

CAN Comment Form

Compliance Application Notice – 0026

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

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Entity Represented: MRO NSRF ~~consisting of~~ represented by: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region: MRO

Primary Interest Groups

Are you suggesting a change to the groups mentioned? **No**

If yes, explain what change and why:

Issue

Are you suggesting a change to the issue statement of the CAN? **Yes**

If yes, explain what change and why: **The NSRF suggests the Issue Statement to end after “protective relays.” The language of the Requirement does not speak about ownership of protective relays or protective relays on an adjacent system. The Issue Statement goes beyond the scope of the Requirement.**

Background

Are you suggesting a change to the background statement of the CAN? **Yes / No**

If yes, explain what change and why: **This CAN does not have a Background Statement**

Compliance Application

Are you suggesting a change to the compliance application section of the CAN? **Yes**

If yes, explain what change and why: The Compliance Application Statement instructs CEAs to verify the applicable Registered Entities have provided to their operating personnel the characteristics, including the purpose and limitations, etc. The phrase “purpose and limitations” is not to be found in this Requirement. TOP-006 Requirement 3 speaks about “appropriate technical information” only. “Appropriate technical information” is not the same as “purpose and limitations.” The “purpose and limitations” phrase is taken directly from PRC-001, Requirement 1, where the TOP, BA, and GOP shall be familiar with the “purpose and limitations” of Protection system schemes applied in its area. On face value, this inconsistency appears to have some measure of double jeopardy involved, with the CAN speaking about PRC-001 Requirement 1 while the scope of the CAN has been identified as “protective relays” under TOP—006 Requirement 3.

NSRF believes this Requirement only obligates the Registered Entities to make “appropriate technical information,” as defined by the Entity, available to their operating personnel. Furthermore, the NSRF strongly believes this item goes beyond the scope of the Requirement and cannot be supported by any other NERC Standard.

The NSRF strongly suggests that Item 2 be removed from the Compliance Application Section and this application should be limited to the Registered Entity’s Functional area only. The sentence should read: **CEAs are to verify that each RC, TOP, and BA has provided appropriate technical information concerning protective relays to their operating personnel.** The Issue Statement and Compliance Application Statement would then be consistent with the Requirement.

In section 278 of FERC Order 693, FERC was explicit on this, stating, “(w)e do not require that they (Registered Entities) exceed the Reliability Standards.” FERC is focused on what is required under the Reliability Standards.

NSRF suggests that Item 2 be moved to a Best Practices document or White Paper that could encompass the PRC-001 R1 and TOP-006 R3 information for 1) appropriate technical information, and 2) the purpose and limitations of protective relays.

Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **Yes**

If yes, explain what change and why: It is disingenuous to have the Effective Period of this Compliance Application Notice with a start date that is before the date it is posted on the NERC website. Is the purpose of this CAN to create a “compliance trap” for the Registered Entities?

Evidence of Compliance

Are you suggesting a change to the evidence of compliance mentioned in the CAN? **Yes**

If yes, explain what change and why: **For the reasons given above, the NSRF requests item b to be removed from this CAN.**