

October 23, 2015

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: Clarifying Supplemental Information Updating Implementation Plan
Docket Nos. RD15-5-000, RD15-5-001, and RD15-6-000**

Dear Secretary Bose:

On July 7, 2015, in accordance with the Federal Energy Regulatory Commission (“Commission”) order on May 13, 2015 (“May 13th Order”),¹ NERC 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*).²

As noted in NERC’s initial Petition for approval of Reliability Standard PRC-004-5 “Proposed Reliability Standard PRC-004-5 is intended to replace prior versions of PRC-004.”³ Similarly, PRC-004-4, which becomes effective on July 1, 2016 is intended to supersede and retire any prior version of the standard. NERC respectfully requests to supplement its pending Petition for Reliability Standard PRC-004-5 with the replacement Implementation Plan attached as Exhibit A to expressly clarify out of an abundance of caution that the Implementation Plan applies to Reliability Standard PRC-004-5(i) (reflecting the VRF revisions) and that upon effectiveness of Reliability Standard PRC-004-5(i), all prior versions of Reliability Standard PRC-004 will be retired. Similarly, for the avoidance of confusion, NERC seeks to supplement its errata pending in Docket No. RD15-6-000 to provide an updated Implementation Plan on Reliability Standard PRC-004-4.⁴ NERC requests that the Commission accept the Implementation Plans as just, reasonable, not unduly discriminatory or preferential, and in the public interest.

¹ See *N. Am. Elec. Reliability Corp.*, 151 FERC ¶ 61,129, at PP 2 and 20 (2015) (“May 13th Order”). See also, *N. Am. Elec. Reliability Corp.*, 151 FERC ¶ 61,186, at n. 4 (2015).

² *Revisions of the North American Electric Reliability Corporation to the Violation Risk Factors for Reliability Standards PRC-004-3, PRC-004-4 and PRC-004-5*, Docket Nos. RD15-5-001, et. al (filed Jul. 7, 2015).

³ *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards PRC-004-5 and PRC-010-2*, Docket No. RD15-5-000 (filed June 8, 2015) (“Petition”).

⁴ *Errata to Petitions of the North American Electric Reliability Corporation for Approval of Reliability Standards BAL-003-1, COM-001-2 VAR-001-4 and Implementation Plan for Reliability Standard PRC-004-4*, Docket No. RD15-6-000 (filed Aug. 25, 2015).

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service lists compiled by the Secretary in Docket Nos. RD15-5-000, RD15-5-001, and RD15-6-000.

Dated at Washington, D.C. this 23rd day of October, 2015.

/s/ Candice Castaneda

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Exhibit A

PRC-004-4(i) Reliability Standard

Clean and Redline Implementation Plan

Implementation Plan

Dispersed Generation Resources

PRC-004-4(i)

Standards Involved

Approval:

- PRC-004-4(i) – Protection System Misoperation Identification and Correction

Retirement:

- PRC-004-3 – Protection System Misoperation Identification and Correction
- PRC-004-2.1(i)a - Protection System Misoperation Identification and Correction

Prerequisite Approvals:

- PRC-004-3 – Protection System Misoperation Identification and Correction¹

Background

In light of the adoption of a revised Bulk Electric System definition by the NERC Board of Trustees, changes to the applicability sections of certain Reliability Standards, including PRC-004, are necessary to align with the implementation of the revised Bulk Electric System definition. The Standard Drafting Team (SDT) for Project 2014-01 – Standards Applicability for Dispersed Power Producing Resources has modified the applicability section or requirements of certain standards applicable to Generator Owners and Generator Operators to recognize the unique technical and reliability aspects of dispersed generation in order to ensure the applicability of the standards is consistent with the reliable operation of the Bulk Power System.

General Considerations

PRC-004-4 was proposed for approval to align the applicability section of PRC-004-3 with the revised definition of the Bulk Electric System. The intent of the SDT was to allow for flexibility of the PRC-004 applicability section regardless of the version that is currently in effect when an applicable governmental authority acts on the PRC-004-3 filing. PRC-004-2.1a was in effect as PRC-004-3 (developed in Project 2010-05.1) was pending regulatory approval. It was contemplated that depending on the timing of approvals for various versions of PRC-004, that PRC-004-2.1a might still be in effect at the time the revised definition of Bulk Electric System becomes effective for all entities. If this occurs, PRC-004-2.1(i)a will go into effect and PRC-004-4(i) shall go into effect after the technical revisions

¹ PRC-004-3 was adopted by the NERC Board of Trustees on August 18, 2014.

developed in Project 2010-05.1 are approved by applicable regulators, or as otherwise provided for in jurisdictions that do not require regulatory approvals.

Effective Date

PRC-004-4(i) shall become effective on the later of the effective date of PRC-004-3, or the date that PRC-004-4 is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective either on the first day of the first calendar quarter after the date PRC-004-4 is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction, or 12 months following the effective date of PRC-004-3, whichever is later.

Retirement of Existing Standards:

The existing standard, PRC-004-3 and PRC-004-2.1(i)a, shall be retired at midnight of the day immediately prior to the Effective Date of PRC-004-4.

For clarity, note that this Implementation Plan intends that upon effectiveness of the Reliability Standard PRC-004-4(i) all prior versions of Reliability Standard PRC-004 will be retired.

Applicability:

This standard applies to the following functional entities:

- Transmission Owner
- Generator Owner
- Distribution Provider

Implementation Plan

Dispersed Generation Resources

PRC-004-4(i)

Standards Involved

Approval:

- PRC-004-4(i) – Protection System Misoperation Identification and Correction

Retirement:

- PRC-004-3 – Protection System Misoperation Identification and Correction
- PRC-004-2.1(i)a - Protection System Misoperation Identification and Correction

Prerequisite Approvals:

- PRC-004-3 – Protection System Misoperation Identification and Correction¹

Background

In light of the adoption of a revised Bulk Electric System definition by the NERC Board of Trustees, changes to the applicability sections of certain Reliability Standards, including PRC-004, are necessary to align with the implementation of the revised Bulk Electric System definition. The Standard Drafting Team (SDT) for Project 2014-01 – Standards Applicability for Dispersed Power Producing Resources has modified the applicability section or requirements of certain standards applicable to Generator Owners and Generator Operators to recognize the unique technical and reliability aspects of dispersed generation in order to ensure the applicability of the standards is consistent with the reliable operation of the Bulk Power System.

General Considerations

PRC-004-4 ~~is was~~ proposed for approval to align the applicability section of PRC-004-3 with the revised definition of the Bulk Electric System. The intent of the SDT was to allow for flexibility of the PRC-004 applicability section regardless of the version that is currently in effect when an applicable governmental authority acts on the PRC-004-3 filing. ~~Currently,~~ PRC-004-2.1a ~~is was~~ in effect as PRC-004-3 (developed in Project 2010-05.1) ~~is was~~ pending regulatory approval. ~~It was contemplated that~~ ~~De~~ depending on the timing of approvals for various versions of PRC-004, ~~that~~ PRC-004-2.1a ~~may might~~ still be in effect at the time the revised definition of Bulk Electric System becomes effective for all entities. If this occurs, PRC-004-2.1(i)a will go into effect and PRC-004-4(i) shall go into effect after the

¹ PRC-004-3 was adopted by the NERC Board of Trustees on August 18, 2014.

technical revisions developed in Project 2010-05.1 are approved by applicable regulators, or as otherwise provided for in jurisdictions that do not require regulatory approvals.

Effective Date

PRC-004-4(i) shall become effective on the later of the effective date of PRC-004-3, or the date that PRC-004-4 is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective either on the first day of the first calendar quarter after the date ~~the standard PRC-004-4~~ is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction, or 12 months following the effective date of PRC-004-3, whichever is later.

Retirement of Existing Standards:

The existing standard, PRC-004-3 and PRC-004-2.1(i)a, shall be retired at midnight of the day immediately prior to the Effective Date of PRC-004-4.

For clarity, note that this Implementation Plan intends that upon effectiveness of the Reliability Standard PRC-004-4(i) all prior versions of Reliability Standard PRC-004 will be retired.

Applicability:

This standard applies to the following functional entities:

- Transmission Owner
- Generator Owner
- Distribution Provider

PRC-004-5(i) Reliability Standard

Clean and Redline Implementation Plan

Implementation Plan

PRC-004-5(i) – Protection System Misoperation Identification and Correction Project 2008-02.2 – Phase 2 UVLS: Misoperations

Requested Approvals

- PRC-004-5(i) – Protection System Misoperation Identification and Correction

Requested Retirements

- PRC-004-4 – Protection System Misoperation Identification and Correction¹

Prerequisite Approvals

- PRC-010-2 – Undervoltage Load Shedding

General Considerations

The implementation period is intended to align with the Effective Date of PRC-010-1 or occurring soon thereafter in order to incorporate certain aspects of PRC-022-1 – Under-Voltage Load Shedding Program Performance into PRC-004-5. The standard PRC-022-1 was retired by PRC-010-1. The Implementation Plan for PRC-010-1² allows twelve (12) calendar months after applicable approvals. Version two of PRC-010 is including undervoltage load shedding (UVLS) that is included in a UVLS Program.

Applicable Entities

- Transmission Owner
- Generator Owner
- Distribution Provider

¹ For clarity, note that this Implementation Plan intends that upon effectiveness of the Reliability Standard PRC-004-5(i) all prior versions of Reliability Standard PRC-004 will be retired..

² Refer to Project 2008-02.2 on the NERC website. (http://www.nerc.com/pa/Stand/Pages/Project-2008-02_2-Phase-2-Undervoltage-Load-Shedding-UVLS-Misoperations.aspx)

Effective Dates

PRC-004-5(i) shall become effective on the later of the first day following the Effective Date of PRC-010-1 or the first day of the first calendar quarter after the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the first day following the Effective Date of PRC-010-1 or the first day of the first calendar quarter after the date PRC-004-5 is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

Implementation Plan

PRC-004-5(i) – Protection System Misoperation Identification and Correction Project 2008-02.2 – Phase 2 UVLS: Misoperations

Requested Approvals

- PRC-004-5(i) – Protection System Misoperation Identification and Correction

Requested Retirements

- PRC-004-4 – Protection System Misoperation Identification and Correction¹

Prerequisite Approvals

- PRC-010-2 – Undervoltage Load Shedding

General Considerations

The implementation period is intended to align with the Effective Date of PRC-010-1 or occurring soon thereafter in order to incorporate certain aspects of PRC-022-1 – Under-Voltage Load Shedding Program Performance into PRC-004-5. The standard PRC-022-1 was retired by PRC-010-1. The Implementation Plan for PRC-010-1² allows twelve (12) calendar months after applicable approvals. Version two of PRC-010 is including undervoltage load shedding (UVLS) that is included in a UVLS Program.

Applicable Entities

- Transmission Owner
- Generator Owner
- Distribution Provider

¹ For clarity, note that this Implementation Plan intends that upon effectiveness of the Reliability Standard PRC-004-5(i) all prior versions of Reliability Standard PRC-004 will be retired. PRC-004-4 was adopted by the NERC Board of Trustees on November 13, 2014. PRC-004-4 is pending adoption or approval by applicable governmental authorities. PRC-004-5 will retire PRC-004-4 if PRC-004-4 is not adopted or approved by an applicable governmental authority.

² Refer to Project 2008-02.2 on the NERC website. (http://www.nerc.com/pa/Stand/Pages/Project-2008-02_2-Phase-2-Undervoltage-Load-Shedding-UVLS-Misoperations.aspx)

Effective Dates

PRC-004-5(i) shall become effective on the later of the first day following the Effective Date of PRC-010-1 or the first day of the first calendar quarter after the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the first day following the Effective Date of PRC-010-1 or the first day of the first calendar quarter after the date ~~PRC-004-5~~ the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.