

Consideration of FERC Directive

Project 2008-02: Underfrequency Load Shedding (UFLS)

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| <p>FERC Order No. 763, Paragraph 48:¹</p> <p>In response to the Commission’s concern that Reliability Standard PRC-006-1 does not specify how soon after an event would an entity need to implement corrections in response to any deficiencies identified in the event assessment under Requirement R11 of PRC-006-1, NERC stated in its comments that:</p> <p style="padding-left: 40px;">The amount of time that a UFLS entity has to implement corrections will be established by the Planning Coordinator, as specified in Requirement R9 of PRC-006-1. The time allotted for corrections will depend on the extent of the deficiencies identified. The schedule specified by the Planning Coordinator will consider the time necessary for budget planning and implementation, recognizing that operating and maintenance budgets normally will not be sufficient to address major revisions and allowances will be necessary for inclusion of approved changes in budgeting cycles.</p> <p>Requirement R9 of PRC-006-1 states:</p> <p style="padding-left: 40px;">R9. Each UFLS entity shall provide automatic tripping of Load in accordance with the UFLS program design and schedule for</p> | <p>Requirement R15 of proposed PRC-006-2 was added in response to the directive from FERC Order No. 763, which raised concern that the standard failed to specify how soon an entity would need to implement corrections after a deficiency is identified by a Planning Coordinator assessment. Requirement R15 addresses the FERC directive by making explicit that if deficiencies are identified as a result of an assessment, the Planning Coordinator shall develop a Corrective Action Plan and schedule for implementation by the UFLS entities. A “Corrective Action Plan” is defined in the NERC Glossary of Terms as, “a list of actions and an associated timetable for implementation to remedy a specific problem.” The Corrective Action Plan developed by the Planning Coordinator will identify the specific timeframe for an entity to implement corrections to remedy any deficiencies identified by the Planning Coordinator as a result of an assessment. The time allotted by the Planning Coordinator for making corrections will depend on the extent of the deficiencies identified. The</p> |

¹ Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards, 139 FERC ¶ 61,098 (May 7, 2012). [[Link to FERC Order No. 763](#)]

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| <p>application determined by its Planning Coordinator(s) in each Planning Coordinator area in which it owns assets. <i>[VRF: High][Time Horizon: Long-term Planning]</i></p> <p>Notwithstanding NERC’s comments, the Commission is not persuaded that Requirement R9 requires corrective action in accordance with a schedule established by the planning coordinator. Based on its comments, however, NERC has expressed no opposition to such a requirement. We accept NERC’s comments that Requirement R9 requires a schedule established by the planning coordinator, but NERC’s reading of Requirement R9 should be made clear in the Requirement itself. Accordingly, we direct NERC to make that requirement explicit in future versions of the Reliability Standard. Within 30 days of the effective date of this Final Rule, NERC is directed to submit a compliance filing indicating how it plans to comply with this directive and a deadline for compliance.</p> | <p>schedule specified by the Planning Coordinator will consider the time necessary for budget planning and implementation, recognizing that operating and maintenance budgets normally will not be sufficient to address major revisions and allowances will be necessary for inclusion of approved changing in budgeting cycles.²</p> <p>Additionally, for Requirements R9 and R10, the standard drafting team added the “Corrective Action Plan” language to ensure that any Corrective Action Plan developed by the Planning Coordinator under Requirement R15 will be implemented by the UFLS entity and/or Transmission Owner as part of the UFLS program.</p> |

² See, *Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards*, 139 FERC ¶ 61,098, P48 (May 7, 2012), citing, *Comments of NERC in Response to Notice of Proposed Rulemaking*, Docket No. RM-11-20-000, at 8 (December 23, 2011).