

## NERC SPCTF Supplemental Assessment Addressing FERC Order 693 Relative to:

- PRC-006-0 – Development and Documentation of Regional UFLS Programs
- PRC-007-0 – Assuring Consistency with Regional UFLS Program Requirements
- PRC-009-0 – UFLS Performance Following an Underfrequency Event

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**May 24, 2007**

A Technical Review of Standards

Prepared by the  
System Protection and Controls Task Force  
of the  
NERC Planning Committee

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This report was approved by the Planning Committee on June 7, 2007, for forwarding to the Standards Committee.

## Introduction and Summary

On March 8, 2007, the SPCTF issued a technical review report on Reliability Standards:

- PRC-006-0 – Development and Documentation of Regional UFLS Programs
- PRC-007-0 – Assuring Consistency with Regional UFLS Program Requirements
- PRC-009-0 – UFLS Performance Following an Underfrequency Event

Within that report, the SPCTF included a summary of the Federal Energy Regulatory Commission's October 20, 2006 Notice of Proposed Rulemaking for adoption of NERC Standards (Docket Number RM06-16-000). The Federal Energy Regulatory Commission has since promulgated Order 693, in which they reiterated their concerns with PRC-006 and did not approve nor remand this standard, approved PRC-007-0 and PRC-009-0 as mandatory and enforceable, and provided specific direction regarding needed changes.

At their March 2007 meeting, the Planning Committee endorsed the SPCTF technical report. The SPCTF's conclusions from that previous report are modified only to replace the Regional Reliability Organization in PRC-006 with the Regional Entity as recommended by FERC in Order 693. The report has been presented to the NERC Standards Committee for consideration, and to the to the Underfrequency Load Shedding (Project 2007-01) SAR Drafting Team.

This report supplements the observations from the March 8, 2007 technical report on PRC-006-0, PRC-007-0, and PRC-009-0 and includes FERC's Order 693 determinations regarding those standards.

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## FERC Order 693 on PRC-006-0 — Development and Documentation of Regional UFLS Programs

In Order 693, for the reasons stated in the FERC October 20, 2006 Notice of Proposed Rulemaking for adoption of NERC Standards (Docket Number RM06-16-000), FERC stated they will not approve or remand PRC-006. The Commission stated they did not expect any lapse in compliance with the existing Standard and restated the importance of the regional reliability organizations (RROs) continuing to fulfill their current roles during this time of transition. The Commission expects that the role of the RROs will pass to the Regional Entities after the regional procedures have been submitted and approved.

### Commission Determination

The following is the determination portion of FERC Order 693 regarding PRC-006-0.

¶1480. For the reasons stated in the NOPR, the Commission will not approve or remand PRC-006-0.

¶1481. The Commission understands that UFLS, when properly coordinated with the dynamic response of the Bulk- Power System, is one of the safety nets that safeguards the system from cascading events, assuming it is properly coordinated with the dynamic response of the system. Until this Reliability Standard is submitted to the Commission for approval, we do not expect any lapse in the compliance with this Reliability Standard. As we stated in the NOPR, it is important that the existing regional reliability organizations continue to fulfill their current roles during this time of transition. The Commission expects that this function will pass from the regional reliability organization to the Regional Entity after they are approved.

## SPCTF Conclusion and Recommendation

In our original report the SPCTF advocated for maintaining the RRO as the appropriate responsible entity for this Standard because “UFLS programs inherently require coordination across and between regions and we believe this role is most effectively provided by the Regional Reliability Organization.” The SPCTF’s concern will be addressed if the role of the RRO in this Standard passes to the Regional Entity.

The SPCTF agrees with FERC and would like to modify our original comment to replace the RRO with the Regional Entity. All other SPCTF comments in the March 8, 2007 technical report on this Standard remain unchanged.

The SPCTF recommends that the existing draft Standards Authorization Request that was endorsed by the Planning Committee at the March 2007 Planning Committee Meeting be modified as deemed necessary by the NERC Standards Committee to address the specific issues identified by the Federal Energy Regulatory Commission within Order 693.

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## FERC Order 693 on PRC-007-0 — Assuring Consistency with Regional UFLS Program Requirements

In Order 693, FERC approved this Standard as mandatory and enforceable. FERC stated they are not persuaded by comments from APPA, ISO/RTO Council, and ISO-NE that PRC-007 cannot be acted upon because it relies on PRC-006. During the transition until PRC-006 is approved, FERC has stated their expectation that the RROs will continue to fulfill their current role. Transmission owners, transmission operators, distributions providers, and load serving entities have voluntarily complied with the regional procedures under PRC-006 and are generally aware of the requirements. Not approving PRC-007 would create a lapse in requirements for these entities to comply with the regional procedures in place to safeguard the system from cascading events.

## Commission Determination

The following is the determination portion of FERC Order 693 regarding PRC-007-0.

¶1485. For the reasons stated in the NOPR, the Commission approves Reliability Standard PRC-007-0 as mandatory and enforceable.

¶1486. We are not persuaded by APPA, ISO/RTO Council and ISO-NE that PRC-007-0 cannot be acted on because it relies on PRC-006-0. We proposed to not approve or remand PRC-006-0 partly because it applies to a regional reliability organization. The Commission was not persuaded that a regional reliability organization’s compliance with a Reliability Standard can be enforced as NERC proposed. That is not the case with PRC-007-0, which applies to transmission owners, transmission operators, distribution providers and LSEs. Since PRC-007-0 is an existing Reliability Standard that has been followed on a voluntary basis, transmission owners, transmission operators, distribution providers and LSEs are generally aware of its requirements. As stated in the Common Issues section, a reference to an unapproved Reliability Standard may be considered in an enforcement action, but is not a reason to delay approving and enforcing this Reliability Standard. The Commission expects that the data will be sent to the Regional Entities (instead of the regional reliability organizations) after they are approved.

## SPCTF Conclusion and Recommendation

The SPCTF agrees with FERC on this matter. All other SPCTF comments in the March 8, 2007 technical report on this Standard remain unchanged.

The SPCTF recommends that the existing draft Standards Authorization Request that was endorsed by the Planning Committee at the March 2007 Planning Committee Meeting be modified as deemed necessary by the NERC Standards Committee to address the specific issues identified by the Federal Energy Regulatory Commission within Order 693.

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## FERC Order 693 on PRC-009-0 — UFLS Performance Following an Underfrequency Event

In Order 693, FERC approved this Standard as mandatory and enforceable. FERC stated they are not persuaded by comments from APPA, ISO/RTO Council, and ISO-NE that PRC-009 cannot be acted upon because it relies on PRC-006. The rationale for this conclusion is the same as for PRC-007 and is repeated in the discussion for PRC-009.

## Commission Determination

The following is the determination portion of FERC Order 693 regarding PRC-009-0.

¶1498. For the reasons stated in the NOPR, the Commission approves Reliability Standard PRC-009-0 as mandatory and enforceable.

¶1499. We disagree with ISO/RTO Council and others that approval or enforcement of PRC-009-0 is linked to approval of PRC-006-0. PRC-009-0 ensures that the performance of a UFLS system is analyzed and documented following an underfrequency event by requiring the transmission owner, transmission operator, LSE, and distribution provider to document the deployment of their UFLS operations. PRC-006-0 requires each regional reliability organization to develop, coordinate and document a UFLS program that includes specified elements. We proposed to neither approve nor remand PRC-006-0 because it applies to a regional reliability organization and the Commission was not persuaded that a regional reliability organization's compliance with a Reliability Standard can be enforced as NERC proposed. That is not the case with PRC-009-0, which applies to transmission owners, transmission operators, LSEs, and distribution providers with UFLS systems. Since PRC-009-0 is an existing Reliability Standard that has been followed on a voluntary basis, entities are aware whether they are required to have a UFLS program in place. Reporting on their UFLS programs therefore should not be burdensome. As stated in the Common Issues section, a reference to an unapproved Reliability Standard may be considered in an enforcement action, but is not a reason to delay approving and enforcing this Reliability Standard. The Commission expects this documentation will be sent to the Regional Entities (instead of the regional reliability organizations) after they are approved.

## SPCTF Conclusion and Recommendation

The SPCTF agrees with FERC on this matter. All other SPCTF comments in the March 8, 2007 technical report on this Standard remain unchanged.

**SPCTF Supplemental Report on PRC-006-0,  
PRC-007-0, and PRC-009-0**

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The SPCTF recommends that the existing draft Standards Authorization Request that was endorsed by the Planning Committee at the March 2007 Planning Committee Meeting be modified as deemed necessary by the NERC Standards Committee to address the specific issues identified by the Federal Energy Regulatory Commission within Order 693.

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