

**Comment Form — 3<sup>rd</sup> Draft of Relay Loadability Standard PRC-023-1**

Please use this form to submit comments on the draft PRC-023-1 standard. Comments must be submitted by April 17, 2007. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "Relay Loadability" in the subject line. If you have questions please contact Harry Tom at [harry.tom@nerc.net](mailto:harry.tom@nerc.net) or by telephone at 609-452-8060.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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Group Comments (Complete this page if comments are from a group.)

**Group Name:** Midwest Reliability Organization  
**Lead Contact:** Joe Knight  
**Contact Organization:** MRO for Group (Great River Energy for Lead)  
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Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Terry Bilke	MISO	MRO	10
Al Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Mike Brytowski, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## **Background**

Following the last comment period, based on stakeholder comments and a review of the latest version of the Functional Model, the drafting team revised Requirement 3 to read as follows:

- The Planning Coordinator shall determine which of the facilities (transmission lines operated at 100 kV to 200 kV and transformers with low voltage terminals connected at 100 kV to 200 kV) in its Planning Coordinator Area are critical to the reliability of the Bulk Electric System to identify the facilities from 100 kV to 200 kV that must meet Requirement 1. [Violation Risk Factor: Medium] [Time Horizon: Long Term Planning]

This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

**The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments: In the SDT's Consideration of Comments from Draft 2, they indicated that the standard has already undergone extensive field testing in conjunction with NERC Recommendation 8a and the Beyond Zone 3 activities. What the SDT was not clear on was, if these activities were conducted with the RC as the responsible entity or the PC. If these activities have not been conducted with the PC as the responsible entity, the MRO recommends that additional field testing is needed. If however the PC was the responsible entity, the MRO does not believe any additional field testing is needed.

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments: The MRO does not believe that this standard in its current form is ready for ballot. The MRO believes that this standard is still too prescriptive and that there is a forced assumption of risk. The amount of risk that a company is willing to assume is a business decision that can only be determined from an in depth risk analysis.

The MRO is interested to know if Facilities, as defined in this standard, that are determined by the PC to be critical to the reliability of the BES in its area are the same as Critical Facilities referenced in other Standards and, are these Critical Facilities covered under the heading of Critical Assets as defined in the NERC Glossary? Additionally, is the RC to maintain a separate list of Critical Facilities for each Standard or is there a master list of Critical Facilities that the RC is to maintain so as to avoid conflict? The MRO recommends that there be a consistent methodology throughout the standards as to what constitutes a Critical Facility. The MRO further recommends that Critical Facility be added to the list of defined terms in the Glossary.

The VSLs do not appear to follow a smooth progression on the violation curve. For example; an Applicable Entity can violate between 1 and 13 of the subrequirements for

Requirement 1 and only be in a Moderate level violation. It would appear more appropriate if there was a cut off that would constitute a High Level violation, such as violating 75% or more of the subrequirements. The same reasoning can be applied to the VSLs for the PC. The PC can go from being compliant if it gets the list of the Critical Facilities to the Applicable Entities on or before to the due date, to having a Moderate level violation for being only one day late. The MRO recommends that the VSLs for the PC with respect to Critical Facility list submission to the Applicable Entities be separated such that if the PC is between 1 and 6 days late it be given a Lower level violation and once the PC is more than 7 days late it be given a Moderate level violation.