

Consideration of Comments

Project 2007-17.2 Protection System Maintenance and Testing – Phase 2 (Reclosing Relays)

The Project 2007-17.2 Drafting Team thanks all commenters who submitted comments on the Standard Authorization Request (SAR) for Protection System Maintenance and Testing (Reclosing Relays). The SAR was posted for a 30-day formal comment period from April 5, 2013 through May 6, 2013. Stakeholders were asked to provide feedback on the SAR and associated documents through a special electronic comment form. There were 24 sets of comments, including comments from approximately 93 different people from approximately 64 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Summary Consideration of all Comments Received

SAR

The SAR was previously posted for information only along with the third draft of PRC-005-2 in May, 2012. The Standards Process Manual supports posting of a SAR for a comment period at the same time that a draft of the resulting standard is posted for a formal comment period. "For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received."

Commenters agreed that the scope of this SAR addresses the regulatory directive associated with Order 758 while a few commenters suggested that NERC pursue "equally efficient and effective" methods for achieving the reliability intent of the FERC directive regarding the maintenance of

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

reclosing relays. The drafting team noted that “equally efficient and effective” alternatives were proposed to FERC in the NOPR preceding Order 758, and they were rejected.

No regional variances were identified as being necessary because of this project.

Two commenters noted they may need to modify or establish business practices.

The drafting team removed the parenthetical and revised a sentence of the SAR’s “Need” statement because the SAMS and SPCS could not identify an application in which autoreclosing is used in coordination with a protection system to meet the system performance requirements in a NERC Reliability Standard or in establishing an IROL. The sentence was formerly read: “Modifying the standard in this fashion will impact Bulk Electric System (BES) reliability by assuring that the reclosing relays (installed to meet performance goals of approved NERC Standards) are properly maintained so that they may be expected to perform properly.” It now reads: “Modifying the standard in this fashion will assure that those reclosing relays that can affect the reliability of the Bulk Electric System are properly maintained.”

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3. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice.18

4. If you have any other comments on this SAR that you haven't already mentioned, please provide them here:21

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Louis Slade	Dominion	X		X		X	X				
Additional Member		Additional Organization	Region	Segment Selection									
1.	Connie Lowe	NERC Compliance Policy	NA - Not Applicable	1, 3, 5, 6									
2.	Chip Humphrey	Fossil & Hydro	NPCC	5									
3.	Sean Iseminger	Fossil & Hydro	RFC	5									
4.	Jeff Bailey	Nuclear	NA - Not Applicable	5									
5.	Mike Garton	NERC Compliance Policy		1, 3, 5, 6									
6.	Michael Crowley	Electric Transmission Compliance	SERC	1, 3									
7.	Randi Heise	NERC Compliance Policy		1, 3, 5, 6									
8.	Matt Woodzell	Fossil & Hydro	SERC	5									
2.	Group	Colby Bellville	Duke Energy	X		X		X	X				

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
Additional Member Additional Organization Region Segment Selection														
1. Doug Hils		RFC	1											
2. Lee Schuster		FRCC	3											
3. Dale Goodwine		SERC	5											
4. Greg Cecil		RFC	6											
3.	Group	Larry Raczkowski	FirstEnergy	X		X	X	X	X					
Additional Member Additional Organization Region Segment Selection														
1. William Smith	FurstEnergy Corp	RFC	1											
2. Cindy Stewart	FirstEnergy Corp	RFC	3											
3. Doug Hohlbaugh	Ohio Edison	RFC	4											
4. Ken Dresner	FirstEnergy Solutions	RFC	5											
5. Kevin Querry	FirstEnergy Solutions	RFC	6											
4.	Group	David Thorne	Pepco Holdings Inc & Affiliates	X		X								
Additional Member Additional Organization Region Segment Selection														
1. Carlton Bradshaw	Delmarva Power & Light Co	RFC	1, 3											
2. Carl Kinsley	Delmarva Power & Light Co	RFC	1, 3											
5.	Group	Robert Rhodes	SPP Standards Review Group		X									
Additional Member Additional Organization Region Segment Selection														
1. Bud Averill	Grand River Dam Authority	SPP	1, 3, 5											
2. Timothy Bobb	Westar Energy	SPP	1, 3, 5, 6											
3. Afshin Jalilzadeh	Westar Energy	SPP	1, 3, 5, 6											
4. Stephanie Johnson	Westar Energy	SPP	1, 3, 5, 6											
5. Bo Jones	Westar Energy	SPP	1, 3, 5, 6											
6. Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6											
7. Russ Matzke	Westar Energy	SPP	1, 3, 5, 6											
6.	Group	Brandy Spraker	Tennessee Valley Authority	X		X		X	X					
Additional Member Additional Organization Region Segment Selection														
1. Rusty Hardison		SERC	1											
2. Ryland Revelle		SERC	1											
3. Karen Ryland		SERC	1											

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
7.	Group	Frank Gaffney	Florida Municipal Power Agency	X		X	X	X	X					
Additional Member		Additional Organization	Region	Segment	Selection									
1.	Tim Beyrle	City of New Smyrna Beach	FRCC	4										
2.	Jim Howard	Lakeland Electric	FRCC	3										
3.	Greg Woessner	Kissimmee Utility Authority	FRCC	3										
4.	Lynne Mila	City of Clewiston	FRCC	3										
5.	Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4										
6.	Randy Hahn	Ocala Utility Services	FRCC	3										
8.	Group	Jason Marshall	ACES Standards Collaborators							X				
Additional Member		Additional Organization	Region	Segment	Selection									
1.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5										
2.	Tom Alban	Buckeye Power	RFC	3, 4										
3.	Kevin Lyons	Central Iowa Power Cooperative	MRO											
4.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1										
5.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5										
6.	John Shaver	Southwest Transmission Cooperative	WECC	1										
7.	Scott Brame	NCEMC	SERC	1, 3, 4, 5										
9.	Group	Guy Zito	Northeast Power Coordinating Council											X
Additional Member		Additional Organization	Region	Segment	Selection									
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10										
2.	Carmen Agavrioloai	Independent Electricity System Operator	NPCC	2										
3.	Greg Campoli	New York Independent System Operator	NPCC	2										
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1										
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1										
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10										
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5										
8.	Kathleen Goodman	ISO - New England	NPCC	2										
9.	Michael Jones	National Grid	NPCC	1										
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1										
11.	Christina Koncz	PSEG Power LLC	NPCC	5										
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
13. Bruce Metruck	New York Power Authority	NPCC 6												
14. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC 5												
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC 10												
16. Robert Pellegrini	The United Illuminating Company	NPCC 1												
17. Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC 1												
18. David Ramkalawan	Ontario Power Generation, Inc.	NPCC 5												
19. Brian Robinson	Utility Services	NPCC 8												
20. Brian Shanahan	National Grid	NPCC												
21. Wayne Sipperly	New York Power Authority	NPCC 5												
22. Donald Weaver	New Brunswick System Operator	NPCC 2												
23. Ben Wu	Orange and Rockland Utilities	NPCC 1												
24. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC 3												
10. Group	Jamison Dye	Bonneville Power Administration	X		X		X	X						
Additional Member	Additional Organization	Region	Segment Selection											
1. Heather Laslo	SPC Technical Svcs	WECC	1											
2. Jason Burt	PSC Technical Svcs	WECC	1											
3. Brenda Vasbinder	Work Planning and Evaluation	WECC	1											
11. Individual	Ryan Millard	PacifiCorp	X		X		X	X						
12. Individual	Marcus Pelt	Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	X		X		X	X						
13. Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X						
14. Individual	John Bee	Exelon and its Affiliates	X		X		X							
15. Individual	Bill Fowler	City of Tallahassee			X									
16. Individual	Chris Mattson	Tacoma Power	X		X	X	X	X						
17. Individual	Thomas Foltz	American Electric Power	X		X		X	X						
18. Individual	Brad Harris	CenterPoint Energy	X											

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
19.	Individual	Kenn Backholm	Public Utility District No.1 of Snohomish County	X		X	X	X	X			X	
20.	Individual	Andrew Z. Puztai	American Transmission Company	X									
21.	Individual	Anthony Jablonski	ReliabilityFirst										X
22.	Individual	Kevin Luke	Georgia Transmission Corporation	X									
23.	Individual	Jonathan Meyer	Idaho Power Company	X									
24.	Individual	Scott Langston	City of Tallahassee	X									

1. Do you agree that the scope of this SAR addresses the regulatory directive associated with FERC Order No. 758? If not, please explain.

Summary Consideration:

Commenters agreed that the scope of this SAR addresses the regulatory directive associated with Order 758. No changes made to the SAR as a result of comments from Question 1.

Some comments pertained to the standard rather than the SAR; however, the drafting team responded to all individual comments.

Several commenters were concerned about initiating the project to establish PRC-005-3 before PRC-005-2 is FERC approved. The drafting team explained that they are acting in accordance with the schedule provide to FERC in an informational filing submitted by NERC, in response to FERC Order 758 which stated: “By July 30, 2012, NERC should submit to the Commission either the completed project which addresses the remaining issues consistent with this order, or an informational filing that provides a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.” In the Order, FERC accepted NERC’s commitment to address the maintenance and testing of reclosing relays that can affect the reliable operation of the Bulk-Power System within the standards development process. Phase 2 (Reclosing Relays) of Project 2007-17 Protection System Maintenance and Testing was initiated to develop PRC-005-3 and satisfy NERC’s commitment to the FERC.

Several commenters questioned the scope of reclosing relays that might be included in the standard; the drafting team explained that the SAR provides the boundaries (scope) for the proposed standard action, establishing the general framework for the project.

Several commenters proposed that NERC pursue “equally efficient and effective” methods for achieving the reliability intent of the FERC directive regarding the maintenance of reclosing relays. The drafting team noted that “equally efficient and effective” alternatives were proposed to FERC in the NOPR preceding Order 758, and they were rejected.

Several commenters objected to the provision within the SAR that optionally permitted changes to the definition of “Protection System”. The drafting team explained that this represented one option for the drafting team to consider, and noted that the drafting team decided not to pursue that option.

Organization	Yes or No	Question 1 Comment
American Electric Power	No	1. AEP supports the efforts of the drafting team, but is concerned by pursuing a version 3 of this standard before the second version has been approved by

Organization	Yes or No	Question 1 Comment
		<p>FERC. There is significant content within version 3 that was new to version 2, so proper implementation of version 3 would rely on the eventual approval of version 2 in its entirety. The content of version 3 has apparently been drafted with this in mind, however, it over-complicates the implementation plan of version 3 by basing it in-part on the previous and not-yet-approved version, and leaving it vulnerable in the event version 2 does not pass.</p> <p>2. In addition, it is not clear exactly which sort of automatic reclosing behavior(s) the proposed changes are attempting to prevent. Accidental reclosing? Failure to reclose? Providing clarity on this fundamental question will help industry in providing sound comments and feedback regarding PRC-005-3.</p>
<p>Response: Thank you for your comments.</p> <ol style="list-style-type: none"> The drafting team thanks you for your support. The drafting team is acting in accordance with the schedule NERC provided to FERC, which outlines the timeframes by which NERC will respond, through the standards drafting process, to the directives of FERC Order 758. Specifically regarding reclose relays (Footnote 37), FERC directed NERC to: “By July 30, 2012, NERC should submit to the Commission either the completed project which addresses the remaining issues consistent with this order, or an informational filing that provides a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.” The SAR is general, in that it specifies that requirements for maintenance and testing of reclosing relays be established, and that “The Applicability section of the Standard must be modified to describe explicitly those devices that entities are to maintain in accordance with the revised standard.” Further, the SAR notes that the drafting team use the report prepared by the NERC SPCS and SAMS as an aid in preparing PRC-005-3; this report includes a discussion regarding the automatic reclosing behavior(s) to be addressed, as well as recommendations regarding the specific applicability. 		
ReliabilityFirst	No	<p>No, the scope of the SAR only lists three bullet items. It should as a minimum include a lead in sentence similar to the following: PRC-005-2 has been revised to include the maintenance and testing of reclosing relays that can affect the reliable operation of the Bulk Power System. The bullet items do not include the changes made to the Definitions of Terms, Requirements or Compliance sections.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: Thank you for your comments. The discussion that you suggest is included in the “Detailed Description” portion of the SAR.</p>		
<p>Dominion</p>	<p>No</p>	<p>The SAR goes beyond the directive in that it appears to indicate that all reclosing relays must operate properly in order to maintain BES reliability. The fact is that, in a majority of applications, these relays exist primarily to decrease outage times. The SAR should be limited to only those reclosing relays whose failure to operate correctly could adversely impact reliable operation of the BES. Dominion therefore recommends revising the sentence that reads “The Applicability section of the Standard must be modified to describe explicitly those devices that entities are to maintain in accordance with the revised standard.” To read “The Applicability section of the Standard must be modified to describe explicitly those reclosing relays that entities are to maintain in accordance with the revised standard.”</p>
<p>Response: Thank you for your comments.</p> <p>The SAR drafting team agrees that many reclosing relays are installed to facilitate automated restoration, and not to specifically maintain BES reliability. The SAR therefore states: “The Standard Drafting Team shall modify NERC Standard PRC-005-2 to explicitly address the maintenance and testing of reclosing relays <u>which can affect the reliable operation of the Bulk Electric System.</u>” <i>[Emphasis added]</i> When drafting the SAR, consideration was given to concerns that automatic reclosing maintenance may extend to more than simply the reclosing relays themselves.</p>		
<p>ACES Standards Collaborators</p>	<p>Yes</p>	<ol style="list-style-type: none"> 1. While we agree the SAR addresses the regulatory directive, we question the value of modifying this standard further when the newest version has yet to be approved. If FERC issues significant directives, the directives could ultimately impact the direction that drafting team should take with modifying the standard to include reclosing relays. Furthermore, because PRC-005 is historically one of the most violated standards primarily because of the zero-defect approach to compliance, we question the value of adding another relay type to the list of relays subject to zero-defect compliance. We are concerned there will be another step function in potential violations that do not ultimately

Organization	Yes or No	Question 1 Comment
		<p>support reliability but detract from reliability because they are focused on documentation.</p> <p>2. We believe that there are other equally-effective options to address the FERC directives, such as issuing an industry guidance document. If the standard ultimately needs to be modified, a guidance document could allow the drafting team to wait until FERC rules on the PRC-005 to determine if there will be any impacts on adding reclosing relays to the standard.</p>
<p>Response: Thank you for your comments.</p> <p>1. The drafting team thanks you for your support. The drafting team is acting in accordance with the schedule NERC provided to FERC, which outlines the timeframes by which NERC will respond, through the standards drafting process, to the directives of FERC Order 758. Specifically regarding reclose relays (Footnote 37), FERC directed NERC to: “By July 30, 2012, NERC should submit to the Commission either the completed project which addresses the remaining issues consistent with this order, or an informational filing that provides a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.”</p> <p>2. NERC, as well as other entities, provided comments in response to FERC NOPR discussions regarding requirements related to maintenance of automatic reclosing, essentially proposing equally effective options. FERC, in response, directed that NERC specifically include requirements related to maintenance of automatic reclosing within PRC-005.</p>		
Duke Energy	Yes	<p>However we are concerned that the SAR includes possible revision of the definition of Protection System. We don’t believe attempting to revise that definition is necessary or advisable.</p>
<p>Response: Thank you for your comments.</p> <p>The SAR does provide the drafting team the option to revise the definition of Protection System. The drafting team chose not to modify the definition.</p>		
FirstEnergy	Yes	
Pepco Holdings Inc & Affiliates	Yes	

Organization	Yes or No	Question 1 Comment
SPP Standards Review Group	Yes	
Florida Municipal Power Agency	Yes	
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	
PacifiCorp	Yes	
Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
Manitoba Hydro	Yes	
Exelon and its Affiliates	Yes	
City of Tallahassee	Yes	
Tacoma Power	Yes	

Organization	Yes or No	Question 1 Comment
Public Utility District No.1 of Snohomish County	Yes	
American Transmission Company	Yes	
Idaho Power Company	Yes	
City of Tallahassee	Yes	

2. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance.

Summary Consideration: Commenters did not identify any regional variances that would be needed.

Organization	Yes or No	Question 2 Comment
American Electric Power	No	AEP is not aware of any regional variances that would be needed as a result of this project.
Dominion	No	
Duke Energy	No	
FirstEnergy	No	
Pepco Holdings Inc & Affiliates	No	
SPP Standards Review Group	No	
Florida Municipal Power Agency	No	
ACES Standards Collaborators	No	
Bonneville Power Administration	No	

Organization	Yes or No	Question 2 Comment
PacifiCorp	No	
Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
Manitoba Hydro	No	
Exelon and its Affiliates	No	
City of Tallahassee	No	
Tacoma Power	No	
Public Utility District No.1 of Snohomish County	No	
American Transmission Company	No	
ReliabilityFirst	No	
Idaho Power Company	No	

Organization	Yes or No	Question 2 Comment
City of Tallahassee	No	

3. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice.

Summary Consideration: Two commenters noted they may need to modify or establish their business practices. No changes made to the SAR.

Organization	Yes or No	Question 3 Comment
Dominion	No	
Duke Energy	No	
FirstEnergy	No	
Pepco Holdings Inc & Affiliates	No	
SPP Standards Review Group	No	
ACES Standards Collaborators	No	
Bonneville Power Administration	No	
PacifiCorp	No	
Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation;	No	

Organization	Yes or No	Question 3 Comment
Southern Company Generation and Energy Marketing		
Manitoba Hydro	No	
City of Tallahassee	No	
Tacoma Power	No	
Public Utility District No.1 of Snohomish County	No	
American Transmission Company	No	
ReliabilityFirst	No	
Idaho Power Company	No	
City of Tallahassee	No	
American Electric Power	Yes	AEP believes that it is likely that some of its business practices would need to at least be modified as a result of this project
Response: Thank you for your comment.		
CenterPoint Energy	Yes	Business practices will be needed to: 1. Document and monitor the generating plant capacity at all Company owned generation interconnection facilities 2. Document and monitor the largest generating unit located in the Balancing Authority 3. Document and monitor the Company owned stations meeting the Applicability attributes described in 4.2.6 of PRC-005-3.

Organization	Yes or No	Question 3 Comment
Response: Thank you for your comments.		
Florida Municipal Power Agency	Yes	
Exelon and its Affiliates	Yes	

4. If you have any other comments on this SAR that you haven't already mentioned, please provide them here:

Summary Consideration:

The comments were general in nature. Some comments were repeats from Question 1 while others pertained to the standard rather than the SAR. However, the drafting team responded to all individual comments.

In response to a comment, the drafting team revised a sentence in the SAR's "Need" statement from "Modifying the standard in this fashion will impact Bulk Electric System (BES) reliability by assuring that the reclosing relays (installed to meet performance goals of approved NERC Standards) are properly maintained so that they may be expected to perform properly." to "Modifying the standard in this fashion will assure that those reclosing relays that can affect the reliability of the Bulk Electric System are properly maintained."

Organization	Question 4 Comment
<p>ACES Standards Collaborators</p>	<p>(1) We understand that NERC is obligated by law to address all FERC directives issued to them. However, not all FERC directives require the development or revision of a reliability standard. FERC has been clear that other alternatives may be used as long as they are equally effective and efficient. NERC and the drafting team need to consider other alternatives that would produce an equally effective method of ensuring that auto-reclosing relays will be maintained and tested. The drafting team should consider a survey of all registered entities subject to the current PRC-005 standard to see if they include auto-reclosers in their PSMT program. This issue goes back to compliance - whether the entity needs to maintain documentation for each of these devices. A guidance document may be an appropriate solution to handle this FERC directive.(2) Thank you for the opportunity to comment.</p>
<p>Response: Thank you for your comments.</p> <p>NERC, as well as other entities, provided comments in response to FERC NOPR discussions regarding requirements related to maintenance of automatic reclosing, essentially proposing equally effective options. FERC, in response, directed that NERC specifically include requirements related to maintenance of automatic reclosing within PRC-005.</p>	

Organization	Question 4 Comment
Manitoba Hydro	(1) Brief Description of Proposed Standard Modifications/Actions - for completeness, add '(BES)' after Bulk Electric System. (2) Need - capitalize 'misoperation' because it appears in the Glossary of Terms. (3) Need - remove the words "Bulk Electric System" to leave only the acronym, BES because this is the second instance of BES in the document.
<p>Response: Thank you for your comments.</p> <ol style="list-style-type: none"> 1. The SAR drafting team is not required to use acronyms for multiple appearances of terms. The SAR drafting team elected to spell out "Bulk Electric System" wherever it appears. 2. The term, "misoperation" is used in a general context within the SAR, rather than the specific context addressed by the NERC definition. 3. The SAR drafting team is not required to use acronyms for multiple appearances of terms. The SAR drafting team elected to spell out "Bulk Electric System" wherever it appears. 	
Tennessee Valley Authority	1. Are reclosing relays considered "protective relays"?2. Are reclosing relays considered part of the "protective system"?3. Is Table 1-3 applicable to CCVTs that feed only reclosing relays?4. Does a "reclosing relay" include all relays used to perform all type of automatic reclosing actions, i.e. sync check, dead line, dead bus, and blind reclosing?
<p>Response: Thank you for your comments.</p> <p>Comments 1-4: All of these considerations are left to the standard drafting team to address.</p>	
ReliabilityFirst	Can the SDT clarify whether high-speed automatic reclosing is covered within the scope of the SAR?
<p>Response: Thank you for your comments.</p> <p>Yes, high-speed reclosing is covered within the scope of the SAR and left to the consideration of the standard drafting team.</p>	
FirstEnergy	FE supports the referenced SAR as stated.

Organization	Question 4 Comment
<p>Response: Thank you for your comment.</p>	
<p>Dominion</p>	<p>Having reviewed, and generally agree with, the technical study performed jointly by the NERC System Analysis and Modeling Subcommittee (SAMS) and System Protection and Control Subcommittee (SPCS) and subsequently approved by the NERC Planning Committee. We therefore support the OPTIONAL approach shown near the bottom of the SAR as we believe would revise the standard in a way that applies new requirements only to those elements of the protection system where reclosing is applied it been demonstrated to that an adverse impact on the BES could occur if those element(s) are not included in one or more reliability standard requirements.</p>
<p>Response: Thank you for your comments.</p>	
<p>Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing</p>	<ol style="list-style-type: none"> 1. It seems out of order to be posting a draft SAR for informal comment at the same time that the revised standard which is the topic of the SAR is posted for a formal comment period. 2. Further, FERC has not approved PRC-005-2 yet. Any changes required by FERC would affect the draft of PRC-005-3. The proposed standard modification seems premature given that PRC-005-3 SAR is still in draft that PRC-005-2 is not yet approved.
<p>Response: Thank you for your comments.</p> <ol style="list-style-type: none"> 1. The SAR was previously posted for information only along with the third draft of PRC-005-2 in May, 2012. The Standards Process Manual supports posting of a SAR for a comment period at the same time that a draft of the resulting standard is posted for a formal comment period. “For SARs that are limited to addressing regulatory directives, or revisions to Reliability Standards that have had some vetting in the industry, authorize posting the SAR for a 30-day informal comment period with no requirement to provide a formal response to the comments received.” 2. The drafting team is acting in accordance with the schedule NERC provided to FERC, which outlines the timeframes by which NERC will respond, through the standards drafting process, to the directives of FERC Order 758. Specifically regarding 	

Organization	Question 4 Comment
<p>reclose relays (Footnote 37), FERC directed NERC to: “By July 30, 2012, NERC should submit to the Commission either the completed project which addresses the remaining issues consistent with this order, or an informational filing that provides a schedule for how NERC will address such issues in the Project 2007-17 reinitiated efforts.”</p>	
SPP Standards Review Group	None
City of Tallahassee	None
City of Tallahassee	None
CenterPoint Energy	<p>Page 2, Paragraph 2 of the “Need” section of the SAR includes a parenthetical “(installed to meet performance goals of approved NERC Standards)”. Recommend deleting this parenthetical statement as the SAMS/SPCS paper concluded on page 2 that “SAMS and SPCS have not identified an application in which auto reclosing is used in coordination with a protection system to meet the system performance requirements in a NERC Reliability Standard or in establishing an IROL”.</p>
<p>Response: Thank you for your comments. The drafting team revised the language to read as follows: “Modifying the standard in this fashion will assure that those reclosing relays that can affect the reliability of the BES are properly maintained.”</p>	
Public Utility District No.1 of Snohomish County	<p>The Public Utility District No.1 of Snohomish County has reviewed and supports this Standard Authorization Request and concluded that the revisions and modifications do not seem impractical or technically unreasonable.</p>
<p>Response: Thank you for your comments.</p>	
Duke Energy	<p>The SAR includes statements under “Goals” and “Detailed Description” that the defined term Protection System might be revised as part of this project. Those statements should be removed from the SAR. We strongly believe that the issue of maintenance and testing of any reclosing relays which can affect reliable operation of the BES, can be addressed without attempting to modify the definition of Protection System.</p>

Organization	Question 4 Comment
	<p data-bbox="155 300 705 331">Response: Thank you for your comments.</p> <p data-bbox="155 354 1848 423">The SAR does provide the drafting team the option to revise the definition of Protection System. The drafting team chose not to modify the definition.</p>

END OF REPORT