

Consideration of Comments on Regional Reliability Standard Automatic Underfrequency Load Shedding - PRC-006-SERC-01

The Regional Reliability Standards Working Group thanks all commenter's who submitted comments on the Regional Reliability Standard Automatic Underfrequency Load Shedding. These standards were posted for a 45-day public comment period from June 29, 2011 through August 15, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 9 sets of comments, including comments from 15 different people from approximately 13 companies representing 5 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 404-446-2560 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

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- The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
- The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

6. If you have any other comments that you have not already provided in the response to the prior questions, please provide them here. 13

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment																																					
				1	2	3	4	5	6	7	8	9	10																												
1.	Group	Brent Ingebrigtsen	LG&E and KU Energy	X		X		X	X																																
No additional members listed.																																									
2.	Group	Louis Slade	Dominion	X		X		X	X																																
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Michael Gildea</td> <td>EMP NERC Compliance</td> <td>MRO</td> <td>5, 6</td> </tr> <tr> <td>2. Mike Garton</td> <td>EMP NERC Compliance</td> <td>NPCC</td> <td>5, 6</td> </tr> <tr> <td>3. Connie Lowe</td> <td>EMP NERC Compliance</td> <td>SERC</td> <td>1, 3, 5, 6</td> </tr> <tr> <td>4. Michael Crowley</td> <td>ET Compliance</td> <td>SERC</td> <td>1, 3</td> </tr> <tr> <td>5. Matt Woodzell</td> <td>F&H</td> <td>SERC</td> <td>5</td> </tr> <tr> <td>6. Chip Humphrey</td> <td>F&H</td> <td>RFC</td> <td>5</td> </tr> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection	1. Michael Gildea	EMP NERC Compliance	MRO	5, 6	2. Mike Garton	EMP NERC Compliance	NPCC	5, 6	3. Connie Lowe	EMP NERC Compliance	SERC	1, 3, 5, 6	4. Michael Crowley	ET Compliance	SERC	1, 3	5. Matt Woodzell	F&H	SERC	5	6. Chip Humphrey	F&H	RFC	5
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3.	Group	Howard Gugel	NERC Staff Technical Review																																						
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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
4.	Individual	Laura Lee	Duke Energy	X		X		X	X				
5.	Individual	John Bee	Exelon	X		X		X					
6.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
7.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
8.	Individual	Kelsey Colvin	MISO		X								
9.	Individual	Michelle R. D'Antuono	Occidental Chemical Corporation					X					

1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Summary Consideration:

Organization	Yes or No	Question 1 Comment
LG&E and KU Energy	Yes	
Dominion	Yes	
NERC Staff Technical Review	Yes	
Duke Energy	Yes	
Exelon	Yes	
South Carolina Electric and Gas	Yes	
Georgia Transmission Corporation	Yes	
MISO		
Occidental Chemical Corporation	Yes	

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Summary Consideration:

Organization	Yes or No	Question 2 Comment
LG&E and KU Energy	No	
Dominion	No	
NERC Staff Technical Review	No	
Duke Energy	No	
Exelon		
South Carolina Electric and Gas	No	
Georgia Transmission Corporation	No	
MISO		<p>MISO is concerned that PRC-006-SERC-001 R2 is too prescriptive and may not allow Planning Coordinators the flexibility and discretion needed to ensure reliability. The Planning Coordinator is tasked with designing the UFLS system and coordinating that system with neighboring systems. PRC-006-SERC-001 R2 specifies acceptable ranges and limits in R2.3, R2.4, R2.5 and R2.6 for the UFLS design. The standard makes no provisions to accommodate a determination by a PC that the best performing design does not fit in with the specified set points and ranges in the standard. As noted in the standard, the set points specified in R2 reflect historic practice, but there may be sound technical justification to deviate from the set points scheme PRC-006-SERC-001 R2 proscribes. It is possible that effective coordination with neighboring systems may require a different approach (e.g. entities in MRO are investigating the reliability benefits of setting the frequency set point blocks at</p>

Organization	Yes or No	Question 2 Comment
		less than 0.2 Hz apart to create finer system control). The explicit set point requirements in R2 would prohibit innovation/coordination of system design that deviated from standard without regard to the reliability benefits of deviating from historic practice.
<p>Response: This is a technical comment that was previously addressed.</p> <p>Based on the 2007 UFLS study there are already 18 different schemes being used within the SERC footprint. Removing the requirements specified in R2 may lead to even more diverse schemes and increase the probability of non-coordination within SERC. The requirements specified in R2 are presently included within approved SERC Regional Criteria. These SDT believes these requirements allow for a high degree of flexibility in developing a UFLS scheme while promoting proper coordination among neighboring schemes both within and outside SERC. The SDT does not believe there will be coordination issues with schemes in other regions since all of the schemes have to meet the performance characteristics in the NERC Standard.</p>		
Occidental Chemical Corporation	No	

3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?

Summary Consideration:

Organization	Yes or No	Question 3 Comment
LG&E and KU Energy	No	
Dominion	No	
NERC Staff Technical Review	No	
Duke Energy	No	
Exelon	No	
South Carolina Electric and Gas	No	
Georgia Transmission Corporation	No	
MISO		
Occidental Chemical Corporation	No	

4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

Summary Consideration:

Organization	Yes or No	Question 4 Comment
LG&E and KU Energy	No	
Dominion	No	
NERC Staff Technical Review	No	
Duke Energy	No	
Exelon		
South Carolina Electric and Gas	No	
Georgia Transmission Corporation	No	
MISO		
Occidental Chemical Corporation	No	

5. Does the proposed regional reliability standard meet at least one of the following criteria?

- The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
- The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

Summary Consideration:

Organization	Yes or No	Question 5 Comment
LG&E and KU Energy	Yes	
Dominion	Yes	
NERC Staff Technical Review	Yes	
Duke Energy	Yes	
Exelon	No	<p>[A] This regional standard is not necessary for GOs due to the work that is being done under NERC Project 2007-09, PRC-024, "Generator Performance During Frequency and Voltage Excursions," and therefore suggest that the SERC UFLS Standard remove GOs from applicability section.</p> <p>[B] It is not clear that the criteria proposed in this standard are really more specific than the performance criteria proposed in the NERC Standard PRC-006, "Development and Documentation of Regional UFLS Programs," currently at the FERC. The intent of the threshold for additional Regional Standards is to address a Regional issue. There doesn't appear to be a particular issue to the SERC Region that is different than the rest of the Eastern Interconnection. Changing a setpoint value that already is an outcome of the performance criteria doesn't necessarily provide additional specificity. For a Region to have requirements that are not included in the continent-wide Standard</p>

Organization	Yes or No	Question 5 Comment
		<p>is problematic, there should be some geographic or electric justification for such a difference, otherwise the Requirements should be incorporated into the continent-wide Standard. Simply adding a Requirement that is not in the pending NERC Standard does not make the Regional Standard necessary. It is not clear that there is a physical difference between the power system of the SERC Region as compared with the rest of the Eastern Interconnection.</p>
<p>Response: This same concern was previously addressed.</p> <p>A. Requirement R7 of the SERC UFLS standard requires additional generator data be provided to SERC above what is included in the current draft of PRC-024. The SDT feels this additional data is needed to adequately perform post event analysis of frequency disturbances. The SDT therefore believes that this standard should be applicable to GO's</p> <p>B. The primary purpose of the SERC regional Standard was to provide region specific requirements for the implementation of NERC standard PRC-006-1 requirements with the goal of adding clarity and providing consistency. The requirements already in the NERC standard were not repeated in the SERC standard. Not only do the requirements of the SERC Standard provide regional consistency and coordination, they also are more stringent than the national standard.</p>		
<p>South Carolina Electric and Gas</p>	<p>Yes</p>	<p>The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard</p>
<p>Response: Thank you for your comments.</p>		
<p>Georgia Transmission Corporation</p>	<p>Yes</p>	
<p>MISO</p>		
<p>Occidental Chemical Corporation</p>	<p>Yes</p>	<p>As a Generator Owner, Occidental Chemical will only be subject to PRC-006-SERC-01 Requirement R8 and its three sub-requirements. These call for GOs to provide SERC their generator frequency relay set points, clearing times, and maximum MW that could be separated from the system; within 30 days of a request. R8 further qualifies the reliability need is to “facilitate post-event analysis of frequency disturbances.”However, SERC already has the authority to gather</p>

Organization	Yes or No	Question 5 Comment
		<p>disturbance-related information from Generator Operators under EOP-004-1. As with many Generator Owners, Occidental Chemical is also registered as a GOP, and would have to provide such information in support of Regional disturbance investigations. However, even organizations which do not support both functions would have to coordinate with each other to supply any system event-related information requests from SERC. If this is not sufficient, MOD-010-0 and MOD-012-0 require Generator Owners to provide static and dynamic generator modeling data in accordance with the Regional Entity’s specification. It would seem that SERC’s specification could be modified to accommodate frequency relay data without creating any new enforceable reliability requirements. We understand that the proposed requirements are not onerous and the data can be easily supplied. However, Occidental Chemical is uneasy about applying a Standard related to underfrequency Load shedding to generation. It implies a connection with other entities that does not exist and a protective function that serves a very different purpose.</p>

Response:

The SDT disagrees. While Attachment 1-EOP-004 NERC Disturbance Report Form requires a report to be filed in response to an event where frequency or voltage goes “below the under-frequency or under-voltage load shed” set points, the form does not include the requirement to report the information spelled out in requirement R7 of PRC-006-SERC-01.

The MOD-010, MOD-012, and associated SERC regional criteria do not require that generator underfrequency and overfrequency protective setpoints be provided. Inclusion of this requirement in the standard ensures that the region receives necessary information. The SDT believes that including this requirement in the standard provides adequate notification to entities regarding providing specific data upon request to facilitate post-event analysis of frequency disturbances.

The SDT believes that this connection between generator underfrequency and overfrequency protection and UFLS protection does exist. While the generator protective function may serve a very different purpose, protection of the generating unit versus protecting the transmission system, both must be coordinated since units that trip offline during an under frequency event remove generation which may aggravate the event.

6. If you have any other comments that you have not already provided in the response to the prior questions, please provide them here.

Summary Consideration:

Organization	Yes or No	Question 6 Comment
LG&E and KU Energy		In R8, LG&E and KU Energy's GO would recommend 45 days, rather than 30 days, simply because while a Company is performing their post-event analysis it normally takes longer than 30 days to collect data with appropriate approvals. As an example, if an event happened in early December of a given year, it might prove difficult to get the appropriate agreement/approvals on data to submit within 30 days in a month that typically has personnel on holiday/vacations. Providing for a 45-day response would minimize this possible occurrence without harming overall system reliability.
<p>Response:</p> <p>The SDT feels that 30 days is adequate for the Generator Owner to provide the information required in R8.1, R8.2 and R8.3. This information should be readily available from the GO and does not require the GO to perform a post event analysis. In the event of an actual frequency disturbance it is imperative that SERC receives this information in a timely manner in order to perform an event analysis within the 90 day requirement specified by NERC.</p>		
Dominion		
NERC Staff Technical Review		<p>We support the following observations made during the Quality Review:</p> <p>General Observations</p> <p>[A] o The standard references the SERC sub-region but it is not defined.</p> <p>[B] o The SERC Region is referenced in the requirements. The RE is not normally referenced in each of the requirements.</p> <p>[C] Requirement R1: 1.1 should be a bullet since it is not a requirement.</p>

Organization	Yes or No	Question 6 Comment
		<p>[D] Requirement R2: Is (percent of load to be shed, frequency set points, and time delays) needed in the main requirement since they are spelled out in the sub-requirements?</p> <p>[E] 2.3.1 is not a sub-requirement because it is an exclusion. Consider making it the last sentence in 2.3 Requirement</p> <p>[F] R3: Imbalance is used two times. Consider referring back to first imbalance and clarifying second imbalance by adding 'such' before the second imbalance.</p> <p>[G] R3 references a specific NERC standard and requirement within that standard - it is generally best not to have a specific reference to another standard. If the referenced standard changes then the standard making the references needs to be updated.</p> <p>[H] General observation: Since the SERC standard does not replace the NERC standard and it is noted in the Guideline and Technical Basis that both the SERC and NERC standards must be followed to ensure full compliance does R3 have the potential for double jeopardy? Requirement</p> <p>[I] R4: 'Shall be responsible for implementing' is passive - consider changing to 'shall implement'. Requirement</p> <p>[J] R5: 'Shall be responsible for implementing' is passive - consider changing to 'shall implement'. Requirement</p> <p>[K] R6: The requirement lists 'which involve frequency settings, relay time delays, and changes'. Are there settings that do not involve the above? Since the above was listed are there settings that do not have to be changed within 18 months? The requirement reads like those are the only settings that will need changes within 18 months. Is the intent to limit it to these parameters or are they examples?</p> <p>[L] Requirement R7: Is it clear to the PC who within SERC this requirement is referencing? Should this be more specific about what department or area in SERC? Requirement</p> <p>[M] R8: General Observation: This is the only requirement that references the Generator Owner. The GO only has to provide information and does not have not to make any changes. Is there another standard that provides the responsibilities of the GO other than providing information?</p>
<p>Response:</p> <p>A. A note on subregions was added to the text box for R1 referencing the SERC Bylaws.</p>		

Organization	Yes or No	Question 6 Comment
		<p>B. The phrase “in the SERC Region” does not appear in R1 and R8, but did appear and has been deleted from R2, R3, R6, and R7. The phrase is needed in R4 and R5 since a UFLS Entity may have load in more than one Regional Entity.</p> <p>C. Part 1.1 was changed to a bullet.</p> <p>D. The phrase was added to provide clarity for what is meant by “the UFLS scheme.”</p> <p>E. Part 2.3.1 was the last sentence of 2.3 in Draft 7, but was separated into a separate part based on a recommendation from a quality review by SERC Legal. The concern was that this exclusion distracted from the main focus of 2.3, and caused some confusion. Part 2.3.1 was changed to a bullet to make it consistent with R1.</p> <p>F. The word “such” was added before the second ‘imbalance.’</p> <p>G. References to the specific requirement and the NERC standard number was removed for the requirement and added to the text box for R3.</p> <p>H. The SDT was concerned with possible double jeopardy and tried to avoid any such issues in the design of the SERC standard. However, the SDT also felt strongly that more specificity was needed on what addressed the “up to” 25% imbalance requirement in R3 of the NERC standard. By specifying the three imbalance levels that are to be simulated, R3 of the SERC standard defines what is required in the SERC region to meet the “up to” requirement in R3 of the NERC standard. However, R3 was revised to clarify the intent.</p> <p>I. The phrase has been changed to “shall implement.” Other revisions were made to R4 to clarify the intent.</p> <p>J. The phrase has been changed to “shall implement.” Other revisions were made to R5 to clarify the intent.</p> <p>K. These three parameters generally define a UFLS scheme. Typically a UFLS Entity annually only needs to make changes to a few UFLS relays due to load growth to ensure both the load shed per step and total load shed is within scheme tolerances. However, if the PC makes changes to frequency settings, relay time delays, and/or changes to the percentage of load in the scheme, it typically could require the UFLS Entities to make field adjustments to a majority of their UFLS relays, and may require installation of addition UFLS relaying. This could be a significant effort which would require much more time to complete than that allowed in R4 and R5.</p> <p>L. This should not be a problem for the PC. SERC has data reporting processes which involve entity notification of data requirements and data submittal through SERC portal forms or bulk upload templates. SERC stakeholders currently report this same UFLS data through a SERC compliance data reporting process.</p> <p>M. SERC has no other standards and no current plans to develop additional standards. While the GO has only a data reporting requirement in this standard, it is felt that this standard is the appropriate place to document that requirement.</p>

Organization	Yes or No	Question 6 Comment
Duke Energy		
Exelon		<p>[A] For GOs there needs to be close integration with Standards being developed by NERC. Similar to other Regions, SERC PRC-006-01 should be suspended until NERC Project 2007-09 and NERC Project 2007-01 are complete. PRC-006-FRCC-01 is currently on hold in the FRCC Region with the status "pending the completion of the NERC Reliability Standard Development Project 2007-01 "Underfrequency Load Shedding."PRC-006-MRO-01 is currently on hold in the MRO Region with the status "suspended."PRC-006-TRE-01 is also currently on hold in the TRE Region with the status "following the progress of the NERC UFLS SDT."Exelon suggests that the SERC SDT also suspend progress on SERC PRC-006-01 and similarly follow the progress of NERC Projects 2007-09 and 2007-01. At that time SERC should reevaluate if additional Regional guidance is necessary.</p> <p>[B] Consideration should be given to ensure that Planning Coordinators not be given the ability to develop defacto NERC Requirements without due process. For example; the Planning Coordinator will have the sole discretion to determine what an island is, determine needed remediation, and determine the UFLS scheme in general without a process for stakeholders to formally interact.</p> <p>[C] For SERC PRC-006-01 the settings should align with the pending NERC Standard PRC-006-1, for the load shedding setting the error bandwidth is too broad and the criteria determination for an island is not clear. As stated previously, Exelon does not see the need for Regional Standard when a NERC Standard will likely be approved by FERC.</p>

Response:

A. While some regions have suspended work on their regional UFLS standards, other regions (e.g. RFC, SPP, and NPCC) are proceeding. The SDT believes that the current NERC PRC-006-1 standard is sufficiently well developed such that moving forward with SERC Standard PRC-006-SERC-01 is beneficial, even though the NERC standard, which was Board Approved November 10, 2010, is still in the final regulatory approval process. SERC Standard PRC-006-SERC-01 provides additional clarity and specificity to the requirements stated in the NERC UFLS standard that the SDT believes are necessary for effective implementation of UFLS within the SERC Region (as is stated in the Guideline and Technical Basis item #1 of PRC-006-SERC-01). The guidance and direction provided in SERC Standard PRC-006-SERC-01 is beneficial. With respect to the comment that "For GOs there needs to be close coordination," the SERC UFLS standard imposes a reporting only requirement for a limited number of existing generator parameters.

Organization	Yes or No	Question 6 Comment
		<p>B. The SERC UFLS standard does not give the Planning Coordinator the ability to develop defacto NERC (or SERC) requirements. The SERC UFLS standard simply provides more specific guidance on how the Planning Coordinator is to execute its essential responsibilities, which have been assigned by the NERC UFLS standard.</p> <p>C. The NERC UFLS standard does not specify any bandwidth for the amount of load to be shed by various UFLS entities. SERC Standard PRC-006-SERC-01 attempts to provide a reasonable margin for the amount of load to enable for UFLS, with additional margin given to smaller UFLS entities which may have difficulty in achieving a precise load percentage due to a limited number of loads and/or feeders. The SDT believes that the bandwidths specified are reasonable, given the practical considerations of implementing the settings in the field. The criteria for determining islands are addressed in the NERC PRC-006-1 standard.</p>
<p>South Carolina Electric and Gas</p>		
<p>Georgia Transmission Corporation</p>		<ol style="list-style-type: none"> 1. R1 seems to have subject/verb confusion as written and the terms “when developing criteria” suggests that the PC would only have to comply ever so often “when developing criteria”. The measurement and VSL suggests the intent of the requirement is for each PC to “develop criteria”. The following is suggested: R1. Each Planning Coordinator shall develop criteria for selecting portions of the BPS that may form islands. The criteria shall: 1.1 include its SERC subregion as an identified island 1.1.1 A Planning Coordinator may adjust island boundaries to differ from subregional boundaries where necessary for the sole purpose of producing a contiguous subregional island more suitable for simulation. 2. M4 identifies a specific target implementation date of “May 1 of each calendar year” which is not identified in the requirement. 3. Should R2 identify a time qualifier to compliment M4...such as “the PC shall annually select or develop an automatic UFLS scheme”? 4. There is circular confusion within M4 and R5. It appears that the PC will develop a UFLS scheme on an annual basis and expect the UFLS entity to implement it. The UFLS entity could then implement it by May 1 according to M4, or recognize it as a change from the previous year’s scheme and implement it within 18 months according to R5. Additionally, It seems based on M4, that the annually developed UFLS scheme target date of May 1 could come before a previously

Organization	Yes or No	Question 6 Comment
		"changed" UFLS scheme with an 18 month target date.
<p>Response:</p> <ol style="list-style-type: none"> 1. The requirement to develop criteria for selecting portions of the BPS that may form islands is in NERC Standard PRC-006-1. The SERC Requirement R1 says that the criteria must include the subregion as an island. The SDT revised R1 to provide additional clarity. 2. May 1 is the date that the implementation of the UFLS scheme will be measured each year. The SDT revised R4 and R5 to provide additional clarity. 3. No. It is not anticipated that the UFLS scheme will change annually. R2 requires the PC's UFLS scheme to meet certain requirements. The scheme does not have to be updated annually. The implementation of the scheme will be checked annually as indicated by R4 and R5. 4. The PC will not annually develop a UFLS scheme. Changes to the scheme will be rare. As indicated in M4, if scheme changes are in progress (the 18 month period), the requirements of R4 do not have to be met. A more detailed explanation is provided in item # 4 of the Guideline and Technical Basis section located at the end of the standard. 		
MISO		MISO believes that the prescriptive requirements for setting frequency set points in PRC-006-SERC-001 are inconsistent with NERC Standard PRC-006-1. The NERC standard requires each Planning Coordinator to develop a UFLS program for its area, and gives the PC substantial discretion to devise specific frequency set points and UFLS block schemes to achieve system condition or performance goals. PRC-006-SERC-001 R2 usurps this grant of discretion by mandating that frequency set points be within a prescriptive range that limits not only the highest and lowest points, but also the number and range of set point blocks that a PC can establish without regard to unique system conditions or coordination with neighboring systems.
<p>Response: See response to your comment on Question 2 above.</p>		
Occidental Chemical Corporation		

END OF REPORT