

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

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

Yes
No
Individual
John Bee
Exelon
Yes
The standard language should be clarified to allow for alternative testing programs, agreed upon by both TO and GO, in cases where testing programs do not follow ownership of the equipment for all Component Types so long as all of the protection for the generator interconnection facility is covered.
Individual
Art Salander
HindlePower, Inc
Yes
No
I believe that the requirements 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 requirement to substitute Ohmic readings vs. discharge test is not based on any industry reliable standards. since there is much debate in the industry as to the validity of Ohmic testing and it has not been accepted by the IEEE as an acceptable practice I would rather see terms in line with either IEEE standard or manufacturer's recommendations.
Individual
John Seelke
Public Service Enterprise Group
Yes
No
Individual
Martin Kaufman
ExxonMobil Research and Engineering
No
The bulk electric system is contiguous. Therefore, any facility owned by the Generator Owner that is used to connect the Generator Owner's generation facilities to the bulk electric system is already considered a bulk electric system asset and part of the Generator Owner's generation facilities. As stated by in the question above, the addition of the term "or generator interconnection Facility" does not resolve a reliability gap or add any substance to the requirement
Yes
The SDT has utilized two terms in this round of the drafting process whose definitions are subject to interpretation. The terms 'generating station switchyard' and 'generator interconnection Facility' need to be defined to prevent inconsistent enforcement or need for the development of a Compliance Application Notice. As referenced in our comments to FAC-003-X/3, when you try to apply the term 'generating station switchyard' to an industrial complex that contains multiple substations between the GSU and utility interconnection facility (another substation) in order to measure the generator lead line for the 1 mile quota, there are several candidates that appear to fit the criteria.
Group
Southwest Power Pool Standards Development Team
Jonathan Hayes

Southwest Power Pool
No
We would advise the Drafting team to take a look at the FERC OATT to reconcile the term "generator interconnection facility" with Tariff term for the LGIA. This should clarify the point of delineation and there should be no misconception of the language as written.
Yes
This effort seems to be redundant due to the work going on with PRC-005-2. We do not understand why this change is being made and it wasn't made very clear in the red line changes or in this comment form background.
Individual
Michelle R D'Antuono
Ingleside Cogeneration LP
Yes
Since PRC-005-1 already requires the Generation Owner to maintain and test all their BES Protection System components, it seems to Ingleside Cogeneration LP that the need to specify those which may trip the interconnection facility as redundant. However, we do not believe that the Standard Development Team's modifications materially change the intent of the Standard – nor can they lead an audit team to assign a double violation for a single incidence of non-compliance.
No
Individual
Dale Fredrickson
We Energies
Yes
No
Individual
Michael Falvo
Independent Electricity System Operator
Yes
The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after "applicable regulatory approval" in the Effective Dates Section A5 of the draft standard and P. 1 of the Implementation Plan, to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities."
Group
Bonneville Power Administration
Chris Higgins
Transmission Reliability Program
Yes
Yes
Regarding Section 1.3 Data Retention, BPA believes that it would be difficult for an entity to provide "other evidence" to demonstrate compliance when the data retention period is shorter than the time since the last audit. BPA requests the drafting team to offer guidance as to what "other evidence" could be provided other than what is already described in the measures. BPA believes that suggesting there is some "other evidence" without providing a description leaves the TO's and GO's without clear direction on how to comply with the standard. BPA suggests the data retention period should be three years or since the time the last audit occurred, whichever is longer for each TO and GO to retain

evidence. Should the drafting team revise the Data Retention language to reflect BPA's concerns, BPA would vote in favor of PRC-005-1.1a.
Individual
Joe Petaski
Manitoba Hydro
Yes
No
Manitoba Hydro does not support the changes being proposed in Project 2010-07 in general. If a Generator Owner is required to register as a TO, all the Requirements applicable to a TO should apply. There is no need to change specific Reliability Standards to allow the Generator Owner to perform only selected TO functions. For additional information, please see Manitoba Hydro's comments submitted in the comment period ending November 18, 2011. Manitoba Hydro does not believe that the SDT fully addressed our concerns in their responses to our comments in that commenting period.
Individual
Thad Ness
American Electric Power
Yes
Yes
While we support changing the standard requirements as proposed, AEP offers the following comments and suggestions. While the implementation plans states that "there was no reliability gap in the previous version of the standard", the previous version of the standard, if applied literally, does indeed contain a reliability gap in that it does not require Generation Owners that own a transmission Protection System to have a Protection System maintenance and testing program. It is AEP's understanding that referring to the proposed revision as "PRC-005-1.1a" implies errata from PRC-005-1a, and the announcement refers to "very limited revisions". If there is indeed a gap of responsibility in this standard, any changes to remediate such a gap would not be errata, regardless of the amount of proposed changes in content. As such, we recommend that the drafting team use a full revision naming convention for these proposed changes, i.e. PRC-005-2. In addition, making these changes immediately effective would allow no opportunity for an entity to take the proper steps to become compliant. We believe the revision should include an implementation plan that allows industry adequate time to analyze their system and complete any additionally required maintenance and testing activities.
Group
Dominion- NERC Compliance Policy
Mike Garton
Dominion
Yes
No
Group
ACES Power Marketing Standards Collaborators
Jean Nitz
ACES Power Marketing
Yes
Yes
The Implementation Plan for PRC-005-1.1a should be updated to reflect the retirement of currently effective PRC-005-1b instead of PRC-005-1a. PRC-005-1b became effective on March 14, 2012

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