Individual or group. (19 Responses) Name (12 Responses) Organization (12 Responses) Group Name (7 Responses) Lead Contact (7 Responses) Contact Organization (7 Responses) Question 1 (18 Responses) Question 1 Comments (19 Responses) Question 2 (18 Responses) Question 2 Comments (19 Responses)

Group
Imperial Irrigation District (IID)
Jesus Sammy Alcaraz
IID
Yes
No
Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
Yes
No
Individual
Keira Kazmerski
Xcel Energy
No
Xcel Energy does not believe that trying to implement a revision of PRC-005-1 at this point improves the reliability of the grid. There are better means of clarifying the perceived "misperceptions" than drafting a standard revision. This is particularly the case when PRC-005-2 is further along in the process and is also posted for industry comment and ballot. The effort of the GOTO SDT is counterproductive.
No
Individual
Dan Roethemeyer
Dynegy Inc.
Yes
No
Group
Imperial Irrigation District (IID)
Jesus Sammy Alcaraz
IID

Individual John Bee Exclon Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No No Deleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede anay industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see Individual John Seelke Public Service Enterprise Group Yes No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that Is used to connect the Generator Owner's generation facilities to the buck electric system is already Stated by in the question above, the addition of the Generator Owner's generation facilities. As stated by in the question above, the addition of the Generator Owner's generation facilities. As stated by in the question above, the addition of the derive and 'generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generation facilities of the buck electric system is already considered a buck electric system sistem enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X'3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substations between the GSU and Utility interconnection	Yes
Individual John Bee Exclon Exclon Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow womership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No Deleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks trequired. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede an any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that Is used to connect the Generator Owner's generation facilities to the Just electric system is already considered a bulk electric system as and any substance to the requirement Yes The SD has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generation facilities to the bulk electric system set or the source or the Generator Owner's generation facilities. As stated by in the question above, the addition of the term 'regenerator interconnection Facility' does not resolve are eliability gap or add any substance to the requirement Yes The SD has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generation facilities of the Duke substance to prevent inconsistent enforcement or need for the development of a compliance Application Notice. As referenced in our comments to FAC-003	
Iohn Bee Exelon Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by yoth TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seetke Public Service Enterprise Group Yes No No No No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities, As stated by in the question above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection facility' neep Application Notice. A	No
John Bee Exelon Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by yoth TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No No No No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is contiguous. Therefore, any facility owned by the Generator Amer facility, does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' does hot be defined to provent inconsistent enforcement or need for the development of a Compliance Application Not	
Exelon Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards, since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No	Individual
Yes The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacyturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms' generation facility (and the term 'or generator interconnection Facility' need to be defined to prevent inconnection facility (antice substation) in order to measure the generator Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substationsbetween th	John Bee
The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc HindlePower, Inc HindlePower, Inc Yes No Covered and the requirment to substitute Ohmic readings vs. discharge test is not based on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptale practice I would rather see terms in line with ether IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Covers and Engineering No Covers and Section Facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is arready considered a bulk electric system asset and part of the Generator Owner's generation facilities to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to Interpretation. The terms of generating station	Exelon
The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc HindlePower, Inc HindlePower, Inc HindlePower, Inc HindlePower, Inc HindlePower to substitute Ohmic readings vs. discharge test is not based on any industry reliable standards. since there is much debate in the industry are to be not real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not based on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptale practice I would rather see terms in line with either IEEE standard or manufacyturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Low Section 1000 Section 10	
both TO and GO_in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. Since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The Suble dectric system is not his round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms is deneration owner to round round round subteheart in terconnection Facility" dees to be defined to prevent inconsistent enforcement oreed for the development of a Compliance Application Notice. A	Yes
Component Types so long as all of the protection for the generator interconnection facility is covered. Individual Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner segneration facilities to the bulk electric system is already considered a bulk electric system is already to the question above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FA	
Individual Art Salander HindlePower, Inc Yes No No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. Since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities. As stated by in the guestion above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to Interpretation. The terms 'generation switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of ac Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term Application Motice. As referenced in our comments to FAC-003-X/3, when you try to apply the term Application Motice. As referenced in our comments to that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator Application Motice. As referenced in our comments to FAC-003-X/3, when you try to apply the term Application Motice. As referenced in our comments to the appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Art Salander HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpretation. The terms in this round of the drafting process whose definitions are subject to interpr	
HindlePower, Inc Yes No I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner system asset ad part of the requirement Yes The bulk electric system is already any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interprietation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement to read or use the face and any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to hiterprietation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenc	
Yes No Is beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Martin Kaufman ExxonMobil Research and Engineering. No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generator facility intercon	
No beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner that is stated by in the question above, the addition of the term or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' no apply the term Generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Set	
I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Set	No
required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No.	
reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-OO3-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator end resolve and unity interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group	
Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede
terms in line with either IEEE standard or manufacvturer's recommendations. Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	on any industry reliable standards. since there is much debate in the industry as to the validity if
Individual John Seelke Public Service Enterprise Group Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
John Seelke Public Service Enterprise Group Yes Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term 'or generator interconnection Facility' does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Public Service Enterprise Group Yes Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Yes No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
No Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	Yes
Individual Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	No
Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Martin Kaufman ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	Individual
ExxonMobil Research and Engineering No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
No The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement. Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Yes The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	stated by in the question above, the addition of the term "or generator interconnection Facility" does
The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	not resolve a reliability gap or add any substance to the requirement
interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	Yes
to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
rgenerating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	
lead line for the 1 mile quota, there are several candidates that appear to fit the criteria. Group Southwest Power Pool Standards Development Team	the GSU and utility interconnection facility (another substation) in order to measure the generator
Southwest Power Pool Standards Development Team	lead line for the 1 mile quota, there are several candidates that appear to fit the criteria.
	Group
Jonathan Hayes	Southwest Power Pool Standards Development Team

Southwest Power Pool

No

We would advise the Drafting team to take a look at the FERC OATT to reconcile the term "generator interconnection facility "with Tariff term for the LGIA. This should clarify the point of delineation and there should be no misconception of the language as written.

Yes

This effort seems to be redundant due to the work going on with PRC-005-2. We do not understand why this change is being made and it wasn't made very clear in the red line changes or in this comment form background.

Individual

Michelle R D'Antuono

Ingleside Cogeneration LP

Yes

Since PRC-005-1 already requires the Generation Owner to maintain and test all their BES Protection System components, it seems to Ingleside Cogeneration LP that the need to specify those which may trip the interconnection facility as redundant. However, we do not believe that the Standard Development Team's modifications materially change the intent of the Standard – nor can they lead an audit team to assign a double violation for a single incidence of non-compliance.

No

Individual

Dale Fredrickson

We Eneraies

Yes

No

Individual

Michael Falvo

Independent Electricity System Operator

Yes

The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after "applicable regulatory approval" in the Effective Dates Section A5 of the draft standard and P. 1 of the Implementation Plan, to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities."

Group

Bonneville Power Administration

Chris Higgins

Transmission Reliability Program

Yes

Yes

Regarding Section 1.3 Data Retention, BPA believes that it would be difficult for an entity to provide "other evidence" to demonstrate compliance when the data retention period is shorter than the time since the last audit. BPA requests the drafting team to offer guidance as to what "other evidence" could be provided other than what is already described in the measures. BPA believes that suggesting there is some "other evidence" without providing a description leaves the TO's and GO's without clear direction on how to comply with the standard. BPA suggests the data retention period should be three years or since the time the last audit occurred, whichever is longer for each TO and GO to retain

evidence. Should the drafting team revise the Data Retention language to reflect BPA's concerns, BPA would vote in favor of PRC-005-1.1a.

Individual

Joe Petaski

Manitoba Hydro

Yes

No

Manitoba Hydro does not support the changes being proposed in Project 2010-07 in general. If a Generator Owner is required to register as a TO, all the Requirements applicable to a TO should apply. There is no need to change specific Reliability Standards to allow the Generator Owner to perform only selected TO functions. For additional information, please see Manitoba Hydro's comments submitted in the comment period ending November 18, 2011. Manitoba Hydro does not believe that the SDT fully addressed our concerns in their responses to our comments in that commenting period.

Individual

Thad Ness

American Electric Power

Yes

Yes

While we support changing the standard requirements as proposed, AEP offers the following comments and suggestions. While the implementation plans states that "there was no reliability gap in the previous version of the standard", the previous version of the standard, if applied literally, does indeed contain a reliability gap in that it does not require Generation Owners that own a transmission Protection System to have a Protection System maintenance and testing program. It is AEP's understanding that referring to the proposed revision as "PRC-005-1.1a" implies errata from PRC-005-1a, and the announcement refers to "very limited revisions". If there is indeed a gap of responsibility in this standard, any changes to remediate such a gap would not be errata, regardless of the amount of proposed changes in content. As such, we recommend that the drafting team use a full revision naming convention for these proposed changes, i.e. PRC-005-2. In addition, making these changes immediately effective would allow no opportunity for an entity to take the proper steps to become compliant. We believe the revision should include an implementation plan that allows industry adequate time to analyze their system and complete any additionally required maintenance and testing activities.

Group

Dominion- NERC Compliance Policy

Mike Garton

Dominion

Yes

No

Group

ACES Power Marketing Standards Collaborators

Jean Nitz

ACES Power Marketing

Yes

Yes

The Implementation Plan for PRC-005-1.1a should be updated to reflect the retirement of currently effective PRC-005-1b instead of PRC-005-1a. PRC-005-1b became effective on March 14, 2012

replacing PRC-005-1a.
Individual
Darryl Curtis
Oncor Electric Delivery Company
Yes
No