

June 17, 2014

**VIA ELECTRONIC FILING**

Jim Crone  
Director, Energy Division  
Manitoba Innovation, Energy and Mines  
1200-155 Carlton Street  
Winnipeg MB R3C 3H8

**Re: Revisions to a Violation Severity Level Assigned to Protection System Maintenance Reliability Standards**

Dear Mr. Crone:

The North American Electric Reliability Corporation (“NERC”) submits a proposed revision to a Violation Severity Level (“VSL”) assigned to Requirement R1 in Protection System Maintenance (“PRC”) Reliability Standard PRC-005-2. NERC has also made the same change to proposed Reliability Standard PRC-005-3, which has been adopted by the NERC Board of Trustees<sup>1</sup> and since submitted.<sup>2</sup>

The proposed VSL revision to PRC-005-2, provided in Attachment A hereto, is consistent with the Federal Energy Regulatory Commission’s (“FERC”) directive in Order No. 793<sup>3</sup>. Attachment B includes a replacement “Exhibit A” to NERC’s PRC-005-3 filing that reflects the same VSL change in the proposed PRC-005-3 Reliability Standard (included as PRC-005-3.1 to reflect an errata change made).<sup>4</sup>

As background, on December 19, 2013, FERC issued Order No. 793, approving Reliability Standard PRC-005-2 – Protection System Maintenance, stating that the “Reliability Standard contains overall improvements over the four existing Reliability Standards.” However, FERC directed one change to the VSL assignment in Requirement R1 regarding the failure to include station batteries in a time-based maintenance program, noting that “the level of risk associated with the failure to test a given battery is not

<sup>1</sup> The agenda for the May 7, 2014 Board of Trustees meeting is available at [http://www.nerc.com/gov/bot/Agenda%20highlights%20and%20minutes%202013/board\\_agenda\\_package\\_May\\_2014.pdf](http://www.nerc.com/gov/bot/Agenda%20highlights%20and%20minutes%202013/board_agenda_package_May_2014.pdf)

<sup>2</sup> On February 21, 2014, NERC submitted a Notice of Filing of proposed Reliability Standard PRC-005-3 (Protection System Maintenance). (“PRC-005-3 filing”)

<sup>3</sup> *Protection System Maintenance Reliability Standard*, Order No. 793, 145 FERC ¶ 61,253 (2013).

<sup>4</sup> This replacement exhibit is the same replacement exhibit included with an errata filing to NERC’s Notice of Filing of proposed Reliability Standard PRC-005-3, which has been separately this day.

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an appropriate consideration in the context of assigning violation severity levels, but rather, should be considered when assigning a violation risk factor.” FERC, therefore, directed NERC to submit a compliance filing changing the VSL for the failure to include station batteries in a time-based maintenance program to “severe.”

The proposed VSL revision is just, reasonable, not unduly discriminatory or preferential, and in the public interest for PRC-005-2..

Respectfully submitted,

/s/ William H. Edwards

William H. Edwards

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**Attachments A – B**

**(Available on the NERC Website at**

**[http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Attachments\\_PR\\_C-005\\_VSL\\_filing.pdf](http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Attachments_PR_C-005_VSL_filing.pdf)**