
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

REGIONAL RELIABILITY STANDARD) Docket No. RM12-9-000
PRC-006-SERC-01 – AUTOMATIC)
UNDERFREQUENCY LOAD SHEDDING)

**FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION IN SUPPORT OF THE SERC RELIABILITY CORPORATION
RESPONSE TO THE NOTICE OF PROPOSED RULEMAKING ON REGIONAL
RELIABILITY STANDARD PRC-006-SERC-01**

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I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”)¹ submits this filing in support of the response of the SERC Reliability Corporation (“SERC”) to the Notice of Proposed Rulemaking, issued on July 19, 2012, proposing to approve regional Reliability Standard PRC-006-SERC-01 - Automatic Underfrequency Load Shedding Requirements (“NOPR”).

By this filing, NERC expresses its support for the response of SERC to the NOPR and requests that the Commission approve the standard consistent with this filing.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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¹ The Federal Energy Regulatory Commission (“FERC” or “Commission”) certified NERC as the electric reliability organization (“ERO”) in its order issued on July 20, 2006 in Docket No. RR06-1-000. *North American Reliability Corporation*, “Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing,” 116 FERC ¶ 61,062 (July 20, 2006).

III. DISCUSSION

On February 1, 2012, NERC submitted a petition seeking approval of regional Reliability Standard PRC-006-SERC-01– Automatic Underfrequency Load Shedding Requirements (“NERC Petition”).² On July 19, 2012, the Commission issued a NOPR³ proposing to approve regional Reliability Standard PRC-006-SERC-01, but expressed concerns about a possible inconsistency between PRC-006-SERC-01 and the continent-wide PRC-006-1 — Automatic Underfrequency Load Shedding.⁴

On August 9, 2012, NERC submitted a compliance filing to Order No. 763, which addressed the Commission’s concern regarding PRC-006-SERC-01 and PRC-006-1:

NERC hereby clarifies that the continent-wide standard PRC-006-1 is not replaced by PRC-SERC-006-01. UFLS entities in the SERC Reliability Corporation Region must be compliant with both standards... In any event, UFLS entities must meet the schedule set by the Planning Coordinator to comply with PRC-006-1, Requirement R9, but the timeframe must not exceed 18 months in the SERC Reliability Corporation Region to comply with PRC-SERC-006-01, Requirement R6.

In its NOPR comments, SERC states that it does not oppose the above clarification by NERC, and SERC proposes to revise the rationale for Requirement R6 of PRC-SERC-006-01 as follows:

The SDT believes it is necessary to put a requirement on how quickly changes to the scheme should be implemented. This requirement specifies that changes must be implemented within 18 months of notification by the PC. The 18 month interval was chosen to give a reasonable amount of time for making changes in the field. All of the SERC Region has existing UFLS schemes which, based on periodic simulations, have provided reliable

² Petition of the North American Electric Reliability Corporation for Approval of Regional Reliability Standard PRC-006-SERC-01, Docket No. RM12-9-000 (February 1, 2012).

³ Notice of Proposed Rulemaking, *Regional Reliability Standard PRC-006-SERC-01 —Automatic Underfrequency Load Shedding Requirements*, 140 FERC ¶ 61,056, (2012).

⁴ On May 7, 2012, the Commission issued Order No. 763 approving the continent-wide Reliability Standard PRC-006-1. *See Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards*, 139 FERC ¶ 61,098 (2012).

protection for years. Events which result in islanding and an activation of the UFLS schemes are extremely rare *in SERC*. Therefore, the SDT does not believe that changes to an existing UFLS scheme will be needed in less than 18 months. However, if a PC determines there is a need for changing the UFLS scheme faster than 18 months, then the PC may require the implementation to be done sooner as allowed by NERC Reliability Standard PRC-006-1.

SERC also does not oppose modifying the VRF assigned to Requirement R6 of PRC-SERC-006-01 from “medium” to “high”.

NERC supports the rationale for Requirement R6 of PRC-SERC-006-01, as revised by SERC, and modifying the VRF assignment to Requirement R6 of PRC-SERC-006-01 from “medium” to “high”.

IV. CONCLUSION

NERC respectfully requests that the Commission approve the standard as proposed in the NOPR and consistent with this filing, as mandatory and enforceable.

Respectfully submitted,

/s/ Willie L. Phillips

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 24th day of September, 2012.

/s/ Willie L. Phillips
Willie L. Phillips
*Attorney for North American Electric
Reliability Corporation*