Pending Regulatory Approval. PRC00201 was remanded by FERC, and PRC00202 has been submitted to FERC and is Pending Regulatory Approval. This might appear elsewhere in the Appendices, and needs to be reviewed. PRC00201 dealt with installation requirements; PRC00202 deals with the capturing of data.

Document Name:

Likes: 0

Dislikes: 0

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Information

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert A. Schaffeld	Southern Company Services, Inc.	SERC	1
R. Scott Moore	Alabama Power Company	SERC	3
William D. Shultz	Southern Company Generation	SERC	5
John J. Ciza	Southern Company Generation and Energy Marketing	SERC	6

Voter Information

Voter	Segment
Pamela Hunter	1,3,5,6
Entity	Region(s)
Southern Company - Southern Company Services, Inc.	SERC

Selected Answer: No

Answer Comment:

We are concerned that the white paper might be used as a measure of compliance due to the extensive use of "should" throughout the document. For example, the FAC-008 guidance provided for PV facilities is nice to have, but involves a very granular evaluation of the DC side of the inverters. It states:

"GO or GOP should provide ratings for array or panel, DC Cables (Positive and Negative), combiner boxes, inverters, as well as associated breakers, instrument transformers (CVTs, PTs), disconnect switches, and relays, etc. This is shown in Figure A."

Note the word "should" in the statement above is the term used in the guideline. NERC should not treat this as a "requirement" and entities should not be audited against it. With this wording, the guideline language may ultimately morph into a requirement of FAC-008. This is problematic and is overreaching from a BES reliability perspective.

We believe that a change in the above FAC-008 wording to "GO or GOP should **have** ratings...." We do not see any practical benefit in "providing" these ratings to a Transmission Planner. If the guidance to document and communicate the

capability of individual PV panels, for example, becomes a standard, it could turn into burdensome bookkeeping task that has very little impact to BES reliability. It is believed that the inverters need to be the limit of granularity at PV plants.

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

Section 4.1.1 FAC-001 – Facility Connection Requirements

While AEP doesn't disagree with the conclusion reached regarding not making changes to FAC-001 R2 or R3, we don't agree with the first two sentences in this section. While it might be uncommon, a significant example of a third party dispersed generator GO connecting to an existing GO dispersed generation system exists at a large wind farm facility in Colorado. The third party connection may have occurred prior to the adoption of the current Requirement R2 in FAC-001-1, but it is a significant example that could be repeated in the future. As a result, we recommend that the first two sentences be removed from the white paper.

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: No

Answer Comment:

Section 4.4.4, FAC-008, Facility Ratings, page 13, lists PTs as equipment needing ratings, however, PTs have been excluded from consideration per CAN-0018. Section 4.7.8, MOD-032, Data for Power System Modeling and Analysis, states that guidance should be provided to show how to best model dispersed power producing resources. When will this guidance be provided?

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - Kathleen Black - -

Selected Answer: No

Answer Comment:

Section 4.4.4, FAC-008, Facility Ratings, page 13, lists PTs as equipment needing ratings, however, PTs have been excluded from consideration per CAN-0018. Section 4.7.8, MOD-032, Data for Power System Modeling and Analysis, states that guidance should be provided to show how to best model dispersed power producing resources. When will this guidance be provided?

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - Kathleen Black - -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Information

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Karl Diekevers	Nebraska Public Power District	MRO	1,3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Stephanie Johnson	Westar Enger, Inc	SPP	1,3,5,6
Wes Mizell	Westar Enger, Inc	SPP	1,3,5,6
Bo Jones	Westar Enger, Inc	SPP	1,3,5,6
Tiffany Lake	Westar Enger, Inc	SPP	1,3,5,6

Voter Information

Voter	Segment
Shannon Mickens	2
Entity	Region(s)
Southwest Power Pool, Inc. (RTO)	SPP

Selected Answer: Yes

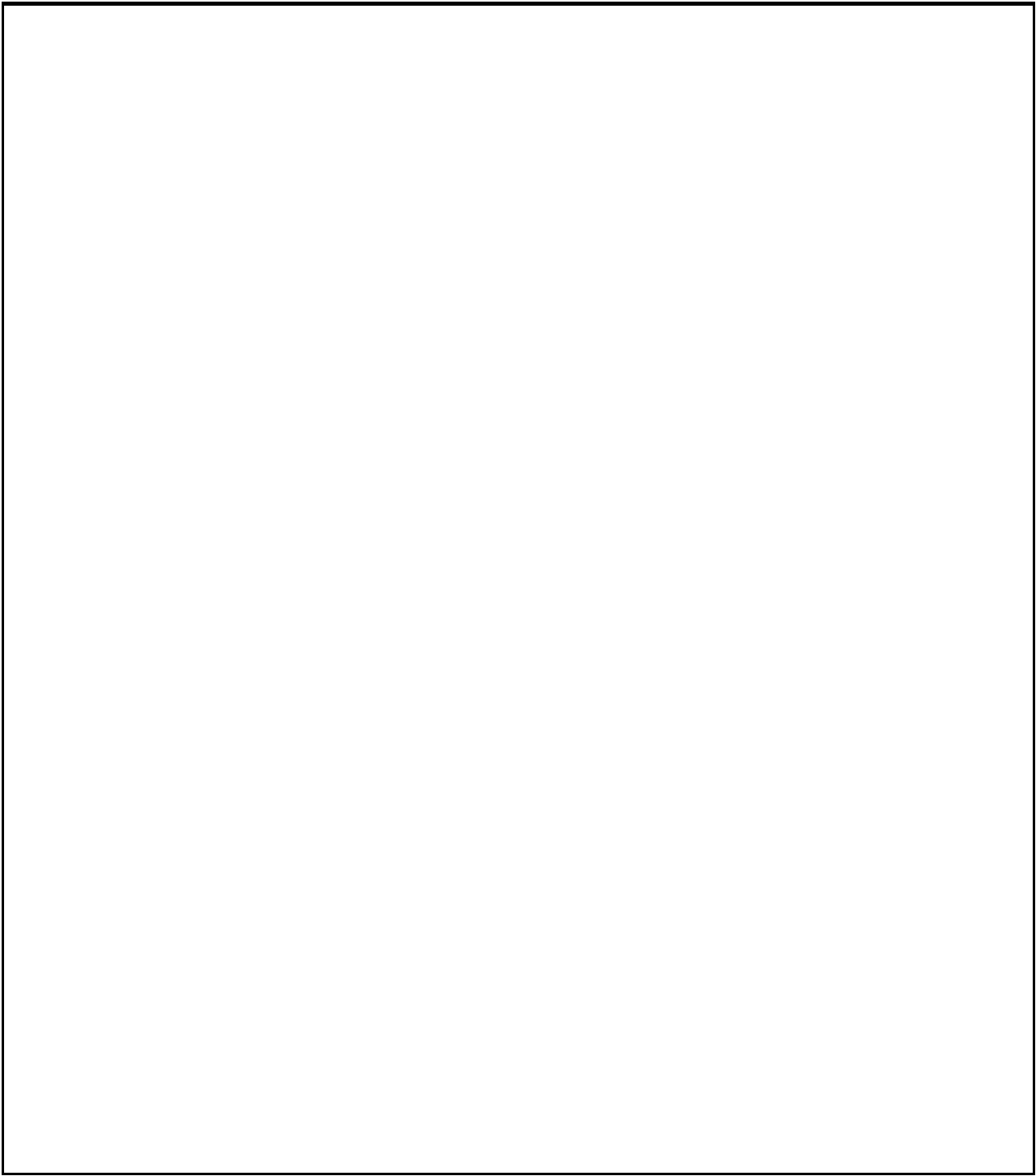
Answer Comment:

We feel that the drafting team did a great job putting this technical documentation together. In our opinion, the information provided is well thought out and paints a vivid picture of the goals that the drafting team are trying to accomplish. However, we would suggest to the drafting team to submit a SAR that would use the description of a dispersed power producing resources(page 6) as a definition and this would be included into relevant documentation such as: the Functional Model, Glossary of Terms and Rules of Procedure (RoP). Additionally, the details in the SAR would help ensure that the proposed definition would properly align with other documentation.

Document Name:

Likes: 0

Dislikes: 0



Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Regarding Section 4.10.1 PRC-001-1.1 R2, clarifying language similar to that used in Section 4.11.1.3 TOP-001-1a R7, which states reporting on losses of 20 MVA or greater would be useful.

In Section 4.10.4 PRC-004 and Section 4.10.7 PRC-005-2, the applicability aggregation limit of 75 MVA will result in the exclusion of all feeder breakers. Texas RE recommends an aggregate limit of 20 MVA, as suggested for the TOP standards, as it is more reasonable and would maintain consistency throughout the standards.

Texas RE is concerned the language in Section 4.10.12 PRC-024 and 4.10.13 PRC-025 is too prescriptive and limiting. The auditors should decide sampling methods.

In Section 4.11.5 TOP-006, the suggestion of only requiring the status of the main high side breaker is counterintuitive to the I2 Inclusion that supports reporting for equipment aggregating greater than 20 MVA. It is reasonable to require the status of the aggregate low side feeder breakers.

In Section 4.14.1 CIP V5 Element 1, Texas RE is concerned the risk that the proper personnel does not receive and/or understand the material remains if the tracking is excluded.

Document Name:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Regarding Section 4.10.1 PRC-001-1.1 R2, clarifying language similar to that used in Section 4.11.1.3 TOP-001-1a R7, which states reporting on losses of 20 MVA or greater would be useful.

In Section 4.10.4 PRC-004 and Section 4.10.7 PRC-005-2, the applicability aggregation limit of 75 MVA will result in the exclusion of all feeder breakers. Texas RE recommends an aggregate limit of 20 MVA, as suggested for the TOP standards, as it is more reasonable and would maintain consistency throughout the standards.

Texas RE is concerned the language in Section 4.10.12 PRC-024 and 4.10.13 PRC-025 is too prescriptive and limiting. The auditors should decide sampling methods.

In Section 4.11.5 TOP-006, the suggestion of only requiring the status of the main high side breaker is counterintuitive to the I2 Inclusion that supports reporting for equipment aggregating greater than 20 MVA. It is reasonable to require the status of the aggregate low side feeder breakers.

In Section 4.14.1 CIP V5 Element 1, Texas RE is concerned the risk that the proper personnel does not receive and/or understand the material remains if the tracking is excluded.

Document Name:

Likes: 0

Dislikes: 0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 - WECC

Selected Answer: No

Answer Comment: Please see MRO-NSRF Comments which have been submitted.

Document Name:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment: N/A

Document Name:

Likes: 0

Dislikes: 0

From: Seelke, John L.
To: [Brian J. Murphy \(Brian.J.Murphy@fpl.com\)](mailto:Brian.J.Murphy@fpl.com); [Fredrick Plett \(frederick.plett@state.ma.us\)](mailto:Frederick.Plett@state.ma.us)
Cc: [Sean Cavote \(Sean.Cavote@nerc.net\)](mailto:Sean.Cavote@nerc.net); [Howard Gugel \(howard.gugel@nerc.net\)](mailto:Howard.Gugel@nerc.net); [Tony Jankowski \(tony.jankowski@we-energies.com\)](mailto:Tony.Jankowski@we-energies.com); [Katherine Street \(Katherine.Street@nerc.net\)](mailto:Katherine.Street@nerc.net); [Holdsworth, Donald M.](mailto:Holdsworth.Donald.M.); [Singh, Randhir](mailto:Singh.Randhir); [Huber, Steven E.](mailto:Huber.Steven.E.); [Koncz, Christina J](mailto:Koncz.Christina.J)
Subject: White Paper posted for comment - Project 2014-01 Standards Applicability for Dispersed Generation Resources
Date: Wednesday, June 24, 2015 8:25:00 AM
Attachments: [Section 11 from Appendix 3A StandardProcessesManual 06.26.13.pdf](#)

Brian and Fred,

While reviewing the referenced white paper for comments that are due by July 13, I discovered a potential process concern that you, as SC chair and vice chair, should be aware of. The project's webpage is at <http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Standards-Applicability-for-Dispersed-Generation-Resources.aspx>

The purpose of the posting is noted on the webpage:

This version of the White Paper is being posted for comment to allow the White Paper to proceed through the Section 11 process set forth in the NERC Standard Processes Manual, which requires NERC Standards Committee authorization to post all supporting references that are linked to an approved Reliability Standard.

My process concern is that this white paper does not support this Section 11 consideration, which I have attached. The description in the White Paper's Executive Summary provides its purpose:

“The purpose of this White Paper is to provide background and technical rationale for proposed revisions to the applicability of several North American Electric Reliability Corporation (NERC) Reliability Standards, and in some cases the standard requirements.”

Simply stated, the white paper is the project team's roadmap and rationale for “proposed revisions ... to Reliability Standards.” As such, there is no issue with the team soliciting comments for the its plans to modify future Reliability Standards consistent with the scope of its SAR. My problem is that this topic does not, in my opinion, meet the threshold for Section 11 treatment.

The team successfully revised versions of PRC-004 (misoperation reporting) and PRC-005 (Protection System maintenance), and guidelines on any of those standards (or other existing standards) would certainly be appropriate. I have copied the project team's chair, Tony Jankoski, and the NERC staff coordinator for the project, Katherine Street.

Thank you for your consideration.

John Seelke, P.E.
NERC Standards Development & Advocacy Manager
Public Service Enterprise Group
973-430-5360 (office)
404-493-3772 (mobile)
john.seelkejr@pseg.com

