Unofficial Comment Form
Project 2008-02 Undervoltage Load Shedding
Revised SAR

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Project 2008-02 Undervoltage Load Shedding (UVLS) revised Standard Authorization Request (SAR) and supporting draft requirements. The electronic comment form must be completed by 8:00 p.m. ET on Wednesday, October 9, 2013.

If you have questions, please contact Erika Chanzes via email or by telephone at 404-823-1132.

The project page may be accessed by clicking here.

Background Information

In January 2010, NERC posted the Project 2008-02 UVLS SAR for public comment. The SAR proposed to consolidate PRC-010-0 and PRC-022-1 and revise the standard to include specific criteria for UVLS programs and the assessments of those programs. A key element cited in the SAR was the Federal Energy Regulatory Commission (FERC) directive relating to PRC-010-0 from Order No. 693, which is explained in more detail in the revised SAR.

Concurrently with the SAR posting, nominations were accepted for a drafting team. No further actions were taken until the effort was recently restarted as part of the 2013–2015 Reliability Standards Development Plan (RSDP) that addresses pending projects.

A formal drafting team was appointed on May 21, 2013, and its members were tasked with reevaluating the SAR. The team’s objective was to ensure that Project 2008-02 addresses the existing UVLS standards such that they are results-based, address the appropriate regulatory directives, align with present reliability standard efforts (e.g., Paragraph 81 and Five-Year Review Teams), and consider current reliability issues associated with UVLS.

Based on these considerations, the drafting team has revised the SAR to propose consolidation and revision of the four existing UVLS standards. To support the revised SAR, the team is also providing initial draft requirements for a proposed PRC-010-1. Also included with the requirements are a proposed new NERC Glossary term, measures, and supporting rationales.

This informal comment period seeks stakeholder feedback on the revised SAR and supporting draft requirements during the development stage.
You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

**Questions**

1. Do you have any specific questions or comments relating to the scope of the revised SAR?

☐ Yes  ☒ No

Comments:

2. Proposed PRC-010-1 consolidates and replaces the requirements previously addressed by PRC-010-0, PRC-020-1, PRC-021-1, and PRC-022-1 in addition to incorporating revisions to meet the Order No. 693 directive and other inputs referenced in the SAR. Do you agree with this approach? If not, please explain your concerns.

☐ Yes  ☒ No

Comments:

3. Do you support the revised NERC Glossary term Automatic UVLS Program? If no, please indicate in the comment section what suggested changes would put you in favor of the new glossary term.

☐ Yes  ☒ No

Comments:  The term Bulk Power System (BPS) should not be used in the definition. The term “Bulk Power System” as defined in NERC’s Glossary of Terms comes from the Energy Policy Act of 2005. The Energy Policy Act extends the authority of NERC and FERC over the BPS, which as confirmed by FERC reaches farther than those facilities that are included in the Bulk Electric System (BES). The BES identifies who must comply with NERC Reliability Standards. Replace the reference to BPS under Definitions of Terms Used in Standard with either Bulk Electric System (BES), or as an alternative, with “interconnected transmission system” as proposed in the Purpose statement of Standard MOD-032-1.
4. Do you agree with the Applicability of the proposed PRC-010-1? If not, please explain your concerns.

☑ Yes
☐ No

Comments:

5. Please specify if you have comments or suggested changes to any of the draft requirements for the proposed PRC-010-1.

☑ Yes
☐ No

Comments: The Standard needs to be reviewed for the proper use of BES versus BPS.

Regarding PRC-010-1 R1 and the automatic switching of devices such as shunt reactors, it is similar to what is mentioned in Requirement R10 of PRC-006-1.

Requirement R1 of PRC-010-1 reads:

R1. Each Planning Coordinator or Transmission Planner that develops or modifies an Automatic UVLS Program shall coordinate the Automatic UVLS Program with other protection and control systems and generator voltage ride-through capabilities.

Requirement R10 of PRC-006-1 reads:

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 application determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission.

How is the flow chart used to classify Automatic Load Shedding Programs (ALSP) provided during the webinar on September 17, 2013, planned to be incorporated into the proposed draft Standard PRC-010-1?
Regarding Requirement R4, Suggest to add the words “the capability of” after “implement”. R4 will then read:

Each UVLS entity shall implement the capability of automatic tripping of load in accordance...” The proposed change is to avoid the misinterpretation that the UVLS entity needs to implement the actual tripping of load even when not initiated by the threshold voltage or system conditions.

The same wording change also applies to Measure M4.

6. Do you support the revised SAR and the direction of the proposed PRC-010-1? If no, please indicate what suggested changes would put you in favor of the revised SAR and draft standard.

☐ Yes
☐ No

Comments: