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 **July 28, 2014.**

If you have questions please contact [Sean Cavote](mailto:Sean.Cavote@nerc.com) or by telephone at 404.446.9697.

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

**Background Information**
This posting solicits formal comments on two of three Project 2014-01 Dispersed Generation Resources (DGR) “high-priority” Reliability Standards as identified in the draft white paper (White Paper) prepared by the Project 2014-01 (Project) drafting team (DGR SDT).

The goal of the Project is to ensure that the 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, 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 performed a review of 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. The industry feedback received 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 determined that there are three high-priority standards in which immediate attention is required to provide direction to industry stakeholders as soon as feasible regarding how to appropriately direct compliance related preparations:

- PRC-004-2.1a;
- PRC-005; and
- VAR-002.

---

1 The current version of the White Paper can be downloaded on the Project web page at [http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Dispersed-Generation-Resources.aspx](http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Dispersed-Generation-Resources.aspx).

2 The DGR SDT has prepared applicability revisions for relevant versions of PRC-004 – the third high-priority standard – which will be posted for ballot and comment separately after the current comment period and ballot of that standard in Project 2010-05.1 ends.
Because each of the “high-priority” standards has recently been revised or is undergoing revision in another current project, the DGR SDT has developed revisions to multiple versions of each standard to allow for different possibilities in the timing of regulatory approvals. When the revisions are being applied to a version that is not the last approved version of the standard or to a version that is pending regulatory approval, the version is noted with “(X)” after it. For example, this posting includes PRC-005-2(X), which proposes applicability changes to PRC-005-2, as well as PRC-005-3(X), which proposes applicability changes to PRC-005-3. Please note that any versions of the standards posted under this project with an “X” suffix will have a version number applied at a later time in order to manage sequencing of version numbers. The intent of balloting the recommended applicability revisions separately from the technical changes that are ongoing 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 BES.

The DGR SDT responded to industry comments as contained in its Consideration of Comments, which is included with this posting, along with the DGR SDT’s response to comments on the original Standards Authorization Request (SAR) that defines the scope of this Project.

The DGR SDT continues to coordinate with other NERC Reliability Standards projects currently under development to ensure continuity and to develop a posting strategy that ensures all applicability changes approved by ballot are filed and implemented as quickly as possible without adversely impacting other projects. The DGR SDT Coordination Plan included with this posting details that coordination.

Summary of Proposed Changes

The DGR’s recommended changes are limited to revising the applicability of the relevant versions of PRC-005 and VAR-002 to appropriately exclude certain dispersed power producing resources from the standards. Although the redlined versions of the standards included with this posting contain changes that appear structurally different, the substance of the changes in each respective set of standards is the same.

The drafting team has posted the following standards, along with corresponding implementation plans:

- PRC-005-2(X) (clean and redlined against PRC-005-2)
- PRC-005-3(X) (clean and redlined against PRC-005-3, which is pending regulatory approval)
- PRC-005-X(X) (clean and redlined against the latest draft of PRC-005-X from Project 2007-17.1)
- VAR-002-2b(X) (clean and redlined against currently enforceable VAR-002-2b)
- VAR-002-4 (clean and redlined against VAR-002-3, which is pending regulatory approval)

In addition, the drafting team has posted the following supporting documents:
- SAR
Please note that the DGR SDT has not revised the Violation Risk Factors (VRFs) or Violation Severity Levels (VSLs) associated with the subject standards because the proposed revisions do not change the reliability intent or impact of any of the requirements. If the applicability recommendations are approved by industry, the DGR SDT’s intent is that the VRFs and VSLs for each requirement would be unchanged from those either previously approved (for currently enforceable versions of standards or those pending regulatory approval) or would be developed by the drafting team responsible for revising technical content (for those versions of standards currently in development in another standards project).

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 made in proposed PRC-005-2(X) to clarify applicability of PRC-005-2 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: X
   No:
   Comments:

2. Do you agree with the revisions made in proposed PRC-005-3(X) to clarify applicability of PRC-005-3 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: X
   No:
   Comments:

3. Do you agree with the revisions made in proposed PRC-005-X(X) to clarify applicability of PRC-005-X (the version of PRC-005 containing revisions to address Sudden Pressure relays, being developed in

---

3 Please note that the DGR SDT is currently revising the White Paper and will post the next version when it is finalized. However, the DGR SDT’s response to White Paper comments identifies areas of the White Paper the DGR SDT intends to clarify.
Project 2007-17.1) 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: X
No:
Comments:

4. Do you agree with the revisions made in proposed VAR-002-2b(X) to clarify applicability of VAR-002-2b 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: X
No:
Comments:

5. Do you agree with the revisions made in proposed VAR-002-4 to clarify applicability of VAR-002-3 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: X
No:
Comments:

6. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?
Yes: 
No: X
Comments: