

7. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement please identify the conflict in the comments section.

Summary Consideration:

Organization	Question 7 Comments:
TRE UFLS Standard Drafting Team	At this time, the TRE UFLS SDT does not believe this proposed standard conflicts with any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or other applicable standard of which the team members are aware.
Response: Thank you for your input.	
Pepco Holdings, Inc - Affiliates	
Bonneville Power Administration	
Northeast Power Coordinating Council	
Southern Company	No Comments for Question #7.
ERCOT ISO	No comment
Electric Market Policy	None
Midwest ISO Stakeholders Standards Collaborators	
SERC UFLS Standards Drafting Team	
FRCC Standards & Operations Departments	

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Organization	Question 7 Comments:
Florida Municipal Power Agency and Select Members	
MRO NERC Standards Review Subcommittee	
Kansas City Power & Light	Not aware of any conflicts.
IRC Standards Review Committee	None
Cowlitz County PUD	
Edward C. Stein	
Colmac Clarion	Requirement differ from some current contract requirements that were 'inclusive' of existing tieline standards when written.
<p>Response: <u>The SDT is not aware of how existing tie-line standards would impact the frequency response following a major disturbance that results in activation of a UFLS program. Regardless, the SDT believes that grandfathering of existing arrangements that are contrary to the reliability objective of the proposed standard is unwise and may prove to be a hindrance to the successful implementation of this standard. The respective group of Planning Coordinators should model any such contract requirements in their UFLS assessments.</u></p>	
City of Bedford	
Alabama Municipal Electric Authority	The SDT should re-look at the timing requirements (4 seconds)in this standard and the timing requirements (such as 6 seconds in the AGC requirement) of other standards.
<p>Response: <u>The SDT appreciates notification of the potential conflict. However, Automatic Generation Control (AGC) is not expected to provide a significant contribution to meeting the frequency recovery performance characteristic in the proposed standard. The combined system response resulting from activation of the UFLS program as well as the frequency response of load and generation are expected to be sufficient to meet the performance characteristics of the proposed standard. As such, the SDT believes there is no conflict in establishing requirements for frequency recovery in a time frame before AGC will be activated.</u></p>	
US Army Corps of Engineers	

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Organization	Question 7 Comments:
NIPSCO	
Public Service Electric and Gas Company	Not aware of any conflicts.
Central Lincoln	
SPP System Protection and Control Working Group	None at this time.
Long island power Authority	
Exelon	Not aware of any conflicts at this time.
ReliabilityFirst Corporation	
Arkansas Electric Cooperative Corporation	
System Protection & Control	
Duke Energy	
ReliabilityFirst	
Illinois Municipal Electric Agency	
Hydro-Québec TransEnergie (HQT)	
AEP	
Ontario Power Generation	

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Organization	Question 7 Comments:
We Energies	We are not aware of any conflicts.
PacifiCorp	No comment
NextEra Energy Resources, LLC	No comment.
American Transmission Company	
Luminant Power	None
Ameren	No
FirstEnergy Corp	We are not aware of any conflicts.
CenterPoint Energy	
Independent Electricity System Operator	None
Xcel Energy	At this time, the TRE UFLS SDT does not believe this proposed standard conflicts with any regulatory function, rule, order, tariff, rate schedule, legislative requirement, or other applicable standard of which the team members are aware.
Response: Thank you for your input.	

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