

September 2, 2015

VIA OVERNIGHT MAIL

Sheri Young, Secretary of the Board
National Energy Board
517 – 10th Avenue SW
Calgary, Alberta
T2R 0A8

RE: *Errata to Notice of Filing of the North American Electric Reliability Corporation of Reliability Standards BAL-003-1, COM-001-2, VAR-001-4, and Implementation Plan for Reliability Standard PRC-004-4*

Dear Ms. Young:

The North American Electric Reliability Corporation (“NERC”) hereby submits errata to three Reliability Standards, BAL-003-1, COM-001-2, VAR-001-4, and an errata to the Implementation Plan for PRC-004-4, which have each been previously filed. As explained below, this consolidated errata filing corrects certain inadvertent errors that have come to NERC’s attention since the original submissions, including various formatting and stylistic revisions, language clarifications, and minor corrections.

BAL-003-1

On April 8, 2013, NERC filed a Notice of Filing of proposed Reliability Standard BAL-003-1 (Frequency Response and Frequency Bias Setting) (“BAL filing”), with the Federal Energy Regulatory Commission (“Commission”) in Docket No. RM13-11-000.

It has come to NERC’s attention that Exhibit B of the BAL Petition, Reliability Standard BAL-003-1, contains several inadvertent errors in numbering of certain sections and subsections as well as font inconsistencies in Measure M4. Pursuant to Section 12.0 of the NERC *Standard Processes Manual*, attached as Appendix 3A of the NERC *Rules of Procedure*, the NERC Standards Committee agreed that these ministerial revisions could be revised as errata on July 15, 2015. A corrected clean copy and redline copy of the standard, now BAL-003-1.1, is attached herein as **Attachment 1** and **Attachment 2**, respectively.

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COM-001-2

On May 29, 2014, NERC filed a Notice of Filing of proposed Reliability Standard COM-001-2 (Communications) and COM-002-4 (Operating Personnel Communications Protocols) (“COM Petition”)

It has come to NERC’s attention that Exhibit A of the COM Petition, Reliability Standard COM-001-2, contains inadvertent numbering errors in the parts to Requirement R6. Pursuant to Section 12.0 of the NERC *Standard Processes Manual*, attached as Appendix 3A of the NERC *Rules of Procedure*, the NERC Standards Committee agreed that these ministerial revisions could be revised as errata on July 15, 2015. A corrected clean copy and redline copy of the standard, now COM-001-2.1, is attached herein as **Attachment 3** and **Attachment 4**, respectively.

VAR-001-4

On June 12, 2014, NERC filed a Notice of Filing of proposed Reliability Standard VAR-001-4 (Voltage and Reactive Control) and VAR-002-3 (Generator Operation for Maintaining Network Voltage Schedules) (“VAR Petition”).

For VAR-001-4 in Exhibit A of the VAR Petition, it has since become apparent that the word “or” was inadvertently omitted from Requirement R5, part 5.3 between the words “schedules” and “Reactive” in both the clean and redline documents. Pursuant to Section 12.0 of the NERC *Standard Processes Manual*, the NERC Standards Committee agreed that these revisions could be revised as errata on September 30, 2014. A corrected clean copy and redline copy of the standard, now VAR-001-4.1, is attached herein as **Attachment 5** and **Attachment 6**, respectively.

PRC-004-4

On February 25, 2015, NERC filed a petition for approval of proposed Reliability Standards PRC-004-2.1(i)a (Analysis and Mitigation of Transmission and Generation Protection System Misoperations), PRC-004-4 (Protection System Misoperation Identification and Correction), PRC-005-2(i) (Protection System Maintenance), PRC-005-3(i) (Protection System and Automatic Reclosing Maintenance), and VAR-002-4 (Generator Operation for Maintaining Network Voltage Schedules). NERC submitted a supplemental filing on March 27, 2015 of Proposed Reliability Standards PRC-001-1.1(ii) (System Protection Coordination), PRC-019-2 (Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection), and PRC-024-2 (Generator Frequency and Voltage Protective Relay Settings), and as corrected on May 26, 2015. On August 19, 2015, NERC submitted revisions to the Violation Risk Factors (“VRF”) for PRC-004-4 in compliance with the Federal Energy Regulatory Commission’s May 13th directive for Reliability Standard PRC-004-3.¹

¹ See, *North American Electric Reliability Corporation*, 151 FERC ¶ 61,129, at PP 2 and 20 (2015) (stating, “For the reasons stated above, we direct NERC to submit a compliance filing within 60 days of issuance of this order that revises the proposed ‘medium’ VRF designations to ‘high.’”); and *Revisions of the North American Electric*

Since filing these Reliability Standards, it has come to NERC's attention that the Implementation Plan associated with Reliability Standard PRC-004-4 should be modified to clarify that Reliability Standard PRC-004-2.1(i)a will retire upon effectiveness of PRC-004-4. As submitted in the filing of, among others, Reliability Standard PRC-004-4, the Implementation Plan for PRC-004-4 stated:

“Depending on the timing of approvals for various versions of PRC-004, PRC-004-2.1a may still be in effect at the time the revised definition of Bulk Electric System becomes effective for all entities. If this occurs, PRC-004-2.1(i)a will go into effect and PRC-004-4 shall go into effect after the technical revisions developed in [on PRC-004-3] are approved....”²

Despite apparent confusion caused by this language, the standard drafting team (SDT) that developed PRC-004-4 intended Reliability Standard PRC-004-2.1(i)a to retire upon midnight of the day immediately prior to the July 1, 2016 effective date for PRC-004-4, but due to the challenges associated with submitting competing time-sensitive updates to PRC-004, the SDT determined that the Implementation Plan for PRC-004-4 would not explicitly state that PRC-004-4 would retire PRC-004-2.1(i)a. While it did not affirmatively retire PRC-004-2.1(i)a, the Implementation Plan for PRC-004-4 contemplated that the retirement would occur.

Pursuant to Section 12.0 of the NERC *Standard Processes Manual*, the NERC Standards Committee voted on July 15, 2015 to agree that this Implementation Plan could be revised as errata on September 30, 2014 to clarify that, as intended, Reliability Standard PRC-004-2.1(i)a will retire upon midnight of the day immediately prior to the July 1, 2016 effectiveness of PRC-004-4. A corrected clean copy and redline copy of the implementation plan is attached herein as **Attachment 7** and **Attachment 8**, respectively.

Reliability Corporation to the Violation Risk Factors for Reliability Standards PRC-004-3, PRC-004-4 and PRC-004-5, (filed August 19, 2015) (including revisions to the VRF of Reliability Standards PRC-004-5 and PRC-004-3).

² See, *Notice of Filing of the North American Electric Reliability Corporation of Proposed Reliability Standards PRC-004-2.1(i)a, PRC-004-4, PRC-005-2(i), PRC-005-3(i), and VAR-002-4*, at Exhibit B, Implementation Plan, PRC-004-4, (filed Feb. 25, 2015).

Respectfully submitted,

/s/ Andrew C. Wills

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ATTACHMENTS 1 – 8

Available on the NERC Website at

http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Errata%20to%20Proposed%20Reliability%20Standards_Exhibits.pdf