Individual or group. (24 Responses)
Name (14 Responses)
Organization (14 Responses)
Group Name (10 Responses)
Lead Contact (10 Responses)
Question 1 (19 Responses)
Question 1 Comments (20 Responses)
Question 2 (18 Responses)
Question 2 Comments (19 Responses)
Question 3 (18 Responses)
Question 3 Comments (19 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
Yes
Yes
No
Individual
Heather Bowden
EDP Renewables North America LLC
No
Requirement 2 and Requirement 3 should add "in response to electrical quantities."
No
Applicability (4.2.1.5) should include "in response to electrical quantities."
No
Group
Arizona Public Service Co
Janet Smith
Yes
Individual
Thomas Foltz
American Electric Power
Yes
Yes
No
Individual
Jonathan Meyer
Idaho Power
Yes

Yes
No
Individual
John Merrell
Tacoma Power
Yes
Yes
No
Individual
Michelle D'Antuono
Ingleside Cogeneration LP/Occidental Energy Ventures Corp
Yes
Occidental Energy Ventures Corp. (OEVC) agrees that the scope of a Misoperation investigation should be limited to those Protection Systems affiliated with 75+ MVA aggregation points located within a dispersed generation facility. It makes no sense requiring a compulsory NERC-compliant investigation and report down to the windmill or solar panel level – unless somehow the aggregation point is affected. This is unlikely to be the case most of the time, and if every minimal incident is subject to PRC-004-2.1a(X), both the relay owner and CEA community could be overwhelmed with the volume of work required. This serves no useful reliability purpose.
Yes
OEVC agrees that the scope of a Misoperation investigation should be limited to those Protection Systems affiliated with 75+ MVA aggregation points located within a dispersed generation facility. It makes no sense requiring a compulsory NERC-compliant investigation and report down to the windmill or solar panel level – unless somehow the aggregation point is affected. This is unlikely to be the case most of the time, and if every minimal incident is subject to PRC-004-3, both the relay owner and CEA community could be overwhelmed with the volume of work required. This serves no useful reliability purpose.
Yes
OEVC is encouraged by the rapid progress that the DGR SDT has made in the development and approval of the first three priority standards. We appreciate the hard work and are hoping the project team will continue at the same rapid pace in the next grouping.
Individual
Venona Greaff
Occidental Chemical Corporation
Group
Colorado Springs Utilities
Kaleb Brimhall
Individual
Michael Moltane
ITC
Yes
The Standard should define dispersed power producing resource. While in a practical sense this is a facility comprised of wind turbines or PV inverters, offering exclusions from Requirements based on

an undefined criteria is not a good practice. R4 – ITC recommends removal of the sub-bullet under R4 excluding the generators identified through Inclusion I4. The exclusion using BES I4 is confusing and may conflict with existing standard VAR-001-4. A non-BES unit or several non-BES units combined together could have an impact on the BES and thus removing the generators from VAR-002-4 R4 solely based on Inclusion I4 may be affect reliability. Per VAR-001-4 R4, the TOP is required to specify criteria that will exempt generators from following a voltage or reactive power schedule and associated notification requirements. Therefore, ITC recommends that VAR-002-3 R4 should be reworded as “Unless exempted by the Transmission Operator, each Generator Operator shall notify its associated Transmission Operator within 30 minutes of becoming aware of a change in reactive capability due to factors other than a status change described in Requirement 3”. The TOP can determine what notifications are necessary and be more specific depending on the needs of the system or individual facility. For example, a TOP exemption criteria may contain: “Dispersed power producing facilities are exempt from reactive capability change notifications less than 10% of the total aggregate lagging reactive capability as measured at the POI at nominal voltage”. TOPs typically will not want to receive individual turbine outage notifications; however, there may be instances where a dispersed power producing resource could lose an individual unit that may affect reliable operations (i.e. large individual units, near nuclear facility). In addition, the sub-bullet language in VAR-002-4 may be interpreted such that generators not in BES are exempt from reactive capability notifications and, in turn, exempt from following schedules which may be in conflict with VAR-001-4 and potentially impact the reliability of the BES. VAR-001-4 requires the TOP to determine the exemption criteria for generators and ITC recommends that VAR-002-4 be consistent with this practice as the TOP may require non-BES generators to follow a voltage or reactive power schedule based on the collective impact to the BES.
Group
MRO NERC Standards Review Forum
Joe DePoorter
Yes
Yes
Yes
Individual
Sonya Green-Sumpter
South Carolina Electric & Gas
Individual
Jo-Anne Ross
Manitoba Hydro
Yes
Yes
No
Individual
John Seelke
Public Service Enterprise Group
No
The changes would create a reliability gap between I4 generators and I2 generators. It also violates Section 303 of the NERC Rules of Procedure, paragraph 1 that states: “Competition - A Reliability Standard shall not give any market participant an unfair competitive advantage.” Presently, every generator at a site that exceeds 75 MVA is subject to the standard. All I2 generators, regardless of size, would remain subject to the standard, but all I4 generators would be exempt except at the

point where their output aggregates to greater than 75 MVA. In addition, individual I2 greater than 20 MVA are subject to the standard, regardless of the aggregate output of generation at a common point of connection. We suggest changes to the added bullet in R2 and R3 to make the standard comparable for all resources (added language is CAPITALIZED): “For Misoperations occurring on the Protection Systems of individual [delete “dispersed power producing resources”] GENERATORS identified under INCLUSION I2 AND Inclusion I4 of the BES definition where the Misoperations affected an aggregate nameplate rating of less than or equal to [delete “75”] 20 MVA of BES facilities, this requirement does not apply.”
No
For the same reasons described in Q1 above, part 4.2.1.5 should have similar changes applied.
Yes
The SDT has not provided a technical rationale for its proposed changes but instead has hidden behind the I4 definition. As the SDT well knows, NERC standards may apply to Elements that are not included in the BES definition.
Individual
Maryclaire Yatsko
Seminole Electric Cooperative, Inc.
Yes
No
Seminole agrees with the specific revisions concerning only the changes to distributed generation, however, Seminole does not agree with the ongoing revisions through Project 2010-05.1 that are included in this revision, such as the owner of the BES interrupting device being required to initiate review in all scenarios as opposed to the entity that initiated the interrupting device’s action. Therefore, Seminole must vote negative as this revision includes language from Project 2010-05.1 that Seminole does not find agreeable.
No
Individual
David Greyerbiehl
Consumers Energy Company
Yes
Yes
Yes
For this exclusion, the standard formatting was changed from the previous standards and revisions. Was this intentional and why? If so, are the other standards going to be revised similarly.
Group
Dominion
Connie Lowe
Yes
Yes
No
Individual
Bill Temple
Northeast Utilities
Yes

Yes
No
Group
Colorado Springs Utilities
Kaleb Brimhall
Group
Puget Sound Energy
Dianne Gordon
Yes
Yes
Yes
In the proposed Applications and Guidelines for PRC-004-4: The section "Composite Protection System - Breaker Failure Example" reads "An example of a correct operation of the breaker's Composite Protection System is when the breaker failure relaying tripped because the line relaying operated, but the breaker failed to clear the fault. The breaker failure relaying operated because of a failed trip coil. The failed trip coil caused a Misoperation of the line's Composite Protection System." This example is inconsistent with #1 of the new proposed Misoperation Definition (Failure to Trip - During Fault), which reads "A failure of a Composite Protection System to operate for a Fault condition for which it is designed. The failure of a Protection System component is not a Misoperation as long as the performance of the Composite Protection System is correct." The example given above is NOT a Misoperation, because the Composite Protection System operated correctly even with a failed trip coil (from what we understand of what is written).
Group
ACES Standards Collaborators
Jason Marshall
Yes
We agree with the changes. However, one additional change is necessary. “BES facilities” should be changed to the defined term “Facilities.” By definition Facilities would be limited to the BES and would appear to constitute the same meaning that is conveyed by “BES facilities.”
Yes
When reviewing the red-line version of the standard comparing this version to the last posting, we can find no differences pertaining the portion of the standard dealing with dispersed generation resources. Comparing for changes would be much easier if all of the red-lines that do not pertain to this project were changed to black text especially considering PRC-004-3 was approved by the NERC Board of Trustees in their mid-August prior to the posting of this standard.
Yes
The SDT should clarify what is meant by “affected.” Does this mean that amount of generation that was actually outaged as a result of the Misoperation? Or would this include an evaluation of the other potential Misoperations that could have occurred if the same conditions were experienced at other locations within the dispersed generation site? We believe that the answer should be the former rather than the latter. To make this clear, we suggest changing the word “affected” to “outaged” or, at least, providing an explanation in the technical/application guidelines section of the standard.
Group
DTE Electric Co.
Kathleen Black
Yes

Yes
No
Group
SPP Standards Review Group
Shannon V. Mickens
Yes
Yes
We would like to thank the drafting team for taking into consideration our suggestions in reference to replacing the term ‘BPS’ with ‘BES’ in both(PRC-004-2.1a(X) and PRC-004-4) as well as including the new term ‘Composite Protection System’ in PRC-004-4. We felt these suggestions would help maintain consistency with the current documentation and the BES Definition.
Individual
John Pearson/Matt Goldberg
ISO New England
No
In R2 and R3, the words “or could have affected” were initially added but then they were deleted. Those words should not have been deleted or similar replacement language should be added. The PRC subteam had indicated to us that those words would be included. The deleted words addressed the concern we expressed during the comment period for the Dispersed Generation White Paper. Specifically, we stated that we do not agree with limiting the analysis requirement to a trip of greater than 75 MVA because that only accounts for very large occurrences that could be unusual. Smaller occurrences, however, may predict an unusual large occurrence that could impact reliability. Many of these wind turbine installations at different sites all use the same equipment and during a major disturbance reliability may be reduced by misoperations. The deleted words were in fact included in the “Standards Applicability Guidelines” that were circulated for comment but were ultimately not issued. Wording that indicates when misoperations occur on relays that are used in applications that ultimately represent over 75 MVA should be added back in.
No
See Question 1 response
No