

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

)	
Protection System Maintenance)	Docket Nos. RM14-8-000
Reliability Standard)	
)	RD15-3-000
North American Electric Reliability)	
Corporation)	
)	RM15-9-000
Protection System, Automatic Reclosing,)	
and Sudden Pressure Relaying)	
Maintenance Reliability Standard)	

**COMMENTS OF THE EDISON ELECTRIC INSTITUTE, THE AMERICAN PUBLIC
POWER ASSOCIATION, NATIONAL RURAL ELECTRIC COOPERATIVE
ASSOCIATION, ELECTRIC POWER SUPPLY ASSOCIATION, ELECTRICITY
CONSUMERS RESOURCE COUNCIL, AND TRANSMISSION ACCESS POLICY
STUDY GROUP**

The American Public Power Association (“APPA”), the Edison Electric Institute (“EEI”), Electric Power Supply Association (“EPSA”), National Rural Electric Cooperative Association (“NRECA”), Electricity Consumers Resource Council (“ELCON”), and Transmission Access Policy Study Group (“TAPS”) (collectively, the “The Trade Associations”) respectfully submit these comments in support of the Motion to Defer Implement and Request for Shortened Response Period and Expedited Action (“Motion”) filed by the North American Electric Reliability Corporation (“NERC”) before the Federal Energy Regulatory Commission (“Commission” or “FERC”) on November 13, 2015, in the above-referenced dockets.¹ The

¹ *Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance Reliability Standard*, Final Rule, 152 FERC ¶ 61,199 (2015).

Trade Associations urge the Commission to grant NERC's Motion for the Commission to defer the implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 from January 1, 2016,² until after the Commission issues a final order on proposed Reliability Standard PRC-005-6, which NERC filed concurrently with its Motion.³

INTEREST OF THE TRADE ASSOCIATIONS

APPA is the national service organization representing the interests of not-for-profit, publicly owned electric utilities throughout the United States. More than 2,000 public power systems provide over 14% of all kilowatt-hour sales to ultimate customers and serve over 48 million people, doing business in every state except Hawaii. Public power systems own approximately 10.3% of the total installed generating capacity in the United States.

Approximately 281 APPA members are subject to compliance with NERC standards applicable to users, owners and operators of the Bulk-Power System ("BPS").

EEI is trade association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia, and directly employ more than 500,000 workers. With more than \$85 billion in annual capital expenditures, the electric industry is responsible for millions of jobs related to the delivery of power, including the construction of modified or new infrastructure. Reliable, affordable, and sustainable electricity powers the economy and enhances the lives of all Americans. EEI has 70 international electric companies as Affiliate Members, and 250 industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides

² NERC states in its Motion that under the approved PRC-005-4 implementation plan, PRC-005-4 will become effective on January 1, 2016, thereby retiring PRC-005-3 and PRC-005-3(i) before they ever become effective.

³ NERC state that in the alternative, as explained in that Petition, it proposes approval of PRC-005-5, which reflects only those revisions necessary to ensure that the PRC-005 standard is applied consistently to dispersed generation resources in accordance with prior Commission-approved revisions to the PRC-005 standard.

public policy leadership, strategic business intelligence, and essential conferences and forums. In addition, its members include Generator Owners and Operators, Transmission Owners and Operators, Load-Serving Entities, and other entities that are subject to mandatory Reliability Standards developed and enforced by NERC.

ELCON is the national association representing large industrial consumers of electricity. ELCON member companies produce a wide range of products from virtually every segment of the manufacturing community. ELCON members operate hundreds of major facilities and are consumers of electricity in the footprints of all organized markets and other regions throughout the United States. Reliable electricity supply is essential to our members' operations.

EPSA is the national trade association representing competitive power suppliers, including generators and marketers. These suppliers account for 40 percent of the installed capacity in the United States.

NRECA is the national service organization dedicated to representing the national interests of cooperative electric utilities and the consumers they serve. NRECA is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to over 42 million people in 47 states or 12 percent of electric customers. Kilowatt-hour sales by rural electric cooperatives account for approximately 11 percent of all electric energy sold in the United States. NRECA members generate approximately 50 percent of the electric energy they sell and purchase the remaining 50 percent from non-NRECA members. The vast majority of NRECA members are not-for profit, consumer-owned cooperatives. NRECA's members also include 65 generation and transmission ("G&T") cooperatives, which generate and transmit power to 668 of the 838 distribution cooperatives. The G&Ts are owned by the

distribution cooperatives they serve. Remaining distribution cooperatives receive power directly from other generation sources within the electric utility sector. Both distribution and G&T cooperatives were formed to provide reliable electric service to their owner-members at the lowest reasonable cost. NRECA members are directly affected by the proposed Reliability Standard developed and enforced by NERC.

TAPS is an association of transmission-dependent utilities (“TDUs”) in more than 35 states, promoting open and non-discriminatory transmission access. TAPS members have long recognized the importance of grid reliability. As TDUs, TAPS members are users of the BPS, highly reliant on the reliability of facilities owned and operated by others for the transmission service required to meet TAPS members’ loads. In addition, many TAPS members participate in the development of and are subject to compliance with NERC Reliability Standards.

COMMENTS

I. FERC should grant the Motion to avoid uncertainty and the patchwork implementation of requirements while considering PRC-005-5 and the proposed comprehensive implementation plan.

The Commission should grant NERC’s request that the Commission defer implementation of approved Reliability Standard PRC-005-3, PRC-005-3(i), and PRC-005-4 and the corresponding revised definitions of “Protection System Maintenance Program.” See Motion at 4. NERC is correct that the current situation where multiple versions of the PRC-005 standard are currently pending enforcement creates an inappropriate patchwork approach to implementation. It is unreasonably burdensome to require entities to perform multiple successive revisions to their System Protection Maintenance Plan to address new in-scope systems introduced in each PRC-005 version. NERC is correct that updating these programs is time consuming, and EEI shares concerns about requiring entities to maintain and audit multiple

program versions and compliance schedules. Id.

The Trade Associations support NERC's proposal to address these concerns by simplifying and streamlining the implementation of PRC-005 requirements for all newly-applicable systems in the proposed PRC-005-6 implementation plan. The Trade Associations agree that the proposed PRC-005-6 implementation plan allows entities a reasonable period of time to develop comprehensive Protection System Maintenance Programs to address newly-applicable systems introduced in PRC-005-2(ii), PRC-005-3, PRC-005-3(i), PRC-005-3(ii), PRC005-4, PRC-005-5, and PRC-005-6.⁴

The Trade Associations agree that this approach better promotes reliability by allowing for a comprehensive consideration of all new devices subject to PRC-005, and will result in fewer misidentified or missed devices. The Trade Associations also appreciate that this approach promotes the efficient use of ERO Enterprise and entity resources by eliminating the need to develop and audit multiple revisions to Protection System Maintenance Programs.

Finally, NERC is correct that the proposed PRC-005-6 implementation plan avoids the significant uncertainty regarding the applicability of the PRC-005 standard to individual dispersed generation resources excluded under currently-effective PRC-005-2(i) and the proposed successor versions of the PRC-005 standard. Thus, the Commission should defer implementation of the approved but not yet effective PRC-005 standard versions consistent with NERC's Motion. Should the Commission ultimately approve proposed PRC-005-6, The Trade Associations support NERC's request the Commission continue to defer implementation until

⁴ NERC states that the proposed PRC-005-6 implementation plan incorporates by reference the existing implementation schedule for Protection System Components made applicable by PRC-005-2 and PRC-005-2(i). See Motion at P.4.

the effective date of PRC-005-6 to allow the PRC-005-6 implementation plan to operate as intended, but if the Commission does not approve PRC-005-6, then the Commission should defer implementation of PRC-005-3, PRC-005-3(i), and PRC-005-4 an additional six months from the effective date of the Commission's order remanding the proposed standard to allow the entities a reasonable amount of time to come into compliance.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Trade Associations request that the Commission NERC's Motion to defer the implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 from January 1, 2016 until after the Commission issues a final order regarding proposed Reliability Standard PRC-005-6, shorten the period for responding to NERC's Motion to seven days, and consider NERC's Motion on an expedited timeframe so that it may issue an order before December 14, 2015.

Respectfully submitted,

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