

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

Please use this form to submit comments on the draft PRC-023-1 standard. Comments must be submitted by April 17, 2007. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Relay Loadability" in the subject line. If you have questions please contact Harry Tom at harry.tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nyiso.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background

Following the last comment period, based on stakeholder comments and a review of the latest version of the Functional Model, the drafting team revised Requirement 3 to read as follows:

- The Planning Coordinator shall determine which of the facilities (transmission lines operated at 100 kV to 200 kV and transformers with low voltage terminals connected at 100 kV to 200 kV) in its Planning Coordinator Area are critical to the reliability of the Bulk Electric System to identify the facilities from 100 kV to 200 kV that must meet Requirement 1. [Violation Risk Factor: Medium] [Time Horizon: Long Term Planning]

This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The NYISO believes that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200kV class.

A suggested change to address the issue we raise is to change the applicability to 100kV and above as determined by the Planning Coordinator.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background

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This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments: While most Planning Coordinators have working relationships with Reliability Coordinators, we are willing to accept the recommendation of Compliance personnel.

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	504-576-3029	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments:

We disagree with the use of the undefined phrase - CRITICAL TO THE RELIABILITY OF THE BULK ELECTRIC SYSTEM. We understand this phrase has been used in previous versions of this draft standard and this comment is late in the development. However, in the last several months the use of the term CRITICAL has taken new and much greater significance, and increased application to a wider range of the industry (for instance cyber security), that we suggest this undefined phrase be replaced with NERC defined terms.

NERC has developed criteria to determine what facilities are critical to the reliability of the bulk electric system. That criteria is defined in other NERC standards and results in IROLs. By definition of an IROL, if a facility is not related to an IROL then that facility is not critical to the reliability of the bulk electric system. Therefore, we suggest the undefined phrase - CRITICAL TO THE RELIABILITY OF THE BULK ELECTRIC SYSTEM - be replaced with - A FACILITY DEFINING AN IROL.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Dave Folk	
Organization:	FirstEnergy	
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

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Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie (HQT)	
Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: We believe that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence, in the applicability section (4.1) and Requirements R3, the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200kV class and specifically applies to equipment 200kV and above.

A suggested change to address the issue we raise is to change the applicability to 100kV and above as determined by the Planning Coordinator or just specify that it applies to equipment determined from an impact based methodology without specifying voltage.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	Independent Electricity System Operator - Ontario	
Telephone:	905 855-6183	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments:

The intent of R3 and its sub-requirements is to ensure that the Planning Coordinator determines the list of critical facilities in its area and to ensure facility owners are informed of which of their facilities are critical to the reliability of the electric system in order that they design/set their relays to meet R1. Communicating that list of critical facilities is, in our view, one of the most important aspects of these requirements.

If one accepts the above argument, the requirement to maintain the list seems secondary. Note that maintaining the list does not imply that the list has been communicated to the facility owners. However, having communicated the list to the owners while not maintaining the list would still meet the intent of this standard. We therefore propose that 3.4.2 "Does not maintain a current list of facilities critical to the reliability of the Bulk Electric System" be moved from "Severe" to the "High level".

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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The intent of R3 and its sub-requirements is to ensure that the Planning Coordinator determines the list of critical facilities in its area and to ensure facility owners are informed of which of their facilities are critical to the reliability of the electric system in order that they design/set their relays to meet R1. Communicating that list of critical facilities is, in our view, one of the most important aspects of these requirements. There is no such thing as a partial communication and so it's a case of either full compliant (communication) or flat out non-compliant (no communication at all). We therefore propose that Severity level 3.3.1 be moved to the Severe level.

If one accepts the above argument, the requirement to maintain the list seems secondary. Note that maintaining the list does not imply that the list has been communicated to the facility owners. However, having communicated the list to the owners while not maintaining the list would still meet the intent of this standard. We therefore propose that 3.4.2 "Does not maintain a current list of facilities critical to the reliability of the BES" be moved from "Severe" to the "High level".

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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- The Planning Coordinator shall determine which of the facilities (transmission lines operated at 100 kV to 200 kV and transformers with low voltage terminals connected at 100 kV to 200 kV) in its Planning Coordinator Area are critical to the reliability of the Bulk Electric System to identify the facilities from 100 kV to 200 kV that must meet Requirement 1. [Violation Risk Factor: Medium] [Time Horizon: Long Term Planning]

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Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

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- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: We suggest either changing the applicability to be 100 kV and above as determined by the Planning Coordinator or BPS facilities to be consistent with the recent FERC Order.

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

Please use this form to submit comments on the draft PRC-023-1 standard. Comments must be submitted by April 17, 2007. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Relay Loadability" in the subject line. If you have questions please contact Harry Tom at harry.tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian F Thumm	
Organization:	ITC Transmission	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background

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The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The Standard still emphasizes a distinct difference between 4-hour and 15-minute facility ratings, which suggests that each are required to be established. An explanatory note or footnote should clearly indicate that multiple facility ratings are not required to be established, and that a single rating can be used to satisfy both R1.1 and R1.2.

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	816-654-1245	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

- Yes
 No

Comments: The Planning Coordinator in the NERC Functional Model is responsible for the coordination of generation and transmission plans of Transmission Planners, Resource Planners and other Planning Coordinators for the purpose of system analysis and subsequent coordination of plans or recommendations for modification to plans to meet system reliability planning criteria. They are responsible to provide results of the analysis to Reliability Coordinators. Ahead of time, Reliability Coordinators coordinate reliability related matters with Transmission Operators and Generator Operators to develop operating agreements or procedures regarding reliability related matters. The Reliability Coordinator coordinates operating procedures with other Reliability Coordinators and determines IROL limits. Fundamentally, the Planning Coordinator identifies areas of reliability concern and helps to plan asset additions or changes to address those concerns. The Reliability Coordinator works with others to mitigate reliability concerns until such asset plans can be implemented and is responsible to establish SOL and IROL limits with Operators. The Reliability Coordinator is in the appropriate position to determine what facilities are critical to the operation of the region based on their responsibility to establish operating limits and operating agreements according to the NERC Functional Model.

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

- Yes
 No

Comments: If the Standard moves forward with the notion that the Planning Coordinator is responsible to identify critical facilities. A field test should reveal if the Planning Coordinator is the appropriate entity.

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

- Yes
 No

Comments: R2: Please review FAC-008-1, R3. Is the requirement R2 in proposed standard PRC-023-1 the same as requirement R3 in FAC-008-1? I believe the intent of FAC-008-1 is for all entities to agree to the facility rating as determined by the asset owner. Agreement must be reached or R3 cannot be satisfied.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	(204)487-5479	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: MH feels that some of our comments during the last two rounds of commenting periods have not been addressed. Mainly:

1) Although the SDT repeatedly stated that protection systems are designed to remove faults but not to prevent equipment damage, and the operator action is required to protect facilities from overload conditions, MH still believes that protection system can provide the last resort protection to prevent equipment damage especially during SCADA failure situations or situations when operators fail to correctly respond on overload conditions.

2) Regarding R13, MH does not agree adding an 15% margin to the loading limitation on a circuit that has a hard loading limit. The SDT stated that this margin is for the inherent error in the relay and the sensing circuits. However, this error could be on the opposite side, such that the relay could trip only when the actual loading is higher than 100% of the hard loading limit in which case damage to the equipment could occur.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments: To our knowledge, there are no entities registered as a Planning Coordinator. There is a need to differentiate the wide-area coordination that is done from the local transmission planner. The industry has not yet provided this differentiation in the standards.

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The standard relies on having a list of critical lines, transformers, and "facilities". The current standards use the term critical facilities in multiple standards. It is not clear if the facilities in this standard are the same as in the existing standards. If we don't know which facilities to which the standard applies, how can it be put in place?

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization
Lead Contact: Joe Knight
Contact Organization: MRO for Group (Great River Energy for Lead)
Contact Segment: 10
Contact Telephone: 763.241.5633
Contact E-mail: jknight@grenergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Terry Bilke	MISO	MRO	10
Al Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Mike Brytowski, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments: In the SDT's Consideration of Comments from Draft 2, they indicated that the standard has already undergone extensive field testing in conjunction with NERC Recommendation 8a and the Beyond Zone 3 activities. What the SDT was not clear on was, if these activities were conducted with the RC as the responsible entity or the PC. If these activities have not been conducted with the PC as the responsible entity, the MRO recommends that additional field testing is needed. If however the PC was the responsible entity, the MRO does not believe any additional field testing is needed.

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The MRO does not believe that this standard in its current form is ready for ballot. The MRO believes that this standard is still too prescriptive and that there is a forced assumption of risk. The amount of risk that a company is willing to assume is a business decision that can only be determined from an in depth risk analysis.

The MRO is interested to know if Facilities, as defined in this standard, that are determined by the PC to be critical to the reliability of the BES in its area are the same as Critical Facilities referenced in other Standards and, are these Critical Facilities covered under the heading of Critical Assets as defined in the NERC Glossary? Additionally, is the RC to maintain a separate list of Critical Facilities for each Standard or is there a master list of Critical Facilities that the RC is to maintain so as to avoid conflict? The MRO recommends that there be a consistent methodology throughout the standards as to what constitutes a Critical Facility. The MRO further recommends that Critical Facility be added to the list of defined terms in the Glossary.

The VSLs do not appear to follow a smooth progression on the violation curve. For example; an Applicable Entity can violate between 1 and 13 of the subrequirements for

Requirement 1 and only be in a Moderate level violation. It would appear more appropriate if there was a cut off that would constitute a High Level violation, such as violating 75% or more of the subrequirements. The same reasoning can be applied to the VSLs for the PC. The PC can go from being compliant if it gets the list of the Critical Facilities to the Applicable Entities on or before to the due date, to having a Moderate level violation for being only one day late. The MRO recommends that the VSLs for the PC with respect to Critical Facility list submission to the Applicable Entities be separated such that if the PC is between 1 and 6 days late it be given a Lower level violation and once the PC is more than 7 days late it be given a Moderate level violation.

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
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Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9 Reliability Standards Working Group
Lead Contact: Guy V. Zito
Contact Organization: Northeast Power Coordinating Council
Contact Segment: 10
Contact Telephone: 212-840-1070
Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Roger Champagne	TransEnergie HydroQuebec	NPCC	1
Randy Macdonald	New Brunswick System Operator	NPCC	2
Herb Schrayshuen	National Grid US	NPCC	1
Al Adamson	New York State Reliability Council	NPCC	10
Kathleen Goodman	ISO-New England	NPCC	2
David Kiguel	Hydro One Networks	NPCC	1
William Shemley	ISO-New England	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1
Michael Schiavone	National Grid US	NPCC	1
Greg Campoli	New York ISO	NPCC	2
Donald Nelson	MA Dept. of Tele. and Energy	NPCC	9
Ed Thompson	ConEd	NPCC	1
Guy V. Zito	NPCC	NPCC	10
Michael Ranalli	National Grid US	NPCC	1

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Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: NPCC Participating members believe that this standard should only apply to the BPS as determined by an approved FERC filed BPS region specific impact based methodology. Hence the standard should have references removed that specify voltage level and should only reference the BPS. There are many instances where 200kV and higher transmission lines do not constitute a BPS facility and on a going forward basis if further 200kV lines are built or relay loadability requirements are adjusted, the only lines that should be considered are BPS lines determined from an impact based methodology. Presently the standard only has an implicit impact based determined BPS in the 100-200kV class.

A suggested change to address the issue we raise is to change the applicability to 100kV and above as determined by the Planning Coordinator.