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Subject: White Paper posted for comment - Project 2014-01 Standards Applicability for Dispersed Generation Resources
Date: Wednesday, June 24, 2015 8:25:00 AM
Attachments: [Section 11 from Appendix 3A StandardProcessesManual 06.26.13.pdf](#)

Brian and Fred,

While reviewing the referenced white paper for comments that are due by July 13, I discovered a potential process concern that you, as SC chair and vice chair, should be aware of. The project's webpage is at <http://www.nerc.com/pa/Stand/Pages/Project-2014-01-Standards-Applicability-for-Dispersed-Generation-Resources.aspx>

The purpose of the posting is noted on the webpage:

This version of the White Paper is being posted for comment to allow the White Paper to proceed through the Section 11 process set forth in the NERC Standard Processes Manual, which requires NERC Standards Committee authorization to post all supporting references that are linked to an approved Reliability Standard.

My process concern is that this white paper does not support this Section 11 consideration, which I have attached. The description in the White Paper's Executive Summary provides its purpose:

“The purpose of this White Paper is to provide background and technical rationale for proposed revisions to the applicability of several North American Electric Reliability Corporation (NERC) Reliability Standards, and in some cases the standard requirements.”

Simply stated, the white paper is the project team's roadmap and rationale for “proposed revisions ... to Reliability Standards.” As such, there is no issue with the team soliciting comments for the its plans to modify future Reliability Standards consistent with the scope of its SAR. My problem is that this topic does not, in my opinion, meet the threshold for Section 11 treatment.

The team successfully revised versions of PRC-004 (misoperation reporting) and PRC-005 (Protection System maintenance), and guidelines on any of those standards (or other existing standards) would certainly be appropriate. I have copied the project team's chair, Tony Jankoski, and the NERC staff coordinator for the project, Katherine Street.

Thank you for your consideration.

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