

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Generator Relay Loadability and)	Docket Nos.	RM13-19-000
Revised Transmission Relay Loadability)		RM14-3-000
Reliability Standards)		

**COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

On March 20, 2014, the Federal Energy Regulatory Commission (“FERC” or the “Commission”) issued a Notice of Proposed Rulemaking (“NOPR”)¹ proposing to approve proposed Reliability Standards PRC-025-1² (Generator Relay Loadability) and PRC-023-3³ (Transmission Relay Loadability) submitted by the North American Electric Reliability Corporation (“NERC”). NERC supports the Commission’s proposal to approve the proposed Reliability Standards as filed. NERC agrees with the Commission that the proposed Reliability Standards will serve to enhance reliability by imposing mandatory requirements governing generator relay loadability, thereby reducing the likelihood of premature or unnecessary tripping of generators during system disturbances. NERC looks forward to the Commission’s final rule on these proposed Reliability Standards and respectfully requests that the Commission maintain its proposal to approve the proposed PRC-025-1 and PRC-023-3 Reliability Standards.

¹ *Generator Relay Loadability and Revised Transmission Relay Loadability Reliability Standards*, 146 FERC ¶ 61,189 (2014) (“NOPR”).

² NERC Sept. 30, 2013 *Petition for Approval of PRC-025-1*, Docket No. RM13-19-000. The purpose of proposed Reliability Standard PRC-025-1 is to set load-responsive protective relays associated with generation Facilities at a level to prevent unnecessary tripping of generators during a system disturbance for conditions that do not pose a risk of damage to the associated equipment.

³ NERC Dec. 17, 2013 *Supplemental Information to Petition for Approval of PRC-025-1*, Docket No. RM14-3-000. The purpose of proposed Reliability Standard PRC-023-3 is to ensure protective relay settings: do not limit transmission loadability; do not interfere with a system operators’ ability to take remedial action to protect system reliability; and are set to reliably detect all fault conditions and protect the electrical network from these faults.

Notices and communications with respect to this filing may be addressed to:⁴

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April 21, 2014

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⁴ Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of 18 C.F.R. § 385.203(b) (2014) to permit the inclusion of more than two people on the service list.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in the proceeding. Dated at Washington, D.C. this 21st day of April, 2014.

/s/ William H. Edwards
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