

Individual or group. (9 Responses)
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Organization (6 Responses)
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Question 1 (8 Responses)
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Individual
Laura Lee
Duke Energy
Yes
No
No
No
Yes
Individual
John Bee
Exelon
Yes
No
No
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. 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 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.

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. 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. 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.

Group

LG&E and KU Energy

Brent Ingebrigtsen

Yes

No

No

No

Yes

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.

Group

Dominion

Louis Slade

Yes

No

No

No

Yes

Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes
No
No
No
Yes
The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
Individual
Jason Snodgrass
Georgia Transmission Corporation
Yes
No
No
No
Yes
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 "changed" UFLS scheme with an 18 month target date.
Individual
Kelsey Colvin
MISO
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 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.

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.

Group

NERC Standards Staff

Howard Gugel

Yes

No

No

No

Yes

We support the following observations made during the Quality Review: General Observations • The standard references the SERC sub-region but it is not defined. • The SERC Region is referenced in the requirements. The RE is not normally referenced in each of the requirements. Requirement R1: 1.1 should be a bullet since it is not a requirement. 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? 2.3.1 is not a sub-requirement because it is an exclusion. Consider making it the last sentence in 2.3 Requirement R3: Imbalance is used two times. Consider referring back to first imbalance and clarifying second imbalance by adding 'such' before the second imbalance. 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. 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 R4: 'Shall be responsible for implementing' is passive – consider changing to 'shall implement'. Requirement R5: 'Shall be responsible for implementing' is passive – consider changing to 'shall implement'. Requirement 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? 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 R8: General Observation: This is the only requirement that references the Generator Owner. The GO only has to provide information and does not have to make any changes. Is there another standard that provides the responsibilities of the GO other than providing information?

Individual

Michelle R. D'Antuono

Occidental Chemical Corporation

Yes

No

No

No

Yes

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 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.