

**Individual or group. (35 Responses)**  
**Name (24 Responses)**  
**Organization (24 Responses)**  
**Group Name (11 Responses)**  
**Lead Contact (11 Responses)**  
**Question 1 (34 Responses)**  
**Question 1 Comments (35 Responses)**  
**Question 2 (29 Responses)**  
**Question 2 Comments (35 Responses)**  
**Question 3 (30 Responses)**  
**Question 3 Comments (35 Responses)**  
**Question 4 (24 Responses)**  
**Question 4 Comments (35 Responses)**

Group
Northeast Power Coordinating Council
Guy Zito
No
UFLS entities should be included in the development of a Corrective Action Plan. Suggested wording of requirement R15: Each Planning Coordinator that conducts a UFLS design assessment under Requirement R4, R5, or R12 and determines that the UFLS program does not meet the performance characteristics in Requirement R3, shall, with the participation of affected UFLS entities, develop a Corrective Action Plan and a schedule for implementation by the UFLS entities within its area. The "...schedule for implementation..." in the above requirements is not specific, and does not appear to address the FERC Directive from Order No. 763 which raised the concern about how soon an entity would need to implement corrections. Suggest adding a definite time period.
Yes
Yes
Individual
Dan Bamber
ATCO Electric
Yes
Yes
Yes
No
Group
Arizona Public Service Company
Janet Smith
Yes
APS requests information on how the new requirement R15 will be integrated with the approved variances. Since the variances specifically address the UFLS plan as does R15, APS is unsure how the requirement will be implemented within the Western Interconnection.
Yes

Yes
No
Individual
Laurie Williams
Public Service Company of New Mexico
No
According to the rationale for the addition of R15 was to address FERC Order No. 763. FERC was cornered that the standard didn't specify when the entity would need to implement a change to correct deficiencies identified during an assessment. R15 in this draft references R3, R4, R5 and R12. PNM is concerned that WECC has a regional variance for all four of these original NERC Std requirements - E.B.3, E.B.4, and E.B.12 are similar to R3, R4, and R12 but the regional variance doesn't contain a requirement similar to R5. PNM's question is how does R15 apply to WECC entities if the referenced standards do not apply? Below is a suggested revision for R15 to allow for alignment with WECC variance. R12. Each Planning Coordinator that conducts a UFLS design assessment [remove "under Requirement R4, R5, or R12"] and determines that the UFLS program does not meet the performance characteristics [remove "in Requirement R3"], shall develop a Corrective Action Plan and a schedule for implementation by the UFLS entities within its area. 15.1 [Remove "For UFLS design assessment performed under Requirement R4 or R5,"] [T]he Corrective Action Plan shall be developed [Add- "within the time frame of the assessment."] {remove - "within the five-year time frame identified in Requirement R4."} Remove R15.2 in its entirety [remove "For UFLS design assessments performed under Requirement R12, the Corrective Action Plan shall be developed within the two-year time frame identified in Requirement R12."]
Yes
Yes
Yes
PNM HAS THE FOLLOWING COMMENT FOR PRC-010-1 THAT WE DID NOT SUBMIT DURING THE COMMENT PERIOD FOR THE SDT'S CONSIDERATION - PNM's concern is that the proposed PRC-010-1 standard requires the PC to annually update the UVLS database. PNM as a PC believes this should be the responsibility of the UVLS entity not the PC. As written, PCs would have to send a request for updates to all UVLS entities within their PC area every year rather than putting the obligation for data submittal on the UVLS entities. PNM is a smaller entity but is registered as a PC, and as such this could potentially create an administrative burden for the PC particularly if the UVLS entity is one that you have to repeatedly request information from without response. Suggested edit to address PNM's concern: R6: replace "update" with "maintain" R7: remove "and schedule" and add "at least once each calendar year" at the end of R7 following "UVLS Program databased"
Individual
Gul Khan
Oncor Electric Delivery LLC
Yes
Yes
Yes
No
Individual

David Thorne
Pepco Holdings Inc.
Yes
Yes
Yes
The requirements included in the standard under R6, R7, R8 and R14 all make sense to be logically included in this standard. The need for over voltage tripping of BES capacitor banks to cover for a possible system over correction should be determined quickly by the respective planning coordinator to allow adequate time for scheme addition or medication to support R10.
No
Group
Puget Sound Energy
Eleanor Ewry
No
While the basis for these changes is relevant, the changes are awkward and require re-wording to further clarify the intent of the requirements. For example, R9 could read something to the effect of: "Each Transmission Owner shall provide automatic switching of its existing capacitor banks, Transmission Lines, and reactors to control over-voltage as a result of underfrequency load shedding if required by the UFLS program and within the schedule for implementation, taking into consideration schedules imposed by any Corrective Action Plan, as determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission. The same wording could apply to R10 as well.
Yes
Yes
No
Individual
Amy Casuscelli
Xcel Energy
No
R15 is a requirement that stipulates actions if the conditions of R3 are not met. Thus, R15 would only apply if an entity were non-compliant with R3, and thus the CMEP would require an appropriate mitigation plan to correct and prevent recurrence. No requirement within the standard itself is needed to drive mitigating steps. Additionally, we suggest that the WECC variance address R15 as well, since the drivers for R15 (R3, R4, R5, R12) are not applicable to entities and it is not clear as to which requirements in the WECC variance substitute for these.
Group
MRO NERC Standards Review Forum
Joe DePoorter
Yes
Yes

Yes
No
Individual
Thomas Foltz
American Electric Power
No
It is important for the Transmission Owner to be allowed to participate in the Planning Coordinator's UFLS assessment process. R15 should be revised to allow the Transmission Owner to review, comment on, and approve of, the proposed Corrective Action Plan and related implementation requirements. AEP has chosen to vote negative on the proposed revisions, based on the concerns expressed above.
Yes
Yes
No
Individual
Mark Wilson
Independent Electricity System Operator
No
We agree with the addition of R15 but do not believe the added language "including any Corrective Action Plan" inserted to R9 and R10 is clear. Reading from the start of the main requirement, the phrase begs the question on what is it that needs to include the CAP: is it the "provide automatic tripping of Load" (in R9) or "provide automatic switching" (in R10), or is it the implementation of these switching requirement together with the CAP? We believe R9 and R10 requires the responsible entities not only to provide the necessary tripping or switching, but also to implement the CAP per the PC's implementation schedule. If that's the intent, then we offer the following suggested wording change to improve clarity: R9. Each UFLS entity shall provide automatic tripping of Load in accordance with the UFLS program design and schedule for implementation and implement any Corrective Action Plan, as determined by its Planning Coordinator(s) in each Planning Coordinator area in which it owns assets. R10. Each Transmission Owner shall provide automatic switching of its existing capacitor banks, Transmission Lines, and reactors to control over-voltage as a result of underfrequency load shedding if required by the UFLS program and schedule for implementation and implement any Corrective Action Plan, as determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission.
Yes
Yes
Individual
Russ Schneider
Flathead Electric Cooperative, Inc.
No
I concerned that the corrective action plan language gives too much authority to the planning coordinate to potentially create BES issues for small entities by adding UFLS requirements to local distribution facilities that are not properly in scope of these regulations. corrective action plan language should be clarified that no UFLS requirements shall be created for non-BES facilities to make them BES as subject to compliance.

No
No
Individual
Chris Scanlon
Exelon Companies
Yes
The conclusion regarding "Requirement R8 should not be retired" in the justification document, beginning on page 3, contains wording that could be considered to negatively portray UFLS entities commitment to reliability and support of the PC. Specifically as written; "Without Requirement R8, the PCs would not be provided with the UFLS data from the UFLS entities...". If in scope for the comment process, we propose that the SDT modify the justification document and revise to say that, "Requirement R8 will ensure the PC has the necessary data to conduct their design and performance assessments." We agree that the Requirements R6, R7, R8, R10 and R14 should NOT be retired, and agree with the justifications of the SDT except as aforementioned.
The background section says that a SDT consideration in developing R15 is that the PC will consider in developing a Corrective Action Plan 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". It is our understanding that the Corrective Action Plan and a schedule for implementation by the UFLS entities within its area as developed per R15 are subject to the requirement (R14) "to respond to written comments submitted by UFLS entities and Transmission Owners within its Planning Coordinator area following a comment period and before finalizing its UFLS program". This is not clear as written. We would like the SDT to address this point in the Requirement and or the Justificatuion.
Individual
Russell A. Noble
Public Utility District No. 1 of Cowlitz County, WA
Yes
Yes
No
Concerning R8, Cowlitz sees this as a fill-in-the-blank Requirement. The Requirement should not be retired, it should be modified. This Requirement should specify the specific data to be available allowing stakeholder comment; as written, the UFLS entity is possibly exposed to unreasonable Planning Coordinator data requests. Cowlitz will defer to the opinions expressed by Planning Coordinators on Requirements R6 and R7. However, concerning Requirement R6, this appears redundant to Requirement R4. It is not possible to "conduct and document a UFLS design assessment at least once every five years that determines through dynamic simulation..." if there is no "UFLS database containing data necessary to model its UFLS program." Further, R7 appears redundant to R5 as coordination is not possible without the sharing of data. Concerning R9 and R10, both of these Requirements mandate the addition or improvement of BPS facilities if "automatic tripping/switching" equipment is not installed. From the Federal Power Act, section 216: "The term 'reliability standard' means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities... the design of planned additions or modifications to such facilities... ..but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity." The requirements should be revised to clarify as where automatic tripping/switching is available, and future plans for

improvements and expansion shall include consideration of UFLS Plan needs. Concerning Requirement 14, Cowlitz is not opposed.
Yes
The Standard should not refer to version 1 (e.g.: 3.1. Frequency shall remain above the Underfrequency Performance Characteristic curve in PRC-006-1 - Attachment 1) for every reference to PRC-006-2 - Attachment 1.
Individual
John Pearson/Matt Goldberg
ISO New England
No
The UFLS entities in R9 and R10 should be responsible for determining the Corrective Action Plan for their deficiencies. The Planning Coordinator is not the correct entity for this.
Yes
No
We do not think that R10 is consistent with the purpose of PRC-006-2. The purpose statement is "To establish design and documentation 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." R10 is to correct for overvoltages as a result of load shedding actions taken by protective devices performing to requirements for PRC-006-2. Although this is a good practice, we agree with the IERP Report that this requirement should not be mandated within this standard. The correction of overvoltage is covered in TPL and VAR as stated by the IERP Report. Such corrections should be made regardless of what the triggering circumstance of an overvoltage condition is. To apply an additional requirement R10 to correct for overvoltage can subject entities to two similar requirements - which is another reason for P81 elimination. It would be appropriate to note in PRC-006 through an explanatory text perhaps in a Guideline or Technical document that overvoltage can results from frequency related load shedding actions and entities must be aware of the requirements in TPL and VAR are complied with. We disagree with the SDT conclusion for R14. The IERP Report has it right. R14 is administrative and does not provide a fundamental reliability need. R14 does SUPPORT the reliability need but it does not rise to the level to be a distinct requirement with a compliance measure. To address the concern raised in Project 2007-1 for ensuring UFLS entities and TO's have a role in defining the UFLS program, PRC-006 should only require that the PC performing a UFLS study request input from those entities identified in its study - which is already done in R6. It seems the intent of R14 is to ensure the study is thorough and comprehensive. This in and of itself is not a fundamental reliability need but rather should be an assumption that a credible and qualified PC will perform studies with such diligence. R6 already requires a PC to have comprehensive information in maintaining a UFLS database - essentially ensuring the same underlying purpose of R14. R6. Each Planning Coordinator shall maintain a UFLS database containing data necessary to model its UFLS program for use in event analyses and assessments of the UFLS program at least once each calendar year, with no more than 15 months between maintenance activities. M6. Each Planning Coordinator shall have dated evidence such as a UFLS database, data requests, data input forms, or other dated documentation to show that it maintained a UFLS database for use in event analyses and assessments of the UFLS program per Requirement R6 at least once each calendar year, with no more than 15 months between maintenance activities.
No
Individual
Don Streebel
Idaho Power
Yes
We agree with the proposed revisions in response to the FERC directive.
Yes
We agree with implementation period of the proposed standard.

Yes
We agree with the drafting team conclusions that the requirements should not be retired.
No
Individual
Andrew Z. Pusztai
American Transmission Company
Yes
Yes
Yes
Individual
John Merrell
Tacoma Power
No
Requirement R15 refers to Requirements R3, R4, R5, and R12. However, these requirements are not applicable to WECC. Consideration should be given to rewording Requirement R15 or including a variance to Requirement R15 for WECC. There is some concern that Planning Coordinators under Requirement R15 may develop unrealistic CAPs. This potential issue is acknowledged in both the Consideration of FERC Directive and Response to Paragraph 81/Independent Expert Review Project Recommendations for PRC-006-1. There is no requirement for Planning Coordinators to consult with UFLS entities about the feasibility of CAPs, including the schedule for implementation. A CAP could be developed by one entity and implemented by one or more other entities. To help to successfully develop and implement a CAP, this issue should be at least addressed either as a footnote or in a Guidelines and Technical Basis section. Perhaps Requirement R14 could be modified to address this comment? Furthermore, there is no mention within the standard about the ability to modify the CAP, including the implementation schedule. Other standards, such as proposed PRC-004-3 and proposed PRC-026-1 permit modification if documented. Additionally, the Guidelines for Requirement R2 of proposed PRC-010-1 permit "deferrals or other relevant changes to the UVLS Program specifications or CAP" if documented. Such flexibility in modifying the CAP, including the implementation schedule, should be permitted by PRC-006-2 if the modifications are documented.
Yes
Yes
Yes
Why is there not a Lower VSL for Requirement R15?
Individual
Sonya Green-Sumpter
South Carolina Electric & Gas
Yes
We recommend a vote to approve the VRFs and VSLs.
Yes
Yes
No

Individual
David Jendras
Ameren
No
We request to modify the wording for R15 as follows, 'Each Planning Coordinator...shall in collaboration with the affected UFLS entity(s) develop a Corrective Action Plan...' Similarly, the wording for R9 and R10 should be modified to include the idea that the UFLS entity or Transmission Owner would collaborate with the Planning Coordinator in developing the Corrective Action Plan.
Group
SPP Standards Review Group
Robert Rhodes
No
In Requirement R15, Part 15.1, replace 'Requirement' with 'Requirements'.
Yes
(1) Although the following do not specifically fall within the limited scope of the SAR, they are errata in Measure M9 that should be addressed while the drafting team is dealing with Requirement R9. Use a lower case 'entity' when referring to UFLS entities in Measure M9. Also, capitalize 'Load' in Measure M9 to make it consistent with Requirement R9. (2) Again, this does not fall within the scope of the SAR but it is an errata that should be addressed while the standard is being revised. In the 2nd bullet under 1.2 Evidence Retention, insert 'its' between 'of' and 'UFLS'. (3) Likewise, this does not fall within the scope of the SAR but it is an errata that should be addressed while the standard is being revised. In the VSLs for Requirement R3, change 'characteristic' to characteristics'. (4) Also, hyphenate 30-, 40-, 50-calendar days and other similar usage in the VSLs for Requirements R7 and R8. (5) Include calendar in 13-calendar, 14-calendar, 15-calendar months and hyphenate in the VSLs for Requirements R11, R12 and R15. (6) We recommend that all changes made to the standard be reflected in the RSAW as well.
Group
Dominion NERC Compliance Policy
Randi Heise
Yes
Yes
No
While we agree with some of the reasons the SDT used to retain these requirements, we do agree with the IERP Recommendation that these ultimately be retired for the reasons they cited. At some point, the many requirements scattered throughout the body of reliability standards that call for the provision of data, maintenance of models and/or database(s) or coordination and cooperation as necessary to support reliability should be rolled into a very few requirements that apply to all registered entities. There should not be a need to have to include a similar requirement in each standard.
Group
Duke Energy
Colby Bellville
No



Duke Energy requests clarification from the drafting team on the applicability of R10. Does R10 only apply to Transmission Owners, or is the requirement also applicable to Distribution Providers as well? Specifically, does R10 bring in to scope the capacitor banks owned by Distribution Providers? We believe the intent of the drafting team is for R10 to solely apply to Transmission Owners, however, we offer the following suggested language revision to eliminate any possible ambiguity. "R10: Each Transmission Owner shall provide automatic switching of its Transmission capacitor banks, Transmission Lines, and Transmission reactors to control over-voltage as a result of underfrequency load shedding if required...."

Yes

No

Duke Energy does not agree with the standard drafting team in retaining R7 and R14 as enforceable requirements in this standard. R7: Duke Energy agrees with the Paragraph 81 team, and views this requirement as unnecessary, and largely administrative in nature. We feel that based on the infrequency with which requests like the one specified in R7 are made, and the likelihood of not receiving cooperation even in the event that a request was made, is so remote that it does not rise to the level of necessitating its own requirement. R14: Duke Energy feels that this requirement is purely administrative, and echoes the opinion of the Independent Expert Review Panel. We feel that simply requiring a Planning Coordinator to respond to comments made by UFLS Entities in its Planning Coordinator area, is not necessary to maintain reliability of the BES. While this requirement may be good business, and may allow for better working relationships between entities, it is not a requirement for BES reliability.

Yes

Duke Energy requests clarification from the drafting team regarding R15. Is it the drafting team's intent to require an entity to do a design assessment, and develop a corrective action plan, if warranted, in the time frames listed in 15.1 and 15.2? More specifically, does the time frame to develop a corrective action plan trigger from the date of the deficiency being found, or the date of the last assessment? As written, the language appears to require that an entity does both the design assessment and the corrective action plan within the period specified in 15.1 and 15.2.

Group

ISO RTO Council Standards Review Committee

Greg Campoli

No

Please refer to our comment on R10 in Question 3.

Yes

No

We do not think that R10 is consistent with the purpose of PRC-006-2. The purpose statement is "To establish design and documentation 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." R10 is to correct for overvoltages as a result of load shedding actions taken by protective devices performing to requirements for PRC-006-2. Although this is a good practice, we agree with the IERP Report that this requirement should not be mandated within this standard. The correction of overvoltage is covered in TPL and VAR as stated by the IERP Report. Such corrections should be made regardless of what the triggering circumstance of an overvoltage condition is. To apply an additional requirement R10 to correct for overvoltage can subject entities to two similar requirements - which is another reason for P81 elimination. It would be appropriate to note in PRC-006 through an explanatory text perhaps in a Guideline or Technical document that overvoltage can result from frequency related load shedding actions and entities must be aware of the requirements in TPL and VAR are complied with. We disagree with the SDT conclusion for R14. The IERP Report has it right. R14 is administrative and does not provide a fundamental reliability need. R14 does SUPPORT the reliability need but it does not rise to the level to be a distinct requirement with a compliance measure. To address the concern raised in Project 2007-1 for ensuring UFLS entities and TO's have a role in defining the UFLS program, PRC-006 should only require that the PC performing a UFLS

study request input from those entities identified in its study - which is already done in R6. It seems the intent of R14 is to ensure the study is thorough and comprehensive. This in and of itself is not a fundamental reliability need but rather should be an assumption that a credible and qualified PC will perform studies with such diligence. R6 already requires a PC to have comprehensive information in maintaining a UFLS database - essentially ensuring the same underlying purpose of R14. R6. Each Planning Coordinator shall maintain a UFLS database containing data necessary to model its UFLS program for use in event analyses and assessments of the UFLS program at least once each calendar year, with no more than 15 months between maintenance activities. M6. Each Planning Coordinator shall have dated evidence such as a UFLS database, data requests, data input forms, or other dated documentation to show that it maintained a UFLS database for use in event analyses and assessments of the UFLS program per Requirement R6 at least once each calendar year, with no more than 15 months between maintenance activities.

Individual

Brian Evans-Mongeon

Utility Services

No

Requirements 9 and 10 are not immediately clear that the Corrective Action Plan referenced in the requirements is the same CAP developed in R15. To add clarity the following modification to the Requirements should be made: R9. Each UFLS entity shall provide automatic tripping of Load in accordance with the UFLS program design and schedule for implementation, including any changes specified in a Corrective Action Plan as developed in accordance with R15, as determined by its Planning Coordinator(s) in each Planning Coordinator area in which it owns assets. R10. Each Transmission Owner shall provide automatic switching of its existing capacitor banks, Transmission Lines, and reactors to control over-voltage as a result of underfrequency load shedding if required by the UFLS program and schedule for implementation, including any changes specified in a Corrective Action Plan as developed in accordance with R15, as determined by its Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission. R15 should allow for input from the TO and UFLS Entity.

Individual

David Kiguel

David Kiguel

Yes

No

Implementation schedule of Requirements R9 and R10 should be agreed upon among involved entities. If design and construction work is required, sufficient time must be given for funding and regulatory approvals as required.

No

R6 is purely administrative in nature and meets the Paragraph 81 Criteria. The manner how the PC compiles and stores the information is up to the entity and should not be specified in the standard. R1 meets the objective ("what") and the standard should not specify how this is to be achieved. R7: For the same reason given in the comment to R6, I recommend deletion of "its UFLS database containing" in R7. Obligation to provide data is sufficient. R8: The format and schedule specified in R8 should be mutually agreed upon among the involved entities so that it's feasible and practical.

Yes

Clarification is requested about the technical justification for using a 25 % threshold in R3.

Group

ACES Standards Collaborators

Jason Marshall

Yes
These proposed revisions appear to address the FERC directive while allowing a reasonable timeframe for a UFLS entity to modify the amount of load under UFLS relay control.
Yes
Given that the UFLS program assessment requirements, R4, R5, and R12, are already effective. The approximate six to nine month implementation time frame is reasonable.
No
(1) R7 is clearly meets multiple P81 criteria (B1 – Administrative, B2 – Data Collection, B4 – Reporting). Specifically, it requires sharing data and information with a third party and provides little to no reliability benefit. The requirement does not even compel the recipient PC to use the data so how could this be viewed as anything other than administrative. (2) We disagree with the assessment for R8 and believe that this requirement clearly meets P81 criteria (B1 – Administrative, B2 – Data Collection, B4 – Reporting, and B7 – Redundant). It involves the requirement to share information with third parties which provide little to no reliability benefit. Contrary to the statement in the analysis, the PC has historically been able to get this information required in R8 and will continue to get the information because there are usually tariff or interconnection agreements that require the information and most UFLS entities understand the reliability need for the information and are willing to provide it. Furthermore, before PRC-006-1 became effective, PCs did not have any issues with receiving this data. (3) R6 also clearly meets P81 criteria. It does not compel anything that supports reliability. It does not compel the PC to have the UFLS information. It simply compels the PC to have the information in a database. How, the PC organizes the necessary UFLS information is irrelevant to reliability as long as they have the information and use it. (4) R14 also clearly meets P81 criteria. Specifically, it meets the documentation criterion in that it requires a document to be produced that provides no reliability benefit. In this requirement, the PC just has to respond to the submitter of the written comments. The reasons do not even have to be technically justified. This requirement is a “feel-good” requirement for the UFLS entities to be able to compel some response to their concerns. This is simply unneeded and the UFLS entities and PC should work together to address any concerns outside of compliance processes. This approach would be more efficient, effective and reliable.
Yes
Thank you for the opportunity to comment.
Group
Florida Municipal Power Agency
Carol Chinn
No
The language of R15 should include a reference to R13 as well, for the same reason that a reference to R5 is included. FMPA also wishes to point out that the third bullet of R5 includes the language “identify modifications to the UFLS program(s) to meet Requirement R3” –this should be changed to developing recommended Corrective Action Plans or should be left to R15 solely to make that statement. R15.2 should also include a reference to R13.
No
FMPA sees two issues with the proposed 6 month implementation. First, conducting a UFLS design study or event evaluation is a complex study that becomes an important part of a PC’s “year ahead” projection of work, and the proposed changes now require Corrective Action Plans which may require the coordination and agreement of a large number of participants to schedule and rectify issues identified prior to the date of issue of the study (e.g. within the 5 year or two year interval). If an entity is in the current year that its 5 year assessment is required, and PRC-006-1 is replaced with PRC-006-2, suddenly additional time is required to complete the study which was not anticipated. Furthermore, entities’ actual UFLS settings are only reported annually, and may be in a state of flux. FMPA believes the date should at minimum be 1 year, as a result. Secondarily and similarly, since PRC-006-1 does not require Corrective Action Plans, it is not clear what will happen if an entity is in the middle of a 2 year event study when the transition occurs. FMPA believes either the entities that are currently in the process of conducting studies should be allowed to finish under the old standard, or that an additional year should be afforded.
No

The five requirements should all be retired as recommended by the independent experts. These requirements are all either too prescriptive in nature and/or administrative in nature. This continued approach is not risk-based nor results-based for standards development.

Individual

Catherine Wesley

PJM Interconnection

Yes

Yes

Yes

No

Individual

Bill Fowler

City of Tallahassee

Yes

Yes

No

The City of Tallahassee (TAL) maintains that R10 should be retired. If the entity's UFLS program requires the automatic shedding for under frequency and then switching in response to over voltage, the entity must comply with that regardless of whether R10 is enforceable or retired. In addition, the entity is required to maintain acceptable system voltage in accordance with system operating and transmission planning standards. Regulatory duplication is not desirable

No

Individual

Scott Langston

City of Tallahassee

Yes

Yes

No

The City of Tallahassee (TAL) maintains that R10 should be retired. If the entity's UFLS program requires the automatic shedding for under frequency and then switching in response to over voltage, the entity must comply with that regardless of whether R10 is enforceable or retired. In addition, the entity is required to maintain acceptable system voltage in accordance with system operating and transmission planning standards. Regulatory duplication is not desirable.

No

Individual

Karen Webb

City of Tallahassee

Yes

Yes
No
The City of Tallahassee (TAL) maintains that R10 should be retired. If the entity's UFLS program requires the automatic shedding for under frequency and then switching in response to over voltage, the entity must comply with that regardless of whether R10 is enforceable or retired. In addition, the entity is required to maintain acceptable system voltage in accordance with system operating and transmission planning standards. Regulatory duplication is not desirable.
No
Individual
Karin Schweitzer
Texas Reliability Entity
No
Texas Reliability Entity, Inc. (Texas RE) supports the addition of "Corrective Action Plan" to Requirements R9 and R10 and agrees the modification addresses the FERC directive, in part. Further, Texas RE supports the addition of Requirement R15 but does not agree that R15.1 and R15.2 are sufficient to satisfy the FERC directive. While the proposed standard now establishes the responsibility for development of a Corrective Action Plan (CAP) and a requirement for a UFLS entity to implement the CAP, the time frames specified are too long and do not appear to meet the spirit of the FERC directive. The Planning Coordinator (PC) is allowed five years (for R4 and R5) or two years (for R12) to develop a Corrective Action Plan (CAP) for entity UFLS programs that do not meet the performance characteristics in Requirement R3. The FERC directive from Order No. 763 raised concern that the standard failed to specify how soon an entity would need to implement corrections. The concern over the timeliness of entity implementation of a CAP is not alleviated by a prolonged period for CAP development. Nor do these extended time frames adequately address risks associated with the UFLS deficiency during the time a CAP is under development. In addition, the SDT acknowledged that that it could take years for an entity to implement corrections when it stated "that time allotted by the PC will depend on the extent of deficiencies and that allowances will be necessary for inclusion of approved changing in budgeting cycles." [Source: "Consideration of FERC Directive Project 2008-02: Underfrequency Load Shedding (UFLS)".] Texas RE understands that the PC should allow time for affected UFLS entities to plan and budget for corrections directed by the PC. However, the proposed language allowing PCs to take several years to develop a CAP and potentially several more years for the UFLS entity to implement corrections. During this extended time frame the risk to the BES posed by the UFLS deficiency persists. Texas RE suggests that the PC should be required to develop the CAP in a shorter time frame and recommends the following language change: R15.1: For UFLS design assessments performed under Requirement R4 of R5, the Corrective Action Plan shall be developed within [one year of completion of the UFLS design assessment]. R15.2: For UFLS design assessments performed under Requirement R12, the Corrective Action Plan shall be developed within [one year of completion of the UFLS design assessment].
Yes
Yes
Group
Bonneville Power Administration
Andrea Jessup
Yes
Yes

Yes
Yes
BPA suggests several references to PRC-006-1 in the WECC regional variance (pp. 27-29) should be corrected to PRC-006-2, specifically in paragraphs: E.B.3.1, E.B.3.2 and E.B.4.1 thru E.B.4.6. BPA believes the new requirement, R15, should be written into the WECC regional variance. Required CAPs in R15 are contingent upon analysis done in R4, R5, or R12, and performance characteristics of R3, all of which are superseded by the regional variance in the WECC. As written it would appear PCs in the WECC would be automatically excluded from compliance with R15 of the standard. BPA believes reference to SPS should be swapped for RAS per project 2010-05.2 (SPS references in PRC-006-2 in R2.2 and E.B.2.2.)
Individual
PHAN, Si Truc
Hydro-Quebec TransEnergie
Yes
Yes
Yes
Yes
Hydro-Québec understands that the actual scope of revision is very limited. However, the issues brought by HQ's latest comments for PRC-006-2 are very limited and concerns Attachment 1A (Quebec) and some editorial changes in the Regional Variance for the Quebec Interconnection. Those portions of the standard impact only NERC members in Québec, which are very few (Hydro-Québec TransÉnergie and Hydro-Québec Production). It is a unique situation where a regional variance addresses only a portion of a NERC Region, the Québec Interconnection. So, it seems not convenient to start a new Standard Drafting Team for modifications that impact so few members. We ask if it is possible to include those modifications in the actual revision of PRC-006-2 for efficiency purposes. Those are the following: 1. Regional Variance for the Quebec Interconnection, E.A.3, change this portion to better reflect R3 : [...] including notification of and for implementation [...] (instead of [...] including a schedule for implementation [...]) 2. Regional Variance for the Quebec Interconnection, E.A.4.2, Attachment 1A (instead of 2A) 3. Attachment 1 A (Québec): the minimum system frequency curve should continue with the same slope from 30 sec to 60 sec, and, at 60 sec, it should be adjusted to 59 Hz instead of 59,3 Hz. The justification for such changes is the following: 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 interconnections (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. The proposed changes do not affect the reliability of the QI, but help to fit the unique characteristics of the system.