**Unofficial Comment Form**Regional Reliability Standard | PRC-006-NPCC-2

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on Regional Reliability Standard **PRC-006-NPCC-2 – Automatic Underfrequency Load Shedding.** The form must be submitted by **8 p.m. Eastern, Friday, June 21, 2019.**

Documents and information about this project are available on the [NPCC’s Standards In Development](https://www.npcc.org/Standards/SitePages/DevStandardDetail.aspx?DevDocumentId=122)page. If you have questions, contact Senior Reliability Standards Analyst, Nasheema Santos (via email) or at (404) 446-2564.

**Background Information**

The NPCC drafting team reviewed Regional Reliability Standard PRC-006-NPCC-1 and made the following changes:

1. Remove redundancies with the most recent of the Continent-wide NERC Standard, PRC-

006-3. Some of the redundancies removed from the Regional Standard PRC-006-NPCC-2 are those related to:

* The Québec Interconnection portion of NPCC shall implement an automatic UFLS program in accordance with Attachment C Table 4;
* Requirements for a UFLS Database;
* Notification of changes to load distribution needed to satisfy UFLS program performance characteristics; and
* Development of an implementation plan when changes to load distribution are needed.
1. Ensure that UFLS island boundaries, once identified, are provided upon request, to affected entities.
2. Minimum time UFLS relay time delay added to Attachment C tables and removed as a separate requirement.
3. Added the ability for a TO or DP to calculate net load shed for UFLS if direct metering is not available.
4. A number of minor clarifications were made to the standard such as requiring the Underfrequency trip relay must to be set to operate “on or below” the appropriate curve. In Version 1 it currently states below and questions arose whether settings on the curve were considered in compliance.
5. Clarification that any compensatory load shedding for non-conformance with the Underfrequency trip specification for generation (in service prior to July 1, 2015) must be within the same island as the generator resides.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Regional Reliability Standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. Regional reliability standards, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC reliability standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process, if adversely affected.

**Balanced** — Regional reliability standards shall have a balance of interests and shall not be dominated by any two-interest categories and no single-interest category shall be able to defeat a matter.

**Due Process** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

Review the revised Regional Reliability Standard and answer the following questions.

1. Do you agree the development of PRC-006-NPCC-2 met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-NPCC-2 met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-NPCC-2 met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-NPCC-2 met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-NPCC-2 met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments: