

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

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| |) | |
| 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 |) | |

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

The American Public Power Association (“APPA”), the Edison Electric Institute (“EEI”), National Rural Electric Cooperative Association (“NRECA”), Electricity Consumers Resource Council (“ELCON”), Transmission Access Policy Study Group (“TAPS”), and Large Public Power Council (“LPPC”) (collectively, “Trade Associations”) respectfully submit this Request for Clarification in response to the December 4, 2015, letter order issued by the Federal Energy Regulatory Commission (“Commission” or “FERC”),¹ which approves the uncontested Motion to Defer Implementation and Request for Shortened Response Period and Expedited Action filed by the North American Electric Reliability Corporation (“NERC”) with the Commission on

¹ See *North American Electric Reliability Corporation*, Docket Nos. RM14-8-000, RD-15-3-000, RM15-9-000 (issued December 4, 2015) (“Letter Order”).

November 13, 2015, in the above-referenced dockets (“NERC Motion to Defer”).²

The Trade Associations appreciate the Commission’s timely issuance of the Letter Order approving NERC’s Motion to Defer implementation of Commission-Approved Reliability Standards PRC-005-3, PRC-005-(3)(i), and PRC-005-4 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance). By this action, the Commission provides subject entities with significant relief needed to assure efficient planning of the broad range of management tasks that need to be in place to implement these standards.

The Trade Associations request clarification that the Commission not only intended to approve NERC’s request to defer implementation of a number of the PRC-005 Reliability Standards until the Commission issues an order on PRC-005-6 (currently pending before the Commission in Docket No. RD16-2-000), but also intended to approve NERC’s request to further defer implementation of these standards until the effective date of PRC-005-6, should the Commission ultimately decide to approve that standard. Clarification would be consistent with NERC’s Motion to Defer and the supporting comments filed by the Trade Associations on November 20, 2015 in the above referenced dockets.³ Given that compliance personnel have raised questions and are seeking assurance that there is no compliance exposure between the date of a final order on PRC-005-6 and the effective date of that standard, as well as the various implementation timing issues raised, and the imminence of those issues, the Trade Associations believe expeditious clarification is needed.

² See NERC Motion to Defer Implementation and Request for Shortened Response Period and Expedited Action, at 6 (Nov. 13, 2015), eLibrary No. 20151113-5108.

³ See Comments of Edison Electric Institute, American Public Power Association, the Electric Power Supply Association, Electricity Consumers Resource Council, Large Public Power Council, and the National Rural Electric Cooperative Association, at 5-6 (Nov. 20, 2015), eLibrary No. 20151120-5302.

The Trade Associations also ask the Commission to clarify, again consistent with NERC's Motion to Defer and the Trade Association's supporting comments, that if the Commission does not approve PRC-005-6, it will 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. The Trade Associations believe this request is consistent with NERC's proposed implementation plan for PRC-005-6 in Docket No. RD16-2-000, which provides that the new standard will be "effective on the first day of the first calendar quarter after the date that the standard is approved" and NERC's request to "align the effective dates of all outstanding PRC-005 Versions, thus simplifying the implementation schedule for this Reliability Standard." NERC PRC-005-6 Petition, Exhibit B at 3, Exhibit B-1b at 1.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Trade Associations request that the Commission clarify that the Letter Order means that implementation of Commission-approved Reliability Standards PRC-005-3, PRC-005-3(i), and PRC-005-4 is deferred from January 1, 2016, until: the effective date of proposed Reliability Standard PRC-005-6, if the Commission approves that standard; or, if the Commission does not approve PRC-005-6, until six months after the final order remanding the proposed standard to NERC.

Respectfully submitted,

EDISON ELECTRIC INSTITUTE

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Dated: December 17, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 17th day of December, 2015.

Respectfully Submitted,

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Document Content(s)

EEI FERC RM14-8 15-3 and 15-9.PDF.....1-6