Unofficial Comment Form

# Project 2017-07 Standards Alignment with Registration

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2017-07 Standards Alignment with Registration** by **8 p.m. Eastern, December 12, 2019.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://nercdotcomstage/pa/Stand/Pages/Project201707StandardsAlignmentwithRegistration.aspx). If you have questions, contact NERC Standards Developer, Laura Anderson (via email), or at 404-446-9671.

## Background Information

Project 2017-07 addresses Reliability Standards impacted by the Risk Based Registration (RBR) initiative approved by the Federal Energy Regulatory Commission (FERC) in Docket No. RR15-4-000. Some Reliability Standards require edits to align existing standards with the RBR. The standard drafting team (SDT) reviewed standards from the BAL, CIP, FAC, INT, IRO, MOD, NUC, and TOP family of standards to remove the references to the retired functions Purchasing-Selling Entity (PSE) and Interchange Authority (IA), and update references to the Load-Serving Entity (LSE) by either removing or replacing with an appropriate Registered Entity (e.g., MOD-032-1). Additionally, the SDT considered adding Underfrequency Load Shedding (UFLS)-Only Distribution Provider (UFLS-Only Distribution Provider) to the Applicability section of PRC-005 and PRC-006 per NERC registration criteria, and whether to include a definition for “UFLS-Only Distribution Provider” into the NERC Glossary of Terms; as well as review the standards to ensure consistent use of the term Planning Coordinator.

The following Reliability Standards have been identified for revision:

* FAC-002-2 is being revised to remove references to Load-Serving Entity.
* IRO-010-2 is being revised to remove references to Load-Serving Entity.
* MOD-031-2 and MOD-033-1 are being revised to change Planning Authority to Planning Coordinator.
* NUC-001-3 is being revised to remove references to Load-Serving Entity. Note: only NUC-001-3 R1 has been recommended for retirement by Standard Efficiency Review Phase 1.
* PRC-006 is being revised to add “UFLS Only- Distribution Provider” to the Applicability section.
* TOP-003-3 is being revised to remove references to Load-Serving Entity.

The following Reliability Standards were reviewed but are not being proposed for modification due to the following reasons:

* BAL-005-0.2b has been superseded by BAL-005-1 on January 1, 2019, which deleted the Load-Serving Entity function).
* CIP-002-5.1a, CIP-003-6, CIP-003-7, CIP-004-6, CIP-005-5, CIP-005-6, CIP-006-6, CIP-007-6, CIP-008-5, CIP-009-6, CIP-010-2, and CIP-011-2 will not be revised at this time due to the current Project 2016-02 (Modifications to CIP Standards) and the CIP Standards Efficiency Review.
* FAC-010-3, FAC-011-3, and FAC-014-2 are being addressed in Project 2015-09.
* INT-004-3.1 and INT-006-4 are recommended for retirement by Standard Efficiency Review Phase 1.
* MOD-001-2, MOD-004-1, MOD-020-0 are recommended for retirement by Standard Efficiency Review Phase 1.
* MOD-032-1 will not be revised at this time due to the work of the System Planning Impact from Distributed Energy Resource Working Group (SPIDERWG). In June 2018, the NERC Planning Committee (PC) formed the SPDERWG subcommittee to address Distributed Energy Resource (DER) impacts on the bulk power system (BPS). Currently, the subcommittee has proposed a Standard Authorization Request (SAR) for MOD-032-1 pertaining to DERs. The SAR is currently under the PC review. At this time, the Project 2017-07 drafting team will not take any action in reference to the MOD-032 standard until the SPIDERWG has completed their initial efforts.
* PRC-005-6 will not be revised at this time due to the current Project 2019-04 (Modifications to PRC-005-6).

## Questions

1. The SDT approach is to align the FAC-002-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach is to align the IRO-010-2 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach is to align the MOD-031-2 and MOD-033-1 standards with the RBR initiative by changing “Planning Authority” to “Planning Coordinator.” Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach is to align the NUC-001-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach is to align the PRC-006-3 standard with the RBR initiative and the standard is being revised to add “UFLS Only- Distribution Provider” consistent with NERC registration criteria. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach is to align the TOP-003-3 standard with the RBR initiative by removing references to retired functions. Do you agree with the proposed changes to the standard? If you disagree, please explain and provide alternative language that will support the RBR initiative.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the SDT to consider that you have not already provided for Project 2017-07.

Comments: