NPCC Members of the NERC Registered Ballot Body,

The Regional Standards Committee (RSC) has reviewed the subject standard currently posted for an initial ballot through 8 pm June 9th, 2014. The RSC members who have responded thus far have indicated that they are not in support of recommending approval of the standard. The main issues precluding RSC support are as follows (comments were submitted to NERC and will be posted on the NPCC website):

- The NERC System Protection and Control Subcommittee concluded in a report that a NERC Reliability Standard to address relay performance during stable swings is not needed, and could result in unintended adverse impacts to Bulk-Power System reliability.
- R2 requires GOs and TOs to evaluate disturbance records “since January 1, 2003,” a time that will precede the effective date of this standard and disturbance records may not be available this far back in time.
- R3 is creating confusion amongst the NPCC members that are P&C SMEs. More work to provide clarity is required in that requirement in order for them to be able to support this.

NPCC as the regional entity will be voting negative and the RSC and its members will be providing supportive comments for this initial ballot.

If you have any questions please contact me.

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