

Individual or group. (27 Responses)
Name (14 Responses)
Organization (14 Responses)
Group Name (13 Responses)
Lead Contact (13 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (2 Responses)

Comments (27 Responses)
Question 1 (24 Responses)
Question 1 Comments (25 Responses)
Question 2 (23 Responses)
Question 2 Comments (25 Responses)
Question 3 (23 Responses)
Question 3 Comments (25 Responses)

Individual
Steve Alexanderson
Central Lincoln
No
No
The revised SAR incorrectly states there are no regional variances for WECC. Unless the SAR includes removal of the variance already granted to the regions in PRC-006-1, the SAR should include these existing variances. And if any of these variances are to be removed, the SAR should state so explicitly.
Individual
Mark Wilson
Independent Electricity System Operator
Yes
In the Related Standards table (P.8 of the SAR), the part that addresses PRC-004-2.a remains unchanged. It states that: "The UVLSSDT will consider if PRC-004 is the more appropriate standard to address UVLS Misoperations and will coordinate with Project 2010-05.1 Protection Systems (Misoperations) (proposed PRC-004-3). While we concur this is an appropriate approach, with the SAR now expanded to include underfrequency load shedding, we believe this part needs to be expanded as well. We make this proposal following receiving a response from the Project 2010-05.1 Protection System Misoperations standard drafting team (PSMSDT) to our comment on the draft PRC-004-3 in which question the basis for including UFLS but excluding UVLS in the PRC-004-3 standard's Applicability Section. The PSMSDT's response below: [UVLS has not been included in the proposed standard's Applicability because Misoperations of UVLS relays are being addressed under Project 2008-02 – Undervoltage Load Shedding when modifying Reliability Standard PRC-022-1 – Under-Voltage Load Shedding Program Performance.] We do not find this rationale sufficient to justify the inclusion of UFLS but exclusion of UVLS since both need to be assessed and treated under the same light. Now that the SAR for Project 2008-02 is expanded, we suggest the UVLSSDT and the UFLSSDT to coordinate with the PSMSDT to achieve a consistent approach to addressing Misoperations of UFLS and UVLS.
Yes
Yes

Group
Duke Energy
Colby Bellville
No
Yes
Duke Energy supports the revised SAR, and the proposal to revise PRC-006-1 based on the outstanding FERC directive. We would like to remind the SDT of current regional standards, such as PRC-006-SERC-01, that depending on the revised language, could result in a conflict with currently enforceable regional standards.
Yes
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
No
Yes
Yes
Group
MRO NERC Standards Review Forum
Joe DePoorter
Yes
The NSRF request that the SAR have the following item added, per FERC Order 763, section 11 which states; "Accordingly, we grant clarification that Order No. 763 did not preclude some degree of overlap between automatic and manual load shedding programs, provided there is sufficient non-overlapping load available for manual shedding to achieve the reliability objective of EOP-003-2". This clarification needs to be addressed in the proposed Standard.
No
The NSRF can support the SAR if the comments in question 1 are contained within the SAR.
Yes
Individual
Thomas Foltz
American Electric Power
Yes
In reference to potential changes to PRC-006-1, exactly what is meant by the phrase "steady state modifications" ?
No
As currently written, the SAR lacks specificity in its direction and intent. FERC Order 763, which approved PRC-006-1 (UFLS standard), appears to direct NERC to modify PRC-006-1 and explicitly state that a PC's "schedule for application" referenced in R9 would apply not only to the implementation of whatever UFLS plan a PC would devise under R3, but also to any corrective adjustments to that plan a PC might identify under R11 and R12. Assuming we understand FERC's

request correctly, we recommend adding the following text to page 3 of the SAR: "Specifically, PRC-006-1 will be modified to make it clear that a PC's "schedule for application" referenced in R9 would apply not only to the implementation of whatever UFLS plan a PC would devise under R3, but also to any corrective adjustments to that plan a PC might identify under R11 and R12."

No

Though we agree with modifying PRC-006-1 to meet FERC's concerns, we do not support the current SAR for the reasons expressed above.

Group

Northeast Power Coordinating Council

Guy Zito

No

Yes

Yes

Individual

David Thorne

Pepco Holdings Inc

No

Yes

Yes

Individual

Chris Mattson

Tacoma Power

Yes

In the context of this revised SAR, what is meant by "steady state modifications"? Additionally, which specific directive in FERC Order No. 763 will be addressed by revising PRC-006-1?

Individual

Si Truc PHAN

Hydro-Quebec TransEnergie

Yes

Since this SAR proposes a revision of PRC-006-1 to determine if any steady state modifications are appropriate, Hydro-Québec respectfully requests to include a revision of the Regional Variance and Attachment 1A for the Québec Interconnection. The Quebec Interconnection (QI) has much less inertia than other Interconnections. This implies a greater variation of frequency for all kinds of contingencies. The curve of Attachment 1A (Québec) doesn't take that into account for the time frame following the 30 second mark. It is requested that the steady state condition would allow a larger frequency gap than other Interconnections, as the QI has already a larger gap allowed at short term (between 56 Hz and 63 Hz) than other interconnection (from 58 Hz to 61,8 Hz). Also, it is requested that the time to attain the steady state, which is 60 seconds for other Interconnections (Attachment 1), would be at least or even longer for the Quebec Interconnection, instead of the

actual 30 seconds value of Attachment 1A. Those proposed changes are necessary to limit the amount and frequency of load shedding for different contingencies. Also, since some contingencies on the QI imply an oscillation mode of low frequency (about 0.05 Hz), the 30 second mark is too short for the transient mode. The proposed changes do not affect the reliability of the QI, but help to fit the unique characteristics of the system.

Yes

Group

Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing

Wayne Johnson

No

Yes

Yes

Group

ACES Standards Collaborators

Ben Engelby

Yes

We would like to see the SAR better clarify the proposed modifications to the PC schedule in PRC-006 R9. This is the applicable requirement that was raised in FERC Order No. 763, which had explicit directions to make the language clear in the requirement itself. The SAR should be responsive to this directive and explain the propose action to PRC-006.

Yes

We support the drafting team's proposal to address both UFLS and UVLS in the same project.

Yes

We support the revised SAR and the review of PRC-006-1 to determine if any steady state modifications are appropriate. This is an appropriate revision based on the FERC directive.

Group

SPP Standards Review Group

Robert Rhodes

No

Yes

Yes

Individual

Chris Scanlon

Exelon Companies

No

Yes
Yes
Individual
John Pearson
ISO New England
Agree
ISO RTO Council Standards Review Committee (SRC)
Group
Dominion
Louis Slade
Yes
Yes
Dominion suggests that the requirements of PRC-011-0 also be considered for possible inclusion into the revised version of PRC-010.
Yes
Group
ISO RTO Council Standards Review Committee
Greg Campoli
Yes
We thank and appreciate the SAR team's consideration and accommodation of our comments from the prior posting: "Some PCs design their system to avoid the need for UVLS and therefore do not have a UVLS program. The standard needs to address the situation when the TP/PC/TOP does not have a UVLS program but the UVLS entity has their own UVLS schemes. The concepts contained within PRC-010-0 R1 should be incorporated within the new standard to ensure that individual UVLS entity schemes that are developed outside or in lieu of a TP/PC/TOP program are coordinated with their TP/PC/TOP." We believe these two bullets address our concern: The revised standard WILL: • Address requirements for these programs after the need for UVLS has been determined by the appropriate planning studies. The revised standard WILL NOT: • Require a UVLS program. We further ask the team to consider situations where UFLS schemes may also not be required due to similar design considerations.
Yes
Yes
We support consideration of the Paragraph 81 review, however, the SDT must note in its proposed standard where addressing a P81 consideration may not have been included due to scope limitations.
Group
Bonneville Power Administration
Andrea Jessup
No
Yes

Yes
Individual
Gul Khan
Oncor Electric Delivery LLC
No
Yes
Yes
Individual
Trevor Schultz
Idaho Power Company
Yes
Yes
Individual
Michelle D'Antuono
Ingleside Cogeneration LP
No
No
Although Ingleside Cogeneration LP ("ICLP") is not immediately affected by FERC's directive to tighten the requirements related to the implementation of a Corrective Action Plan, we believe that a cautious approach is in order. Our reading of Order 763 indicates that the Commission is understandably eager to eliminate UFLS reliability gaps in a high priority manner, but is aware that some corrections cannot be implemented due to limitations in capital and maintenance budgets. We would like to see an expectation set in the SAR that the project team investigate a means to capture the sense of urgency of the situation without mandating a maximum time frame that allows no flexibility regardless of any extraordinary circumstances. Otherwise, ICLP can easily see that once a zero-tolerance precedent has been set, it will naturally be applied to every type of corrective plan – including those applicable to us as a GO/GOP.
No
ICLP has no issue with the Paragraph 81 retirements that were proposed by the IERP. We agree with their findings that the requirements in question were redundant or overly administrative in nature. However, the IERP included a recommendation called for Generator Owners to be subject to PRC-006-1's Underfrequency Load Shedding requirements. This seems to be a misunderstanding on the part of the IERP that PRC-024-1 already mandates frequency ride-through settings at generation Facilities which ensure that units are not disconnected from the BES before load is shed. (Generators have a stabilizing influence on system frequency, and it is desirable to keep them online as long as possible during a disturbance, Fault, or abnormal operating condition.) Since PRC-024-1 has already been approved by FERC, we believe that the SAR should contain a statement indicating that this IERP recommendation has already been fulfilled. We see no benefit in including the GO as an applicable entity under PRC-006-1 as well.
Group

PacifiCorp
Sandra Shaffer
Yes
The definition of "UFLS" entity should be clarified: --to clearly specify whether "any entity responsible for the ownership, operation, or control of UFLS equipment" includes non-registered entities --If the definition of "UFLS" entity includes only registered entities, who takes responsibility for the UFLS assignment gaps caused by entities not registered/or recently deregistered? --How will this be impacted by risk-based registry initiative and revisions to the Registry Criteria? --PRC-006-1 R9 needs to be clarified with respect to roles of the entities and to address gaps in the "Coordinated Plan" caused by entities not registered/or recently deregistered. --If UFLS and UVLS responsibilities apply to BES, does that include facilities that are owned/operated by non-registered entities that have not filed/obtained formal NERC Exclusions/Exceptions? Who determines the facilities that are included and where is the information available?
Yes
The definition of "UFLS" entity should be clarified: --to clearly specify whether "any entity responsible for the ownership, operation, or control of UFLS equipment" includes non-registered entities --If the definition of "UFLS" entity includes only registered entities, who takes responsibility for the UFLS assignment gaps caused by entities not registered/or recently deregistered? --How will this be impacted by risk-based registry initiative and revisions to the Registry Criteria? --PRC-006-1 R9 needs to be clarified with respect to roles of the entities and to address gaps in the "Coordinated Plan" caused by entities not registered/or recently deregistered. --If UFLS and UVLS responsibilities apply to BES, does that include facilities that are owned/operated by non-registered entities that have not filed/obtained formal NERC Exclusions/Exceptions? Who determines the facilities that are included and where is the information available?
Yes
Individual
Dennis Chastain
Tennessee Valley Authority
No
Yes
We agree with the direction to re-open this standard in order to address FERC's directive. FERC's concern is perhaps better understood by referencing paragraphs 42-43 of Order No. 763. Within this context, FERC is questioning the total period of time it will take following a UFLS triggering event to conduct a post-event assessment (per R11, up to one year after the event) and then, if the assessment identifies UFLS program deficiencies, determine what program adjustments are necessary (per R12, up to two years after the event), and then issue program changes (PC) and implement those changes in the field (UFLS entity). The timing expectations for the last two stages of this process are not clearly addressed; however we agree with NERC that requirement R9 addresses the expectation for a UFLS entity to provide automatic tripping "...in accordance with the UFLS program design and schedule for application determined by its Planning Coordinator(s)...". Requirement R9 allows the PC a degree of flexibility in determining what the implementation schedule should be, and this must be done in consultation with the UFLS entity(s) per requirement R14.
Yes
Group
DTE Electric
Kathleen Black

No
Yes
Yes
Group
Alliant Energy - Compliance
Larry Heckert
No
Yes
Yes
Individual
Venona Greaff
Occidental Chemical Corporation
Agree
Ingleside Cogeneration, LP
Group
Associated Electric Cooperative, Inc. - JRO00088
Phil Hart
No
Yes
Yes