

Individual or group. (17 Responses)
Name (10 Responses)
Organization (10 Responses)
Group Name (7 Responses)
Lead Contact (7 Responses)
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Question 2 Comments (17 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
No
Sub-Parts 4.2.6 and 4.2.6.1 can be combined into one sub-Part 4.2.6 to read: 4.2.6 Protection Systems and Sudden Pressure Relaying for BES dispersed power producing Facilities identified through Inclusion I4 of the BES definition.
No
Individual
Reena Dhir
Manitoba Hydro
Yes
No
Individual
David Kiguel
David Kiguel
No
The meaning of the phrase "for generators not identified through Inclusion I4 of the BES definition," inserted in Section 4.2.5 of PRC-005-5 is not clear. If the intent is to include protections for generators that are not BES because they are not captured by Inclusion I4 of the BES definition, I suggest inserting the word "and" so the applicability is clearly stated as "Protection Systems and Sudden Pressure Relaying for (a) generator Facilities that are part of the BES, and (b) generator Facilities that are not identified through Inclusion I4 of the BES definition."
No
Individual
Jeremy Voll
Basin Electric Power Cooperative
Yes
Yes
Section 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including: The inclusion of the "for generators not identified through Inclusion I4 of the BES definition" is worded in a way that makes it sound like all generators that are not BES also need to be subject to this standard. This is the wrong approach to the standard as it would then make every generator applicable to PRC-005. This should be removed from the applicability section.

Group
OG&E Compliance
Don Hargrove
Yes
Yes
The language in 4.2.5 is a little confusing until you read 4.2.6, and still it does not read clearly. We suggest modifying the language as follows. It doesn't change the meaning, but makes it easier to understand. CURRENT - 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including: SUGGESTED - 4.2.5 Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES and not identified through Inclusion I4 of the BES definition, including:
Individual
Craig Jones
Idaho Power
Yes
No
Group
Associated Electric Cooperative, Inc.
Phil Hart
Yes
Although AECEI agrees with the intent of the language, applicability section 4.2.5 could use some clarity. Suggested language: "Protection Systems and Sudden Pressure Relaying for generator Facilities that are included within the BES definition, but not identified through Inclusion I4, including:"
Group
SPP Standards Review Group
Robert Rhodes
No
The structure of 4.2.5 under Applicability is awkward and unclear. We suggest revising 4.2.5 to read 'Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES but not included through Inclusion I4 of the BES definition, including:'
No
Individual
Thomas Foltz
American Electric Power
No
Facilities Section 4.2.5: There appears to be a "stranded paragraph" under section 4.2.5.2 "Protection Systems and Sudden Pressure Relaying for station service or excitation transformers connected to the generator bus of generators which are part of the BES, that act to trip the generator either directly or via lockout or tripping auxiliary relays." Should this paragraph instead be classified as 4.2.5.3? 4.2.6: The word "facilities" should be removed from 4.2.6.1 so that it reads "Protection Systems and Sudden Pressure Relaying used in aggregating...". We suspect its inclusion may have been unintentional, but if not, we request that the drafting team explain its inclusion.
Yes

AEP supports the overall efforts of the drafting team, and agree in principle with the apparent purpose and intent of the standard. Our negative vote is driven solely by the inclusion of the word "facilities" in 4.2.6.1 of the Applicability section.
Group
Dominion
Connie Lowe
Yes
No
Individual
Marc Donaldson
Tacoma Power
Yes
Yes
The Implementation Plan states, "Reliability Standard PRC-005-4, with its associated Implementation Plan, was adopted by the Board of Trustees on November 7, 2013." Version 4 of PRC-005 was adopted later than November 7, 2013.
Individual
William English
Consumers Energy Company
No
I agree with the proposed changes to 4.2 Facilities, however the Standard is missing the label 4.2.5.3 at the bottom of page 3. The Standard should not be approved until this error is corrected.
No
Individual
Sergio Banuelos
Tri-State Generation and Transmission Association, Inc.
Yes
Tri-State G&T believes the language in the Facilities Section 4.2.5 "Protection Systems and Sudden Pressure Relaying for generator Facilities that are part of the BES, for generators not identified through Inclusion I4 of the BES definition, including:" is confusing as it is currently written. We believe the intent was in the right place in trying to exclude the individual dispersed generating units. We would suggest possibly using language such as "Protection System and Sudden Pressure Relaying for generator Facilities that are part of the BES, with the exception of those generator units identified through Inclusion I4 of the BES definition, including:".
No
Individual
Mike Smith
Manitoba Hydro
Yes
No
Individual
David Jendras
Ameren

No
PRC-019-2, PRC-024-2, and PRC-006-2 apply to the individual dispersed generator if the protection applies to the individual unit, (in addition to or rather than the 75MVA aggregate). Thus, we advocate that PRC-005-5 should require maintenance of those Protection Systems on those individual units.
No
Group
Duke energy
Michael Lowman
Yes
Duke Energy would like to thank the SDT for its effort on this project and agrees with the changes made to PRC-005-5.
No
Group
DTE Electric Co.
Kathleen Black
No
We recommend that a statement specifically excluding individual generating units be added in Section 4.2.6.1. Section 4.2.5 should be restated to clarify its meaning, especially the phrase "for generators not identified through Inclusion I4 of the BES definition".
No
No Comments

Additional Comments:

ACES

Jason Marshall

1. Do you agree with the revisions proposed in PRC-005-5 to clarify applicability of PRC-005-4 to dispersed power producing resources included in the BES through Inclusion I4 of the BES definition? If not, please provide technical rationale for your disagreement, along with suggested language changes.

Yes:

No: X

Comments: We conceptually agree with the changes, but believe the language in the applicability section requires refinement to accurately capture the intent of the changes. For example, section 4.2.6 states that the standard is applicable to "Protection Systems and Sudden Pressure Relaying for the following BES generator Facilities". Thus, one would expect the next subsection to be a list of Facilities. It is not. It refers to Protection Systems and Sudden Pressure Relaying Facilities which do not meet the NERC definition of Facility. A Facility is a set of electrical equipment that operates as a single BES Element. For example,

a line or generator would be a Facility. A Protection System and Sudden Pressure Relaying would be components of a Facility but they would not be Facilities themselves. We think this issue can be resolved very simply by combining sections 4.2.6 and 4.2.6.1, and instead read: “Protection Systems and Sudden Pressure Relaying for dispersed power producing resources, identified through the BES definition Inclusion I4, where those resources aggregate to greater than 75 MVA and connect to a common point of connection at or above 100 kV”.

2. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?

Yes:

No:

Comments: We think that section 4.2.5 is written in a confusing manner. We suggest moving the clause “for generator not identified through Inclusion I4 of the BES definition” to a footnote. Section 4.2.5 could then be further modified to read: “Protection Systems and Sudden Pressure Relaying for non-dispersed generator Facilities”. By definition, Facilities are limited to the BES, so there is no need to repeat “that are part of the BES” in the applicability section. The footnote could further explain what is intended by non-dispersed generator Facilities. We think this will make it clearer to read and understand.