Unofficial Comment Form
Standard Authorization Request - Application of Certain GO/GOP Reliability Standards and Requirements to Dispersed Generation

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the definition. The electronic comment form must be completed by **December 19, 2013**.

All documents and information about this project are available on the [project page](#). If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

**Background Information**

The Standards Authorization Request (SAR) asks that the applicability section of certain Reliability Standards that apply to a Generator Owner (GO)/Generator Operator (GOP) or the requirements of certain GO/GOP Reliability Standards be reviewed, and where appropriate revised to recognize the unique technical and reliability aspects of dispersed generation in order to ensure the applicability of the standards is consistent with the reliable operation of the Bulk Electric System (BES). Dispersed generation resources are those resources that are small-scale power generation technologies using a system designed primarily for aggregating capacity providing an alternative to, or an enhancement of, the traditional electric power system. Examples could include but are not limited to solar, geothermal, energy storage, flywheels, wind, micro-turbines, and fuel cells.

This request is related to the revised definition of the Bulk Electric System (BES) from Project 2010-17, and it is desirable to complete any revisions determined to be necessary so that revisions are approved by the Board of Trustees and applicable regulatory agencies prior to the effective date for newly identified elements under the revised BES definition. This effective date is expected to be July 1 2016, although it is possible that regulatory action could change the date.

The scope of the SAR involves review of and possible revisions to the applicability section of the following Reliability Standard applicability sections and/or Reliability Standard requirements applicable to GOs/GOPs: (a) PRC-005-2 (-3); (b) FAC-008-3; (c) PRC-023-3/PRC-025-1; (d) PRC-004-2a (-3) ; and (e) VAR-002-2 so it is clear what, if any, requirements should apply to dispersed generation. Also, any IRO, MOD, PRC, or TOP standards that require outage and protection and control coordination, planning, next day study or real time data, or reporting of changes in real and reactive capability should be examined and revised, as needed, to ensure it is clear that these activities and reporting are conducted at the point of aggregation to 75 MVA, and not at an individual turbine, inverter, or unit level for dispersed generation.

The scope of work would also include development of a technical guidance paper for Standard Drafting Teams developing new or revised standards, so that they do not incorrectly apply requirements to dispersed generation unless such an application is technically sound and promotes the reliable operation of the BES.
To the extent there are existing Standard Drafting Teams that have the expertise and can make the requested changes prior to the compliance date of newly identified assets under the BES definition (i.e., June 2016), those projects may be assigned the required changes as opposed to creating new projects.

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 scope and objectives of this 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: X
   No: 
   Comments:

2. Do you agree that the scope of the SAR should be limited to considering revisions necessary to address the unique technical and reliability aspects of dispersed generation resources, or should the scope encompass consideration of changes to standards applicability for all small generation regardless of type? Please provide a technical rationale for your response.
   Yes: 
   No: 
   Comments:

3. Do you agree with the list of standards to be reviewed? If you do not agree, please note specific standards you think should be added to or removed from the list.
   Yes: X
   No: 
   Comments:

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this SAR should it move forward? If yes, please identify the business practice.
   Yes: 
   No: X
   Comments:

5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.
   Yes: X
   No: 

Comments: It must be considered that the operating system in Quebec follows chapter R-6.01 An Act Respecting the Regie de L’Energie, which details:
(1) an owner or operator of a facility with a capacity of 44 kV or more connected to an electric power transmission system;
(2) an owner or operator of an electric power transmission system;
(3) an owner or operator of a production facility with a capacity of 50 megavolt amperes (MVA) or more connected to an electric power transmission system;
(4) a distributor with a peak capacity of over 25 megawatts (MW), whose facilities are connected to an electric
6. Are there any other concerns with this SAR that haven’t been covered in previous questions?

Yes: 
No: X

Comments: