

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ELECTRIC RELIABILITY

North American Electric Reliability Corporation
Docket Nos. RM14-8-000, RD15-3-000, RM15-9-000

December 4, 2015

North American Electric Reliability Corporation
1325 G Street N.W., Suite 600
Washington, D.C. 20005

Attention: Lauren A. Perotti
Counsel for North American Electric Reliability Corporation

Reference: Motion of the North American Electric Reliability Corporation to Defer
Implementation and Request for Shortened Response Period and Expedited
Action

Dear Ms. Perotti:

On November 13, 2015, the North American Electric Reliability Corporation (NERC) filed a motion to defer the implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 until after the Commission issues a final order on proposed Reliability Standard PRC-005-6 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance). Concurrently, NERC filed a petition for approval of proposed Reliability Standard PRC-005-6, which would revise the standard to include the supervisory devices associated with certain automatic reclosing relays as part of applicable entities' required protection system maintenance programs.

In its November 13, 2015 Petition, NERC states that multiple versions of the PRC-005 standard are now pending enforcement or Commission approval, creating a patchwork approach to implementation.¹ Under the current approach, NERC states that entities will be required to perform multiple successive revisions to their Protection System Maintenance Plans to address new in-scope systems introduced in each revised

¹ NERC states that Reliability Standard PRC-005-4 will become effective on January 1, 2016, thereby retiring PRC-005-3 and PRC-005-3(i) before they ever become effective. NERC Motion at 1, n.1.

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PRC-005 version. NERC maintains that updating these programs is expected to be a time consuming task for many entities, and that affected entities have expressed concerns regarding maintaining and auditing multiple program versions.

NERC is proposing an implementation plan with its proposed Reliability Standard PRC-005-6 that would defer implementation of all approved versions of PRC-005-3 and PRC-005-4 so that all newly-applicable systems could be addressed in one comprehensive set of changes to an entity's protection system maintenance program. NERC maintains that this will promote reliability, by reducing the number of misidentified or missed devices, and the efficient use of ERO Enterprise and registered entity resources.

NERC's petition was filed on November 13, 2015, with interventions, comments and protests due on or before November 28, 2015. One comment was received, filed jointly by the Edison Electric Institute, the American Public Power Association, National Rural Electric Cooperative Association, Electricity Consumers Resource Council, Transmission Access Policy Study Group, and Large Public Power Council, in support of NERC's proposal for delayed implementation of PRC-005-3, PRC-005-3(i), and PRC-005-4.

NERC's uncontested motion to defer the implementation of the pending versions of Reliability Standard PRC-005 is hereby approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability under 18 C.F.R. § 375.303 (2015), effective as of the date of this order.

This action shall not be construed as approving any other application, including proposed revisions of Electric Reliability Organization or Regional Entity rules or procedures pursuant to 18 C.F.R. § 375.303(a)(2)(i). Such action shall not be deemed as recognition of any claimed right or obligation associated therewith and such action is without prejudice to any findings or orders that have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the Electric Reliability Organization or any Regional Entity.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2015).

Sincerely,

Michael Bardee, Director
Office of Electric Reliability

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