

Consideration of Comments

Generator Requirements at the Transmission Interface Project 2010-07: PRC-005-1.1a

The GOTO Drafting Team thanks all commenters who submitted comments on the first formal posting for PRC-005-1.1a, part of Project 2010-07—Generator Requirements at the Transmission Interface. Overwhelmingly, commenters approved the standard as written, and the team appreciates that support. These standards were posted for a 45-day public comment period from March 2, 2012 through April 16, 2012. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 19 sets of comments, including comments from approximately 65 different people from approximately 38 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

A few commenters did not support the use of the term “generator interconnection Facility” without a formal definition. Based on comments received elsewhere in this project, the SDT has avoided the creation of new NERC glossary terms, and has received significant industry support for that strategy. While it is possible that other language could have been used, the SDT believes the reference “generator interconnection Facility” is clear.

Some commenters are concerned about the changes proposed in PRC-005-1.1a given the fact that PRC-005-2 is also being revised. PRC-005-2 does not have the same issues as PRC-005-1, so no additional changes are needed to that standard to incorporate generator interconnection Facilities, but in case PRC-005-2 does not proceed to NERC’s Board of Trustees, the SDT wants to ensure that the generator interconnection Facility is covered.

Some commenters were concerned about the language in the Data Retention section of the standard. That portion of the standard was modified by NERC staff during the quality review to add boilerplate compliance language recently approved by NERC legal staff. Modifying it further is outside the scope of this SDT.

Some commenters pointed out that PRC-005-1b was approved by FERC on March 14, 2012, replacing PRC-005-1a. As noted in the text box above, going forward, all references to PRC-005-1.1a will be changed to refer to PRC-005-1.1b.

Note: PRC-005-1b was approved by FERC on March 14, 2012. Thus, the changes the SDT proposes will be applied to that version of the standard. To reduce confusion, the SDT’s modified standard is still referred to as PRC-005-1.1a below, but all other documents going forward will be appropriately updated to reference PRC-005-1.1b and incorporate the associated interpretation.

Some commenters stated that the addition of “generator interconnection Facility” was unnecessary because that Facility is already considered part of the Generator Owner’s assets. While the SDT believes that Generator Owners do treat the generator interconnection Facility as one of their assets, commenters in previous postings suggested that adding “generator interconnection Facility” could add clarity to the specific language in PRC-004 and PRC-005. It was pointed out to the SDT that language in the requirements of PRC-004 and PRC-005 differed from PRC-001-1, so if the requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems under PRC-004 and PRC-005 (whereas this interpretation wasn’t a risk under PRC-001).

PRC-001-1 used language that had more a more broad application as noted below:

- R1 – “...shall be familiar with the purpose and limitations of protection system schemes applied in its area.”
- R2 – “...shall notify reliability entities of relay or equipment failures as follows...”
- R3 “...shall coordinate new protective systems and changes as follows...”

PRC-004-2a and PRC-005-1b originally used language which could be construed as being more restrictive (as shown below):

- PRC-004-2a@R2 – “The Generator Owner shall analyze its generator Protection System Misoperations...”
- PRC-005-1b@R1 – “...each Generator Owner that owns a generation Protection System...”
- PRC-005-1b@R2 – “...each Generator Owner that owns a generation Protection System...”

The SDT agreed with the comments and modified the standards accordingly.

Other minority comments are addressed alongside their specific comments below.

The SDT considered all stakeholder comments submitted and determined that, save for the update to reference PRC-005-1.1b instead of PRC-005-1.1a, no additional changes are necessary. The standard will be posted for a recirculation ballot.

All comments submitted may be reviewed in their original format on the standard’s project page:

http://www.nerc.com/filez/standards/Project2010-07_GOTO_Project.html

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 of Standards and Training, Herb Schrayshuen, at 404-446-2560 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

Index to Questions, Comments, and Responses

- 1. Based on stakeholder comment, the SDT inserted the phrase “or generator interconnection Facility” in Requirements R1 and R2 of PRC-005-1.1a. While there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. The clarifying changes to R1 and R2 make clear that generator interconnection Facilities are also part of Generator Owners’ responsibility in the context of this standard. Do you support the addition of the phrase “or generator interconnection Facility” to accomplish this clarification? 9
- 2. Do you have any other comments that you have not yet addressed? If yes, please explain. 13

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	Jesus Sammy Alcaraz	Imperial Irrigation District (IID)	X		X	X	X	X					X
Additional Member Additional Organization Region Segment Selection														
1.	Jose Landeros	IID	WECC	1, 3, 4, 5, 6										
2.	Epi Martinez	IID	WECC	1, 3, 4, 5, 6										
2.	Group	Guy Zito	Northeast Power Coordinating Council											
Additional Member Additional Organization Region Segment Selection														
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10										
2.	Greg Campoli	New York Independent System Operator	NPCC	2										
3.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1										
4.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1										
5.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
6.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
7.	Kathleen Goodman	ISO - New England	NPCC	2																
8.	Chantel Haswell	FPL Group, Inc.	NPCC	5																
9.	David Kiguel	Hydro One Networks Inc.	NPCC	1																
10.	Michael R. Lombardi	Northeast Utilities	NPCC	1																
11.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9																
12.	Bruce Metruck	New York Power Authority	NPCC	6																
13.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
14.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
15.	Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
16.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																
17.	Brian Robinson	Utility Services	NPCC	8																
18.	Saurabh Saksena	National Grid	NPCC	1																
19.	Michael Schiavone	National Grid	NPCC	1																
20.	Wayne Sipperly	New York Power Authority	NPCC	5																
21.	Tina Teng	Independent Electricity System Operator	NPCC	2																
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.		3																
3.	Group	Jonathan Hayes	Southwest Power Pool Standards Development Team		X	X	X		X	X										
	Additional Member	Additional Organization	Region	Segment Selection																
1.	Jonathan Hayes	Southwest Power Pool	SPP	NA																
2.	Robert Rhodes	Southwest Power Pool	SPP	NA																
3.	Dan Lusk	Xcel Energy	SPP	1, 3, 5, 6																
4.	Julie Lux	Westar	SPP	1, 3, 5, 6																
5.	Mahmood Safi	OPPD	MRO	1, 3, 5																
6.	Roy Boyer	Xcel Energy	SPP	1, 3, 5, 6																
7.	Mitchell Williams	Western Farmers	SPP	1, 3, 5																
8.	John Pasierb	East Texas	NA - Not Applicable	NA																
9.	David Kral	Xcel Energy	SPP	1, 3, 5, 6																
10.	Tom Hesterman	Westar	SPP	1, 3, 5, 6																

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
11.	Tiffani Lake	Westar	SPP	6, 1, 3, 5									
12.	Don Taylor	Westar	SPP	1, 3, 5, 6									
4.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				
Additional Member Additional Organization Region Segment Selection													
1.	Dean	Bender	WECC	1									
5.	Group	Mike Garton	Dominion- NERC Compliance Policy	X		X		X	X				
Additional Member Additional Organization Region Segment Selection													
1.	Connie Lowe	NERC Compliance Policy	RFC	6									
2.	Louis Slade	NERC Compliance Policy	SERC	5									
3.	Michael Crowley	Electric Transmission	SERC	1, 3									
4.	Sean Iseminger	Fossil & Hydro	SERC	6									
5.	Chip Humphrey	Fossil & Hydro	NPCC	6									
6.	Jeff Bailey	Nuclear	MRO	6									
6.	Group	Jean Nitz	ACES Power Marketing Standards Collaborators	X		X	X	X	X				
Additional Member Additional Organization Region Segment Selection													
1.	Mohan Sachdeva	Buckeye Power, Inc	RFC	3, 4									
2.	Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5									
3.	Clem Cassmeyer	Western Farmers Electric Cooperative	SPP	1, 5									
7.	Individual	Keira Kazmerski	Xcel Energy	X		X		X	X				
8.	Individual	Dan Roethemeyer	Dynegy Inc.					X					
9.	Individual	John Bee	Exelon	X		X		X	X				
10.	Individual	Art Salander	HindlePower, Inc										
11.	Individual	John Seelke	Public Service Enterprise Group	X		X		X	X				
12.	Individual	Martin Kaufman	ExxonMobil Research and Engineering	X				X					
13.	Individual	Michelle R D'Antuono	Ingleside Cogeneration LP					X					
14.	Individual	Dale Fredrickson	We Energies			X	X	X					
15.	Individual	Michael Falvo	Independent Electricity System Operator		X								
16.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
17.	Individual	Thad Ness	American Electric Power	X		X		X	X					
18.	Individual	Darryl Curtis	Oncor Electric Delivery Company	X										
19.	Individual	Will Smith	MRO NSRF											

1. **Based on stakeholder comment, the SDT inserted the phrase “or generator interconnection Facility” in Requirements R1 and R2 of PRC-005-1.1a. While there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. The clarifying changes to R1 and R2 make clear that generator interconnection Facilities are also part of Generator Owners’ responsibility in the context of this standard. Do you support the addition of the phrase “or generator interconnection Facility” to accomplish this clarification?**

Summary Consideration:

The SDT thanks all commenters for their feedback on the proposed changes to PRC-005-1.1a. Over 90% of commenters approved the standard as written, and the team appreciates that support.

A few commenters did not support the use of the term “generator interconnection Facility” without a formal definition. Based on comments received elsewhere in this project, the SDT has avoided the creation of new NERC glossary terms, and has received significant industry support for that strategy. While it is possible that other language could have been used, the SDT believes “generator interconnection Facility is clear, and no changes were made.

One commenter stated that the addition of “generator interconnection Facility” was unnecessary and complicates the ongoing development of PRC-005-2. The SDT believes that the clarifying language is necessary, and points out that if PRC-005-1.1a proceeds to recirculation ballot next as planned, it will actually be slightly ahead of the PRC-005-2 work, because the drafting team working on PRC-005-2 is still reviewing stakeholder comments from a successive ballot that ended March 28, 2012.

One commenter stated that the addition of “generator interconnection Facility” was unnecessary because that Facility is already considered part of the Generator Owner’s assets. While the SDT believes that Generator Owners do treat the generator interconnection Facility as one of their assets, some commenters in previous postings suggested that adding “generator interconnection Facility” could add clarity to the specific language in PRC-004 and PRC-005. The SDT agreed and incorporated that language prior to the last posting.

The SDT considered all of these comments and determined that, save for the update to reference PRC-005-1.1b instead of PRC-005-1.1a, no additional changes are necessary.

Organization	Yes or No	Question 1 Comment
Southwest Power Pool Standards Development Team	No	We would advise the Drafting team to take a look at the FERC OATT to reconcile the term “generator interconnection facility “with Tariff term for the LGIA. This should clarify the point of delineation and there should be no misconception of the language as written.
<p>Response: Thank you for the comment. As recommended by stakeholders throughout this project, the SDT has avoided creation of new terms. No change made.</p>		
Xcel Energy	No	Xcel Energy does not believe that trying to implement a revision of PRC-005-1 at this point improves the reliability of the grid. There are better means of clarifying the perceived “misperceptions” than drafting a standard revision. This is particularly the case when PRC-005-2 is further along in the process and is also posted for industry comment and ballot. The effort of the GOTO SDT is counterproductive.
<p>Response: Thank you for your comment. The SDT revised the standard based upon comments it received suggesting that it do so. We do agree that there may have been alternative means to address the issue, such as a request for interpretation or CAN, but given this was in the scope of the SAR, the SDT modified the standard to add the clarity recommended. If PRC-005-1.1a proceeds to recirculation ballot next as planned, it will actually be slightly ahead of the PRC-005-2 work, because the drafting team working on PRC-005-2 is still reviewing stakeholder comments from a successive ballot that ended March 28, 2012.</p>		
ExxonMobil Research and Engineering	No	The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner’s generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner’s generation facilities. As stated by in the question above, the addition of the term “or generator interconnection Facility” does not resolve a reliability gap or add any substance to the requirement
<p>Response: Thank you for your comment. The SDT added the language to add clarity. As we cited above, while there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the</p>		

Organization	Yes or No	Question 1 Comment
<p>misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. We believe that the clarifying change is useful.</p>		
<p>Kansas City Power & Light (Note: Comment was manually added)</p>	<p>No</p>	<p>The phrase “generator interconnection” facility lacks definition making it difficult to comment on the proposed change. It is important for the standards and requirements to clearly delineate, define, or identify the facilities or operating condition subject to application of the standards and requirements.</p>
<p>Response: Thank you for your comment. As recommended by stakeholders throughout this project, the SDT has avoided creation of new terms. No change made.</p>		
<p>Ingleside Cogeneration LP</p>	<p>Yes</p>	<p>Since PRC-005-1 already requires the Generation Owner to maintain and test all their BES Protection System components, it seems to Ingleside Cogeneration LP that the need to specify those which may trip the interconnection facility as redundant. However, we do not believe that the Standard Development Team’s modifications materially change the intent of the Standard - nor can they lead an audit team to assign a double violation for a single incidence of non-compliance.</p>
<p>Response: Thank you for your comment. The SDT added the language to add clarity. As we cited above, while there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. We believe that the clarifying change is useful.</p>		
<p>Imperial Irrigation District (IID)</p>	<p>Yes</p>	
<p>Northeast Power Coordinating Council</p>	<p>Yes</p>	
<p>Imperial Irrigation District (IID)</p>	<p>Yes</p>	

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	
Dominion- NERC Compliance Policy	Yes	
ACES Power Marketing Standards Collaborators	Yes	
Dynegy Inc.	Yes	
HindlePower, Inc	Yes	
Public Service Enterprise Group	Yes	
We Energies	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Electric Power	Yes	
Oncor Electric Delivery Company	Yes	

2. Do you have any other comments that you have not yet addressed? If yes, please explain.

Summary Consideration:

The SDT thanks all commenters for their feedback on the proposed changes to PRC-005-1.1a. Overwhelmingly, commenters approved of the standard as written, and the team appreciates that support.

Some commenters are concerned about the changes proposed in PRC-005-1.1a given the fact that PRC-005-2 is also being revised. PRC-005-2 does not have the same issues as PRC-005-1, so no additional changes are needed to that standard to incorporate generator interconnection Facilities, but in case PRC-005-2 does not proceed to NERC's Board of Trustees, the SDT wants to ensure that the generator interconnection Facility is covered.

Some commenters were concerned about the language in the Data Retention section of the standard. That portion of the standard was modified by NERC staff during the quality review to add boilerplate compliance language recently approved by NERC legal staff. Modifying it further is outside the scope of this SDT.

Some commenters pointed out that PRC-005-1b was approved by FERC on March 14, 2012, replacing PRC-005-1a. Going forward, all references to PRC-005-1.1a will be changed to refer to PRC-005-1.1b.

Some commenters did not support the use of the term "generator interconnection Facility" without a formal definition. Based on comments received elsewhere in this project, the SDT has avoided the creation of new NERC glossary terms, and has received significant industry support for that strategy. While it is possible that other language could have been used, the SDT believes "generator interconnection Facility" is clear, and no changes were made.

One commenter was concerned that the addressing of a literal "reliability gap" should not be considered an errata change. The SDT maintains that there is no actual reliability gap in the current standard language – just the possible perception of one. The SDT and most stakeholders still believe that the clarifying change is a useful one, but it is appropriate to classify as a minor change because it does not change the scope or intent of the associated standard. Still, the SDT agrees that the errata label is confusing, as errata changes do not require a ballot. The SDT will no longer refer to its changes as errata.

One commenter was concerned that the standard as written does not allow for alternative testing programs in cases where testing programs do not follow the ownership of the equipment. The SDT points out that an entity can enter into an agreement (including a Coordinated Functional Registration) whereby another entity is assigned responsibility for compliance with one or more requirements of one or more reliability standards without the standard itself being so modified. The SDT therefore does not agree that this standard should be explicitly modified to allow what the commenter suggests.

One commenter was concerned about the statement that “no changes” were made to the VSLs. Because the SDT has not proposed changes that affect the scope or intent of the current standard, no changes to the VSLs were necessary. The same VSLs that have been approved by FERC (which can be found in the VSL matrix posted on NERC’s website: <http://www.nerc.com/page.php?cid=2|20|288>) will remain in effect.

One commenter stated that the addition of “generator interconnection Facility” was unnecessary because that Facility is already considered part of the Generator Owner’s assets. While the SDT believes that Generator Owners do treat the generator interconnection Facility as one of their assets, some commenters in previous postings suggested that adding “generator interconnection Facility” could add clarity to the specific language in PRC-004 and PRC-005. The SDT agreed and modified the standards accordingly.

One commenter continues to find the changes proposed under Project 2010-07 to be unnecessary. As it has in previously consideration of comment reports, the SDT points out that it must act within the scope of the SAR for this project. As mandated by its SAR, the SDT has addressed standards for which there is a reliability gap or possible perception of a gap when it comes to the generator interconnection Facility, as justified in great depth in its [Technical Justification document](#).

One commenter encouraged the SDT to update the Effective Dates and Implementation Dates language to incorporate the latest NERC legal boilerplate language. That change has been made.

The SDT considered all of these comments and determined that, save for the update to reference PRC-005-1.1b instead of PRC-005-1.1a, no additional changes are necessary.

Organization	Yes or No	Question 2 Comment
Baltimore Gas & Electric Company	Abstain	Please refer to comments submitted by Exelon.
Southwest Power Pool Standards Development Team	Yes	This effort seems to be redundant due to the work going on with PRC-005-2. We do not understand why this change is being made and it wasn’t made very clear in the red line changes or in this comment form background.
<p>Response: Thank you for your comment. The Project 2007-17 Protection System Maintenance and Testing SDT is working on comprehensive changes to PRC-005, as described in detail in the SAR posted on that projects webpage, while the Project 2010-07</p>		

Organization	Yes or No	Question 2 Comment
<p>Generator Requirements at the Transmission Interface SDT is focused on making surgical revisions to standards where there might be a reliability gap related to generator-owned Transmission Facilities. The current draft of PRC-005-2 does not have the same issues as PRC-005-1 with respect to generator-owned Facilities, so no additional changes are needed to that standard to incorporate generator interconnection Facilities, but in case PRC-005-2 does not proceed to NERC’s BOT, the Project 2010-07 SDT wants to ensure that the generator interconnection Facility is covered.</p>		
<p>Bonneville Power Administration</p>	<p>Yes</p>	<p>Regarding Section 1.3 Data Retention, BPA believes that it would be difficult for an entity to provide “other evidence” to demonstrate compliance when the data retention period is shorter than the time since the last audit. BPA requests the drafting team to offer guidance as to what "other evidence" could be provided other than what is already described in the measures. BPA believes that suggesting there is some “other evidence” without providing a description leaves the TO’s and GO’s without clear direction on how to comply with the standard. BPA suggests the data retention period should be three years or since the time the last audit occurred, whichever is longer for each TO and GO to retain evidence. Should the drafting team revise the Data Retention language to reflect BPA’s concerns, BPA would vote in favor of PRC-005-1.1a.</p>
<p>Response: Thank you for your comment. This section was revised by NERC staff to add boilerplate compliance language recently approved by NERC legal staff. Thus, it is outside the scope of the SDT and no change was made.</p>		
<p>ACES Power Marketing Standards Collaborators</p>	<p>Yes</p>	<p>The Implementation Plan for PRC-005-1.1a should be updated to reflect the retirement of currently effective PRC-005-1b instead of PRC-005-1a. PRC-005-1b became effective on March 14, 2012 replacing PRC-005-1a.</p>
<p>Response: Thank you for your comment. The SDT agrees with the comment and has made the suggested changes.</p>		
<p>Exelon</p>	<p>Yes</p>	<p>The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: Thank you for your comment. An entity can enter into an agreement (including a Coordinated Functional Registratyon) whereby another entity is assigned responsibility for compliance with one or more requirements of one or more reliability standards without the standard itself being so modified. The SDT therefore does not agree that this standard should be explicitly modified to allow this. No change made.</p>		
<p>ExxonMobil Research and Engineering</p>	<p>Yes</p>	<p>The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms ‘generating station switchyard’ and ‘generator interconnection Facility’ need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term ‘generating station switchyard’ to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria.</p>
<p>Response: Thank you for your comment. As recommended by stakeholders throughout this project, the SDT has avoided creation of new NERC glossary terms. While the SDT concedes there may be other language that could be used, the language posted has wide industry support, therefore no change will be made.</p>		
<p>American Electric Power</p>	<p>Yes</p>	<p>While we support changing the standard requirements as proposed, AEP offers the following comments and suggestions. While the implementation plans states that “there was no reliability gap in the previous version of the standard”, the previous version of the standard, if applied literally, does indeed contain a reliability gap in that it does not require Generation Owners that own a transmission Protection System to have a Protection System maintenance and testing program. It is AEP’s understanding that referring to the proposed revision as “PRC-005-1.1a” implies errata from PRC-005-1a, and the announcement refers to “very limited revisions”. If there is indeed a gap of responsibility in this standard, any changes to remediate such a gap would not be errata, regardless of the amount of proposed changes in content. As such, we recommend that the drafting team use a full revision naming</p>

Organization	Yes or No	Question 2 Comment
		<p>convention for these proposed changes, i.e. PRC-005-2. In addition, making these changes immediately effective would allow no opportunity for an entity to take the proper steps to become compliant. We believe the revision should include an implementation plan that allows industry adequate time to analyze their system and complete any additionally required maintenance and testing activities.</p>
<p>Response: Thank you for your comment. The SDT added the language to add clarity. As we cited above, while there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. We believe that the clarifying change is a useful one, but it is appropriate to classify as a minor change because it does not change the scope or intent of the associated standard. Regarding the naming convention, the SDT was advised that the errata naming convention would be acceptable to avoid confusion with the more complete set of revisions to PRC-005 that are underway in Project 2007-17. The SDT had previously used the word “errata” to describe its changes, but agrees that the errata label is confusing, as errata changes do not require a ballot. The SDT will no longer refer to its changes as errata. No change made.</p>		
<p>Southern Illinois Power Coop., Brazos Electric Power Cooperative, Inc.</p>	<p>Affirmative</p>	<p>The Implementation Plan for PRC-005-1.1a should be updated to reflect the retirement of currently effective PRC-005-1b instead of PRC-005-1a. PRC-005-1b became effective on March 14, 2012 replacing PRC-005-1a.</p>
<p>Response: Thank you for your comment. The SDT agrees with the comment and has made the suggested changes.</p>		
<p>Pacific Gas and Electric Company</p>	<p>Affirmative</p>	<p>The data retention period identified in D1.3 cannot be shorter than the time between audits or the prior maintenance and testing interval</p>
<p>Response: Thank you for your comment. This section was revised by NERC staff to add boilerplate compliance language recently approved by NERC legal staff. Thus, it is outside the scope of the SDT and no change was made.</p>		
<p>AEP Service Corp., AEP and AEP Marketing, American Electric Power</p>	<p>Affirmative</p>	<p>Comments are being submitted via electronic form by Thad Ness on behalf of American Electric Power</p>

Organization	Yes or No	Question 2 Comment
Great River Energy	Affirmative	Great River Energy agrees with the comments of the MRO NSRF.
Dairyland Power Coop.	Affirmative	Please see comments submitted by MRO NSRF.
Muscatine Power & Water	Affirmative	Please see comments submitted by the MRO NERC Standards Review Forum
Madison Gas and Electric Co.	Affirmative	Please see MRO NSRF comments.
Omaha Public Power District	Affirmative	Please see MRO NSRF Comments.
Brazos Electric Power Cooperative, Inc.	Affirmative	See ACES Power Marketing comments.
Occidental Chemical	Affirmative	See comments submitted by Ingleside Cogeneration LP
Central Electric Power Cooperative	Affirmative	See Matt Pacobit's comments from AECl
Southern Company Services, Inc.	Affirmative	None
Alabama Power Company	Affirmative	None
Georgia Power Company	Affirmative	None
Gulf Power Company	Affirmative	None
Mississippi Power	Affirmative	None
Southern Company Generation and Energy	Affirmative	None

Organization	Yes or No	Question 2 Comment
Marketing		
Beaches Energy Services	Affirmative	(No Comments.)
Independent Electricity System Operator		The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after “applicable regulatory approval” in the Effective Dates Section A5 of the draft standard and P. 1 of the Implementation Plan, to the following effect:”, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.”
<p>Response: Thank you for your comment. The language you cite has been approved by NERC legal and has been updated in the Effective Dates section and in the Implementation Plan.</p>		
Sunflower Electric Power Corporation	Negative	A new term is introduced that is not a NERC defined term, the term is generator interconnection Facility. The term was inserted without comment and clearly is intended to include something that is not covered by the Standard. This new term should be removed or defined in Glossary of Terms so entities may understand just what is covered by this new term. The Implementation Plan for PRC-005-1.1a should be updated to reflect the retirement of currently effective PRC-005-1b instead of PRC-005-1a. PRC-005-1b became effective on March 14, 2012 replacing PRC-005-1a.
<p>Response: Thank you for your comment. As recommended by stakeholders throughout this project, the SDT has avoided creation of new NERC glossary terms. The SDT purposefully did not create a new term (note that only Facility is capitalized, while generator and interconnection are not). No change made.</p>		
Seminole Electric Cooperative, Inc.	Negative	a) Section D.2 Violation Severity Levels (no changes) - The standard should stand on its own, therefore, just stating that the VSLs have "(no changes)" is incomplete and will lead to confusion. Please provide definition and clarity to this section.
<p>Response: Thank you for your comment. The SDT has not proposed changes that affect the scope or intent of the current standard,</p>		

Organization	Yes or No	Question 2 Comment
<p>and because of that, no changes to the VSLs are necessary. The same VSLs that have been approved by FERC (which can be found in the VSL matrix posted on NERC’s website: http://www.nerc.com/page.php?cid=2 20 288) will remain in effect. No change made.</p>		
Austin Energy, City of Austin dba Austin Energy	Negative	<p>Adding the words "generator interconnection" to the Facility description does not add clarity to the Standard. PRC-005-1 is clear as written, indicating the actual owner of a device supporting the BES is responsible for performing the actions necessary to comply with PRC-005. The term "generator interconnection" is not defined and introduces confusion, making responsibility for the application of the Requirements less clear.</p>
<p>Response: Thank you for your comment. The SDT added the language to add clarity. As we cited above, while there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. We believe that the clarifying change is useful. No change made.</p>		
Kansas City Power & Light Co.	Negative	Concerns have been expressed in the Standard comment forms provided by NERC.
Tucson Electric Power Co.	Negative	<p>It would be difficult for an entity to provide "other evidence" to demonstrate compliance when the data retention period is shorter than the time since the last audit. Suggest that the data retention period language should be modified to "three years or since the time the last audit occurred, whichever is longer"</p>
<p>Response: Thank you for your comment. This section was revised by NERC staff to add boilerplate compliance language recently approved by NERC legal staff. Thus, it is outside the scope of the SDT and no change was made.</p>		
Bonneville Power Administration	Negative	Please refer to BPA's comments submitted separately.
Manitoba Hydro	Negative	Please see comments submitted by Joe Petaski (Manitoba Hydro)
Xcel Energy, Inc.	Negative	Xcel Energy sees this project as counter-productive to the efforts of the Protection

Organization	Yes or No	Question 2 Comment
		System Maintenance and Testing Standard Drafting Team that currently has PRC-005-2 posted for comment and successive ballot.
<p>Response: Thank you for your comment. PRC-005-2 does not have the same issues as PRC-005-1, so no additional changes are needed to that standard to incorporate generator interconnection Facilities, but in case PRC-005-2 does not proceed to NERC’s BOT, we want to ensure that the generator interconnection Facility is covered.</p>		
City and County of San Francisco	Negative	This revision should be used as an opportunity to clean up language relating to the data retention period for PRC-005. The following language has been suggested and appears consistent with the actual data retention period needed for all functional registrations encompassed by this Standard: "three years or since the time the last audit occurred, whichever is longer"
<p>Response: Thank you for your comment. This section was revised by NERC staff to add boilerplate compliance language recently approved by NERC legal staff. Other changes are outside the scope of the SDT.</p>		
HindlePower, Inc	No	I beleive that the requirments as shown in 1-4a - c need to be better clarified as to the actual tasks required. There seems to be no real distinction between Verification and inspection. There is no clear reporting structure and the requirment to substitute Ohmic readings vs. discharge test is not basede on any industry reliable standards. since there is much debate in the industry as to the validity if Ohmic testing and it has not been accepted by the IEEE as an acceptbale practice I would rather see terms in line with either IEEE standard or manufacvturer's recommendations.
<p>Response: Thank you for your comment. The SDT believes these comments may have been intended for the Project 2007-17 drafting team which is making comprehensive revisions to PRC-005-2. The comment will be forwarded to that team by NERC staff.</p>		
Manitoba Hydro	No	Manitoba Hydro does not support the changes being proposed in Project2010-07 in general. If a Generator Owner is required to register as a TO, all theRequirements applicable to a TO should apply. There is no need to changespecific Reliability

Organization	Yes or No	Question 2 Comment
		<p>Standards to allow the Generator Owner to perform only selected TO functions. For additional information, please see Manitoba Hydro's comments submitted in the comment period ending November 18, 2011. Manitoba Hydro does not believe that the SDT fully addressed our concerns in their responses to our comments in that commenting period.</p>
<p>Response: Thank you for your comment. The SDT must act within the scope of the SAR for this project. The comments appear to indicate that the entity disagrees with the SAR although they cite the Technical Justification document. The Technical Justification document is meant to be used to show how the SDT arrived at its decisions to revise only 4 reliability standards as opposed to all that were originally included in the Ad Hoc report, or those in the cited FERC orders.</p>		
<p>MRO NSRF</p>		<p><i>Section D, Article 1.3 Data Retention</i> states that the entities retain evidence for the entire audit period since the last audit. Furthermore, in the 2nd paragraph of Article 1.3, it states that an entity “shall retain evidence of the implementation of its Protection System maintenance and testing program for three years.”</p> <p>If an entity is to prove compliance related to R2.1 and R2.2 of PRC-005-1.1a, the NSRF recommends that Evidence Retention be revised to state “the two most recent performance of each distinct maintenance activity for the Protection System Components, or all performances of each distinct maintenance activity for the Protection System Component since the previous scheduled audit date, whichever is longer.” This agrees with the current draft in progress for PRC-005-2 Section D, Compliance, Article 1.3, paragraph 4.</p> <p>The NSRF is also concerned with those testing intervals, such as 12 years, which would dictate a Registered Entity maintain 24 years of records, which is unreasonable. This should be revised to have documentation for <u>the most current</u> one testing interval, if after 06/18/07.</p> <p>The NSRF believes that “the term “generation” in R1 and R2 should be changed to “generator”. If changed, both Measures will need to be updated as well.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: Thank you for your comment. The Data Retention section was revised by NERC staff to add boilerplate compliance language approved elsewhere. Thus, it is outside the scope of the SDT and no change was made.</p> <p>In R1 and R2, the reference to “generation” was in the original standard, referring to a generation Protection System. While “generator” may work better here, it is not within the scope of the 2010-07 SDT to change language outside the surgical insertion of “generator interconnection Facility.”</p>		
Oncor Electric Delivery Company	No	
Imperial Irrigation District (IID)	No	
Northeast Power Coordinating Council	No	
Imperial Irrigation District (IID)	No	
Dominion- NERC Compliance Policy	No	
Xcel Energy	No	
Dynergy Inc.	No	
Public Service Enterprise Group	No	
Ingleside Cogeneration LP	No	

Organization	Yes or No	Question 2 Comment
We Energies	No	

END OF REPORT