NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comments on Relay Loadability Reference Document

The Standards Committee thanks all commenters who submitted comments on the Relay Loadability Reference Document. This document was posted for a 30-day public comment period from March 20, 2008 through May 3, 2009.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Reliability Standards Development Procedures: http://www.nerc.com/standards/newstandardsprocess.html.

Index to Questions and Comments

Consideration of Comments on Relay Loadability Reference Document

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 – Regional Reliability Organizations, Regional Entities

Commenter		Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
1.	Dean Bender	Bonneville Power Administration	x		x		x	x				
2.	James Y. Busbin (G1)	Southern Company Services, Inc.	x									
3.	J.T. Wood (G1)	Southern Company Services, Inc.	x									
4.	Marc Butts (G1)	Southern Company Services, Inc.	x									
5.	Roman Carter (G1)	Southern Company Services, Inc.	x									
6.	Terry Coggins (G1)	Southern Company Services, Inc.	x									
7.	Chris Wilson (G1)	Southern Company Services, Inc.	x									
8.	Greg Ward/Rafeal Garcia	Oncor Electric Delivery Company LLC	x									
9.	Greg Rowland	Duke Energy Corporation	x		x		x	x				
10.	Thad K. Ness	American Electric Power	x		x		x	x				
11.	Rick White	Northeast Utilities	x									
12.	Kris Manchur	Manitoba Hydro	x		x		x	x				
13.	Alissia Dawes	Hydro One Networks, Inc.	x		x							
14.	Michael J. Ranalli (G2)	National Grid	x		x							
15.	Phil Tatro (G2)	National Grid	x		x							

G1 — Southern Company Services, Inc.
G2 — National Grid

Consideration of Comments on Relay Loadability Reference Document

1. Does the “Determination and Application of Practical Relaying Loadability Ratings” reference document aid in either the implementation or understanding of the Transmission Relay Loadability standard?

Organization	Question 1:	Question 1 Comments:
Bonneville Power Administration	Yes	
Southern Company Services	Yes	
Oncor Electric Delivery Company LLC	Yes	
Duke Energy Corporation	Yes	We like this reference document, and believe it is useful in implementing the standard.
AEP	Yes	
Northeast Utilities	Yes	
Manitoba Hydro	Yes	
Hydro One Networks	Yes	
National Grid	Yes	The Reference Document contains a significant volume of information to assist the industry in applying the Relay Loadability Standard, PRC-023. The Reference Document should be posted as a permanent reference with the Standard on the NERC website.

Consideration of Comments on Relay Loadability Reference Document

2. Is the terminology in the “Determination and Application of Practical Relaying Loadability Ratings” reference document consistent with the related standard? If not please explain.

Organization	Question 2:	Question 2 Comments:
Bonneville Power Administration	Yes	
Southern Company Services	No	Please see response to Question 4.
Oncor Electric Delivery Company LLC	Yes	
Duke Energy Corporation	Yes	
AEP	Yes	
Northeast Utilities	Yes	Linking the sections of the reference document to the requirements in the standard is a significant aid in understanding both documents.
Manitoba Hydro	Yes	
Hydro One Networks	Yes	
National Grid	Yes	

Consideration of Comments on Relay Loadability Reference Document

3. Has the development of the "Determination and Application of Practical Relaying Loadability Ratings" reference document been approved through some other open process? Please identify.

Organization	Question 3:	Question 3 Comments:
Bonneville Power Administration	No	
Southern Company Services		Not to our knowledge.
Oncor Electric Delivery Company LLC	No	
Duke Energy Corporation	No	We are not aware of approval through another process.
AEP	No	We do not know of any other open approval process.
Northeast Utilities	No	While the reference document has accompanied the standard through several revision reviews, we're not aware of any official posting of the reference document for review.
Manitoba Hydro	No	
Hydro One Networks	No	none known
National Grid	No	

Consideration of Comments on Relay Loadability Reference Document

4. Please provide any other comments you have on the “Determination and Application of Practical Relaying Loadability Ratings” reference document that you haven’t already provided.

Organization	Question 4 Comments:
Bonneville Power Administration	OK as written
Southern Company Services	We feel we have found several inconsistencies between the reference document and PRC-023. We are reviewing these internally and will submit them to the SCPTF under separate cover.
Oncor Electric Delivery Company LLC	No additional comments
AEP	The reference document has not addressed guidance on situations where the application of loadabilty requirements conflict with the primary directive that protective relays are to be set to reliably detect all fault conditions and protect the electrical network from these faults.
Northeast Utilities	None.
Manitoba Hydro	
Hydro One Networks	
National Grid	