

August 19, 2015

Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O Box 2319  
2300 Yonge Street  
Toronto, Ontario, Canada  
M4P 1E4

**Re: Revisions to the Violation Risk Factors for Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5.**

Dear Ms. Walli:

In accordance with Section 320 of the North American Electric Reliability Corporation (“NERC”) Rules of Procedure,<sup>1</sup> NERC submits proposed revisions to the Violation Risk Factors (“VRF”) for Requirements R1 through R6 of Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5 (*Protection System Misoperation Identification and Correction*) (attached as Exhibit A). On June 22, 2015, the NERC Board of Trustees approved submission of the revised VRFs. These VRF revisions are consistent with the Federal Energy Regulatory Commission’s (“FERC”) directive in the May 13<sup>th</sup> Order.<sup>2</sup> The revised VRF designations are just, reasonable, not unduly discriminatory or preferential, in the public interest, and compliant with FERC’s directive.

## I. Background

As initially proposed, Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5 reflected “medium” VRF designations for Requirements R1 through R6. Support for these VRF designations was included in Exhibit F of NERC’s Reliability Standard PRC-004-3 filing submitted on September 23, 2014. Reliability Standards PRC-004-4 and PRC-004-5 adopted the VRFs proposed for PRC-004-3 on the basis

<sup>1</sup> NERC *Rules of Procedure*, Section 320 (effective March 19, 2015), available at <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

<sup>2</sup> See *N. Am. Elec. Reliability Corp.*, 151 FERC ¶ 61,129, at PP 2 and 20 (2015) (stating, “For the reasons stated above, we direct NERC to submit a compliance filing within 60 days of issuance of this order that revises the proposed ‘medium’ VRF designations to ‘high.’”) (“May 13<sup>th</sup> Order”). See also, *N. Am. Elec. Reliability Corp.*, 151 FERC ¶ 61,186, at fn. 4 (“May 29<sup>th</sup> Order”) (citing the May 13<sup>th</sup> Order and stating, “In the immediate proceeding, we approve the requested modifications to both the currently effective standard, and the approved but not yet effective version of the standard, to ensure continuity in the application of the provisions pertaining to dispersed generation.”)

**3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)**

that the revisions submitted in versions 4 and 5 of the standard did not give rise to modification of the VRFs.<sup>3</sup>

In the May 13<sup>th</sup> Order, FERC approved Reliability Standard PRC-004-3, two new defined terms for the NERC Glossary of Terms, the implementation plan for Reliability Standard PRC-004-3, and the Violation Severity Levels (“VSLs”) for the Reliability Standard.<sup>4</sup> In addition, FERC directed NERC to submit a compliance filing, within 60 days of the issuance of the May 13<sup>th</sup> Order, to revise the VRF designations for Requirements R1 through R6 of Reliability Standard PRC-004-3 from “medium” to “high.”<sup>5</sup> As the VRF designations for Reliability Standards PRC-004-4 and PRC-004-5 adopted the designations in Reliability Standard PRC-004-3, the May 13<sup>th</sup> Order’s directive also necessitated review of conforming revisions to the VRFs for versions 4 and 5 of the standard.

## II. Proposed VRF Revisions

Upon issuance of the May 13<sup>th</sup> Order, NERC re-examined VRF designations for versions 3, 4, and 5 of PRC-004, pursuant to Section 320 of the NERC Rules of Procedure. The NERC director of standards recommended that the NERC Board of Trustees approve the FERC directed revisions to the VRFs for PRC-004. On June 22, 2015, the NERC Board of Trustees approved submission of the revised VRFs for Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5, reflected in Exhibit A. Therefore, consistent with FERC’s directive in the May 13<sup>th</sup> Order, NERC is proposing to modify the VRFs for Requirements R1 through R6 of Reliability Standards PRC-004-3, PRC-004-4, and PRC-004-5.

## III. Conclusion

For the foregoing reasons, NERC respectfully requests approval of the proposed VRF revisions, as just, reasonable, not unduly discriminatory or preferential, in the public interest, and compliant with the May 13<sup>th</sup> Order.

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<sup>3</sup> See, *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards PRC-004-2.1(i)a, PRC-004-4, PRC-005-2(i), PRC-005-3(i), and VAR-002-4*, at Section V (filed Feb. 25, 2015); and *Petition of the North American Electric Reliability Corporation For Approval Of Proposed Reliability Standards PRC-004-5 And PRC-010-02*, at Section IV.C. (filed June 17, 2015) (including NERC’s note that it was examining the VRF designations assigned, consistent with the May 13<sup>th</sup> Order).

<sup>4</sup> See, May 13<sup>th</sup> Order, at P 2.

<sup>5</sup> *Id.*, at P 20.

Respectfully submitted,

/s/ Candice Castaneda

Holly A. Hawkins

Associate General Counsel

Candice Castaneda

Counsel

North American Electric Reliability Corporation

1325 G St., NW, Suite 600

Washington, DC 20005

202-400-3000

[holly.hawkins@nerc.net](mailto:holly.hawkins@nerc.net)

[candice.castaneda@nerc.net](mailto:candice.castaneda@nerc.net)

## **Exhibit A**

Available on the NERC Website at

[http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/VRF%20Revisions%20for%20PRC-004%20Medium%20to%20High\\_exhibits.pdf](http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/VRF%20Revisions%20for%20PRC-004%20Medium%20to%20High_exhibits.pdf)