

**From:** [Guy V. Zito](#)  
**To:** [rsballot](#)  
**Cc:** [rscmembers](#)  
**Subject:** NERC Initial Ballot - Project 2018-04 Modifications to PRC-024-2 "Generator Voltage and Frequency Protection"  
**Date:** Wednesday, May 29, 2019 6:55:31 AM  
**Importance:** High

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NPCC Members and Entities of the NERC Registered Ballot Body,

A 10-day initial ballot for the standard and a non-binding polls of the associated Violation Risk Factors and Violation Severity Levels is currently underway and will end at 8pm on May 31, 2019.

Proposed revisions to the standard were developed as a result of the analyses of the Blue Cut Fire and Canyon 2 Fire disturbances in southern California along and in consideration of PRC-024-2 Gaps Whitepaper. The IRPTF identified potential modifications to PRC-024-2 to ensure that inverter-based generator owners, operators, developers, and equipment manufacturers understand the intent of the standard in order for their plants to respond to grid disturbances in a manner that contributes to the reliable operation of the BPS.

The Regional Standards Committee (RSC) has reviewed the proposed standard and has not reached a consensus ballot position. The issues precluding support by some of the RSC members are as follows:

- Transmission Owners should not be added to the applicability of the standard simply because the Transmission Owner may own an element that is being tripped by the Generator Owner's protection.
- "Protection" should be clearly defined. More information is needed regarding what is and isn't included in the scope of "protection."
- More clarity should be added that auxiliary equipment is excluded from Applicability.
- The Standard Drafting team should clarify which Transformer a GO should consider when they have multiple Step Up or Collector transformers on line (multiple stages of step up to reach Interconnecting voltage)
- The Facilities section should be consolidated. There are currently redundancies in section 4.2.1. and also issues currently covered by the NERC BES Definition.

The current draft of the standard is not under any specific FERC Directives or filing deadlines.

Furthermore NPCC recognizes that there are important reliability related matters that need to be addressed with the revision of this standard, such as addressing the "momentary cessation" issue and differentiating "may trip" zones from "must trip" as well as the potential for inverters to support reliability if optimally deployed. **NPCC as the Regional Entity will cast an Abstention vote for this draft, submit comments and allow the NERC drafting team time to address RSC concerns in the next draft.**

Thanks,

Guy V. Zito  
RSC Chair

NPCC Asst. Vice President Standards