NPCC Members and Entities of the NERC Registered Ballot Body,

The NPCC Regional Standards Committee (RSC) have reviewed the subject standard currently posted for an initial ballot and a non-binding poll of the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) through 8pm September 7, 2017. During the course of implementing the previous version of the standard, PRC-025-1 Generator Relay Loadability, it became evident that there were four specific issues that needed to be corrected in the standard:

- Prevent instances of non-compliance for conditions where the Generator Owner may be prevented from achieving the margin specified by the standard for dispersed generation resources (DGR).
- Prevent a lowering of reliability and potential non-compliance where the Generator Owner might apply a non-standard relay element application and undermine the goal of the standard.
- Prevent a lowering of reliability where the Generator Owner might only apply part of the Table 1 application(s) thereby misapplying the loadability margins to relays for the stated application(s).
- Prevent a lowering of dependability of protective relays directional toward the transmission system at generating facilities that are remote to the transmission network.

The RSC members have not indicated any intent to cast a negative voting position. NPCC as the Regional Entity believes the issues above were corrected in this version of the standard and will be casting an AFFIRMATIVE vote to support the standard and a POSITIVE vote for the non-binding poll.

Please contact me with any questions.

Thanks,
Guy V. Zito
Assistant Vice President-Standards
Northeast Power Coordinating Council, Inc.
1040 Avenue of the Americas, 10th Floor
New York, NY 10018
212-840-1070
212-302-2782 fax