Unofficial Comment Form
Project 2008-02: Underfrequency Load Shedding (UFLS)

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8 p.m. Eastern Wednesday, October 8, 2014.

If you have questions please contact Lacey Ourso, NERC Standards Developer by email or by telephone at 404-446-2581.

The Project 2008-02 Underfrequency Load Shedding project page may be accessed by clicking here.

Background Information
This is the first draft of the proposed Reliability Standard PRC-006-2, and it is being posted for stakeholder comment and initial ballot. This draft includes proposed revisions to address the directive in the FERC Order issued May 7, 2012, in Docket No. RM11-20-000, Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards, 139 FERC ¶ 61,098, P48 (2012). In Order No. 763, FERC 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 assessment. As a result of this lack of clarity, FERC directed NERC to make this requirement explicit in future versions of the standard.

In May 2014, the NERC Standards Committee authorized posting the revised SAR for informal comment. The limited scope of the revised SAR authorized the UFLS standard drafting team to address the outstanding FERC directive and review PRC-006-1 to determine what actions, if any, should be taken in response to the Paragraph 81 and Independent Expert Review Project recommendations.

In accordance with the limited scope of the SAR, the Project 2008-02 UFLS standard drafting team addressed the FERC directive by adding one new requirement (Requirement R15) and modifying two existing requirements (Requirements R9 and R10). Requirement R15 addresses the FERC directive by making explicit that if deficiencies are identified as a result of an assessment, the Planning Coordinator 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.” The Corrective Action Plan developed by the Planning Coordinator will identify the specific timeframe for an entity to implement corrections to remedy any deficiencies identified by the Planning Coordinator as a result of an assessment. The time allotted by the Planning Coordinator for making corrections will depend on the extent of the deficiencies identified. The schedule specified by the Planning Coordinator will consider 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. Additionally, for Requirements R9 and R10, the standard drafting team added the “Corrective Action Plan” language to ensure that any Corrective Action Plan developed by the Planning Coordinator under Requirement R15 will be implemented by the UFLS entity and/or Transmission Owner as part of the UFLS program.

Also, the drafting team reviewed five requirements contained in PRC-006-1 to consider whether the requirements should be retired as a result of the Paragraph 81 and Independent Expert Review Project recommendations. Specifically, the UFLS team reviewed Requirements R6, R7, R8, R10 and R14. The team determined that these requirements are necessary and/or support reliability objectives, and they should not be retired. The team drafted a justification document outlining the basis for its conclusion that the requirements should not be retired. This document is posted on the Project 2008-02 project page.

Initial 45-day Formal Comment Period
This posting is soliciting formal comment. The electronic comment form must be completed by 8 p.m. Eastern Monday, October 6, 2014.

*Please use the electronic comment form to submit your final comments to NERC.*

Please enter comments in simple text format, as bullets, numbers, and special formatting will not be retained (even if it appears to transfer formatting when copying from the unofficial Word version of the form into the official electronic comment form). If you enter extra carriage returns, bullets, automated numbering, symbols, bolding, italics, or any other formatting, that formatting will not be retained when you submit your comments.

- Separate discrete comments by idea, e.g., preface with (1), (2), etc.
- Use brackets [] to call attention to suggested inserted or deleted text.
- Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.
- **Do not use** formatting such as extra carriage returns, bullets, automated numbering, bolding, or italics.
- **Please do not repeat other entity’s comments.** Select the appropriate item to support another entity’s comments. An opportunity to enter additional or exception comments will be available.
- If supporting other’s comments, be sure the other party submits comments.
Questions:

1. In response to the FERC directive, the SDT proposes to add one new requirement (Requirement R15) and modify two existing requirements (Requirements R9 and R10). Specifically, the following revisions are proposed:

   R9. Each UFLS entity shall provide automatic tripping of Load in accordance with the UFLS program design and schedule for implementation application, including any Corrective Action Plan, as determined by its Planning Coordinator(s) in each Planning Coordinator area in which it owns assets. [VRF: High][Time Horizon: Long-term Planning]

   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 application, including any Corrective Action Plan, as determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission. [VRF: High][Time Horizon: Long-term Planning]

   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 develop a Corrective Action Plan and a schedule for implementation by the UFLS entities within its area. [VRF: High][Time Horizon: Long-term Planning]

      15.1 For UFLS design assessments performed under Requirement R4 or R5, the Corrective Action Plan shall be developed within the five-year time frame identified in Requirement R4.

      15.2 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.

Do you agree with the proposed revisions in response to the FERC directive? If not, please provide the basis for your disagreement with the proposed revisions along with your suggested language changes.

☐ Yes
☒ No

Comments: 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.

2. Do you agree with implementation period of the proposed standard? If not, what do you believe the implementation period should be and why?

☐ Yes
☐ No

Comments:

3. The UFLS drafting team reviewed five requirements (Requirements R6, R7, R8, R10 and R14) contained in PRC-006-1 to consider whether the requirements should be retired as a result of the Paragraph 81 and Independent Expert Review Project recommendations. The team determined that these requirements are necessary and/or support reliability objectives, and they should not be retired. The team drafted a justification document outlining the basis for its conclusion that the requirements should not be retired, which can be found on the project page.

Do you agree with the drafting team conclusions that the requirements should not be retired? If not, please identify the specific conclusions that you do not agree with, and the basis for your disagreement.

☐ Yes
☐ No

Comments:

4. If you have any other comments or concerns on the proposed standard (related to an issue that falls within the limited scope of the SAR), please provide them here:

Comments: