

**Comment Form — 2<sup>nd</sup> Draft of SAR for Project 2007-11 Underfrequency Load Shedding**

Please use this form to submit comments on Draft 2 of the SAR for Project 2007-01, Underfrequency Load Shedding (UFLS). Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "UFLS SAR" in the subject line. If you have questions please contact David Taylor at [dave.taylor@nerc.net](mailto:dave.taylor@nerc.net) or by telephone at 609-452-8060.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" 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 standards:

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

The standards in this set 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. The Version 0 standards and recent updates were put in place as a temporary starting point to start up the electric reliability organization and begin enforcement of mandatory standards. 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 (SDT) will work with stakeholders to review PRC-006 and each of the current regional programs developed in accordance with that standard, including any other associated programs and/or requirements related to and contained with the UFLS program documentation. The SDT shall determine which requirements should be continent-wide requirements and which requirements should be included in regional standards.

PRC-007 and 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. These standards shall be included with PRC-006 for consideration as one or more revised standards as necessary for consistency and clarity of overall program requirements and any other associated programs and/or requirements that affect or impact the UFLS program.

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.

Draft 1 of this SAR was posted for a 30-day public comment period from November 29, 2006 through January 12, 2007. The Underfrequency Load Shedding SAR Drafting Team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 26 sets of comments, including comments from 70 different people from more than 25 companies representing 6 of the 10 industry segments.

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Based on the comments received, the SAR drafting team revised the SAR for Project 2007-01, which includes:

1. PRC-008 was removed from the list of standards to be revised in association with Project 2007-01. The SAR drafting team agreed with a number of commenters that suggested grouping all the relay maintenance and testing standards into a single project. The SAR drafting team has requested that NERC staff remove PRC-008 from Project 2007-01 and place it in a project with the following standards:
  - PRC-005 (currently in Project 2008-04)
  - PRC-008 (currently in Project 2007-01)
  - PRC-011 (currently in Project 2008-02)
  - PRC-017 (currently in Project 2008-04)
  - PRC-018 Requirement 6 (currently in Project 2007-011)
2. The SAR was revised to clarify the scope of work to be performed on each standard including the addition of Appendix A to the SAR. The scope of the SAR is designed to provide the standard drafting team with sufficient flexibility to address all necessary revisions. Work is not to be limited to the “To Do List” (renamed, “Issues to Consider”), nor are the items identified in the Issues to Consider mandatory revisions. A unique development aspect of the projects included in NERC’s three-year reliability standards development plan is that the standard drafting teams will not be inhibited from addressing at one time all necessary improvements to the standards, or from even proposing new changes to the standard, as long as the changes are within the content area of the standard. The goal is for the drafting team to develop the best possible standard within the defined subject area, as supported by a consensus of stakeholders. The SAR drafting team encourages all commenters to read Volume I of [NERC’s Three-year Reliability Standards Development Plan](#) which identifies a set of specific issues each standard drafting team is to consider when revising a standard.
3. The Applicability section of the SAR was expanded to include Balancing Authority, Planning Authority/Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator. The “applicability” identified in the SAR is the starting point for consideration of redrafting of the standard. The standard drafting team will review the appropriate applicability of each of these standards.
4. The SAR drafting team noted a number of comments suggesting additional topics or issues to consider with the refinement of the standards. These comments have been noted and added to the SAR for resolution during standard drafting.
5. Other miscellaneous changes as requested and agreed to by the SAR drafting team and identified in the redlined version of Draft 2 of the SAR for Project 2007-01.

The UFLS SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR for Project 2007-01. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “UFLS SAR” in the subject line by **March 9, 2007**.

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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 agree that PRC-008 should be removed from the list of standards to be revised in association with Project 2007-01 and placed into a project with all the relay maintenance and testing standards? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with revising the SAR to clarify the scope of work to be performed on each standard including the addition of Appendix A and Appendix C to the SAR? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with expanding the Applicability section of the SAR to include Balancing Authority, Planning Authority or Planning Coordinator, Transmission Planner, Generator Owner, and Generator Operator so that the standard drafting team can consider these entities when reviewing the appropriate applicability of the standards? If not, please explain in the comment area.

Yes

No

Comments:

4. Do you have any other concerns with the revisions made to the SAR? If yes, please explain in the comment area.

Yes

No

Comments: