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

**Regional Reliability Standard PRC-006-NPCC-1) Docket No. RM12-12-000
Automatic Underfrequency Load Shedding)**

**COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability
Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595– facsimile

Charles A. Berardesco
Senior Vice President, General Counsel and
Corporate Secretary
Holly A. Hawkins
Assistant General Counsel
Stacey Tyrewala
Attorney
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099– facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@nerc.net

November 26, 2012

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The North American Electric Reliability Corporation (“NERC”)¹ hereby provides these comments in response to the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) September 20, 2012, Notice of Proposed Rulemaking (“NOPR”)² regarding the proposed regional Reliability Standard PRC-006-NPCC-1 (Automatic Underfrequency Load Shedding). The proposed regional Reliability Standard applies to generator owners, planning coordinators, distribution providers, and transmission owners in the Northeast Power Coordinating Council Region and is designed to ensure the development of an effective automatic underfrequency load shedding (“UFLS”) program to preserve the security and integrity of the Bulk-Power System during declining system frequency events, in coordination with the NERC continent-wide UFLS Reliability Standard PRC-006-1.

I. BACKGROUND

In the NOPR, the Commission proposes to approve the proposed regional Reliability Standard PRC-006-NPCC-1, the associated violation risk factors (“VRFs”) and violation severity levels (“VSLs”), implementation plan, and effective dates proposed by NERC. Proposed

¹ The Federal Energy Regulatory 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 Electric Reliability Corporation*, 116 FERC ¶ 61,062 (2006).

² *Regional Reliability Standard PRC-006-NPCC-1—Automatic Underfrequency Load Shedding*, 140 FERC ¶ 61,203 (September 20, 2012) (“NOPR”).

regional Reliability Standard PRC-006-NPCC-1 has 23 requirements, each having an associated measure of compliance. The proposed regional Reliability Standard is designed to work in conjunction with and augment Reliability Standard PRC-006-1 by mitigating the consequences of an underfrequency event, while accommodating differences in system transmission and distribution topology among Northeast Power Coordinating Council, Inc. (“NPCC”) planning coordinators due to historical design criteria, makeup of load demands, and generation resources.

II. COMMENTS

The Commission seeks comment on: (1) the technical basis for the 57.8 Hz maximum tripping limit for existing nuclear units established in Requirement R19; and (2) the time-frames for actions that result in changes to the NPC UFLS program.

A. NERC Supports the Comments of the Northeast Power Coordinating Council

NERC supports the comments submitted by NPCC in this proceeding on the two issues addressed in the NOPR. NERC and NPCC assert that a region-wide and fully coordinated single set of UFLS requirements is of benefit to achieving an effective and efficient UFLS program. The requirements in the PRC-006-NPCC-1 standard are consistent with the PRC-006-1 NERC standard and support reliability.

NERC respectfully requests that the Commission approve PRC-006-NPCC-1 and the associated violation risk factors, violation severity levels and effective dates.

III. CONCLUSION

For the reasons stated above, NERC respectfully requests that the Commission accept these comments for consideration.

Respectfully submitted,

/s/ Stacey Tyrewala

Gerald W. Cauley
President and Chief Executive Officer
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Corporation
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Suite 600, North Tower
Atlanta, GA 30326
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stacey.tyrewala@nerc.net

Dated: November 26, 2012

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 26th day of November, 2012.

/s/ Stacey Tyrewala
Stacey Tyrewala
*Attorney for North American Electric
Reliability Corporation*