

## Comment Form — 1<sup>st</sup> Draft of SAR for Underfrequency Load Shedding

Please use this form to submit comments on the proposed SAR for Underfrequency Load Shedding (UFLS). Comments must be submitted by **January 12, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the abbreviation "UFLS" in the subject line. If you have questions please contact David Taylor at [David.Taylor@nerc.net](mailto:David.Taylor@nerc.net) or by telephone at 609-452-8060.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 - Regional Reliability Organizations and Regional Entities



### **Background Information**

This project involves revising the requirements in the following four standards:

- PRC-006 — Development and Documentation of Regional Reliability Organizations' Underfrequency Load Shedding Programs
- PRC-007 — Assuring Consistency with Regional UFLS Programs
- PRC-008 — Underfrequency Load Shedding Equipment Maintenance Programs
- PRC-009 — UFLS Performance Following an Underfrequency Event

The four standards associated with this project are all Version 0 standards. As the electric reliability organization begins enforcing compliance with reliability standards under Section 215 of the Federal Power Act in the United States and applicable statutes and regulations in Canada, the industry needs a set of clear, measurable, and enforceable reliability standards. The Version 0 standards, while a good foundation, were translated from historical operating and planning policies and guides that were appropriate in an era of voluntary compliance. However, it is important to update the standards in a timely manner, incorporating improvements to make the standards more suitable for enforcement and to capture prior recommendations that were deferred during the Version 0 translation.

PRC-006 is one of the few reliability standards identified by the Regional Reliability Standards Working Group as a standard that has some requirements that need to be defined by each regional entity in a regional standard.

The standard drafting team will work with stakeholders to review PRC-006 and each of the current regional UFLS procedures to determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

PRC-007 through PRC-009 have some "fill-in-the-blank" characteristics, as identified in the Regional Reliability Standards Working Group work plan, which need to be removed.

The standard drafting team may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you believe that there is a reliability-related need to eliminate the "fill-in-the-blank" characteristics and upgrade the requirements in this set of standards?**

Yes

No

**If "No," please explain why in the comment area below and provide supporting information.**

Comments:

- 2. Do you agree with the scope of the proposed project (the scope includes all the items noted on the "Standard Review Forms" attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards)?**

Yes

No

**If "No," please explain why in the comment area below and provide supporting information.**

Comments: The MRO does NOT agree with the scope of the proposed project because the modification of these standards, PRC-006 through PRC-009, is a much more complex and detailed procedure than outlined in the scope.

First, with FERC's recent announcement to remove the Regional Reliability Organizations (RRO's) from the Applicability section of ALL NERC standards, standard PRC-006 now needs to become a Regional Standard and be included in the Region's Delegation Agreement. Additionally, when a Regional Standard is developed for the UFLS program, the standard must enforce ALL member participation and that the UFLS study be customized and performed at a Regional level, not at a member level. The characteristics of each UFLS program may differ greatly between regions, thereby warranting a customized Regional Standard for each region.

Finally, the MRO believes that the UFLS standards, PRC-007 through PRC-009 could be broadly applied to ALL entities that comply with a customized Regional UFLS standard. Therefore, for simplification purposes, the MRO would support combining standards PRC-007 through PRC-009 into one UFLS NERC standard.

- 3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.**

Yes

No

Comments: The MRO does not have any additional comments at this time