

Technical Rationale for Reliability Standard PRC-006-3

April 20, 2020

PRC-006-3 - Automatic Underfrequency Load Shedding

Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

Rationale for R9:

The "Corrective Action Plan" language was added in response to the FERC directive from 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 (PC) assessment. The revised language adds clarity by requiring that each UFLS entity follow the UFLS program, including any Corrective Action Plan, developed by the PC.

Also, to achieve consistency of terminology throughout this standard, the word "application" was replaced with "implementation." (See Requirements R3, R14 and R15)

Rationale for R10:

The "Corrective Action Plan" language was added in response to the FERC directive from 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 PC assessment. The revised language adds clarity by requiring that each UFLS entity follow the UFLS program, including any Corrective Action Plan, developed by the PC.

Also, to achieve consistency of terminology throughout this standard, the word "application" was replaced with "implementation." (See Requirements R3, R14 and R15)

Rationale for R15:

Requirement R15 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 PC assessment. Requirement R15 addresses the FERC directive by making explicit that if deficiencies are identified as a result of an assessment, the PC 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." Thus, the Corrective Action Plan developed by the PC will identify the specific timeframe for an entity to implement corrections to remedy any deficiencies identified by the PC as a result of an assessment.