**Unofficial Comment Form**Regional Reliability Standard | PRC-006-SERC-03

**DO NOT** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Regional Reliability Standard, PRC-006-SERC-03 – Automatic Underfrequency Load Shedding** by **8 p.m. Eastern, Friday, October 8, 2021.**

Documents and information about this project are available on the [SERC Regional Reliability Standards](https://serc1.org/program-areas/standards-regional-criteria) page. If you have questions, contact Senior Reliability Standards Analyst, Kimberlin Harris (via email) or at (404) 446-9794.

**Background Information**

The revisions to the PRC-006-SERC-02 Automatic Underfrequency Load Shedding (UFLS) include:

1. Removal of the requirement (Requirement R1) to allow Planning Coordinators to build a contiguous island, due to entities moving from one Planning Coordinator to another and no longer being contiguous with the existing island;
2. Modification of UFLS settings to account for the existing settings of the Florida peninsula in Requirement R2;
3. Addition of a second method to calculate the percent of load shed based on existing Florida peninsula practices in Requirements R4 and R5;
4. Removal of the SERC UFLS Database requirement, Requirement R7, to remove an unnecessary burden on entities; and
5. Addition of Planning Coordinator as a requestor in Requirement R8 to facilitate post-event analysis of frequency disturbances.

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

Each regional difference (i.e. Regional Reliability Standard or Variance) shall be: (1) is more stringent than the continent-wide Reliability Standard, including a regional difference that addresses matters that the continent-wide reliability standard does not; or (2) necessitated by a physical difference in the bulk power system. Regional Reliability Standards and Variances 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 and Variances, 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 proposed Regional Reliability Standard or Variance, or the retirement of an existing standard or Variance, requires NERC to publicly notice and request comment. 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.

**Questions**

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

[ ] Yes

[ ] No

Comments:

1. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

[ ] Yes

[ ]  No

Comments:

1. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed Regional Reliability Standard 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 meet at least one of the following criteria?
* The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
* The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
* The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

[ ]  Yes

[ ]  No

Comments: