

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Coordination of Protection Systems for  
Performance During Faults and  
Specific Training for Personnel  
Reliability Standards

Docket No. RM16-22-000

**COMMENTS OF THE AMERICAN PUBLIC POWER  
ASSOCIATION AND TRANSMISSION ACCESS  
POLICY STUDY GROUP**

The American Public Power Association (“APPA”) and the Transmission Access Policy Study Group (“TAPS”) submit these comments on the Commission’s November 16, 2017 Notice of Proposed Rulemaking.<sup>1</sup> The Commission’s NOPR proposes to approve, with directives, Reliability Standards PRC-027-1 (Coordination of Protection Systems for Performance During Faults) and PRC-006-1 (Specific Training for Personnel) as proposed by North American Electric Reliability Corporation (“NERC”) on September 2, 2016.<sup>2</sup> APPA and TAPS support Commission approval of the standards as proposed by NERC, without directives.

**I. INTERESTS OF APPA AND TAPS**

APPA is the national service organization representing the interests of the nation’s 2,000 not-for-profit, community-owned electric utilities. Public power utilities account for 15% of all sales of electric energy (kilowatt-hours) to ultimate customers and

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<sup>1</sup> *Coordination of Protection Systems for Performance During Faults and Specific Training for Personnel Reliability Standards*, 82 Fed. Reg. 55,535 (proposed Nov. 22, 2017), 161 FERC ¶ 61,159 (proposed 2017) (“NOPR”).

<sup>2</sup> Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards PRC-027-1 and PER-006-1 and Retirement of PRC-001-1.1(ii) (Sept. 2, 2016), eLibrary No. 20160902-5226 (“NERC Petition”).

collectively serve over 49 million people in every state except Hawaii. Approximately 261 public power utilities are registered entities subject to compliance with NERC mandatory reliability standards.

TAPS is an association of transmission-dependent utilities (“TDUs”) in more than 35 states, promoting open and non-discriminatory transmission access.<sup>3</sup> TAPS members have long recognized the importance of grid reliability. As TDUs, TAPS members are users of the Bulk Power System and are 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.

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<sup>3</sup> David Geschwind, Southern Minnesota Municipal Power Agency, chairs the TAPS Board. Jane Cirrincione, Northern California Power Agency, is TAPS Vice Chair. John Twitty is TAPS Executive Director.

Communications regarding these proceedings should be directed to:

For APPA

John E. McCaffrey, Regulatory Counsel  
Jack Cashin, Director of Policy Analysis  
& Reliability Standards  
AMERICAN PUBLIC POWER ASSOCIATION  
2451 Crystal Drive, Suite 1000  
Arlington, VA 22202  
Tel.: (202) 467-2900  
Email : jmccaffrey@publicpower.org  
jcashin@publicpower.org

For TAPS

Cynthia S. Bogorad  
Latif M. Nurani  
SPIEGEL & MCDIARMID LLP  
1875 Eye Street, NW  
Suite 700  
Washington, DC 20006  
Tel.: (202) 879-4000  
Fax: (202) 393-2866  
E-mail: cynthia.bogorad@spiegelmc.com  
latif.nurani@spiegelmc.com

John Twitty  
Executive Director  
TRANSMISSION ACCESS POLICY STUDY  
GROUP  
PO Box 14364  
Springfield, MO 65814  
Tel.: (417) 838-8576  
E-mail: jtwitty@tapsgroup.org

## II. COMMENTS

APPA and TAPS ask the Commission to approve the standards as proposed by NERC without adding its proposed directive. The Commission's proposal to require NERC to modify PRC-027-1 to require an initial protection system coordination study as a baseline is not necessary, and would impose an undue burden without a proportional reliability benefit.<sup>4</sup>

In addition, APPA and TAPS support NERC's proposed 15% deviation threshold, which is reasonable.

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<sup>4</sup> APPA and TAPS generally support the explanation provided by NERC in comments being filed today.

Respectfully submitted,

John E. McCaffrey, Regulatory Counsel  
Jack Cashin, Director of Policy Analysis  
& Reliability Standards  
AMERICAN PUBLIC POWER ASSOCIATION  
2451 Crystal Drive, Suite 1000  
Arlington, VA 22202  
Tel.: (202) 467-2900

*American Public Power Association*

/s/ Cynthia S. Bogorad

Cynthia S. Bogorad  
Latif M. Nurani  
SPIEGEL & MCDIARMID LLP  
1875 Eye Street, NW, Suite 700  
Washington, DC 20006  
Tel.: (202) 879-4000

*Transmission Access Policy Study Group*

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