

January 13, 2016

VIA OVERNIGHT MAIL

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

Re: Clarifying Supplemental Information Updating Implementation Plan

Dear Ms. Young:

On August 19, 2015, NERC proposed revisions to the Violation Risk Factors (“VRF”) for Requirements R1 through R6 of Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5 (*Protection System Misoperation Identification and Correction*).

As noted in NERC’s initial filing of Reliability Standard PRC-004-5, submitted on June 17, 2015, “Proposed Reliability Standard PRC-004-5 is intended to replace prior versions of PRC-004.”¹ Similarly, PRC-004-4, which becomes effective on July 1, 2016 is intended to supersede and retire any prior version of the standard. NERC respectfully requests to supplement its pending filing for Reliability Standard PRC-004-5 with the replacement Implementation Plan attached as Exhibit A to expressly clarify out of an abundance of caution that the Implementation Plan applies to Reliability Standard PRC-004-5(i) (reflecting the VRF revisions) and that upon effectiveness of Reliability Standard PRC-004-5(i), all prior versions of Reliability Standard PRC-004 will be retired. Similarly, for the avoidance of confusion, NERC seeks to supplement its errata filed on September 2, 2015 to provide an updated Implementation Plan on Reliability Standard PRC-004-4. The Implementation Plan is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

¹ Notice of Filing of the North American Electric Reliability Corporation of Proposed Reliability Standards PRC-004-5 and PRC-010-2, (filed June 17, 2015).

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Respectfully submitted,

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Exhibit A

(Available on the NERC Website at

[http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Exhibit%20for%20PRC-004-5\(i\)%20Supplemental%20Info%20Implementation%20Plan.pdf](http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Exhibit%20for%20PRC-004-5(i)%20Supplemental%20Info%20Implementation%20Plan.pdf))