

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ELECTRIC RELIABILITY

North American Electric Reliability Corporation
Docket No. RD16-2-000

December 18, 2015

North American Electric Reliability Corporation
1325 G Street N.W., Suite 600
Washington, D.C. 20005

Attention: Lauren A. Perotti
Counsel for North American Electric Reliability Corporation

Reference: Petition of the North American Electric Reliability Corporation for
Approval of Proposed Reliability Standard PRC-005-6

Dear Ms. Perotti:

On November 13, 2015, the North American Electric Reliability Corporation (NERC) filed a petition for Commission approval, pursuant to section 215(d)(1) of the Federal Power Act (FPA)¹ and Section 39.5 of the Commission's regulations,² of proposed Reliability Standard PRC-005-6 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance). NERC also requests approval of the proposed implementation plan for PRC-005-6, including the retirement of previous versions of Reliability Standard PRC-005.

NERC explains in its petition that Reliability Standard PRC-005-6 represents an improvement upon the most recently-approved version of the standard, PRC-005-4,³ in two respects. First, PRC-005-6 would revise the standard to include the supervisory

¹ 16 U.S.C. § 824o (2006).

² 18 C.F.R. § 39.5 (2015).

³ Reliability Standard PRC-005-4, which added testing and maintenance requirements for certain sudden pressure relays to the standard, was approved by the Commission in September 2015. *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance Reliability Standard*, 152 FERC ¶ 61,199 (2015).

devices associated with certain automatic reclosing relays, as directed by the Commission in Order No. 803.⁴ Second, proposed Reliability Standard PRC-005-6 would incorporate, as previously approved in other versions of PRC-005, language to address the standard's applicability to owners of dispersed generation resources.⁵ Specifically, PRC-005-6 would include testing and maintenance requirements for equipment used to aggregate individual dispersed generating units (e.g. wind or solar units) to a common point of interconnection with the Bulk-Power System.

Additionally, NERC states that the proposed implementation plan for PRC-005-6 represents an improvement over the status quo, as it facilitates an orderly and efficient transition from currently-effective PRC-005-2(i) to PRC-005-6. As NERC explains, multiple versions of the PRC-005 Reliability Standard have recently been approved and are pending enforcement. Under the separate, staggered implementation plans associated with each version of the standard, applicable entities would be required to perform three consecutive updates to their protection system maintenance programs. Under the proposed PRC-005-6 implementation plan, NERC seeks to instead align the compliance dates for all versions of PRC-005 pending enforcement (*i.e.*, PRC-005-2(ii), PRC-005-3(i) and (ii)) with the compliance dates for PRC-005-6.

NERC maintains that this approach will simplify and streamline the implementation process, with only a slight delay in the compliance deadlines associated with the testing and maintenance requirements for newly-applicable systems. NERC further maintains that this comprehensive approach will result in fewer errors, omissions, and misidentified devices when setting up maintenance programs, will decrease the potential for confusions and missed device testing when implementing the maintenance programs, and will promote the efficient use of both registered entity and ERO Enterprise resources. Finally, NERC asserts that this approach will allow NERC additional time to conduct outreach and provide training on the revised protection system maintenance

⁴ See *Protection System Maintenance Reliability Standard*, Order No. 803, 150 FERC ¶ 61,039 at P 31 (2015) (approving PRC-005-3, which will require applicable entities to test and maintain certain autoreclosing relays as part of their protection system maintenance program, and directing NERC to develop a revised standard to incorporate supervisory devices associated with such autoreclosing relays into their maintenance programs).

⁵ See *North American Elec. Reliability Corp.*, 151 FERC ¶ 61,186 (2015) (approving Reliability Standards PRC-005-2(i), PRC-005-3(i), and certain other Reliability Standards containing revisions to address applicability to owners of dispersed generation resources). NERC notes that revisions to PRC-005-4 to address dispersed generation were approved by the NERC Board of Trustees as PRC-005-5. However, that standard was never filed with the Commission and the relevant revisions were instead incorporated into PRC-005-6.

standard.⁶

NERC's filing was noticed on November 23, 2015, with interventions, comments and protests due on or before December 8, 2015. No comments were received.

NERC's uncontested petition is hereby approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability under 18 C.F.R. § 375.303 (2015), effective as of the date of this order, including NERC's request for clarification that its data collection obligations as set out in Order No. 803 will begin one year following the effective date of PRC-005-6.⁷

This action shall not be construed as approving any other application, including proposed revisions of Electric Reliability Organization or Regional Entity rules or procedures pursuant to 18 C.F.R. § 375.303(a)(2)(i). Such action shall not be deemed as recognition of any claimed right or obligation associated therewith and such action is without prejudice to any findings or orders that have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the Electric Reliability Organization or any Regional Entity.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2015).

Sincerely,

Michael Bardee, Director
Office of Electric Reliability

⁶ As noted in NERC's petition, NERC filed a separate motion to delay implementation of the approved, but not yet effective, versions of the PRC-005 Reliability Standard in Docket Nos. RM14-8-000 (PRC-005-3), RD15-3-000 (PRC-005-3(i)), and RM15-9-000 (PRC-005-4) until after the Commission issues an order or rule regarding proposed PRC-005-6. NERC's motion was granted in a delegated letter order issued December 4, 2015. See *North American Elec. Reliability Corp.*, Docket Nos. RM14-8-000 *et al.* (Dec. 4, 2015) (delegated letter order).

⁷ See Order No. 803, 150 FERC ¶ 61,039 at P 25 (directing NERC to collect and make available to the Commission "data sufficient to analyze the effectiveness of PRC-005-3," including relevant information regarding events on the Bulk-Power System involving high speed autoreclosing relays).