

Comment Form for Fourth Posting of Set One of Phase III & IV Standards

Please use this form to submit comments on Set One of the Phase III & IV Drafting Team's fourth draft of the standards PRC-002 (Define Regional Disturbance Monitoring and Reporting Requirements) and PRC-018 (Disturbance Monitoring Equipment Installation and Data Reporting). Comments must be submitted by **May 3, 2006**. You must submit the completed form by e-mailing it to sarcomm@nerc.com with the words "Phase III & IV" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or 813-468-5998.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:**
- Do** enter text only, with no formatting or styles added.
 - Do** use punctuation and capitalization as needed (except quotations).
 - Do** use more than one form if responses do not fit in the spaces provided.
 - Do** submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not** insert tabs or paragraph returns in any data field.
 - Do not** use numbering or bullets in any data field.
 - Do not** use quotation marks in any data field.
 - Do not** submit a response in an unprotected copy of this form.

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, ISOs, Regional Reliability Councils
<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

Background Information

Please review the drafting team's consideration of the comments submitted with the third draft of these standards and then review the drafting team's conforming changes made to the standards. The 'red line' versions of PRC-002 and PRC-018 show the changes made to the third draft of these standards.

<http://www.nerc.com/~filez/standards/Phase-III-IV.html>

The drafting team believes that the most significant changes made to PRC-002 and PRC-018 are:

- PRC-002 was revised to more clearly focus on the 'functional' requirements and not on requirements of any specific piece of equipment. The intent is to have each region establish functional requirements and then allow facility owners to use any equipment or any combination of equipment to meet those requirements.
- The functional requirements common to all disturbance monitoring equipment (DME) that had been identified in PRC-002 were moved from PRC-002 to PRC-018. This modification will ensure that the DMEs installed in all regions meet a minimum set of criteria. The requirements that were moved address time synchronization and the ability to retrieve disturbance data. The time synchronization requirements were further refined as follows:
 - The time stamp cannot be greater than one millisecond from the time the condition reached the input device, measured with the local station's clock.
 - Each local clock shall be synchronized to within one millisecond of Coordinated Universal Time (UTC).
- The levels of non-compliance in PRC-018 were modified to address all requirements.

Most other changes made to the standards were made to improve consistency in format.

The drafting team asks you to consider your acceptance of these changes in answering the following questions.

Please read the background information and review the revised standards before responding to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

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

1. Do you agree with the drafting team's modification that moved the 'functional' requirements that should be common across all regions from PRC-002 into PRC-018?

Yes

No

(i) Moving the DME's time synchronization requirements to PRC-018-1 is not necessary. In fact, this move has resulted in convoluting the latter standard – both in requirements and in measures and compliance. Synchronizing requirements are part and partial of the technical requirements that apply to the recording devices, which should remain in PRC-002-1. The SDT's rationale that the move would ensure consistency across all regions does not appear to be well-founded. Keeping them in PRC-002-1 can also achieve this objective since NERC standards are applied industry-wide. Regional specific requirements, in this context, would be restricted to the location and other specific monitoring and recording requirements detailed in R1 to R3 of PRC-002-1.

(ii) Moving the concerned requirement out of PRC-002-1 does not necessarily make this standard more clear cut or standalone. In fact, since the RROs are responsible for meeting the requirements stipulated in this standard, it makes more sense to also stipulate in this standard that the Regions include the specified time synchronization requirements in their regional requirements. Comments:

2. Do you agree with the revised time synchronization requirements in PRC-018?

Yes

No

The first sentence in R1.1 is sufficient to provide the needed requirement. All DMEs must be synchronized to a universal time standard. The second sentence and its reference to "a station clock" is confusing, and the 1 millisecond is so stringent that some DMEs may not be able to meet. We suggest this sentence be removed. Comments:

3. Do you agree with the drafting team's modifications to the levels of non-compliance in PRC-018?

Yes

No

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(i). Measure M1: With R1 added (from PRC-002-1), M1 is now very convoluted. This should not be case if R1 stays in PRC-002-1 and is stipulated as “shall be included in regional requirements”.

(ii). Measure M4: M4, as written, is a requirement repeating R6. It should be reworded in the context of, for example, “shall have evidence or documentation to demonstrate R6 is met”.

(iii). Compliance Level 2.4.4: the sentence “Documentation of the DME maintenance and testing program, or its implementation, was not provided” needs clarification. Suggest to reword it to read something similar to 2.2.5, for example: “Documentation of the DME maintenance and testing program was not provided, or no evidence that the testing program did occur within the identified intervals”.
Comments:

4. Please identify anything you feel needs to be modified before these standards are implemented.

Yes

No

(i) PRC-002 and PRC-018 should be restructured to meet their respective purposes, i.e. that PRC-002 is intended to stipulate the requirements to ensure that Regional Reliability Organizations establish technical, data and location requirements for installation of Disturbance Monitoring Equipment (DME), whereas PRC-018 is intended to stipulate the requirements for ensuring that DMEs are installed and that disturbance data is reported in accordance with regional requirements to facilitate analyses of events; for example R1.1 of PRC-018 is better suited in PRC-002

(ii) R1, R2 and R3 of PRC-002 as written could result in the RRO stipulating the locations for installing DMEs. Responsible entities within the region may have their own specific needs to install DMEs at other locations. Moreover, preferred locations to install DMEs to meet regional needs would normally be coordinated with the responsible entities. We suggest the leading sentences of R1, R2 and R3 be reworded to include only the monitoring and recording requirements, and add a sentence at the end of each of these three requirements to require that the RRO shall coordinate with responsible entities within the region to identify the location for SMD installation.

(iii) For each of R1, R2 and R3 in PRC-002, there needs to be a requirement on the minimum availability of the DMEs. One of the findings of the 2003 blackout investigation was that some DMEs were found not operational. We believe this is an important requirement to ensure that installed DMEs are operational when called upon (i.e. when unavailability is otherwise not detected during routine maintenance and testing.)

Comments: