

Comment Form — 3rd Draft of Relay Loadability Standard PRC-023-1

Please use this form to submit comments on the draft PRC-023-1 standard. Comments must be submitted by April 17, 2007. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Relay Loadability" in the subject line. If you have questions please contact Harry Tom at harry.tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background

Following the last comment period, based on stakeholder comments and a review of the latest version of the Functional Model, the drafting team revised Requirement 3 to read as follows:

- The Planning Coordinator shall determine which of the facilities (transmission lines operated at 100 kV to 200 kV and transformers with low voltage terminals connected at 100 kV to 200 kV) in its Planning Coordinator Area are critical to the reliability of the Bulk Electric System to identify the facilities from 100 kV to 200 kV that must meet Requirement 1. [Violation Risk Factor: Medium] [Time Horizon: Long Term Planning]

This change re-assigns responsibility for making the determination of the facilities critical to the reliability of the BES from the Reliability Coordinator to the Planning Coordinator. Because this task is performed in the 'long-term planning' time frame, this task should be assigned to the Planning Coordinator.

Compliance personnel recommended that the above requirement be field tested to verify that the Planning Coordinator is able to identify the facilities from 100 kV to 200 kV that are 'critical to the reliability of the Bulk Electric System'.

The drafting team is seeking your input into these two changes. Please review the revised standard and answer the questions on the following page.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. The drafting team, in response to comments, has changed the responsible entity for R3 from Reliability Coordinator to Planning Coordinator. Do you agree with this change? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you feel that a field test is necessary to confirm that the Planning Coordinator (as detailed in the NERC Functional Model and approved by the Board of Trustees on February 13, 2007) is able to perform the responsibilities detailed in R3 and R4? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Other than the question posed in Questions 1 and 2, do you feel that this standard is ready to move forward to ballot? If not, please explain in the comment area.**

Yes

No

Comments:

The intent of R3 and its sub-requirements is to ensure that the Planning Coordinator determines the list of critical facilities in its area and to ensure facility owners are informed of which of their facilities are critical to the reliability of the electric system in order that they design/set their relays to meet R1. Communicating that list of critical facilities is, in our view, one of the most important aspects of these requirements.

If one accepts the above argument, the requirement to maintain the list seems secondary. Note that maintaining the list does not imply that the list has been communicated to the facility owners. However, having communicated the list to the owners while not maintaining the list would still meet the intent of this standard. We therefore propose that 3.4.2 "Does not maintain a current list of facilities critical to the reliability of the Bulk Electric System" be moved from "Severe" to the "High level".