

## Project 2007-01: Underfrequency Load Shedding Review of Issues from Database

Source	Language
Other	Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure
<b>PRC-006-0 — Development and Documentation of Regional ULS Program Requirements</b>	
FERC Order 693	Transfer responsibility from the regional reliability organization to the regional entity.
	<p><b>SDT Response:</b> Order 672 says that requirements are applied to users, owners and operators. As such the drafting team applied the requirements to entities in the Functional Model not the Regional Entities.</p>
Fill in the Blank Team	<ul style="list-style-type: none"> <li>• Modify R1 to require each Region to develop a regional standard, and</li> <li>• Development of regional standards needs to be coordinated with Regional entities. Regional entities should begin process for developing regional standards once the drafting team for the North American standard has determined what elements of UFLS should be included in the continent-wide standard and what elements should be included in the regional standards.</li> <li>• Determine what elements (if any) of UFLS should be included in the North American standard and what elements should be included in the regional standards.</li> <li>• Related PRC-007, PRC-008, and 009.</li> <li>• PRC-006 will be a continent-wide standard supported by Regional Reliability Standards.</li> </ul>
	<p><b>SDT Response:</b></p> <ul style="list-style-type: none"> <li>• The drafting team is not requiring the Regions to develop regional standards. Instead, the drafting team is proposing common performance characteristics that all UFLS programs must meet.</li> <li>• This issue is not within the scope of the continent wide drafting team; however, many regions have begun development of UFLS standards.</li> <li>• The UFLS drafting team is proposing performance characteristics in version 3 of the draft standard.</li> </ul>
Version 0 Team	<ul style="list-style-type: none"> <li>• Not a standalone standard</li> <li>• Who do you submit compliance material to?</li> <li>• Need to define evidence</li> </ul>
	<p><b>SDT Response:</b> The drafting team has clarified responsibilities for entities including database related responsibilities.</p>
<b>PRC-007-0 — Assuring Consistency with Regional UFLS Programs</b>	
FERC's December 20, 2007 Order in Docket Nos. RC07-004-000, RC07-6-000, and RC07-7-000	In FERC's December 20, 2007 Order, the Commission reversed NERC's Compliance Registry decisions with respect to three load serving entities in the ReliabilityFirst (RFC) footprint. The distinguishing feature of these three LSEs is that none own physical assets. Both NERC and RFC assert that there will be a "reliability gap" if retail marketers are not registered as LSEs. To avoid a possible gap, a consistent, uniform approach to ensure that appropriate Reliability Standards and associated requirements are applied to retail marketers must be followed. Each drafting team responsible for reliability standards that are applicable to LSEs is to review and change as necessary, requirements in the reliability standards to address the issues surrounding

	<p>accountability for loads served by retail marketers/suppliers. For additional information see:</p> <ul style="list-style-type: none"> <li>• FERC’s December 20, 2007 Order (<a href="http://www.nerc.com/files/LSE_decision_order.pdf">http://www.nerc.com/files/LSE_decision_order.pdf</a> )</li> <li>• NERC’s March 4, 2008 (<a href="http://www.nerc.com/files/FinalFiledLSE3408.pdf">http://www.nerc.com/files/FinalFiledLSE3408.pdf</a> ),</li> <li>• FERC’s April 4, 2008 Order (<a href="http://www.nerc.com/files/AcceptLSECompFiling-040408.pdf">http://www.nerc.com/files/AcceptLSECompFiling-040408.pdf</a> ), and</li> <li>• NERC’s July 31, 2008 (<a href="http://www.nerc.com/files/FinalFiled-CompFiling-LSE-07312008.pdf">http://www.nerc.com/files/FinalFiled-CompFiling-LSE-07312008.pdf</a> ) compliance filings to FERC on this subject.</li> </ul> <p><b>SDT Response:</b> The drafting team is not assigning responsibilities to LSEs in the proposed standard. The team thinks that the appropriate entities, following the guidance in the Functional Model, have been identified in the proposed standard.</p>
<p>Fill in the Blank Team</p>	<ul style="list-style-type: none"> <li>• The regional procedures need to be converted to a standard to implement this.</li> <li>• Change "program" to "standard" in R1.</li> <li>• Coordinated with PRC-006.</li> </ul> <p><b>SDT Response:</b></p> <ul style="list-style-type: none"> <li>• The drafting team is proposing performance characteristics that UFLS programs must meet.</li> <li>• It is not within the scope of the drafting team to convert regional procedures into standards.</li> </ul>
<p>Version 0 Team</p>	<ul style="list-style-type: none"> <li>• Need to refine levels of non-compliance</li> <li>• Need to include RA</li> </ul> <p><b>SDT Response:</b></p> <ul style="list-style-type: none"> <li>• The drafting team has applied compliance elements based on the guidelines in FERC Orders and NERC’s standard drafting team guidelines.</li> </ul>
<p><b>PRC-009-0 — UFLS Performance Following an Underfrequency Event</b></p>	
<p>Fill in the Blank Team</p>	<ul style="list-style-type: none"> <li>• See notes for PRC-007.</li> <li>• Change "program" to "standard'.</li> </ul> <p><b>SDT Response:</b></p> <ul style="list-style-type: none"> <li>• The drafting team is proposing requirements to be applied to UFLS programs (not standards).</li> </ul>
<p>FERC’s December 20, 2007 Order in Docket Nos. RC07-004-000, RC07-6-000, and RC07-7-000</p>	<p>In FERC’s December 20, 2007 Order, the Commission reversed NERC’s Compliance Registry decisions with respect to three load serving entities in the ReliabilityFirst (RFC) footprint. The distinguishing feature of these three LSEs is that none own physical assets. Both NERC and RFC assert that there will be a “reliability gap” if retail marketers are not registered as LSEs. To avoid a possible gap, a consistent, uniform approach to ensure that appropriate Reliability Standards and associated requirements are applied to retail marketers must be followed. Each drafting team responsible for reliability standards that are applicable to LSEs is to review and change as necessary, requirements in the reliability standards to address the issues surrounding accountability for loads served by retail marketers/suppliers. For additional information see:</p> <ul style="list-style-type: none"> <li>• FERC’s December 20, 2007 Order (<a href="http://www.nerc.com/files/LSE_decision_order.pdf">http://www.nerc.com/files/LSE_decision_order.pdf</a> )</li> <li>• NERC’s March 4, 2008 (<a href="http://www.nerc.com/files/FinalFiledLSE3408.pdf">http://www.nerc.com/files/FinalFiledLSE3408.pdf</a> ),</li> <li>• FERC’s April 4, 2008 Order (<a href="http://www.nerc.com/files/AcceptLSECompFiling-040408.pdf">http://www.nerc.com/files/AcceptLSECompFiling-040408.pdf</a> ), and</li> <li>• NERC’s July 31, 2008 (<a href="http://www.nerc.com/files/FinalFiled-CompFiling-LSE-07312008.pdf">http://www.nerc.com/files/FinalFiled-CompFiling-LSE-07312008.pdf</a> ) compliance filings to FERC on this subject.</li> </ul>

	<p><b>SDT Response:</b></p> <p>The drafting team is not assigning responsibilities to LSEs in the proposed standard. The team thinks that the appropriate entities, following the guidance in the Functional Model, have been identified in the proposed standard.</p>
Version 0 Team	<ul style="list-style-type: none"> <li>• Exemptions for those with shunt reactors who don't shed load</li> <li>• 90 days vs. 30 days</li> <li>• Define evidence</li> </ul>
	<p><b>SDT Response:</b></p> <ul style="list-style-type: none"> <li>• The drafting team is not proposing any exemptions for shunt reactors. The requirement indicate that responsible entities are to provide load tripping and switching of elements according to the UFLS programs and the UFLS programs may or may not have such exemptions.</li> </ul>