**Unofficial Comment Form**NPCC Quebec Regional Variance PRC-006-3

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on Regional Reliability Standards **PRC-006-3 – Automatic Underfrequency Load Shedding NPCC Quebec Regional Variance Revision (NPCC Quebec Regional Variance)**. Comments must be submitted by **8 p.m. Eastern, Wednesday, June 21, 2017.**

The [Regional Reliability Standards Under Development](http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx)page contains documents and information about this project. If you have questions, contact Mat Bunch (via email) or at (404) 446-9785.

**Background Information**

Northeast Power Coordinating Council, Inc. (NPCC) requested that NERC post PRC-006-3 Automatic Underfrequency Load Shedding with an NPCC Quebec Regional Variance for industry review and comment in accordance with the NERC Rules of Procedure.

Any variance from a NERC reliability standard requirement that is proposed to apply to responsible entities within a regional entity organized on an interconnection-wide basis shall be considered an

Interconnection-wide Variance and shall be developed through that regional entity’s NERC-approved regional reliability standards development procedure. While an interconnection-wide variance may be developed through the associated Regional Entity standards development process, regional entities are encouraged to work collaboratively with existing continent-wide drafting team to reduce potential conflicts between the two efforts. An Interconnection-wide Variance from a NERC reliability standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC reliability standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC reliability standard that is developed, in accordance with a standards development procedure approved by NERC, by a regional entity organized on an interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Unfair or Closed Process –** The regional reliability standard was not developed in a fair and open process that provided an opportunity for all interested parties to participate. Although a NERC-approved regional reliability standards development procedure shall be presumed to be fair and open, objections could be raised regarding the implementation of the procedure.

**Adverse Reliability or Commercial Impact on Other Interconnections –** The regional reliability standard would have a significant adverse impact on reliability or commerce in other interconnections.

**Deficient Standard –** The regional reliability standard fails to provide a level of reliability of the bulk power system such that the regional reliability standard would be likely to cause a serious and substantial threat to public health, safety, welfare, or national security.

**Adverse Impact on Competitive Markets within the Interconnection –** The regional reliability standard would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

Without these variances, an entity can use flawed generator modeling practices and still be in alignment with the requirements of PRC-006-3, leaving questions of credibility of certain generator models. As a result, entities could plan their systems based on models whose veracity has never been determined. Use of these acceptable-yet-flawed practices creates inaccuracies in the NPCC model databases. As a result, reliability is at risk without the variance.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Regional Reliability Standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. Regional reliability standards, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC reliability standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process, if adversely affected.

**Balanced** — Regional reliability standards shall have a balance of interests and shall not be dominated by any two-interest categories and no single-interest category shall be able to defeat a matter.

**Due Process** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

**Questions**

1. Do you agree the proposed standard/variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed standard/variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed standard/variance pose a serious and substantial threat to public health, safety, welfare, or national security?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed standard/variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed regional reliability standard/variance meet at least one of the following criteria?
* The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.
* The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.
* The proposed regional difference is necessitated by a physical difference in the bulk power system.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-3 met the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-3 met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-3 met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-3 met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of PRC-006-3 met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments: