

## Comment Form for Draft 3 of Part of Set One of Phase III & IV Standards

Please use this form to submit comments on the Phase III & IV Drafting Team's third draft of the remaining standards in the first set of Phase III & IV Standards. Comments must be submitted by **January 17, 2006**. You must submit the completed form by e-mailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Phase III & IV Standards Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.**

- DO:**
- Do** enter text only, with no formatting or styles added.
  - Do** use punctuation and capitalization as needed (except quotations).
  - Do** use more than one form if responses do not fit in the spaces provided.
  - Do** submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not** insert tabs or paragraph returns in any data field.
  - Do not** use numbering or bullets in any data field.
  - Do not** use quotation marks in any data field.
  - Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	<b>Ron Falsetti</b>	
Organization:	<b>Independent Electricity System Operator (IESO), Ontario</b>	
Telephone:	<b>905 855-6187</b>	
E-mail:	<b>ron.falsetti@ieso.ca</b>	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MRO	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory, or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA — Not Applicable	<input type="checkbox"/>	



**Major Changes to PRC-002 and PRC-018 Following 2<sup>nd</sup> Posting:**

During the second posting of PRC-002 and PRC-018, the drafting team asked stakeholders if the requirements for Dynamic Disturbance Recorders should be removed from PRC-002 and PRC-018 and placed into two new standards. Most commenters indicated that the requirements should remain in PRC-002 and PRC-018 and requested that the requirements be modified to ensure that many existing installations could meet the standards' requirements.

The drafting team made the following major changes to PRC-002:

- Definition of Disturbance Monitoring Equipment: Removed the requirement of 'continuous' recording.
- Definition of Protection System: Removed, 'power circuit breakers' from the list of elements considered to be part of a protection system.
- Removed requirements that are more characteristic of new Phasor Measurement Units (PMUs)
- Changed the time synchronization requirements for sequence of event recorders and dynamic disturbance recorders so they both require that the device be synchronized to within four milliseconds of Coordinated Universal Time (UTC).
- Modified the requirement for continuous recording to indicate that this only applies to devices installed more than 3 years beyond the date the Board of Trustees adopts the standard.
- Modified the recording requirements of DDRs from 30 samples/second to 6 records/second.

Some commenters suggested that data cannot be provided in COMTRADE format. The drafting team would like to know if this is a significant issue.

The drafting team did not make any significant changes to PRC-018, however the changes in PRC-002 have an impact on the requirements of PRC-018, and the drafting team wants stakeholders to review and consider these standards as a set. The drafting team asks you to consider your acceptance of the above changes as you respond to the following questions.

**Please Enter All Comments in Simple Text Format.**

***Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.***

1. Please identify anything you believe needs to be modified before this standard is balloted:
  - PRC-002-1 — Define Regional Disturbance Monitoring and Reporting Requirements (Modified Version 0)

Comments:

R3.2.2: For consistency the IESO suggests the same wording as in R 1.2.2 and R 2.2.3 be used, i.e. "...synchronized to within four milliseconds of Coordinated Universal Time."

R3.2.3: We suggest the term "collect" be used in place of the first "sample".

R4.2 and R5: The acronym DME needs to be defined upfront, say, in Section A, Item 3 Purpose.

2. Please identify anything you believe needs to be modified before this standard is balloted:
  - PRC-018-1 — Disturbance Monitoring Equipment Installation and Data Reporting

Comments:

3. Do you agree with the proposed implementation plan for PRC-002 and PRC-018? If no, please identify specifically what you feel needs to be modified.

Yes

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No

Comments: