**Unofficial Comment Form**

Project 2014-01 Standards Applicability for Dispersed Generation Resources

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=dfddab5e74c649cf8c84d7920297e661) to submit comments on the posted documents. The electronic comment form must be completed by **January 20, 2015.**

If you have questions please contact [Katherine Street](mailto:katherine.street@nerc.net) (by email) or by telephone at 404-446-9702.

All documents for this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Standards-Applicability-for-Dispersed-Generation-Resources.aspx).

## Background Information

This posting solicits informal comments on the Project 2014-01 Standards Applicability for Dispersed Generation Resources (DGR) standards drafting team (SDT) revised draft White Paper, which provides background and technical rationale for proposed revisions to the applicability of several Reliability Standards. The revised draft White Paper is the second version following the first version posted on April 17, 2014. This version of the White Paper is intended to support the DGR SDT’s recommendations on the high-priority DGR standards. The DGR SDT intends to post a third and final version of the White Paper at the conclusion of this project.

As explained in the White Paper, the goal of the DGR SDT is to ensure that Generator Owners (GOs) and Generator Operators (GOPs) of dispersed power producing resources are appropriately assigned responsibility for requirements that impact the reliability of the Bulk Power System (BPS), as the characteristics of operating dispersed power producing resources can be unique. In light of the revised BES definition approved by the Federal Energy Regulatory Authority (FERC) in 2014, the intent of this effort is generally to maintain the status quo for applicability of the standards as they have been applied over time with respect to dispersed power producing resources, where the status quo does not create a reliability gap, and to ensure continent-wide consistency in the application of Reliability Standards to dispersed power producing resources.

The DGR SDT performed a review of all standards that apply to GOs and GOPs (listed in Appendix A, as posted) and determined how each standard requirement should be appropriately applied to dispersed power producing resources, which are categorized as follows:

* The existing standard language is appropriate when applied to dispersed power producing resources and does not need to be addressed;
* The existing standard language is appropriate when applied to dispersed power producing resources but additional guidance is needed to clarify either how to implement the requirements for dispersed generating resources or how to demonstrate compliance for such resources; and
* The existing standard language needs to be modified in order to account for the unique characteristics of dispersed power producing resources. This could be accomplished through the Applicability Section of the standard in most cases; or, if required, through changes to the individual requirements. However, please note that any recommended changes to requirements are limited to changes in the applicability of the subject requirement and will not include technical changes to any requirement.

Other standards (listed in posted Appendix B) have been revised or require further review by the SDT to determine the necessity and the type of clarification or guidance to the applicability for dispersed power producing resources.

This posting includes three documents:

* Revised draft White Paper;
* Appendix A – List of all standards reviewed by the DGR SDT; and
* Appendix B – List of standards recommended as requiring further consideration for dispersed power producing resources.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. Do you agree with the accuracy of the technical content of the posted version of the White Paper? If not, please explain and offer alternative language.

Yes

No

Comments:

1. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?

Yes

No

Comments: