Unofficial Comment Form

“Pilot” of the NERC CEAP regarding Project 2010-13.2
Phase 2 of Relay Loadability: Generation

Please **DO NOT** use this form to submit comments. Please use the electronic form to submit comments for this posting of the “pilot” of Phase Two of the Cost Effective Analysis Process (CEAP) for Project 2010-13.2 – Phase 2 of Relay Loadability: Generation. Project 2010-13.2 has already been deemed to be required to meet an adequate level of reliability, therefore Phase One (a cost impact assessment) of the CEAP is unnecessary. The electronic comment form must be completed by 8 p.m. ET **Monday, March 11, 2013.**

If you have any questions, please contact Scott Barfield-McGinnis at Scott.Barfield@nerc.net or by telephone at (404) 446-9689.

**Background Information on CEAP**

In response to concerns expressed by stakeholders and regulators in both the US and Canada, NERC has developed a CEAP. The NERC CEAP concept of cost consideration and effectiveness is being piloted in the development of new and revised standards to afford the industry with opportunities to offer alternative methods to achieve the reliability objective of draft standards which may result in less implementation costs and resource expenditures. The NERC CEAP was developed from the Northeast Power Coordinating Council (NPCC) regional CEAP. NPCC developed the first regional CEAP in response to concerns raised by its regional Board of Directors regarding the need for standards development to consider potential cost impacts and effectiveness of draft standards in meeting their reliability objectives.

The NERC CEAP introduces cost consideration to the standards development process in two phases. These two phases will be performed during the comment periods and both involve posing some additional voluntary questions to industry. The first phase of the CEAP will be implemented during the SAR stage to determine cost impact and identify “order of magnitude” or potentially egregious costs, to determine if a proposed standard will meet or exceed an adequate level of reliability, and what potential risks are being mitigated. This information will be used to help determine if a project should move forward to the standard development and drafting stage or be remanded back to the requestor. The second phase will be done later in the standard development process and afford the industry the opportunity to offer more cost efficient solutions that may be equally effective to achieving the reliability intent of the draft standard. Upon completion of both phases of the CEAP a report will be developed.
This report will be posted at the time the standard is balloted. The report will present the data collected in a manner which will provide the industry with representative cost implementation and effectiveness information to allow a more informed choice during balloting. Some entities are unsure of implementation costs currently and this effort will result in an opportunity to sharing information and promote consensus and alleviate concerns over cost and effectiveness. The published report will be an aggregate of the response received and contain no Critical Energy Infrastructure Information (CEII) or market sensitive information and contain representative costs provided by the industry.

The application of both phases of the NERC CEAP will be to all new NERC standards and only the second, cost effectiveness phase, is envisioned to be applied to revised, urgent action or expedited standards. Existing standards being revised have already been deemed to be required to meet an adequate level of reliability, therefore a cost impact assessment Phase One of the CEAP, is unnecessary. The CEAP guideline may be found at:


**PRC-025-1 - Phase Two Cost Effective Analysis (CEA)**

As part of the pilot of the NERC CEAP, NERC is proposing to conduct a CEA to provide information about cost impacts (e.g., implementation, maintenance, and ongoing compliance resource requirements) of draft reliability standards and their relative effectiveness, which will allow the industry to evaluate and propose alternative approaches for achieving the reliability objectives of the standard. Phase Two will typically be conducted at the time of the first combined formal comment period and ballot. The CEA will involve two sets of survey questions which will be asked concurrently. The first set relates to technical feasibility and effectiveness of the proposed requirements as well as soliciting possible more cost effective alternatives to achieve the reliability objectives. The second set of questions will solicit cost impacts (e.g., implementation, maintenance, and ongoing compliance resource requirements) and any related implementation information. For this pilot of the CEAP, NERC will only be soliciting a subset of the total CEA questions envisioned.

**Reporting**

All information provided during the CIA and CEA phases of the CEAP will be consolidated and evaluated to produce a CEAP report. The CEAP report prepared by the Standards Committee Process Subcommittee Subgroup will be provided to the NERC Standards Committee (SC) and to the Standard Drafting Team (SDT) for informational purposes.

All available resources will be utilized effectively and efficiently to produce a CEAP report in a timely manner that does not create unnecessary delays to the standards development process. It must be emphasized that the purpose of the CEAP is not to provide impediments to the NERC standard development process, but rather to inform stakeholders and decision makers of proposed industry cost impact and provide an opportunity for suggestions of alternate methods to achieve equally effective
reliability goals and objectives that may result in less costly implementation. The final report is not intended to be analytical in nature but to promote better judgment and decision-making.

**Instructions:**
The Standards Committee Process Subcommittee Subgroup is providing this form for industry participants to offer their comments on the proposed PRC-025-1 – Generator Relay Loadability Reliability Standard.

For each question that you provide a comment, please provide specific suggestions that would eliminate or minimize any concerns you have with the item in question. A comment or response to every question is not required. Respondents should identify their responses they believe to be CEII, market sensitive, or otherwise confidential.

Please note that the official comment form does not retain formatting (even if it appears to transfer formatting when you copy from the unofficial Word version of the form into the official electronic comment form). If you enter extra carriage returns, bullets, automated numbering, symbols, bolding, italics, or any other formatting, that formatting will not be retained when you submit your comments. Therefore, if you would like to separate portions of your comment by idea, e.g., the drafting team requests that each distinct idea in the same comment block be prefaced with (1), (2), etc., instead of using formatting such as extra carriage returns, bullets, automated numbering, bolding, or italics.

**Cost and Implementation Questions**

CI-1. Describe the size of your organization in broad general terms, e.g. GO-Total installed MWs, TOs circuit miles by kV and total load served, etc.

Comments:

CI-2. Please answer the following regarding the estimated costs and benefits of each of the proposed requirements:

CI-2a. What are the initial one time, ongoing, implementation, and maintenance costs of complying with the requirements?

Comments:

CI-2b. What is the on-going long term cost impact (after implementation) of complying with the requirements in terms of equivalent full time employees (EFTE)?

Comments:
CI-2c. What are the resource benefits (labor, materials, administrative) of implementing these requirements?

Comments:

CI-2d. What are the reliability benefits of implementing these requirements?

Comments:

CI-3. Are there alternative method(s) or existing reliability standard requirement(s) not identified in the draft standard which may achieve the reliability objective of the standard that may result in less cost impact (implementation, maintenance, and ongoing compliance resource requirements)? If so what? Please provide as much additional supporting evidence as possible.

☐ Yes  ☐ No

Comments:

CI-4. How long would it take your organization to implement full compliance to the standard as written? What would affect the implementation (i.e. outage scheduling, availability of materials, human resources, etc.)?

Comments:

CI-5. Would a technical guideline or “best practices” whitepaper or a training program be effective in achieving a desired outcome to meet the reliability need, as opposed to a “continent-wide” standard or variance?

☐ Yes  ☐ No

Comments:

CI-6. Do you have any other comments? If so, please provide suggested changes and rationale.

Comments: It is premature to evaluate cost until clarity of intent is provided in PRC-023 and PRC-025.