

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

**Mandatory Reliability Standards
for the Bulk-Power System**

)
)

Docket No. RM06-16-000

JOINT COMMENTS OF THE ISO/RTO COUNCIL

The ISO/RTO Council (“IRC”)¹ respectfully submits these joint comments on the Commission’s Notice of Proposed Rulemaking on *Mandatory Reliability Standards for the Bulk-Power System* (“NOPR”).² Each IRC member is an independent entity whose first and most important responsibility is to preserve the reliability of the transmission system that it operates as well as the bulk system as a whole. Because its members are directly responsible for the reliability of facilities serving much of the United States and Canada, the IRC naturally shares the Commission’s desire that strong, clear, technically sound, and enforceable Reliability Standards be in place across North America as quickly as possible. The IRC stands ready to help the Commission, its staff, and the North American Electric Reliability Corporation (“NERC”) as they work towards this goal.

¹ The IRC was formed by the nine functioning Independent System Operators (“ISOs”) and Regional Transmission Organizations (“RTOs”) in North America in April 2003. It includes The Independent System Operator operating as the Alberta Electric System Operator (“AESO”), California Independent System Operator, Inc. (“CAISO”), Electric Reliability Council of Texas (“ERCOT”), the Independent Electricity System Operator of Ontario (“IESO”), ISO New England, Inc. (“ISO-NE”), Midwest Independent Transmission System Operator, Inc. (“MISO”), New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and Southwest Power Pool (“SPP”).

The AESO and IESO are not subject to the Commission’s jurisdiction. While the AESO and IESO concur with these joint comments of the IRC, their concurrence should not be construed as agreement or acknowledgement that they are subject to the Commission’s jurisdiction.

The IRC’s mission is to work collaboratively to develop effective processes, tools, and standard methods for improving competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers.

² 71 Fed. Reg. 64,770 (Nov. 3, 2006).; FERC Stats. & Regs. ¶ 32,068.

The NOPR represents a significant step in the right direction. In particular, although NERC deserves praise for the significant progress it has made, the NOPR is correct to focus on the fact that “much work remains to be done.”³ As a general matter, the Commission is right to demand excellence from NERC, to conduct thorough reviews of proposed Reliability Standards, and to determine which Reliability Standards should be given the highest priority for further development. It is also appropriate to insist that Reliability Standards accommodate legitimate regional variations, including those that are driven by the characteristics of transmission operators in different regions, and to require that standards have no undue effect on approved market designs. These determinations, along with several others that are discussed below, should be included in a final rule.

At the same time, the IRC is concerned that certain NOPR proposals will have the unintended effect of impeding, rather than advancing, the Commission’s reliability agenda. In some cases this is because the NOPR mistakenly elevates the Commission’s desire for the quick implementation of enforceable Reliability Standards over the need for such standards to be complete and unambiguous or the need to allow a reasonable time for the industry to come into compliance with new requirements. In the sections that follow, the IRC recommends a few changes that are meant to restore the balance in these areas.

These comments necessarily reflect the collective views of the IRC. A number of IRC members will also be submitting comments of their own to address matters of individual concern.

I. OVERVIEW

With respect to a number of the specific questions for which the NOPR sought comments, the IRC recommends that the Commission:

³ NOPR at P 1.

- Adopt the NOPR’s proposal that NERC define “User of the Bulk Power System” on a standard-by-standard basis using the NERC Functional Model but that it discourage the use of that model to drive decisions about which entities should perform specific tasks in individual regions, as that matter is defined in ISO and RTO operating agreements, as approved by the Commission. (PP 42-47).
- Require NERC to submit modifications to the Functional Model that might affect the applicability of Reliability Standards to the Commission for its approval (P 48).
- Support a continued role for Regional Reliability Organizations in supporting reliability (P 57).
- Modify the proposed “transitional” definition of “Bulk Power System” for ISO/RTO regions to correspond to the transmission facilities that are currently subject to ISO/RTO tariffs (PP 60-71).
- To the extent that the final rule adopts the NOPR’s proposed definition of “Bulk Power System,” it should also establish a “transition period” during which entities’ facilities that were not previously subject to NERC’s rules would not be exposed to financial sanctions (PP 90-94).
- Adopt the NOPR’s decision not to remand any of the proposed Reliability Standards but be careful not to provide such detailed guidance on “deferred” standards that international regulatory conflicts result (PP 72-82).
- Defer its approval of fifteen proposed Reliability Standards that refer to other proposed standards whose approval has been deferred (PP 72-81).
- Direct NERC not to refer to “Local Control Centers,” and that to the extent the performance of these entities is reviewed, that the review be done in accordance with the responsibilities of such entities as laid out in Commission-approved ISO/RTO operating agreements (PP 236-37).
- Clarify its recommendations with respect to frequency response standards and avoid imposing unnecessary procedural requirements in this area (PP 175-76).

II. COMMENTS CONCERNING THE APPLICABILITY OF RELIABILITY STANDARDS

A. **The NOPR Correctly Authorizes NERC to Define “User of the Bulk Power System” on a Standard-by-Standard Basis Using the NERC Functional Model, But the Commission Should Not Allow the Functional Model to Prevent Regions from Determining Which “Responsible Entities” Should Perform Which Tasks**

At P 43, the NOPR states that it will not create a generic definition of the term “User of the Bulk-Power System,” and proposes instead to have NERC continue its current practice of defining the applicability of each Reliability Standard on a standard-by-standard basis. Under this proposal, each Reliability Standard would identify the specific subset of users, owners, and operators of the bulk power system that would be subject to it.

The IRC endorses this proposal. It is clear that the Commission’s expansive reliability jurisdiction under Section 215 of the Federal Power Act (“FPA”) encompasses all “users, owners and operators” of the bulk power system within the United States. It is also clear, however, that there will be circumstances where entities that fall under FERC’s jurisdiction need not be subject to a specific Reliability Standard. It makes sense, and will not diminish the Commission’s authority, to decline to enforce the rules against entities that were never intended to be subject to them.

The IRC also agrees that NERC should use the categories set forth in the NERC Functional Model when identifying which tasks to be performed by Responsible Entities are subject to particular Reliability Standards. The Commission should be careful, however, not to allow the Functional Model categories to prescribe who will perform particular functions in different regions. The Functional Model, in conjunction with the division of Responsible Entity tasks pursuant to an ISO/RTO's governing documents, operating agreements and Tariffs with their

Transmission Owners and stakeholders, should be sufficient to accompany the Reliability Standards.

B. NERC Should Be Required to File Proposed Changes to the Functional Model That Might Affect the Applicability of Reliability Standards and Obtain Commission Approval Before Such Changes Take Effect

The IRC supports the NOPR's proposal, at P 48, to require NERC to "submit any future modifications to the functional model that may affect the future applicability of the Reliability Standards for Commission approval." The Commission has correctly emphasized that entities which will be subject to Reliability Standards, and thereby exposed to financial penalties, must have a clear understanding of what obligations they must meet. This objective would best be served if Functional Model changes that could affect the applicability of Reliability Standards were only made after an open Commission process that provides all interested stakeholders with reasonable notice and an opportunity to be heard.

C. Regional Reliability Organizations Should Not Be Involved in Establishing and Enforcing Reliability Standards But Should Be Allowed to Continue to Perform Other, Non-Statutory, Functions

The IRC agrees with the NOPR's conclusion, at PP 56-57, that Regional Reliability Organizations ("RROs") should not be assigned responsibilities under, or made subject to, proposed Reliability Standards. Among other considerations, the IRC believes that the Commission's concerns about the enforceability of Reliability Standards that reference RROs are well-founded. Under the legal framework established by FPA Section 215, Regional Entities, not RROs, should play a role in establishing and enforcing Reliability Standards using authority delegated from NERC and the Commission.

On the other hand, the IRC does not interpret the NOPR's suggestion, at P 57, that "Regional Entities" should, in "the long run" assume all RRO functions through delegation from

the ERO, as requiring the RROs to cease performing all of their functions. If this was the Commission's intent it should reconsider its position in the final rule.

RROs can play an important part in maintaining reliability both during and after any transition period. This role is articulated in the update to the NERC Reliability Functional Model, Version 3, which is currently awaiting approval. Under it, the RRO, as the Responsible Entity for regional reliability assurance, has the following obligations:

- Coordinate reliability assurance among adjacent regions within an Interconnection through the development of necessary protocols and processes
- Coordinate the activities related to maintaining critical infrastructure protection
- Establish regionally-specific reliability assurance criteria related to planning and operations within the region
- Develop and maintain a Regional Reliability Plan
- Perform both regional transmission and regional resource adequacy evaluations
- Perform evaluations of protection systems as they relate to the reliability of the Bulk Power System within the Region
- Perform disturbance analysis evaluations.

Moreover, RROs are generally expected to continue in the role of establishing and, where appropriate, enforcing adequacy requirements.

D. The “Bulk Power System” in ISO/RTO Regions Should Be Defined As Encompassing Transmission Facilities That Are Subject to ISO/RTO Tariffs During the “Transition Period”

At PP 60-71, the NOPR proposes to expand the definition of “Bulk Power System” well beyond the scope of what NERC has proposed. The NOPR's approach would treat all transmission facilities rated 100 kV or higher, any lower voltage facilities that could limit or supplement the operation of the higher voltage system, and other significant transmission facilities as part of the Bulk Power System. The IRC shares the Commission's concern that all facilities that are potentially significant to reliability be included within the ambit of the

Reliability Standards. The Commission could, however, protect reliability just as effectively in ISO/RTO regions, by taking advantage of the progress that has already been made within them and defining the “Bulk Power System” to correspond to the transmission facilities that are subject to the relevant ISO/RTO tariff. ERCOT, of course, does not operate under a Commission tariff, but Section 2.1 of the ERCOT Protocols does have a clear definition of “Transmission Facilities” on which the Commission can rely.⁴

In some cases ISO/RTO tariffs will encompass fewer transmission facilities than the NOPR’s proposed definition. Nevertheless, the ISO/RTO facilities were previously identified as the ones necessary to support the reliable and efficient operation of the transmission grid in their regions. These determinations were often made after extensive stakeholder processes, and were always made with the Commission’s approval. They have worked well over time and provided for reliable systems. ISO/RTO regions have thus already gone through a process similar to what the NOPR contemplates NERC will undertake in the future to establish a more refined Bulk Power System definition. There is no reason to require the thousands of stakeholders that ISOs/RTOs serve to live under an unnecessarily broad “Bulk Power System” definition for a transition period. Similarly, although the NOPR expresses a reluctance to allow the definition of “Bulk Power System” to vary across regions, the Commission should recognize that the differences in transmission facilities subject to ISO/RTO tariffs are based on legitimate regional variations that are worthy of respect at least for an interim period.⁵

⁴ ERCOT Protocols Section 2.1 essentially defines “Transmission Facilities” to include facilities operated at 60 kV or above, as well as the direct current ties between ERCOT and other interconnection systems.

⁵ The IRC acknowledges that its suggested approach could not be applied in non-ISO/RTO regions. The Commission could either adopt the rule proposed in the NOPR for such regions or encourage them to develop more suitable proposals of their own, modeled on what is in place in ISO/RTO regions.

There is no question that the FPA gives the Commission reliability jurisdiction over all of the facilities that would be included in its proposed definition. The only issue is whether it is necessary for the Commission to use such a broad definition in every region that is subject to its jurisdiction. In weighing this question, the Commission should recognize the potentially disruptive consequences of imposing an unnecessarily expansive standard in ISO/RTO regions.

For example, some ISOs and RTOs would have to make significant changes if the Commission adopted the NOPR's definition to include facilities that are not currently under their operation and control. To expand their coverage, ISOs and RTOs would have to collect metering information for these facilities, perform studies related to them, and include them in their system analysis tools to secure them in real time. Otherwise, ISOs and RTOs would have to work with the facility owners themselves and ask that they register as the NERC-defined Transmission Operator for those facilities. These situations would create cumbersome arrangements that could cause confusion. Such confusion could be avoided if the Commission defines the "Bulk Power System" to correspond to the transmission facilities that are subject to the relevant ISO/RTO tariff.

In addition, many transmission facilities that were traditionally not thought to be subject to NERC's rules would be swept up by the new definition. This could be very costly for owners of assets that do not significantly affect bulk system reliability, have not traditionally had to comply with NERC requirements, and could not reasonably have expected to come under NERC's rules until the NOPR's issuance. Under the NOPR, these owners would have to come into compliance by January 1, 2007, which could be expensive, and might be impossible. Failing to comply would open the door to substantial penalties.

E. To the Extent that the Commission Adopts a More Expansive Definition of “Bulk Power System” It Should Adopt a “Transition Period” Before Exposing Entities that Were Not Previously Subject to NERC Rules to Financial Sanctions

If the Commission does not accept the IRC’s proposed definition of “Bulk Power System” for ISO/RTO regions, or NERC’s current “Bulk Electric System” standard, it should recognize that it will be difficult for facilities that were not previously subject to NERC’s requirements to comply with them. Moreover, the NOPR’s stated rationale, at PP 92-93, for introducing penalties without a “transition period” does not apply to “historically excluded” entities that have no experience with NERC rules. Rather than subjecting such entities to penalties, while suggesting that NERC and Regional Entities might exercise their discretion not to assess them, it would be more reasonable to establish a transition period of at least six months during which they would not be subject to financial sanctions.

III. COMMENTS CONCERNING THE APPROVAL AND ENFORCEABILITY OF RELIABILITY STANDARDS

A. The NOPR Adopted Reasonable Standards for Reviewing Reliability Standards, But the Commission Should Be Careful Not to Provide Overly Detailed Guidance that Might Create International Regulatory Conflicts

The NOPR decided not to adopt detailed proposals submitted by a number of commenters, including the IRC, that would have delayed the implementation of various Reliability Standards. Although the IRC continues to believe that its original recommendations represent a more balanced approach it can generally accept the NOPR’s model.

The NOPR did not propose to exercise the Commission’s statutory authority to “remand” defective Reliability Standards back to NERC for further development. The IRC supports this approach, which recognizes the transitional nature of the reliability standards⁶ in use today as

⁶ Id. at 7.

“good utility practices,” and as mandatory and enforceable reliability standards in other jurisdictions. In particular, the continued recognition of “deferred” Reliability Standards as a good utility practice⁷ is significant as the ERO must function as an international organization. Cross-border coordination of applicable standards is critical to maintaining reliability during the transition to continent-wide enforceable reliability standards. Having Reliability Standards that are not utilized on one side of the border could impede reliability by creating conflicts in the operation of the Bulk Power System.

The IRC further recommends that the Commission’s usual practice should be to refrain from issuing detailed directives regarding specific changes that NERC should make to deferred Reliability Standards. Finding the best way to improve a standards should generally be left to NERC and its stakeholders, at least in the first instance. Moreover, detailed Commission directives may cause difficult international regulatory conflicts if they are undertaken without coordination with the appropriate Canadian governmental authorities.

B. The Commission Should Defer Its Approval of Reliability Standards That Incorporate References to Reliability Standards for Which the NOPR Proposed to Defer Approval

The NOPR proposed that the Commission would neither approve nor remand certain Reliability Standards until NERC supplied additional information. The IRC supports this aspect of the NOPR, but recommends that the Commission go further and also defer its approval of the fifteen proposed Reliability Standards that incorporate references to the “deferred” Reliability Standards. The fifteen standards are: MOD-010-0, MOD-012-0, MOD-016-1, MOD-017-0,

⁷ See Statement of Chairman Joseph T. Kelliher at October 19, 2006 Open Commission Meeting Regarding Mandatory Reliability Standards for the Bulk Power System Under RMO6-16 <<http://www.ferc.gov/press-room/statements-speeches/kelliher/2006/10-19-06-kelliher-E-1.asp>>.

MOD-018-0, MOD-019-0, MOD-021-0, PRC-004-1, PRC-007-0, PRC-008-0, PRC-009-0, PRC-009-0, PRC-015-0, PRC-018-1, and PRC-021-1. (See Appendix A for further details.) It would be unreasonable for the Commission to approve these standards at this time because they cannot legitimately be said to be complete until the ambiguities surrounding the standards to which they refer have been resolved. Entities should not be subject to enforcement actions under standards whose meaning depends on incomplete standards any more than they should be subject to the incomplete standards themselves.

IV. COMMENTS ON OTHER SUBSTANTIVE ISSUES

A. The Reliability Standards Should Not Refer to “Local Control Centers” Because the Term Will Have Different Meanings In Different Regions

The Commission proposes, at PP 236-37, that all local control centers (“LCCs”) and organizations necessary for the actual implementation of the operational decisions made by an ISO or RTO be part of the transmission or generation operator function under the NERC Reliability Functional Model (“Functional Model”).⁸ Furthermore, the Commission proposes that all requirements for Reliability Standards that address such activities as telecommunication, training, operator certification,⁹ transmission operations, and cyber and physical security would also apply to “LCCs.”

The IRC recommends the term “LCC” not be included or referenced in the Reliability Standards as it is not a defined function in the Functional Model and its use is very likely to cause confusion. The IRC instead proposes, consistent with its comments with respect to defining “users” of the Bulk Power System, that the Reliability Standards be limited to defining

⁸ NOPR at 236-237.

⁹ Current certification program would not be appropriate for organizations performing only a portion of the tasks of a given Responsible Entity. Development of specialized certification programs could be expected to require a number of years.

the tasks that are to be performed by each class of entity identified under the Functional Model. In ISO/RTO regions, the functions to be performed by particular “Responsible Entities” within this framework would be determined pursuant to ISO/RTO governing documents, operating agreements, tariffs, and related arrangements with transmission owners and other stakeholders. This approach would result in the identification of all entities that need to be registered for compliance with the appropriate Reliability Standards and should satisfy all of the Commission’s concerns without preempting regional arrangements.

B. The Commission Should Not Attempt to Establish Frequency Response Bias or Natural Frequency Response Standards and Should Not Impose Additional Requirements in this Area

The IRC disagrees with the NOPR’s assertion, at P 129, that the “methods for calculating frequency bias” reflect universally accepted industry practices that should therefore “be included as uniform requirements in the Reliability Standards.” The NOPR goes on to propose instituting a formalized process across the regions to ensure that uniform frequency bias rules are included in Reliability Standards in order “protect reliability by providing a common basis for analysis and corrective actions.”¹⁰

The IRC submits that there is in fact no single right way to develop and apply a frequency bias setting and no universally accepted norm in this area. The Commission should therefore not try to set a standard. Indeed, the key point is that the frequency bias setting be greater than the natural frequency response of the relevant system. NERC has ensured system security by establishing a minimum bias setting of one percent of a Balancing Authority’s forecasted peak load. In addition, the IRC does not agree with the NOPR’s concern regarding the over-biased state of the Eastern Interconnection. While it is true that an “over-bias” exists

¹⁰ NOPR at P 129.

the IRC believes that the current levels are conducive to reliability and should be maintained.

The IRC's judgment is that natural response is likewise unsuited to standardization. Natural response is an inherent and unique characteristic of a given system. It will vary continuously over time depending on factors such as whether generators are operating at minimum load, maximum load or within their deadbands. That said, it would be appropriate for NERC to investigate: (i) reliability issues associated with low natural response; (ii) the causes of decreasing natural response; and (iii) possible opportunities for creating markets for load and generator response to frequency changes.


The NOPR also requests comment, at P 175, on whether Proposed Reliability Standard BAL-003-0 appropriately addresses frequency bias setting during both normal and emergency conditions. It asks further whether Balancing Authorities should be required to calculate the frequency response necessary for reliability in each of the interconnections and identify a method of obtaining that frequency response from a combination of generation and load resources. The IRC recommends that the Commission not impose additional requirements on Balancing Authorities because the details of the procedures that are used to ensure frequency bias remains at an appropriate level are not a significant reliability concern.

Finally, the NOPR proposes, at P 176, to direct NERC to conduct annual surveys to compare calculated frequency bias values to actual frequency response, with the ultimate objective of refining frequency bias settings. For the reasons stated above, the IRC believes that yearly surveys are unnecessary and that it would be preferable for NERC to focus instead on surveying Balancing Authority responses to large frequency disturbance (with "large frequency disturbance" to be defined by NERC) and on investigating the issues described above.

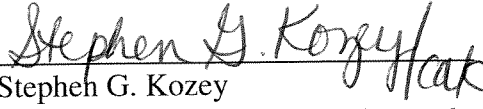
V. CONCLUSION

WHEREFORE, for the foregoing reasons, the IRC respectfully requests that the Commission adopt the IRC recommendations set forth above and expeditiously issue a final rule in this proceeding.

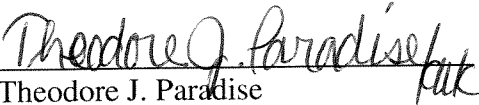
Respectfully submitted,



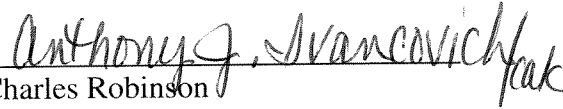
Craig Glazer
Vice President – Federal Government
Policy
Steven R. Pincus – Senior Counsel,
Regulatory
PJM Interconnection, L.L.C.
1200 G Street, NW, Suite 600
Washington, D.C., 20005



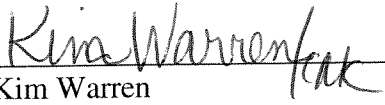
Stephen G. Kozey
Vice President and General Counsel
**Midwest Independent Transmission
System Operator, Inc.**
701 City Center Drive
Carmel, Indiana, 46032



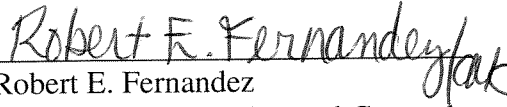
Theodore J. Paradise
Senior Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040



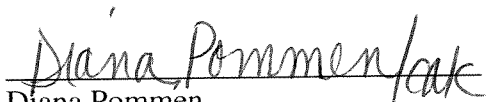
Charles Robinson
Vice President and General Counsel
Anthony J. Ivancovich
Assistant General Counsel- Regulatory and
Acting Vice President Legal
**California Independent System
Operator Corporation**
151 Blue Ravine Road
Folsom, CA 95630



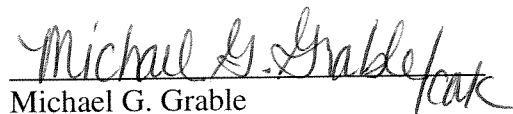
Kim Warren
Manager, Regulatory Affairs
**Independent Electricity System
Operator of Ontario**
655 Bay Street, Suite 410
Toronto, Ontario, M5G-2K4



Robert E. Fernandez
Vice President and General Counsel
Elaine Robinson
Director of Regulatory Affairs
**New York Independent System
Operator, Inc.**
290 Washington Avenue Extension
Albany, N.Y. 12203


Diana Pommen
Director Business Operations
**Independent System Operator operating
as the Alberta Electric System Operator**
Calgary Place
2500 330 - 5th Avenue SW
Calgary, AB T2P 0L4


Stacy Duckett
General Counsel & Corporate Secretary
Southwest Power Pool
415 North McKinley
#140, Plaza West
Little Rock, AR 72205-3020


Michael G. Grable
Assistant General Counsel
Electric Reliability Council of Texas
7620 Metro Center Drive
Austin, TX 78744

January 3, 2007

Appendix A: Non-Pending Standards That Rely On (Pending) RRO Standards

Reliability Standard	Title	Pending Standard(s) Referenced in this Standard
<p>MOD-010-0 (can be grouped with MOD-012-0)</p>	<p>Steady-State Data for Transmission System Modeling and Simulation</p>	<p>MOD-011-0</p>
<p>MOD-012-0 (can be grouped with MOD-010-0)</p>	<p>Dynamics Data for Transmission System Modeling and Simulation</p>	<p>MOD-013-0</p>
<p>MOD-016-1</p>	<p>Actual and Forecast Demands, Net Energy for Load, Controllable DSM</p>	<p>MOD-011 MOD-013 MOD-014 MOD-015 TPL-005 TPL-006</p>
<p>MOD-017-0</p>	<p>Aggregated Actual and Forecast Demands and Net Energy for Load</p>	<p>MOD-016-1 (if the Commission agrees with the IRC's recommendation that it NOT approve MOD-016, then this MOD-017-0 would also reference an unapproved Standard</p>
<p>MOD-018-0</p>	<p>Reports of Actual and Forecast Demand Data</p>	<p>MOD-016-1 (if the Commission agrees with the IRC's recommendation that it NOT approve MOD-016, then this MOD-018-0 would also reference an unapproved Standard</p>
<p>MOD-019-0</p>	<p>Forecasts of Interruptible Demands and DCLM Data</p>	<p>MOD-016-1 (if FERC agrees with the IRC's recommendation that it NOT approve MOD-016, then this MOD-019-0 would also reference an unapproved Standard</p>

Reliability Standard	Title	Pending Standard(s) Referred in this Standard
MOD-021-0	Accounting Methodology for Effects of Controllable DSM in Forecasts	MOD-016-1 (if FERC agrees with the IRC's recommendation that it NOT approve MOD-016, then this MOD-021-0 would also reference an unapproved Standard)
PRC-004-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperations	PRC-003
PRC-007-0	Assuring Consistency with Regional UFLS Program	PRC-006-0
PRC-008-0	Underfrequency Load Shedding Equipment Maintenance Programs	PRC-006-0
PRC-009-0	UFLS Performance Following an Underfrequency Event	PRC-006-0
PRC-015-0	Special Protection System Data and Documentation	PRC-012-0 PRC-013-0
PRC-016-0	Special Protection System Misoperations	PRC-012-0
PRC-018-1	Disturbance Monitoring Equipment Installation and Data Reporting	PRC-002
PRC-021-1	Under-Voltage Load Shedding Program Data	PRC-020-1