

Consideration of Comments

Project Name:	2021-05 Modifications to PRC-023 Draft 1
Comment Period Start Date:	10/10/2022
Comment Period End Date:	12/5/2022
Associated Ballot(s):	2021-05 Modifications to PRC-023 PRC-023-6 Implementation Plan IN 1 OT 2021-05 Modifications to PRC-023 PRC-023-6 IN 1 ST

There were 54 sets of responses, including comments from approximately 142 different people from approximately 97 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Vice President of Engineering and Standards [Howard Gugel](#) (via email) or at (404) 446-9693.

Questions

1. Do you agree that Reliability Standard PRC-023-4, Requirement R1 “...for all fault conditions...” covers the intent of Requirement R2 so that the Requirement R2 should be retired?
2. Do you agree with the removal of Section 2.3 from Attachment A?
3. Provide any additional comments for the standard drafting team to consider, if desired.

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	SPP RE	SRC 2022	Charles Yeung	SPP	2	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISONE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Greg Campoli	NYISO	1	NPCC
Elizabeth Davis	PJM	2	RF					
Portland General Electric Co.	Daniel Mason	6		Portland General Electric Co.	Brooke Jockin	Portland General Electric Co.	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Adam Menendez	Portland General Electric Co.	3	WECC
					Ryan Olson	Portland General Electric Co.	5	WECC
					Daniel Mason	Portland General Electric Co	6	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
					Ryan Strom	Buckeye Power, Inc.	5	RF
					Shari Heino	Brazos Electric Power	5	Texas RE

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Cooperative, Inc.		
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Patricia Ireland	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Public Utility District No. 1 of Chelan County	Meaghan Connell	5		PUD No. 1 of Chelan County	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Diane Landry	Public Utility District No. 1 of Chelan County	1	WECC
					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
					Meaghan Connell	Public Utility District No. 1 Chelan County	5	WECC
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					James Mearns	Pacific Gas and Electric Company	5	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
NPCC	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					John Hastings	National Grid	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Dan Kopin	Vermont Electric Power Company	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Associated Electric	Todd Bennett	3		AECI	Michael Bax	Central Electric Power	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Cooperative, Inc.						Cooperative (Missouri)		
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power	3	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Cooperative, Inc.		
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric	6	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Cooperative, Inc.		
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. Do you agree that Reliability Standard PRC-023-4, Requirement R1 “....for all fault conditions...” covers the intent of Requirement R2 so that the Requirement R2 should be retired?

Brian Lindsey - Entergy - 1

Answer No

Document Name

Comment

Agree that R2 is unnecessary but it is not the same as R1. R1 does not preclude out-of-stop blocking outside the 150% load region. R2 does. Therefore, they are not the same.

Likes 0

Dislikes 0

Response

Thank you for your response. We agree that R1 and R2 are not the same, but it wasn't the intent of the SDT to imply that. The SDT feels that the dependability statement in R1 covers the fault conditions of R2.

Michael Brytowski - Great River Energy - 3

Answer No

Document Name

Comment

These comments were submitted incorrectly. Please ignore.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT will comply with your request.

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Thank you for your support.

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Thank you for your support.

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the retirement of Requirement R2 since the "... for all fault conditions..." in Requirement R1 covers the intent of R2.

Likes 0

Dislikes 0

Response

Thank you for your support.

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County

Answer Yes

Document Name

Comment

I agree that retirement R2 should be retired as R1 already covers the intent of R2.

Likes 0

Dislikes 0

Response

Thank you for your support.

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer Yes

Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	

FirstEnergy agrees that R1 covers the intent of R2 and therefore agrees with the retirement of R2	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Kimberly Turco - Constellation - 6	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments.	

Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
The requirement R2 and the attachment A 2.3 cause interpretation confusion and the proposal to remove both from the requirements would allow the normal functioning of the OOSB relays during power swing conditions	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.	
Answer	Yes
Document Name	
Comment	
Portland General Electric Company supports the comments provided by EEI.	
Likes	0

Dislikes	0
Response	
Thank you for your support.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI	
Likes	0
Dislikes	0
Response	
Thank you for your support.	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the language in R1 that states that “for all fault conditions” is sufficient to cover the intent of Requirement R2, so that R2 can be retired.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Alison MacKellar - Constellation - 5	
Answer	Yes
Document Name	
Comment	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.

Likes 0

Dislikes 0

Response

Thank you for your support.

Randall Buswell - VELCO -Vermont Electric Power Company, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - John Daho

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Loiacano - Arkansas Electric Cooperative Corporation - 1 - MRO,SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Carl Pineault - Hydro-Quebec Production - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

2. Do you agree with the removal of Section 2.3 from Attachment A?

Michael Brytowski - Great River Energy - 3

Answer No

Document Name

Comment

Thank you for your participation. We are not sure how to answer your concern.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

Alan Kloster - Alan Kloster On Behalf of: Jennifer Flandermeyer, Evergy, 3, 6, 5, 1; Jeremy Harris, Evergy, 3, 6, 5, 1; Kevin Frick, Evergy, 3, 6, 5, 1; Marcus Moor, Evergy, 3, 6, 5, 1; - Alan Kloster

Answer Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.

Likes 0

Dislikes 0

Response

Thank you for your support.

Alison MacKellar - Constellation - 5

Answer Yes

Document Name

Comment

Constellation has no additional comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Thank you for your support.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	Yes
Document Name	
Comment	
EEI supports the removal of Section 2.3 from Attachment A.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Exelon supports the comments submitted by EEI	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	

Exelon supports the comments submitted by EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.	
Answer	Yes
Document Name	
Comment	
Portland General Electric Company supports the comments provided by EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
The requirement R2 and the attachment A 2.3 cause interpretation confusion and the proposal to remove both from the requirements would allow the normal functioning of the OOSB relays during power swing conditions	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy agrees with the removal of Section 2.3 from Attachment A.	
Likes	0
Dislikes	0

Response	
Thank you for your support.	
Josh Combs - Black Hills Corporation - 3	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees with the removal of Attachment A, Section 2.3 exclusion since it is related to Requirement R2 which is being retired.

Likes 0

Dislikes 0

Response

Thank you for your support.

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

Black Hills Corporation (BHP) agrees with EEI comments.

Likes 0

Dislikes 0

Response

Thank you for your support.

Claudine Bates - Black Hills Corporation - 6

Answer Yes

Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Lindsey - Entergy - 1	
Answer	Yes
Document Name	
Comment	
No Comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Robert Follini - Avista - Avista Corporation - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5, Group Name PUD No. 1 of Chelan County	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jennifer Loiacano - Arkansas Electric Cooperative Corporation - 1 - MRO,SERC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
John Daho - John Daho On Behalf of: David Weekley, MEAG Power, 3, 1; - John Daho	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Randall Buswell - VELCO -Vermont Electric Power Company, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kimberly Turco - Constellation - 6	
Answer	
Document Name	
Comment	
Constellation has no additional comments.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

3. Provide any additional comments for the standard drafting team to consider, if desired.
Brian Lindsey - Entergy - 1

Answer	
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	
Document Name	
Comment	
Black Hills Corporation (BHP) agrees with EEI's additional comment.	
Likes 0	
Dislikes 0	
Response	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	
Document Name	
Comment	

Black Hills Corporation (BHP) agrees with EEI's additional comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
PG&E wishes to thank the Standard Drafting Team (SDT) for their efforts on the modification work and has no additional comments.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
Consider comments provided by EEI.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	
Document Name	
Comment	
nothing further at this time	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Marc Sedor - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	
Comment	
Regarding the deletion of Requirement R2 if deleted from this PRC standard, it should be added to another PRC standard where the SDT may opine on its insertion subject to review by stakeholders before finalization of deletion from this Standard.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT does not agree that the content of R2 needs to be included in another standard. This was reviewed at greater length in the Technical Rationale.	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	

Answer	
Document Name	
Comment	
<ul style="list-style-type: none"> • Section D1.2 (Data Retention): 1st paragraph, sentence should end with a period instead of a semi-colon. • Please considering updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete. • Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan. 	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comments</p> <ul style="list-style-type: none"> • The SDT will make the [;] → [.] correction. • EEI had a similar comment on the Compliance Section, but the SDT believes this change is outside the scope of the present SAR. • The SDT has added the Planning Coordinator to the Implementation Plan’s Applicable Entities. 	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	
Document Name	
Comment	
No additional comments	
Likes 0	
Dislikes 0	
Response	
Josh Combs - Black Hills Corporation - 3	

Answer	
Document Name	
Comment	
1. Black Hills Corporation (BHP) agrees with EEI's additional comment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
<p>FirstEnergy supports EEI's comments which states:</p> <p>Under Section B. (Associated Documents) the following document is Referenced: "Determination and Application of Practical Relaying Loadability Ratings," Version 1.0, June 2008." However, the hyperlink appears to be broken and the associated document has not been included in the documents to be reviewed by the industry, except for Appendix C. While Appendix C a portion of this document that is of greatest concern, the entire document should be revised, updated and attached for industry review.</p> <p>The Compliance Section of PRC-023-6 does not appear to conform to the latest approved language that is to be used in new or revised Reliability Standards. Please update this section to conform to the current Compliance language for NERC Reliability Standards.</p>	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	
Document Name	
Comment	
<ul style="list-style-type: none"> Section C1.2 (Data Retention): 1st paragraph, sentence should end with a period instead of a semi-colon. Please considering updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete. Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan. Section "Regional Variances" and "Associated Documents" should be sections D. and E. and not A. and B. as seen in the clean version. (Redlines are ok) 	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments	
<ul style="list-style-type: none"> The SDT will make the [;] → [.] correction. EEI had a similar comment on the Compliance Section, but the SDT believes that this change is outside the scope of the present SAR. The SDT has added the Planning Coordinator to the Implementation Plan's Applicable Entities. The SDT believes that this change is outside the scope of the present SAR. 	
Micah Runner – Black Hills Corporation – 1	
Answer	
Document Name	
Comment	

Black Hills Corporation (BHP) agrees with EEI's additional comment.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.

Darcy O'Connell - California ISO - 2

Answer

Document Name

Comment

CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

Thank you for your comments. Please see the SDT's response to the IRC Standards Review Committee comments by Charles Yeung.

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation has no additional comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	
Document Name	
Comment	
Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
Response	
You are welcome.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE recommends using NERC Glossary terms where appropriate or defining terms that are not clearly defined in the NERC Glossary. For example, criteria numbers 8 and 9 under Requirement R1 use the term "highest operator established emergency	

transformer rating”, and criterion number 9 also uses the term “maximum applicable nameplate rating”. Neither of these terms exist in the NERC Glossary, though the terms Emergency Rating and Rating do exist in the NERC Glossary.

In Section C 1.2, Texas RE noticed the use of the term Data Retention. It appears that other proposed standards are using the term Evidence Retention as in proposed Reliability Standards CIP-012-2, VAR-002-5, MOD-026-2, IRO-010-5, and TOP-003-6.

Texas RE noticed that Section C 1.3 Compliance Monitoring and Enforcement Processes differs from Section C1.3 in other currently proposed standards, where it describes the Compliance Monitoring and Enforcement Program. Is this the SDT’s intent?

Texas RE has the following comments on Attachment B:

- The first bullet in “Circuits to evaluate” needs a space between “200” and “kv”
- Criteria B1 does not mention the ERCOT Interconnection. Is this the SDT’s intent?
- The footer page numbers need corrected (“Page 17 of 16”)
- Since Criterion B3 is referring to NUC-001, is “Transmission Entity” referring to Transmission Entity as described in section A 4 of NUC-001-4?

In the Implementation Plan, under Time Period to Address New Designations, correct “pursyant” to “pursuant”.

It is unclear what the “applicable effective date” is referencing since, presumably, a “New Designation” under PRC-023-6 would only occur after the effective date of PRC-023-6.

Likes	0
Dislikes	0

Response

Thank you for your comments. However, the SDT believes that your first comment is outside the scope of the SAR under which the SDT operates.

The SDT believes that changes to the section C 1.2 are outside the scope of the present SAR.

The SDT believes that changes to the section C 1.3 are outside the scope of the present SAR.

The SDT response to your Attachment B comments are as follows:

- We will correct the spacing referenced in your first bullet
- The SDT believes that second bullet is outside the scope of the SAR. The absence of ERCOT from Criteria B1 appears to be a product of the original version of the Attachment B.
- We will correct the footer page numbers referenced in your third bullet
- “Transmission Entity” is defined for purpose of the NUC-001 standard and is not a defined NERC Glossary Term. However, the interpretation of “Transmission Entity” in Criteria B3 is outside the scope of this project SAR.

The SDT will correct the spelling of “pursyant” in the final Implementation Plan.

The SDT believes that a “New Designation” for an Element may occur anytime the Planning Coordinator performs their analysis under Criteria B4 using the specified one to five year planning horizon. The SDT is merely attempting to clarify when the Element must achieve compliance with the Standard after the Element has been identified by the Planning Coordinator.

Daniel Mason - Portland General Electric Co. - 6, Group Name Portland General Electric Co.

Answer

Document Name

Comment

Portland General Electric Company supports the comments provided by EEI.

Likes 0

Dislikes	0
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Daniel Gacek - Exelon – 1	
Answer	
Document Name	
Comment	
Exelon supports the comments submitted by EEI.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	
Kinte Whitehead - Exelon – 3	
Answer	
Document Name	
Comment	
Exelon supports the comments submitted by EEI	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please refer to the SDT's response to Mark Gray of EEI.	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
<p>EEI offers the following additional input for SDT consideration:</p> <p>Under Section B. (Associated Documents) the following document is Referenced: “Determination and Application of Practical Relaying Loadability Ratings,” Version 1.0, June 2008.” However, the hyperlink appears to be broken and the associated document has not been included in the documents to be reviewed by the industry, except for Appendix C. While Appendix C a portion of this document that is of greatest concern, the entire document should be revised, updated and attached for industry review.</p> <p>The Compliance Section of PRC-023-6 does not appear to conform to the latest approved language that is to be used in new or revised Reliability Standards. Please update this section to conform to the current Compliance language for NERC Reliability Standards.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comments. Use of a different browser may allow document access through the present link.</p> <p>The NERC System Protection and Control Work Group is the owner of this document. Revision is already in the SPCWG work plan for 2023. Industry will have the opportunity to review and comment on the results.</p> <p>The Compliance Section of the standard is outside the scope of the present SDT’s SAR.</p>	
Alison MacKellar - Constellation – 5	
Answer	
Document Name	

Comment	
Constellation has no additional comments.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	
Document Name	
Comment	
Thank you for the opportunity to comment.	
Likes	0
Dislikes	0
Response	
You are welcome.	
Ruida Shu - NPCC - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	

Change Data Retention Section 1.2 to:

The Transmission Owner, Generator Owner, and Distribution Provider shall each retain documentation to demonstrate compliance with Requirements R1 through R5 since the last audit period.

Section D1.2 (Data Retention): In 1st paragraph, the sentence should end with a period instead of a semi-colon.

Please consider updating section C. Compliance to use the most up-to-date version of the NERC wording for section C. Compliance. The wording used in Section C. Compliance, for draft 1 of PRC-023-6, is obsolete.

Please consider adding the Planning Coordinator to the Applicable Entities list in the Implementation Plan.

Likes 0

Dislikes 0

Response

Thank you for your comments. The first proposed change to Data Retention Section 1.2 is outside the scope of this SDT’s SAR.

The SDT will conform the section to correct punctuation.

The SDT believes that changes to section C 1.2 are outside the scope of the present SAR.

The SDT has added the Planning Coordinator to the Applicable Entities in the Implementation Plan.

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Document Name	
Comment	
<p>SPP recommend that the drafting team revise the current/future comment form to reflect the appropriate standard version so, it aligns with documentation posted to the NERC page. For example, the one stop shop details for PRC-023-4 shows that this standard became effective on April 1, 2017 with an inactive date of March 31, 2024. However, PRC-023-5 will become effective April 1, 2024. Our interpretation is that all proposed changes would be associated with PRC-023-5 instead of PRC-023-4 in which the background information and the comment form suggests on the project page. Additionally, the redline document suggests that PRC-023-5 is the appropriated document to be mentioned in the background information. From our perspective, this creates confusion on which document is being used to support the drafting teams efforts.</p> <p>Additionally, SPP recommends the drafting team further develop the physical document for the Technical Rationale associated with the PRC-023-6 Standard by including rationale for the legacy requirements. The link located in the “Associated Documents” sections of both PRC-023-5 (Project 2015-09) and PRC-023-6 (proposed) appears to not work properly to grant access to this data, which will create issues for industry. Moreover, there was a NERC project conducted to remove all Technical Rationale and Guidelines and Technical Basis from the back of all standards and put into structured independent formatted documentation. From our perspective, a link in the Associated Documents section of the standard in place of a separate Technical Rationale document doesn’t align with NERCs intent for drafting teams and their development of quality independent documentation. The proposed Technical Rationale document for PRC-023-6 should be updated to include the information that is associated with the link described above to be consistent with the current template for standards.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comments. The draft PRC-023-6 that was posted for comment is based on the FERC approved PRC-023-5. The changes from PRC-023-4 to PRC-023-5 only affected Attachment B.</p> <p>The Technical Rationale specifically supports the proposed revisions to the Standard. Development of a Technical Rationale for the entire standard is beyond the scope of this SDT SAR. The NERC System Protection and Control Work Group is already scheduled to consider</p>	

revision of the “Determination and Application of Practical Relaying Loadability Ratings,” Version 1.0, June 2008” including its Attachment C in their 2023 work plan.

Use of a different browser may allow document access through the present link.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC 2022

Answer

Document Name

Comment

The IRC SRC supports improvements to clarify requirements on how Out-of-Step Blocking protection schemes should work. The proposed changes will provide more certainty in how these schemes will perform to reduce exposure to islanding. We do ask NERC to consider the implementation schedule and need for these changes in the context of the numerous other standards being developed and anticipated to be adopted. As described in the Technical Rationale, situations where OOSB relays may have not been correctly coordinated have seen little direct impact on system reliability. If this initial ballot fails and industry needs to expend more resources to review changes to reach consensus, we ask NERC to consider the immediacy of these changes relative to other risks where PRC requirements revisions are needed. Industry protection schemes expertise should be focused on the greatest reliability threats.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT agrees that industry expertise should be focused on the greatest reliability threats. The proposed changes do not add new requirements. That said, the industry response to the SDT proposal has indicated substantial consensus to approve this proposal, so there seems to be no need for any further delay on this project.

End of Report