

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

**Disturbance Monitoring and Reporting)
Requirements Reliability Standard)**

Docket No. RM15-4-000

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

On April 16, 2015, the Federal Energy Regulatory Commission (“FERC” or the “Commission”) issued a Notice of Proposed Rulemaking (“NOPR”) proposing to approve Reliability Standard PRC-002-2 (Disturbance Monitoring and Reporting Requirements) submitted by the North American Electric Reliability Corporation (“NERC”).¹ NERC supports the Commission’s proposal to approve the proposed Reliability Standard as filed.

NERC agrees with the Commission that proposed Reliability Standard PRC-002-2 will enhance reliability by imposing mandatory requirements concerning the monitoring and reporting of disturbances and providing greater continent-wide consistency regarding collection methods for data used in the analysis of disturbances on the Bulk-Power System. Additionally, as the Commission noted, proposed Reliability Standard PRC-002-2 enhances reliability by consistently requiring covered entities to collect time-synchronized information and to report disturbances on the Bulk-Power System.

NERC looks forward to the Commission’s final rule in this proceeding and respectfully requests that the Commission maintain its proposal to approve proposed Reliability Standard PRC-002-2 as filed.

¹ *Disturbance Monitoring and Reporting Requirements Reliability Standard*, 151 FERC ¶ 61,042 (2015).

Respectfully submitted,

/s/ Shamai Elstein

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Date: June 22, 2014

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 this proceeding. Dated at Washington, D.C. this 22nd day of June, 2015.

/s/ Shamai Elstein

Shamai Elstein
*Counsel for the North American Electric
Reliability Corporation*