

## **Analysis of Impact to PRC-004-WECC-1 of Modifying the Definition of System Operator**

### **Provided by WECC staff:**

The issue at hand seems to be the inclusion of the Generator Operator in the definition of System Operator. The use of the term "System Operator" in the instances identified in the *Analysis of Impact of Revising Definition of "System Operator" to Remove "Generator Operator"* are not applicable to the Generator Operator in any of the NERC continent-wide standards. The use of the term in the WECC regional reliability standard PRC-004-WECC-1 appears to be what is at issue. However, WECC did not define the term System Operator in the development of the regional standard. Therefore WECC relies on the NERC definition.

In looking at the applicability section of PRC-004-WECC-1, Generator Owners, not Generator Operators, are identified (section 4.2). PRC-004-WECC-1 is only applicable to the Generator Owners of Remedial Action Schemes (RAS) identified in the Table titled "Major WECC Remedial Action Schemes" and not to all Generator Owners. The proposed change to the definition of System Operator would not impact PRC-004-WECC-1. Because the current NERC definition does not include Generator Owners, removing Generator Operators from the definition would not impact PRC-004-WECC-1. R1 requires System Operators and System Protection personnel to analyze all operations to identify apparent Misoperations. Generator Owners, not Generator Operators, of the RAS listed in the referenced table need to analyze all operations to identify apparent Misoperations. System Operators are required to review all tripping of transmission elements and RAS to identify apparent Misoperations within 24 hours. This would be the Transmission Operators identified in the Applicability Section 4.3. The Transmission Owner and Generator Owner personnel (Applicability Sections 4.1 and 4.2) are required to analyze all operations within 20 business days to identify potential Misoperations the System Operators (Transmission Operators from Applicability Section 4.3) might have missed.

To summarize, after reviewing the *Analysis of Impact of Revising Definition of "System Operator" to Remove "Generator Operator"* and the language of PRC-004-WECC-1, from the WECC perspective of PRC-004-WECC-1 there is no issue with the proposed change to the definition of System Operator. The same circumstances surrounding the use in the continent-wide standard pertain to PRC-004-WECC-1.