

## Rui Da Shu

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**From:** Guy V. Zito <gzito@npcc.org>  
**Sent:** Thursday, July 17, 2014 11:02 PM  
**Subject:** Project 2008-02 Undervoltage Load Shedding (UVLS) & Underfrequency Load Shedding (UFLS)RSC

**Importance:** High

RSC Members,

The TFSP has reviewed the subject which is currently posted for comment will be balloted from July 29<sup>th</sup> – 8pm August 7<sup>th</sup> 2014. Their recommendation is a negative vote. The main issues TFSP cites are as follows;

1. Requirement R2, as written, gives considerable authority to the Planning Coordinator or Transmission Planner. Nowhere in the new standard is there any provision for an existing or proposed UVLS entity, such as a TO, to comment or advise on the feasibility of the program specification and particularly the implementation schedule on their system. There should be an opportunity for the UVLS entity to provide input to the plan schedule, and a mechanism should be in the standard for resolving disagreements.
2. Similar concern with Requirement R5 in regard to the specification and execution of the CAP.

I sent this off earlier to the SDT Developer for the project to see if she can obtain the SDT perspective on why the requirements were drafted this way. While we await a response, please indicate if you share the concern or if you have a voting recommendation please share it with the group.

From an NPCC Regional Entity perspective, I have no problem with the PC/TP developing, and having the TO implement UVLS on a schedule that is necessary to maintain reliability. I do think any PC/TP would, pragmatically, work with the TO outside of the standard's requirements to develop a mutually agreed upon design and implementation schedule. All these types of issues don't need to be in standards in my view and create burdens for entities and compliance. Thoughts or comments?

Guy V. Zito  
Assistant Vice President Standards  
Northeast Power Coordinating Council, Inc.  
1040 Avenue of the Americas, 10<sup>th</sup> Floor  
New York, NY 10018  
212-840-1070  
212-302-2782 Fax  
[gzito@npcc.org](mailto:gzito@npcc.org)

