

Unofficial Comment Form

Generator Requirements at the Transmission Interface (Project 2010-07)

Please **DO NOT** use this form to submit comments. Please use the [electronic comment form](#) to submit comments on the first formal posting for Project 2010-07—Generator Requirements at the Transmission Interface. The electronic comment form must be completed by **April 16, 2012**.

[2010-07 Project Page](#)

If you have questions please contact Mallory Huggins at mallory.huggins@nerc.net or 202-383-2629.

Background

During the formal comment period that ended on November 18, 2011, the SDT asked the following question: “The SDT is attempting to modify a set of standards so that radial generator interconnection Facilities are appropriately accounted for in NERC’s Reliability Standards, both to close reliability gaps and to prevent the unnecessary registration of GOs and GOPs as TOs and TOPs. Does the set of standards currently posted achieve this goal?” In response, stakeholders suggested that the proposed revisions to PRC-004-2 should also be made to PRC-005. Accordingly, the SDT has revised PRC-005-1.1a, and is posting it for a formal 45-day comment period and initial ballot. The Standards Committee has authorized waiving the initial 30-day comment period because the changes to PRC-005-1.1a are minor.

The purpose of Project 2010-07 is to ensure that all generator-owned Facilities are appropriately covered under NERC’s Reliability Standards. While many Generator Owners and Generator Operators operate Elements and Facilities that are considered by some entities to be Transmission, these are most often radial Facilities that are not part of the integrated grid, and as such should not be subject to the same standards applicable to Transmission Owners and Transmission Operators who own and operate Transmission Elements and Facilities that are part of the integrated grid.

As part of the BES, generators affect the overall reliability of the BES. However, registering a Generator Owner or Generator Operator as a Transmission Owner or Transmission Operator, as has been the solution in some cases in the past, may decrease reliability by diverting the Generator Owner’s or Generator Operator’s resources from the operation of the equipment that actually produces electricity – the generation equipment itself.

The drafting team’s goal is to ensure that an adequate level of reliability is maintained in the BES by clearly describing which standards need to be applied to generator interconnection Facilities that are not already applicable to Generator Owners or Generator Operators. The SDT believes that properly applying PRC-005-1.1a to Generator Owners as proposed in the redline standard posted for comment supports this objective.

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

1. Based on stakeholder comment, the SDT inserted the phrase "or generator interconnection Facility" in Requirements R1 and R2 of PRC-005-1.1a. While there was no reliability gap in the previous version of the standard, if the Requirements were applied literally, there was the possibility for the misperception that the Generator Owner was only responsible for analyzing its generator Protection Systems, exclusive of its generator interconnection Facility Protection Systems. The clarifying changes to R1 and R2 make clear that generator interconnection Facilities are also part of Generator Owners' responsibility in the context of this standard. Do you support the addition of the phrase "or generator interconnection Facility" to accomplish this clarification?

Yes

No

Comments:

2. Do you have any other comments that you have not yet addressed? If yes, please explain.

Yes

No

Comments: