Unofficial Comment Form
Project 2017-07 Standards Alignment with Registration

Do not use this form for submitting comments. Use the electronic form to submit comments on the revised Standards Authorization Request for Project 2017-07 Standards Alignment with Registration. The electronic form must be submitted by 8 p.m. Eastern, Friday, March 2, 2018.

Additional information is available on the project page. If you have questions, contact Standards Developer, Laura Anderson (via email), or at 404-446-9671.

Background Information
On March 19, 2015, the Federal Energy Regulatory Commission (FERC) approved the North American Electric Reliability Corporation (NERC) Risk-Based Registration (RBR) Initiative in Docket No. RR15-4-000. FERC approved the removal of two functional categories, Purchasing-Selling Entity (PSE) and Interchange Authority (IA), from the NERC Compliance Registry due to the commercial nature of these categories posing little or no risk to the reliability of the bulk power system.

FERC also approved the creation of a new registration category, Underfrequency Load Shedding (UFLS)-only Distribution Provider (DP), for PRC-005 and its progeny standards. FERC subsequently approved on compliance filing the removal of Load-Serving Entities (LSEs) from the NERC registry criteria. Several projects have addressed standards impacted by the RBR initiative since FERC approval; however, there remain some Reliability Standards that require minor revisions so that they align with the post-RBR registration impacts.

Project 2017-07 Standards Alignment with Registration is focused on making the tailored Reliability Standards updates necessary to reflect the retirement of PSEs, IAs, and LSEs (as well as all of their applicable references). This alignment includes three categories:

1. Modifications to existing standards where the removal of the retired function may need replacement by another function. Specifically, Reliability Standard MOD-032-1 specifies certain data from LSEs that may need to be provided by other functional entities going forward.

2. Modifications where the applicable entity and references may be removed. These updates may be able to follow a similar process to the Paragraph 81 initiatives where standards are redlined and posted for industry comment and ballot. A majority of the edits would simply remove deregistered functional entities and their applicable requirements/references. Additionally, PRC-005 and PRC-006 will be updated to add UFLS-only DP to the Applicability sections.

3. Initiatives that can address RBR updates through the periodic review process. The 2017-07 Standards Authorization Request (SAR) drafting team should consider whether it or the periodic review teams currently reviewing those standards should make the necessary revisions.

Additionally, the project will consider whether to include a definition for UFLS into the NERC Glossary of Terms, as well as reviewing the standards to ensure consistent use of the term Planning Coordinator.
Questions

1. The SAR drafting team added “Additionally, the project will consider whether to include a definition for UFLS into the NERC Glossary of Terms, as well as review the standards to ensure consistent use of the term Planning Coordinator.” Do you agree the project should consider including a definition for UFLS into the NERC Glossary of Terms and reviewing the standards to ensure consistent use of the term Planning Coordinator? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

☐ Yes
☐ No

Comments:

2. Project 2017-07 is a review and alignment effort resulting from the RBR Initiative project and would modify Reliability Standards to be consistent with the FERC-approved changes; as such, the SAR drafting team has removed references to PRC-004 and PRC-008 as being out of scope for this project. Do you agree that references to PRC-004 and PRC-008 should be removed from the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

☐ Yes
☐ No

Comments:

3. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

Comments: