Unofficial Comment Form

Project 2014-01 Standards Applicability for Dispersed Generation Resources White Paper

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the posted documents by 8 p.m. Eastern, Monday, July 13, 2015.

Documents and information about this project are available on the project page. If you have questions please contact Katherine Street (by email) or at (404) 446-9702.

Background Information

This posting solicits 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 and actual revisions to the applicability of several Reliability Standards. Specifically, the DGR SDT asks industry to comment on the accuracy of the technical content of the document. The revised draft White Paper is the third version posted for industry comment following the second version posted for industry comment on December 22, 2014.

The White Paper provides stakeholders with background and technical rationale for proposed revisions to the applicability of several Reliability Standards, and in some cases the standard requirements. The White Paper is intended to be helpful guidance for current stakeholders and future standards development activity that touches upon the subject standards.

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 the 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:

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1 See section 11 of the NERC Standard Processes Manual.
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.

Question

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: 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.

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.