

Individual or group. (15 Responses)
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Question 1 (12 Responses)
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Question 6 Comments (15 Responses)

Individual
John Bee
Exelon
Yes
No
No
No
This proposed Regional Standard is not necessary for GOs due to the work that is currently being done under NERC Project 2007-09, PRC-024, "Generator Performance During Frequency and Voltage Excursions," and therefore suggest that the RFC UFLS Standard PRC-006-RFC-01 remove GOs from applicability section. It is not clear that the criteria proposed in PRC-006-RFC-01 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 in the RFC 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 RFC Region as compared with the rest of the Eastern Interconnection.
Group
FirstEnergy Corp.
Sam Ciccone
Yes
FirstEnergy thanks the SDT for their hard work and dedication to this standard over the past few years. When this effort began, there was no enforceable standard because FERC did not approve PRC-006-0 as it was one of the "fill-in-the-blank" standards identified in FERC Order 693. RFC felt the need to address this fill-in the blank standard and to

consolidate the three legacy region requirements (ECAR, MAAC, MAIN) by starting the development of PRC-006-RFC-01. At that time, FE, along with most of the RFC members agreed with the development of the regional standard since NERC was far from development of their continent wide standard PRC-006-1. But since then, while the RFC standard development continued on into seven draft periods, the development of NERC PRC-006-1 was expedited and completed before the RFC standard. Furthermore, FERC has just released a NOPR indicating its intent to approve PRC-006-1. The NOPR comment period ends November 21, 2011 and industry will likely see action from FERC no later than the first quarter of 2012. Also, NERC is in the process of completing PRC-024-1 which sets requirements for Generator Frequency and Voltage Excursions which will be applied in conjunction with PRC-006-1. The PRC-024-1 standard is a high priority project at NERC and is scheduled for completion by the end of the first quarter of 2012. FE recognizes that the RFC drafting team has made substantial changes to bring their proposed UFLS standard into better alignment with NERC PRC-006-1 and has removed a number of glaring inconsistencies. However, we continue to believe that this standard development should be halted at this time. Some of the reasons we believe it should be stopped include: 1. The prescriptive text of the RFC standard, although good guidance for the development of a Planning Coordinator's UFLS program, may be too constraining for Planning Coordinators in the RFC footprint whose territories may span more than just the RFC region. For example, the Midwest ISO is the registered Planning Coordinator in the regions of MRO, RFC, SERC and should be given the flexibility to implement a single UFLS program for its territory. Similarly PJM's territory covers RFC and SERC. 2. This will cause burden, confusion and inefficiencies to be placed on entities required to comply with two separate UFLS standards and for the auditors who must audit multiple standards. 3. The uncertainty of the consistency of Generator Owner requirements of PRC-006-RFC-01 and the still developing NERC standard PRC-024-1. This will create possible issues when a GO is implementing the RFC standard and then may have issues implementing an inconsistent PRC-024-1 standard. 4. The RFC standard, if approved by the RFC Board, will only be enforceable upon FERC approval. This creates more uncertainty in that RFC will not know if FERC will even approve the regional standard. RFC members have continuously voiced the desire for RFC to suspend their work on their standard due to the NERC standard PRC-006-1 development. For instance, in the last comment period, 15 of 16 respondents (the 16th commenter Abstaining) believed that the standard should not be balloted, and most (12) of respondents (including PJM and MISO) commented that they believed that the work of the RFC standard development should be suspended in lieu of the NERC PRC-006-1 standard development. Therefore, due to the pending regulatory approval of NERC PRC-006-1 and RFC member majority opinions to halt work on this regional standard, we believe that the RFC standard is not needed from a reliability standpoint at this time. We suggest the team stop work on the standard, allow the implementation of PRC-006 and PRC-024 and then at a later time RFC can determine if there is a reliability need for RFC standard PRC-006-RFC-01. Furthermore, we believe the excellent work of this drafting team will serve as a good starting point for the development of the Planning Coordinator's UFLS program within the RFC region and that the implementation of NERC standards PRC-006-1 and PRC-024-1 will achieve the same end goal of reliability and avoid the inefficiencies of implementing multiple standards.

Group
Electric Market Policy & NERC Compliance
Louis Slade
Yes
Yes
Dominion continues to oppose the requirement (R8) to procure load shed service for the reasons we have stated in previous comments submitted during RFC postings of this regional standard. Dominion believes that this draft standard is technically unsound and essentially guarantees that a Generator Owner of a non-conforming generator will not be able to comply with this requirement. Also, very importantly, Dominion believes that the addition of this requirement will reduce reliability in order to provide the 'fairness' the SDT desires. For example, if the service is to be provided only when the non-conforming generator actually trips due to a frequency event, then the non-conforming generator would have to contact the seller and the seller would have to shed equivalent load (all within the 0-2 second time allowance contained in this proposed standard Dominion does not believe deployment of the service can be done this quickly errors, and therefore the adverse impact to reliability will be greater than if the non-conforming generator was included in the UFLS plan. Equally concerning, if the service is to be provided whenever the frequency reaches the set point of the non-conforming generator (regardless of the output of the generator, including 0, if off line at onset of event), Dominion believes that deployment (if not equal to output of non-conforming generator at onset of the event) could result in over recovery of frequency and therefore the adverse impact to reliability. Again, this result could be more detrimental to reliability than if the non-conforming generator was included in the UFLS plan The proposed NERC (continent wide) standard recognizes that there are generators which can't conform to the UFLS set points and requires that this be taken into consideration in developing the UFLS plan. Dominion believes this is superior to the proposed RFC regional standard.
No
Yes
The proposed standard requires an owner of a non-conforming generator to procure load shed service. We have polled entities and have found none that offer, or intend to offer such service. We provided this information to the SDT. Their

response was "The SDT considered other methods to allow a generator to stay in service but meet the standard requirements. This method of procuring additional load shedding has been deemed to be the most fair by the SDT, in that it does not burden the DP's with extra load shedding responsibilities due to a generator which does not conform to the time vs. frequency curve."

Yes

While it does include requirements that are not included in the corresponding continent-wide reliability standard, Dominion does not see where these additional requirements improve the standard or make an improvement in reliability.

Individual

Dan Roethemeyer

Dynegy Power, LLC

Yes

No

Not that we are aware of

No

Not that we are aware of

No

Not that we are aware of

Yes

Regional Standard covers requirements not yet approved continenet wide

• NERC is drafting PRC-006-1. The regions should wait until the NERC standard is approved to make sure the regional standard doesn't conflict with the NERC standard. • How can RFC force entities into commercial agreements for load shedding? • NPCC allows 2 years for implementation while RFC allows 1. Suggest asking RFC to modify theirs to 2 years as well. It may take a while to comply if, for instance, an entity would choose to change out relays to avoid entering into a load shedding agreement.

Individual

Kevin

Koloini

Yes

No

No

No

Yes

For DP that meet the criteria in R2.4, 50 or fewer feeders, please consider the reliability benefit of requiring the PC to provide a choice to the DP in the program. It appears that the PC is required to choose only one of the three items in R2.4 to comply with the requirement. Should system conditions for a DP change, the DP should be able to reprogram the system to choose the best functionality. I may be wrong, but I believe I found several similarities when mapping the PRC-006-1 and the PRC-006-RFC-01 documents - similarities on requirements for failing to perform an assessment, provide a written response, missing island criteria, an entity not providing data, etc. If the region needs additional requirements to improve reliability, then only those requirements should be added. It appears to me that the PRC-006-1 requirements are being redrafted in the PRC-006-RFC-01 standard. Please remove similar or redundant requirements, if any. The expectation I had was that the PRC-006-1 standard would stand alone. The PRC-006-RFC-01 standard has added some 14 requirements, and added Generator Owners as applicable entities for underfrequency load shedding. The issue of concern is that the PRC-006-1 standard has not been implemented. The PRC-006-RFC-01 standard adds more requirements before anyone can establish a baseline for reliability on the PRC-006-1 standard. The PRC-006-RFC-01 standard, and other regional UFLS standards, should be postponed until PRC-006-1 has been implemented and enough time has passed to establish a need for regional reliability requirements that PRC-006-1 did not address.

Individual

David Thorne

Pepco Holdings Inc

Yes
No
No
No
Yes
Group
MISO
Marie Knox
Yes
No
No
No
Yes
Our primary concern with PRC-006-RFC-01 is that the standard is too prescriptive and limits the ability of the Planning Coordinator to design the best possible UFLS program. We propose that consideration of establishing a PRC-006-RFC-1 standard be deferred until the industry gains enough experience with the PRC-006-1 standard to determine whether the development of an RFC regional standard is warranted. In addition, we have concerns with several items in Draft 7: a. The more prescriptive UFLS program design criteria (R1 & R2) and island identification criteria (R3) in the PRC-006-RFC-1 may be unnecessary and prevent the development of more appropriate UFLS program designs and island identifications. b. The proposed language for R5 refers to “a request for clarification” according to R4, but R4 does not specify any requirements for DPs, TOs, or GOs to request clarification. Rather, R4 solely governs the timeframe for the PC to supply the island identification criteria. Therefore, the language stating “in accordance with Requirement R4” does not add clarity. c. For R5, it is not known whether 45 calendar days is a practical and reasonable timeframe to respond to challenges to a PC’s island identification criteria because PCs have not had to develop these criteria before and find out what issues they may be asked to address. d. For R6, it is not known what mitigation measures the standards drafting team has in mind and whether the expected mitigation measures can be identified, developed, approved, and implemented within 6 months. Therefore, no implementation timeframe should be placed in the standard until there is more clarity and experience with the actual time it takes to establish a reasonable number and range of types of mitigation measures e. In R6, it is also unclear what the basis the standards drafting team assumes would be used to determine what the range of imbalance of Load and generation would be for the area of islanding. We would expect the imbalance basis to be the Load, generation and power transfer conditions (generation dispatch and firm transfers) of Year One Peak Demand base cases drawn from the applicable MMWG series base cases. f. In R6, the proposed regional standard introduces two issues for registered entities: a. There is an implicit requirement that Planning Coordinators must develop mitigation plans for islands with imbalances greater than 25% and up to 50%. This is a new obligation without any explicit requirements within the standard. b. Additionally, this requirement is likely unworkable for islands that span Regional Entities because there is not a corresponding requirement within PRC-006-1 (e.g., TOs would be unable to require registered entities outside of the RFC to participate in a mitigation plan mandated by RFC). g. The language in R7 should not specify a required timeframe for completion of the mitigation plan by DPs, TOs and GOs. Similar requirements regarding UFLS program implementation in PRC-006-1 gives the PCs the ability to establish the schedule for making corrections. This flexibility should be retained such that the PC, for example, can require an earlier date if the PC determines that this is appropriate and reasonable. h. In R8, compensatory load tripping should only be established when it is needed to meet UFLS program requirements for the island as determined by the PC in lieu of changes by the GO. If compensatory load tripping is needed, the Planning Coordinator should determine the amount of compensatory load shedding as well as the location that would meet the performance requirements. i. In R10, it is not known what distinction the standards drafting team is making between the UFLS program “design” and “implementation”. This requirement is okay if the difference is understood to be that “design” refers to the load shedding that the Planning Coordinator determined was needed for acceptable UFLS program performance and required to be implemented (R11) and “implementation” refers to what the

Distribution Provider, Transmission Owner, or Generation Owner reported was actually implemented (R7), which may be a little more than what was required. All of these requirements specify RFC UFLS program design criteria. However, if the Planning Coordinator has a better plan that is outside of historic industry norms (as prescribed in this standard) the better idea cannot be proposed. The prescriptive text of the RFC standard is too constraining for Planning Coordinators in the RFC footprint whose territories span more than just the RFC region. MISO is the registered Planning Coordinator in the regions of MRO, RFC, and SERC and should be given the flexibility to implement a single UFLS program for its territory.

Individual

John Seelke

PSEG Services Corporation

No

See answer to Q4 below.

Yes

The standard requires actions by Planning Coordinators (PC) within RFC. First, two PCs (MISO and PJM) in RFC operate in multiple regions. On the surface, how would a PC that spans multiple regions comply with this standard? Would it apply to its RFC load only? If so, these PCs will end up with multiple UFLS programs. If that occurs, it will cause confusion with the TOs and DPs in the different regions. That confusion would be a detriment to reliability because of the increased potential for error in both design and implementation. Second, the standard lacks the requirement for coordination between PCs who have a part of one PC's island within another PC's region (R5 in NERC PRC-006-1). UFLS program design may require coordination across regional boundaries as addressed in the NERC standard. R4 in the RFC standard is especially RFC-centric, whereas the power system is not: "Each Planning Coordinator shall make its island identification criteria available for technical review by those entities directly and materially affected by the reliability of ReliabilityFirst Bulk Electric System (BES), within 15 calendar days of the receipt of a request." Of course, a regional standard cannot require coordination with a PC in another region. The NERC standard is superior in that regard, and therefore the RFC standard, which lacks this requirement, would be a detriment to reliability. Third, UFLS programs need to be developed on an Interconnection-wide basis, not a regional basis. Frequency is an interconnection-specific parameter. This is recognized in the draft NERC standard BAL-003-1 – Frequency Response and Frequency Bias Setting, where all Balancing Authorities within an Interconnection must have a portion of the required Interconnection frequency response.

No

Yes

NERC's PRC-006-1 does not contain a specific generator performance requirement. Generators that cannot meet the underfrequency operational assumption in Attachment 1 of the standard are modeled "as is" by the Planning Coordinator in accordance with R4, and the UFLS calculated with their actual underfrequency generator performance parameters must be provided by UFLS entities (Transmission Owners and Distribution Providers). However, RFC's draft standards propose specific generator performance requirements on existing and new generators. In addition, it would require existing Generator Owner's to obtain offsetting UFLS for the early tripping of their generator's which cannot meet their specific performance requirements – see R8, third bullet. This offsetting UFLS would be provided by Transmission Owners or Distribution Providers, but the Generator Owner would be required to obtain it. Although not directly stated in this regional standard, the presumption is that Generator Owners would be required to compensate their providers for their offsetting UFLS. PSEG objects to this aspect of the draft regional standards for several reasons. First, the added cost to existing Generation Owners whose generators do not meet the draft standard's performance requirements will impact the competitiveness of these generators. This violates the RFC Regional Standards Development Procedure, which adheres to NERC's market principles – see p. 9 of their procedure. The NERC market principles state, in part, that "A reliability standard shall not give any market participant an unfair competitive advantage." Second, the requirement that existing Generator Owners acquire offsetting UFLS to make up for their generators underfrequency performance is completely absent in the functional model description of a Generator Owner's functions.

Yes

While there are more specific criteria and more requirements, the standard has the deficiencies cited in Q2 and Q4 above.

Group

Transmission Access Policy Study Group (see www.tapsgroup.org for a list of TAPS' more than 40 members)

Cynthia Bogorad

Yes

TAPS questions the need for the proposed regional standard. A continent-wide UFLS standard, PRC-006-1, has been approved by stakeholders and the NERC Board, and in Docket No. RM11-20-000, FERC proposes to approve the

NERC standard. That standard is sufficient to protect reliability; Regions and the industry should not, at this point in time, be devoting their scarce resources to developing regional standards on the same subject. NERC Reliability Standard PRC-006-1 requires Planning Coordinators to develop UFLS programs. It does not require Regional Entities to develop separate UFLS reliability standards. RFC should stop work on the proposed regional standard, which, as discussed below, does not add any reliability benefit to PRC-006-1. Furthermore, a regional standard on this topic could place the entities in RFC under a double jeopardy threat since all the entities will need to comply with mandatory NERC and Regional Standards. This double jeopardy threat is exacerbated by the fact that the continent-wide standard requires a periodic review and potential change to the program every five years, whereas the RFC proposal would lock the UFLS relay settings into a regional standard that could not be changed without FERC approval. If those relay settings need to be changed pursuant to the continent-wide standard, there would be a conflict between the continent-wide standard and the regional standard that could only be resolved through a revision to one of the standards, which would have to be FERC-approved to go into effect. In the meantime, entities would have no choice but to be non-compliant with one of the two standards. RFC would be better served by being consistent with NERC's PRC-006-1 and not developing a UFLS program as a regional standard. In addition, while the continent-wide PRC-006-1 is deliberately not applicable to Generator Owners, because a different standard (PRC-024-1) covers GOs' ride-thru obligations, RFC's proposed regional PRC-006 standard would apply to GOs. With respect to GO obligations, the proposed regional standard adds nothing positive to PRC-024-1. For example, the current curve in PRC-006-RFC-1 is not complete since it does not give an upper limit and does not stipulate nominal conditions, and the draft standard fails to account for the fact that generators may trip off line for reasons other than an under frequency relay pickup.

Yes

Requirement R8 would force generators that do not meet the performance requirements in the standard (non-conforming generators) to either: 1) make substantial investments to meet performance requirements imposed on them after they are already interconnected and in commercial operation, or 2) enter an agreement for compensatory load shedding with one of a limited number of entities that can offer such service, and with no market to inform pricing of such service. Either option is a significant burden on the competitiveness of these generators which results in a substantial burden on competitive markets. Compensatory load shedding should NOT be allowed for two reasons: 1) the standards should not force agreements to be made; and 2) the UFLS program would become a highly complex scheme with settings that would need to change over time to reflect the status of the non-conforming generator; e.g., if the unit were off-line, then too much load would be "armed" to trip, so, those relay settings would need to be changed when the unit was off-line. The complexity of a UFLS program that would have to track the status of non-conforming generators is staggering. For instance, a non-conforming generator with a capacity of 300 MW would presumably have 300 MW of compensatory load shedding. If it were running at 200 MW, then we would want the 300 MW of compensatory load shedding dropped to 200 MW. How would such a thing be possible if we are limited to a finite level of distribution circuits whose load varies minute to minute with different load patterns, with varying levels of critical loads (e.g., hospitals) and non-critical loads on those circuits? At what UFLS steps would the compensatory load shedding be adjusted? Would it be multiple steps? If the generator were providing regulation service, the relay settings would need to change minute by minute on different circuits depending on actual loads on those circuits. If the ability to make such minute-by-minute relay changes were not in place, would the generator be barred from participating in the regulation service ancillary services market, further burdening competitive markets? Compensatory load shedding is ill-conceived and highly impractical. The continent-wide standard that FERC proposes to approve takes the correct approach. Existing non-conforming generators of a sufficient size to matter should be modeled and the UFLS program be designed in a robust enough fashion to handle the non-conforming generation.

It is important to note that the record of the proposed standard at RFC shows a significant amount of stakeholder opposition. For example, in RFC's most recent comment period, which closed on October 27, 2011, 100% (12 out of 12) of commenters opposed the draft standard proceeding to Category Ballot, and many ask that RFC cease work on the draft. For this reason, as well as the reasons described above, RFC should cease work on the regional standard.

Group

NextEra Energy, Inc.

Silvia Parada Mitchell

No

No, the proposed regional reliability standard does not meet one of the above listed criteria. Instead, there appears to be a significant and fatal flaw in the current draft, because this regional reliability standard has inappropriately moved from the regional reliability organization (RRO) implementing the standard to planning coordinators, distribution providers, generator owners and transmission owners. The need for Automatic Underfrequency Load Shedding is not a bottom up analysis, which appears, at times, to be the approach set forth in PRC-006-RFC-01. Instead, the need for automatic underfrequency load shedding is more appropriately decided collectively by Transmission Planners.

Transmission Operators, Reliability Coordinators and Planning Coordinators. Consider that the purpose section of the proposed regional standard states: "To establish ReliabilityFirst Regional requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures." (Emphasis added) The entities that are responding to the above mentioned events and implementing the last resort measures are generally Transmission Operators and Reliability Coordinators. The current construct of the regional reliability standard does not include Transmission Operators, Transmission Planners and Reliability Coordinators, the entities that should be working with the Planning Coordinator to develop regional plans for where on the system any automatic underfrequency load shedding schemes are necessary. Transmission Owners, Generator Owners and Distribution Providers would only be involved in the process to the extent the regional plan (developed by Transmission Operators, Transmission Planners, Planning Coordinators and Reliability Coordinators) requires action on their part. Contrary to this approach, the current draft of the regional standard requires action (examples provided below in question 6) that are independent of any appropriately developed regional plan, and, therefore, are not efficient or effective or in the best interest promoting the reliability of the bulk power system. Accordingly, the current construct of the regional reliability standard should be re-thought and re-drafted to first require that the Transmission Operators, Transmission Planners, Planning Coordinators and Reliability Coordinators first develop a regional plan, and then coordinate the implementation of that plan with those Generator Owners, Transmission Owners and Distribution Providers identified in the plan as needing to take a specific action. This approach, while different, is not that dissimilar to the manner in which black start generation is identified in restoration plans. Thus, NextEra Energy, Inc. requests that PRC-006-RFC-01 be re-written consistent with these comments.

There needs to be a provision for nuclear Generator Owners that do not meet the curve from Attachment 1 since licensing design basis and nuclear safety is the overriding priority at nuclear facilities. Nuclear generators cannot violate the license requirements as regulated by the Nuclear Regulatory Commission (NRC). Examples of actions that are not in sync with an appropriately developed regional plan for Automatic Underfrequency Load Shedding include the following: R7. Requirement 7 requires Transmission Owners, Generation Owners and Distribution Providers implement the mitigation plan developed by a Planning Coordinator. As stated in response to question 5, the regional plan needs to take into consideration regional load shedding needs, which cannot solely be judged by a Planning Coordinator. Any regional plan and associated mitigation should be developed jointly by the Planning Coordinators, Transmission Planners, Transmission Operators and Reliability Coordinators in that region. Thus, for requirement 7 to be valid, the regional standard needs to be re-written to have a regional plan developed jointly by the Planning Coordinators, Transmission Planners, Transmission Operators and Reliability Coordinators. This comment is also relevant for many of the other requirements, including requirement 11. R8 (bullet 3). Generator Owners should not be independently working with Distribution Providers on load shedding schemes. Regional load shedding schemes need first be developed as described in response to question 5, and if the plan indicates a need for a Distribution Provider to implement load shedding in relation to a the megawatt output of a particular generator, then coordination of that scheme is between the developers of the regional plan and the Distribution Provider – not the Generator Owner. To place a requirement on a generator to work with a Distribution Provider in this manner is misplaced, likely to cause confusion and inappropriately requires the generator to be a intermediary between the Distribution Provider and the Planning Coordinator, etc. Such a process does not promote the implementation of load shedding or the reliability of the bulk power system.

Individual
Thad Ness
American Electric Power
Yes
No
No
No
Yes
Group
NERC Compliance
Daniel Herring
Yes
No

No
No
Yes
Detroit Edison does not agree with the language change regarding underfrequency tripping of generators. In this proposed draft of PRC-006-RFC-01 Attachment 1 is a curve that shows at 58.2 HZ the minimum time delay is 10 seconds whereas the previous draft stated that at 58.2 HZ the time delay was at the owner's discretion. It is Detroit Edison's position that the time delay setting remain at the owner's discretion as Detroit Edison is concerned that a minimum time delay setting of 10 seconds may put Detroit Edison's generators at risk due to turbine damage.
Individual
Chris Higgins/Fran Halpin/Don Watkins/John Anasis/Rebecca Berdahl/Fred Ojima/Larry Furumasu
Bonneville Power Administration
BPA thanks you for the opportunity to provide feedback for this request. BPA generally stands in support of the development of Regional Standards, however at this time; BPA abstains from comment due to this being an RFC regional standard, outside of the WECC region BPA resides in.
Individual
Scott Berry
Indiana Municipal Power Agency
Yes
No comments.
Abstain. No comments.
Abstain. No comments.
Yes
IMPA does not believe in making the Generator Owner responsible for arranging Load shedding if it cannot set its under frequency protection relays to the proper curve set points due to possible damage to the unit during an under frequency event (requirement 8). The Generator Owner will find it difficult to reach a mutual agreement with a Distribution Provider to load shed an equivalent amount of load to the Generator Owner's generation. There is no incentive for the Distribution Provider to shed load and it may not even be enough to equal the Generator Owner's generation. In today's marketplace Generation Owners are not necessarily connected in any way (physically or in business terms) to Distribution Providers. Plus, trying to coordinate a load shedding scheme to know when and how much load is online is impossible. If a Generator Owner cannot meet the settings due to possible damage to its generation unit and it cannot reach an agreement with a Distribution Provider, what choice is left for the Generator Owner to choose? The Generator Owner does need an exception if it cannot set its under frequency relays to the RFC UFLS standard requirements due to equipment limitations. The possible loss of generation due to not being able to meet a reliability standard requirement does create a burden on competitive markets for generation while also possibly negatively affecting reliability. If a load shedding agreement is reached between a Generator Owner and a Distribution Provider, it will probably involve some form of financial compensation. A regional or NERC standard should not force entities into some form of a financial compensation agreement. It can create a market disadvantage for a generating entity and give advantages to other entities. In addition, a reliability standard should not force a Generator Owner to choose between possible equipment damage and intentionally violating a reliability standard in order to generate power, if the Generator Owner cannot reach a load shedding agreement with a local Distribution Provider. Both of the situations raised in answering this question could pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.
Yes
The proposed regional standard does have requirements that are not included in the corresponding continent-wide reliability standard. However, there is a very good reason why these requirements are not included in the continent-wide standard. The requirements in the RFC regional standard are too constraining to the Planning Coordinators who span more than just the RFC footprint or have a better way of performing an UFLS program. Planning Coordinators need the flexibility to implement a single UFLS program for its territory that covers multiple Regional Entities.
IMPA appreciates all the work the SDT has put into this standard and we realize at one time this regional standard may have been needed. However, IMPA does not believe there is still a need for this standard. FERC has just released a

NOPR indicating its intent to approve PRC-006-1. The NOPR commenting period ends on November 21, 2011, and IMPA believes that FERC will take action on PRC-006-1 in the first quarter of 2012. In addition, NERC is in the progress of completing PRC-024-1 which sets the requirements for the generator to ride through frequency and voltage excursions. PRC-024-1 is the standard that fully covers the generators. NERC has PRC-024-1 scheduled to be complete in the first quarter of 2012. IMPA believes that only one standard is needed to ensure generators stay online during a frequency excursion and if two standards are applicable to generators in the RFC area, it will cause confusion and inefficiencies on the generator entities when trying to comply with two separate standards. This also is true with PRC-006-1 and only needing one standard for entities to comply with the requirements. It is the belief of IMPA that the work on this regional standard should be halted. It has been said many times that the standard drafting teams represent the industry. If one looks back at the last commenting period, 15 of the 16 (there was one abstention) commenting entities believed that the standard was not ready for balloting, and 12 entities (including PJM and MISO) stated that they believed that the work of the RFC UFLS standard development should be suspended in lieu of the NERC PRC-006-1 standard development. As for covering reliability, we believe that the two NERC standards (PRC-006-1 and PRC-024-1) should be allowed to be implemented and then determine if any reliability gaps existed in the UFLS program. This includes allowing these two NERC standards to replace the old legacy UFLS documents. One also needs to remember that we are not creating a UFLS program from scratch and that there is UFLS protection today.

Individual

Andrew Z. Pusztai

American Transmission Company

Yes

No

No

No

Yes

ATC proposes that consideration of establishing a RPC-006-RFC-1 standard be deferred until the industry gains enough experience with the PRC-006-1 standard to determine whether there are that warrant the development of a RFC regional standard. In addition, we have concerns with several items in Draft 7: a. The more prescriptive UFLS program design criteria (R1 & R2) and island identification criteria (R3) in the PRC-006-RFC-1 may be unnecessary and prevent the development of more appropriate UFLS program designs and island identifications. b. The proposed language for R5 refers to "a request for clarification" according to R4, but R4 does not specify any requirements for DPs, TOs, or GOs to request clarification. Rather, R4 solely governs the timeframe for the PC to supply the island identification criteria. Therefore, the language stating "in accordance with Requirement R4" does not add clarity. c. For R5, it is not known whether 45 calendar days is a practical and reasonable timeframe to respond to challenges to a PC's island identification criteria because PCs have not had to develop these criteria before and find out what issues they may be asked to address. d. For R6, it is not known what mitigation measures the standards drafting team has in mind and whether the expected mitigation measures can be identified, developed, approved, and implemented within 6 months. Therefore, no implementation timeframe should be placed in the standard until there is more clarity and experience with the actual time it takes to establish a reasonable number and range of types of mitigation measures. e. In R6, it is also unclear what the basis the standards drafting team assumes would be used to determine what the range of imbalance of Load and generation would be for the area of islanding. We would expect the imbalance basis to be the Load, generation and power transfer conditions (generation dispatch and firm transfers) of Year One Peak Demand base cases drawn from the applicable MMWG series base cases. f. In R6, the proposed regional standard introduces two issues for registered entities: 1) There is an implicit requirement that Planning Coordinators must develop mitigation plans for islands with imbalances greater than 25% and up to 50%. This is a new obligation without any explicit requirements within the standard. 2) Additionally, this requirement is likely unworkable for islands that span Regional Entities because there is not a corresponding requirement within PRC-006-1 (e.g., ATC would be unable to require registered entities outside of the RFC to participate in a mitigation plan mandated by RFC). g. The language in R7 should not specify a required timeframe for completion of the mitigation plan by DPs, TOs and GOs. Similar requirements regarding UFLS program implementation in PRC-006-1 gives the PCs the ability to establish the schedule for making corrections. This flexibility should be retained such that the PC, for example, can require an earlier date if the PC determines that this is appropriate and reasonable. h. In R8, compensatory load tripping should only be established when it is needed to meet UFLS program requirements for the island as determined by the PC in lieu of changes by the GO. If compensatory load tripping is needed, the Planning Coordinator should determine the amount of compensatory load shedding as well as the location that would meet the performance requirements. i. In R10, it is not known what distinction the standards drafting team is making between the UFLS program "design" and "implementation". This requirement is okay if the difference is understood to be that "design" refers to the load shedding

that the Planning Coordinator determined was needed for acceptable UFLS program performance and required to be implemented (R11) and “implementation” refers to what the Distribution Provider, Transmission Owner, or Generation Owner reported was actually implemented (R7), which may be a little more than what was required. j. Problem with RFC’s RSVP Portal while submitting responses to On-line questions: RFC comments from stakeholders on this Regional Standard were due on 10/27/11. ATC logged onto RFC’s RSVP portal to enter the comments on the applicable online Comment Form and was surprised that the questions on the portal did not line up or match the Comment Form provided in the RFC posting request for comments. This created some confusion and frustration, since the responses to the questions were prepared using the previously posted Comment Form with the RFC 30-day Request for Comment. For example, Question #1 of the posted Comment form was different from the online Comment Form. If changes are made after the posting, ATC suggests that RFC notify the stakeholders so that they are informed of the changes prior to submitting the responses to each question.