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 Standards. The electronic comment form must be completed by **January 22, 2015**.

If you have questions, please contact Laura Anderson or by telephone at 404-446-9671.

All documents for this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Standards-Applicability-for-Dispersed-Generation-Resources.aspx).

**Background Information**
This posting solicits formal comments on PRC-005, a Project 2014-01 Standards Applicability for Dispersed Generation Resources (DGR) high-priority Reliability Standard, as identified in the draft White Paper prepared by the Project 2014-01 (Project) standards drafting team (DGR SDT).

The goal of the Project is to ensure that Generator Owners (GOs) and Generator Operators (GOPs) of dispersed power producing resources\(^1\) are appropriately assigned responsibility for requirements that impact the reliability of the Bulk Power System, as the characteristics of operating dispersed power producing resources can be unique. In light of the revised Bulk Electric System (BES) definition approved by the Federal Energy Regulatory Commission in 2014, the intent of this Project 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.

The DGR SDT reviewed all standards that apply to GOs and GOPs and categorized how each standard should be applied to dispersed power producing resources to accomplish the reliability purpose of the standard. The DGR SDT developed the White Paper to explain its approach, which was posted on April 17, 2014 for an informal comment period.\(^2\) Industry feedback on the White Paper allowed the DGR SDT to refine its approach and finalize recommended revisions to the standards. As part of this review, the DGR SDT identified three high-priority standards which required immediate attention:

- PRC-004;
- PRC-005; and
- VAR-002.

Because each of the high-priority standards were revised in other concurrent projects focusing on substantive revisions to the standard requirements, the DGR SDT developed revisions to allow for

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\(^1\) The terms dispersed generation resources and dispersed power producing resources are used interchangeably.

different possibilities in the timing of regulatory approvals. Now that the substantive revisions to the high-priority standards are complete, and in light of the recent NERC Board of Trustees approval of all high-priority DGR standards to date, the DGR SDT proposes these final changes to PRC-005. The intent of balloting the recommended applicability revisions separately from the technical changes made in other projects is to provide flexibility to allow approved applicability revisions to move forward on an expedited timeline as needed to support implementation of the revised definition of the BES.

Summary of Proposed Changes
The DGR SDT’s recommended changes are limited to revising the applicability of the relevant version of PRC-005 to appropriately account for certain dispersed power producing resources.

The DGR SDT has posted the following standard, along with its corresponding Implementation Plan:

- PRC-005-5
- SAR

Please note that the DGR SDT has not revised the Violation Risk Factors (VRFs) or Violation Severity Levels (VSLs) associated with the high-priority standards because the proposed revisions do not change the reliability intent or impact any of the requirements. If the applicability recommendations are approved by industry as proposed, the DGR SDT would not seek to change the VRFs and VSLs.

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 revisions proposed in PRC-005-5 to clarify applicability of PRC-005-4 to dispersed power producing resources included in the BES through Inclusion I4 of the BES definition? If not, please provide technical rationale for your disagreement, along with suggested language changes.

   Yes:

   No: X

   Comments: Sub-Parts 4.2.6 and 4.2.6.1 can be combined into one sub-Part 4.2.6 to read:

   4.2.6 Protection Systems and Sudden Pressure Relaying for BES dispersed power producing Facilities identified through Inclusion I4 of the BES definition.

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

   Yes:
No: X

Comments: