

Unofficial Comment Form

Project 2017-07 Standards Alignment with Registration

Do not use this form for submitting comments. Use the [electronic form](#) to submit comments on **Project 2017-07 Standards Alignment with Registration**. The electronic form must be submitted by **8 p.m. Eastern, Tuesday, January 9, 2018**.

Additional information is available on the [project page](#). If you have questions, contact Standards Developer, [Laura Anderson](#) (via email), or at 404-446-9671.

Background Information

On March 19, 2015, the Federal Energy Regulatory Commission (FERC) approved the North American Electric Reliability Corporation (NERC) Risk-Based Registration (RBR) Initiative in Docket No. RR15-4-000. FERC approved the removal of two functional categories, Purchasing-Selling Entity (PSE) and Interchange Authority (IA), from the NERC Compliance Registry due to the commercial nature of these categories posing little or no risk to the reliability of the bulk power system.

FERC also approved the creation of a new registration category, Underfrequency Load Shedding (UFLS)-only Distribution Provider (DP), for PRC-005 and its progeny standards. FERC subsequently approved on compliance filing the removal of Load-Serving Entities (LSEs) from the NERC registry criteria. Several projects have addressed standards impacted by the RBR initiative since FERC approval; however, there remain some Reliability Standards that require minor revisions so that they align with the post-RBR registration impacts.

Project 2017-07 Standards Alignment with Registration is focused on making the tailored Reliability Standards updates necessary to reflect the retirement of PSEs, IAs, and LSEs (as well as all of their applicable references). This alignment includes three categories:

1. Modifications to existing standards where the removal of the retired function may need replacement by another function. Specifically, Reliability Standard MOD-032-1 specifies certain data from LSEs that may need to be provided by other functional entities going forward.
2. Modifications where the applicable entity and references may be removed. These updates may be able to follow a similar process to the Paragraph 81 initiatives where standards are redlined and posted for industry comment and ballot. A majority of the edits would simply remove deregistered functional entities and their applicable requirements/references. Additionally PRC-005 will be updated to replace Distribution Providers (DP) with the more-limited UFLS-only DP to align with the post-RBR registration impacts.
3. Initiatives that can address RBR updates through the periodic review process. This would include the INT-004 and NUC-001 standards. In other words, rather than making the revisions immediately, this information would be provided to the periodic review teams currently reviewing

INT-004 and NUC-001 so that any changes resulting from those periodic reviews, if any, may be proposed at the same time after completion of each periodic review.

Questions

1. Do you agree with the proposed scope and objectives for Project 2017-07 described in the SAR? If not, please explain why you do not agree and, if possible, **provide specific language revisions that would make it acceptable to you.**

Yes
 No

Comments:

2. The SAR Drafting Team has merged the Project 2017-07 Standards Alignment with Registration SAR and the MOD-032-1 SAR into a single SAR for this project. Do you agree with the merging of the two SARs into a single SAR for Project 2017-07? If not, please explain why you do not agree and, if possible, **provide specific language revisions that would make it acceptable to you.**

Yes
 No

Comments:

3. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Comments:

[It would be helpful if the SAR contained the list of standards that are affected by the proposed changes.](#)