

## Notes to UFLS SDT

### Supplemental SAR:

Is there a supplemental SAR to expand the scope and address the modifications to EOP-003?

Stephanie will send to Maureen with the response to her comments.

### Standard:

**Definitions** – recommend defining Region. If left undefined, the default is to use the collegiate definition of the word, which does not support the intent of the requirements in the standard.

Rob and Jonathan will propose the definition, apply it to the requirements and scan the existing standards for impact.

**Applicability** – entities are registered for compliance based on the compliance registration criteria.

[http://www.nerc.com/files/Statement\\_Compliance\\_Registry\\_Criteria-V5-0.pdf](http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf)

Brian E M to lead discussion on behalf of the SDT with Craig L. on the issue of DP registration.

The applicability section of the standard and the assignment of responsibility for the requirements are both confusing. Is it the SDT's intent to add a new classification to the compliance registry called "PCG?" If yes, then assigning the responsibility for a requirement to a PCG is correct, but then the PCG should be added to the applicability section of the standard and Requirement R1 is not needed. If the SDT does not intend to have compliance add the PCG to the categories in the compliance registry, then the requirements that assign tasks to a PCG should be reworded so that the requirement, like the measures, assigns each PC to work with its PCG to . . . .

The team did not reach agreement on the call and decided to take a vote on this issue at the next conference call.

### Requirements

Requirement R8 – need to add some words to clarify which database is being referenced. The team added the word "UFLS" in front of database in the requirements, measures. Etc.

Requirement R10 – is the TO the correct responsible entity here – or should this be the DP?

The SDT decided that the TO's are the correct responsible entity for this requirement because it is intended to control higher voltages on the transmission system (TO level not the DP level).

Requirement R11 – what is the reliability impact of this requirement?

Rob, Phil and Gary will work on proposing language to modify R11

**Measures** – the measures don't provide any clarity on what is expected beyond what is already written in the requirements.

Frank will review the measures and add examples – Stephanie will send out the prior versions of the measures (Oct. 29)

**Compliance** - Some of the compliance sections are blank and need to be completed prior to posting.

Frank will review the date retention piece of the Compliance Section. Stephanie to send Frank the SDT guidelines.

**Variance** – Any reason why bulk power system is used rather than BES? Need a separate measure and VSLs – that reference the appropriate requirements – Requirement E4, Parts 4.1 and 4.2 and Requirement E5, Parts 5.1 and 5.2.

Si Truc will draft the VSLs and Measures for the Variance

Since the variance was developed by the team and not by the respective interconnection through a NERC-approved standard development process applicable to the interconnection, then the variance is subject to stakeholder approval.

## **EOP-003**

Need to update the VSLs

Tony Jablonski will review the VSLs – Stephanie will send the VSLs and latest EOP standard to Tony. (~1 week)

### **Consideration of Comments**

- Need to add a summary of changes to the cover page that includes any strong minority issues that were raised and were not resolved.
- In the summary response to question 1b, it would reinforce the SDT's position if the SDT clearly stated that the compliance folks have reviewed the concept of having a "group of PCs" responsible and they can support this – of course it would be better still if you could identify whether the term would be added to the compliance registry.
- A fill-in-the-blank requirement is a requirement where the specifics are "unseen" – not all requirements assigned to the RE are fill-in-the-blank requirements

- The Rules of Procedure, section 100 recognize that there are some requirements that will be assigned to REs and NERC :
  - NERC shall comply with each approved reliability standard that identifies NERC or the electric reliability organization as a responsible entity. Regional Entities shall comply with each approved reliability standard that identifies Regional Entities as responsible entities. A violation by NERC or a Regional Entity of such a reliability standard shall constitute a violation of these Rules of Procedure.
- The following sentence confused me with the use of the word, “detailed” – does the SDT really mean that detailed models aren’t useful?
  - The Planning Coordinator is the Functional Model entity best equipped to model adjacent areas which are needed to identify islands as well as simulate regional or inter-regional underfrequency events – detailed and localized views cannot do that.
- Summary response to question 5 – the SDT indicated it made a change to the performance characteristics- it would be helpful to note the old/new requirement numbers and to provide a red line showing the change within the summary.
- Response to Q5 comment from Exelon – there is a comment indicating that Phil will provide some additional compliance information . . .
- Summary response to question 6 – there is a comment from Phil that says, “The SDT has not clarified this. The SDT has kept this the same as it was in the last posting of the standard. The only difference is that Requirements R6.4.1 and R6.4.2 have been combined into one part 4.3.1 of Requirement R4.”
- Summary response to question 6 – the SDT indicates it did not make any changes to what is now R4, but there were some changes, so this statement should be removed.
- Summary response to question 6 - See suggested rearrangement of paragraphs in the summary response.
- Response to IRC comments on question 6 don’t seem to address the comment, which was to apply the requirement to all generators meeting compliance registration criteria
- Summary response to Question 8 – think the reference to R3 and R4 in the following should be a reference to R2 and R3:
- In response to a variety of comments the SDT deleted requirement R4 and combined other requirements to simplify the requirements for inter-regional coordination and criteria for selecting islands to be used as a basis for designing a UFLS program. These revised requirements are contained in **Requirements R3 and R4** for selecting islands and R6 for inter-regional coordination.
- Response to ERCOT on Question 8 – if the requirement is not clear (and the folks from ERCOT didn’t interpret it the same way as the team) then consider adding a few words to the requirement for improved clarity:

Comment 3 - It would be appropriate for the load referenced in the imbalance calculation in requirement R6 to include system (island) losses. The standard should be clearer.

**Response: The SDT intentionally excluded island losses from the imbalance definition. The losses within an island are difficult to measure because the losses in the steady-state pre-event condition will change upon formation of the island. The SDT notes that excluding losses results in a slightly more conservative assessment because more**

generation would have to be online for a given imbalance if losses are included in the equation. In most cases the losses are on the order of 1 to 3 percent; thus while excluding losses is conservative, it is not overly conservative.

**Response to MISO on question 8** - If this is an important aspect of the documentation, the standard should require this - otherwise, some PCs may elect not to do this and there won't be any justification for finding them noncompliant.

This requirement (now R2) requires the group of Planning Coordinators to develop and document their criteria, which the SDT expects would include the rationale for the islands selected for evaluation.

- **Response to MISO on question 8** - The measures do not provide any examples of evidence - they merely restate that the responsible entity must have evidence. . .

**Response:** Requirement R4 has been deleted and the SDT developed Measures for all requirements that include examples of evidence but do not introduce new requirements on entities.

- **Response to MRO on question 8** – Expect to receive more comments along these lines based on differing interpretations of annually in the field - it would be better to make the proposed modification. . .

R8 - Since the interpretation of "annually" can vary widely, we suggest this rewording, "each calendar year and within 15 months of the last update".

**Response:** Since “annually” is not defined a NERC term, it has the meaning “occurring or happening every year or once a year.” as found in a collegiate dictionary. The SDT believes the reliability objective of this requirement is met without specifying details of when during the year the requirement is fulfilled.

- **Response to ATC on question 8** - Could not find a response to ATC’s comment on R14

### **Barry Francis Responses**

- Page 3 – may need to revise response based on decisions made to applicability
- Page 11 – the response seems to be missing a few words.

**SDT will review the comments on the consideration of comments on the next conference call.**

### **Implementation Plan**

The response to comments indicated that the Gen Verification standard (PRC-024) has a requirement that will result in the PC receiving specific information – so should the implementation for PRC-006 be dependent upon approval and implementation of PRC-024?

The proposed effective date doesn’t give the PCs much time to get organized.

**SDT will review this on the next conference call.**

### **Comment Form**

Suggest breaking down the questions so that they are more targeted . . . it will be easier to assemble the related comments and make sense of those comments.

Need to revise Question 2 so it is clear that you are asking a question about the acceptability of the expanded scope in the supplemental SAR.

**SDT will review this on the next conference call.**