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

**Automatic Underfrequency Load Shedding and)
Load Shedding Plans Reliability Standards)**

Docket No. RM11-20-000

**MOTION OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
TO CORRECT THE RECORD**

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Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 CFR § 385.212 (2011), the North American Electric Reliability Corporation (“NERC”) respectfully submits this limited motion to correct the record in regard to the Commission’s Final Rule in this proceeding issued on May 7, 2012.¹

NERC is not seeking rehearing of Order No. 763 — NERC believes Order No. 763 correctly approved Reliability Standards PRC-006-1 (Automatic Underfrequency Load Shedding) and EOP-003-2 (Load Shedding Plans). NERC does respectfully request, however, that the Commission correct the record regarding the Final Rule with respect to Order No 763’s characterization of comments filed by NERC in this proceeding.

FERC issued a Notice of Proposed Rulemaking (“NOPR”) on October 20, 2011.² In the NOPR, FERC requested comments in response to the following:

P 43. “We agree that planning coordinators should consider generators that trip prior to underfrequency set points when developing their UFLS programs. The Commission seeks comments from the ERO and other interested persons on how generation losses outside of the UFLS set points (i.e., generators having trip settings prior to the UFLS underfrequency set points) should be accounted for in UFLS programs (e.g., generator owners who trip outside of the UFLS set points could procure load to shed to account for the loss in generation).”

NERC filed comments in response to FERC’s NOPR, stating that “[w]hile requiring the Planning Coordinator to account for generators that trip prior to underfrequency set points when developing their UFLS programs is appropriate, it is not appropriate for a Reliability Standard to prescribe how the Planning Coordinator will determine whether mitigation is necessary or who

¹ *Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards*, 139 FERC ¶61,098 (Order No. 763) (May 7, 2012).

² *Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards*, 137 FERC ¶61,067 (October 20, 2011).

would be responsible for providing the mitigation.”³ In Order No. 763, FERC summarized these comments by stating that NERC said “it is appropriate for planning coordinators to consider generators that trip outside of the UFLS set points when designing UFLS programs, but *it is inappropriate for planning coordinators to determine whether mitigation is necessary and who will be responsible for providing mitigation*” (*emphasis added*).⁴ This characterization of NERC’s comments is inaccurate.

NERC believes Order No. 763 takes certain statements made by NERC out of context, which could potentially affect the Commission’s assessment of pending and future regional standards addressing underfrequency load shedding or future versions of the continent-wide standard. NERC said in its NOPR comments that it is not appropriate for a Reliability Standard to prescribe *how* the Planning Coordinator will determine whether mitigation is necessary or who would be responsible for providing the mitigation, not *if* the mitigation is necessary. These are two completely different issues.

NERC apologizes if its comments were less than clear on this point. NERC did not intend to say that it is inappropriate for Planning Coordinators to determine whether mitigation is

³ See, *Comments of the North American Electric Reliability Corporation in Response to Notice of Proposed Rulemaking*, Docket No. RM11-20-000, December 23, 2011.

⁴ See, Paragraphs 58 and 58 of Order No. 763 (*emphasis added*):

50. NERC, EEI, TAPS, Dominion, FRCC and EPSA oppose requiring generator owners to procure load to shed for generators that trip outside of the UFLS set points. NERC states that it is appropriate for planning coordinators to consider generators that trip outside of the UFLS set points when designing UFLS programs, *but it is inappropriate for planning coordinators to determine whether mitigation is necessary and who will be responsible for providing mitigation*.

58. Based on the comments, the Commission is persuaded to take no action to require compensation for generation losses outside of the UFLS set points (i.e., generators having trip settings prior to the UFLS underfrequency set points). Reliability Standard PRC-006-1 is an improvement because it requires planning coordinators to consider generators that trip outside of the UFLS set points when modeling and designing UFLS programs. We are persuaded by NERC’s comments that it is appropriate for planning coordinators to consider generators that trip outside of the UFLS set points when designing UFLS programs, *but it is inappropriate for planning coordinators to determine whether mitigation is necessary and who will be responsible for providing mitigation*. For these reasons, we take no action to modify the Reliability Standard.

necessary and who will be providing mitigation. On the contrary, the Planning Coordinator is one of the functional entities with responsibility for maintaining the reliability of the bulk power system. One of the Planning Coordinators' responsibilities is to ensure that UFLS programs meet the performance characteristics defined in the standard. The approach in the standard provides Planning Coordinators with needed flexibility in developing UFLS programs based on the conditions and circumstances within their Planning Coordinator areas. Planning Coordinators must have access to all tools at their disposal to implement successful underfrequency load shedding programs.

For these reasons, NERC respectfully requests that the Commission correct the record to accurately reflect NERC's comments filed in this docket.

Respectfully submitted,

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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 6th day of June, 2012.

/s/ Holly A. Hawkins
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