Please **DO NOT** use this form for submitting comments. Please use the [electronic form](http://www.nerc.com/pa/Stand/Pages/Project-2010-13-2-Phase-2-Relay-Loadability-Generation.aspx) to submit comments on the Standard. The electronic comment form must be completed by **August 5, 2013**. If you have questions please contact Scott Barfield-McGinnis at Scott.Barfield@nerc.net or by telephone at (404) 446-9689.

**Summary of changes**

The generator relay loadability standard drafting team (“SDT”) has revised the proposed draft of PRC-023-3 – Transmission Relay Loadability based on stakeholder comments received during its first 30-day formal posting. The following narrative is a summary of the significant improvements made to the standard.

**PRC-023-3**

The SDT, based on industry stakeholder comments, made substantive changes to the PRC-023-3 standard. The chief change was removing the previously proposed Requirement R7 and R8 which applied to the generator interconnection Facility and generator step-up transformer applicable to the Distribution Provider and Transmission Owner. With this change the SDT added the Distribution Provider and Transmission Owner to the applicability of PRC-025-1 and removed the applicability of those lines and transformers that are used exclusively to export energy directly from a BES generating unit or generating plant to the network from PRC-023 to establish the bright line between standards according to stakeholder comments.

- **Applicability**
  - Removed references to Requirements R7 and R8
  - Added the exception to sections 4.2.1.1, 4.2.2.1, and 4.2.2.2 to exclude lines and transformers that are used exclusively to export energy directly from a BES generating unit or generating plant to the network
  - Removed the sections 4.2.3 and 4.2.4

- **Requirements**
  - Requirement R1, criterion 6 was removed to comport with the elimination of addressing load-responsive protective relays on lines and transformers that are used exclusively to export energy directly from a BES generating unit or generating plant to the network
• Measures
  o Removed the proposed Requirement R7
  o Removed the proposed Requirement R8
• Compliance
  o Removed R7 and R8 references
• Violation Severity Levels
  o Removed R7 and R8
• Attachment A
  o Revised criterion 2.4 as “Note Used” since it is no longer needed
• Attachment C
  o Removed due to Requirements R7 and R8 being eliminated

Implementation Plan
• Updated to reflect the transition of PRC-023-3 Requirement R1, Criterion 6 to the proposed PRC-025-1 criterion

VRF/ VSL Justifications
• No change, not being provided for comment because the SDT is making substantive changes. Only references to Requirement R1, criterion 6 were removed
*Please use the electronic comment form to submit your final comments to NERC.*

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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.

- Separate discrete comments by idea, e.g., preface with (1), (2), etc.
- Use brackets [] to call attention to suggested inserted or deleted text.
- Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.
- Do not use formatting such as extra carriage returns, bullets, automated numbering, bolding, or italics.
- Please do not repeat other entity’s comments. Select the appropriate item to support another entity’s comments. An opportunity to enter additional or exception comments will be available.

1. The drafting team has modified the Applicability in PRC-023-3 to establish a bright line between PRC-023-3 and PRC-025-1 by excluding lines that are used exclusively to export energy directly from a BES generating unit or generating plant to the network and GSU and in doing so included the DP and TO in PRC-025-1. **Do you agree that this establishes a bright line for the owners of load-responsive protective relays applied these Facilities (i.e., except lines that are used exclusively to export energy directly from a BES generating unit or generating plant to the network and GSUs)?** If not, provide specific detail that would improve the PRC-023-3 Applicability clarity or any other comment.

- Yes
- No

Comments: Other comments:

Most, if not all of the lines being excluded from the Standard could still be utilized to provide station service supply to the generating plant. Are any lines used “exclusively “ to export energy from a BES GO? Would lines used to supply station service load at generating plants (for example during generator shutdown) still be excluded from PRC-023-3?

From the Applicability for R1 on page 3 of the Implementation Plan for PRC-023-3 should be revised from “Each Transmission Owner, Generator Owner and Distribution Provider with
transmission lines operating at...” to “Each Transmission Owner, Generator Owner and Distribution Provider with load-responsive protection systems on transmission lines operating at...” The transmission line owner and load-responsive relay owner could be represented by two or more different entities. The owner of the load-responsive protection system should be responsible for compliance as identified properly under Section 4, Applicability of PRC-023-3. The Implementation Plan should not contradict Applicability or the Requirements set forth in the Standard.