Unofficial Comment Form
Project 2014-01 Standards Applicability for Dispersed Generation Resources

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the posted documents. The electronic comment form must be completed by January 20, 2015.

If you have questions please contact Katherine Street (by email) or by telephone at 404-446-9702.

All documents for this project are available on the project page.

Background Information
This posting solicits informal comments on the Project 2014-01 Standards Applicability for Dispersed Generation Resources (DGR) standards drafting team (SDT) revised draft White Paper, which provides background and technical rationale for proposed revisions to the applicability of several Reliability Standards. The revised draft White Paper is the second version following the first version posted on April 17, 2014. This version of the White Paper is intended to support the DGR SDT’s recommendations on the high-priority DGR standards. The DGR SDT intends to post a third and final version of the White Paper at the conclusion of this project.

As explained in the White Paper, the goal of the DGR SDT is to ensure that Generator Owners (GOs) and Generator Operators (GOPs) of dispersed power producing resources are appropriately assigned responsibility for requirements that impact the reliability of the Bulk Power System (BPS), as the characteristics of operating dispersed power producing resources can be unique. In light of the revised BES definition approved by the Federal Energy Regulatory Authority (FERC) in 2014, the intent of this effort is generally to maintain the status quo for applicability of the standards as they have been applied over time with respect to dispersed power producing resources, where the status quo does not create a reliability gap, and to ensure continent-wide consistency in the application of Reliability Standards to dispersed power producing resources.

The DGR SDT performed a review of all standards that apply to GOs and GOPs (listed in Appendix A, as posted) and determined how each standard requirement should be appropriately applied to dispersed power producing resources, which are categorized as follows:

- The existing standard language is appropriate when applied to dispersed power producing resources and does not need to be addressed;
The existing standard language is appropriate when applied to dispersed power producing resources but additional guidance is needed to clarify either how to implement the requirements for dispersed generating resources or how to demonstrate compliance for such resources; and

The existing standard language needs to be modified in order to account for the unique characteristics of dispersed power producing resources. This could be accomplished through the Applicability Section of the standard in most cases; or, if required, through changes to the individual requirements. However, please note that any recommended changes to requirements are limited to changes in the applicability of the subject requirement and will not include technical changes to any requirement.

Other standards (listed in posted Appendix B) have been revised or require further review by the SDT to determine the necessity and the type of clarification or guidance to the applicability for dispersed power producing resources.

This posting includes three documents:

- Revised draft White Paper;
- Appendix A – List of all standards reviewed by the DGR SDT; and
- Appendix B – List of standards recommended as requiring further consideration for dispersed power producing resources.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.
Questions

1. Do you agree with the accuracy of the technical content of the posted version of the White Paper? If not, please explain and offer alternative language.

☐ Yes  
☐ No

Comments:

2. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?

☐ Yes  
☐ No

Comments: Page numbers in the following comments refer to the clean version of the document.

On the cover page the title should be revised to read Proposed Revisions to the Applicability of NERC Reliability Standards to Dispersed Generation Resources.

In the second paragraph on page 5, it states “...This document provides justification of, and proposes revisions to, the applicability of the Reliability Standards and requirements, both existing and in development, and should be considered guidance for future standard development efforts...” This could result in considerable time savings and effort in the development of standards. Is there a mechanism in place for ensuring this is done?

On page 9 above the table it is mentioned that “...In cases where a change is recommended to a regional standard, the SDT will notify the affected region.” Is it appropriate for the SDT to make this notification, and when will the notification be made?

Bulk Power System is used extensively on page 10, and not capitalized. If it is intended for its definition to be consistent with that listed in the NERC Glossary, it should be capitalized. Also, from the NERC Glossary, it should be Bulk-Power System.

In Section 3.3.3 Prioritization Methodology, for high priority could exceptions be issued for entities to avoid the pitfalls of rushing changes to standards? Exceptions should be considered for medium and low priorities as well. In the medium priority bullet “appreciable reliability benefit” is used. What is considered an “appreciable reliability benefit”? There are operating conditions where the loss of
5MW can put the Bulk-Power System in an Emergency condition.

On page 22 of 33 in Section 4.10.12 PRC-024—Generator Frequency and Voltage Protective Relay Settings, the second sentence should be reworded to read to be consistent with the language in the Rationale for Footnotes 4 and 6 in PRC-024-2:

The SDT has determined it is appropriate to require that Protection System settings applied on both the individual generating units and aggregating equipment (including any Protection Systems applied on non-BES portions of the aggregating equipment), are set respecting the “no-trip zone” referenced in the requirements to maintain reliability of the BES.

The Appendix A Source incorrectly lists PRC-002-1 as Pending Regulatory Approval. PRC-002-1 was remanded by FERC, and PRC-002-2 has been submitted to FERC and is Pending Regulatory Approval. This might appear elsewhere in the Appendices, and needs to be reviewed. PRC-002-1 dealt with installation requirements; PRC-002-2 deals with the capturing of data.