

The following pages contain all comments submitted with the 1st ballot of Phase III & IV undervoltage load shedding standards. The comments are organized with Company Name in alphabetical order within each Industry Segment. All but one of the comments was submitted with an affirmative ballot and most comments appear to be suggestions for future enhancements.

Based on the comments received, the drafting team did not make any changes to any of these standards.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments Submitted with 1st Ballot of Phase III & IV UVLS Standards

- PRC-020 - Under-Voltage Load Shedding Program Database
- PRC-021 - Under-Voltage Load Shedding Program Data
- PRC-022 - Under-Voltage Load Shedding Program Performance

Summary Consideration: Most stakeholders approved of these standards as proposed. The drafting team did not make any changes to the standards. Note that only one comment was submitted with a 'negative' ballot. All other comments were submitted with an affirmative ballot.

Company	Industry Segment	Balloter	Comment
Nebraska Public Power District NPPD	1	Alan Boesch	<p>Affirmative: I cannot think of any reason why a Distribution Provider would own a UVLS program that is applicable to the Bulk Electric system. They might have their load shed as a result of the implementation of the system but they would not own the system.</p>
<p>Response: There are some Distribution Providers that do own UVLS programs that are applicable to the Bulk Electric System. If a DP owns a UVLS that is not applicable, then that DP isn't required to comply with these requirements. In addition, PRC-010 and PRC-011 are applicable to Distribution Providers that own UVLS programs.</p>			
Northeast Utilities NU	1	Roger C. Zaklukiewicz	<p>Affirmative: Draft standard PRC-022-1 requires a Transmission Operator and others to retain data of UVLS operations and misoperations for two years. Yet in proposed standard PRC-004-1 the Transmission Owner is required to maintain Protection System Misoperation data and each accompanying Corrective Action Plan until the Corrective Action Plan has been executed or for 12 months, whichever is later. Since a UVLS system is a protective relaying system which initiates the shedding of firm load for specific undervoltage conditions (combination of voltage level and duration), why in one standard should the data retention duration be different for misoperations. A UVLS is a protective relaying system. This appears to be a minor point; however, consistency is important.</p>
<p>Response: Data retention periods are inconsistent, however there doesn't seem to be anything wrong with this.</p>			

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Alberta Electric System Operator AESO	2	Anita Lee	<p>Affirmative: PRC-021-1 R2 requires each Transmission Owner and Distribution Provider that owns a UVLS program to provide data to the RROs. We would like to point out that this is not the current practice in Alberta. We are the ISO of Alberta and currently submit data to the WECC on behalf of our TOs and DPs. We recommend that the standard be re-worded to allow for such arrangements.</p>
<p>Response: The standard does not preclude the responsible entity from delegating a task to another entity. This is the arrangement you've described where the Transmission Owners and Distribution Providers have delegated their task to the ISO. The Transmission Owners and Distribution Providers are still responsible for ensuring that the task is accomplished.</p>			
City Water Light & Power CWLP	5	Karl Kohlrus	<p>Negative: This standard basically misses the key point as to whether an entity needs a UVLS or not. ECAR and FE would have complied with this standard in 2003 because FE did not have a UVLS should have had one! Simply not having a UVLS should not make you automatically comply with this standard. The standard should require regions to perform a study of their regions to determine whether UVLS is needed or not.</p>
<p>Response: This would require a new SAR since this is a gross expansion of the Phase III & IV Measures assigned to this SAR DT. During the first posting of this set of standards the drafting team asked commenters to indicate whether they would support the concept you've described, and most indicated they would not. If a UVLS is needed, it should show up when doing planning assessments under the Version 0 TPL sequence of standards (TPL-001, TPL-002, etc.).</p>			
Lincoln Electric System LES	5	Dennis Florom	<p>Affirmative: should consider adding language "to mitigate the risk of voltage collapse or voltage instability in the Buk Electric System" to Applicability items 4.1 and 4.2 on future ballots</p>
<p>Response: The language you've suggested is already covered in the purpose statement.</p>			
California Energy Commission	9	William Mitchell Chamberlain	<p>Affirmative: This standard has a proposed effective date of April 1, 2006, which was fine when it was drafted, but which is now very close to the adoption of the standard. I believe standards should have effective dates one year from the date when the standard is approved by the NERC Board. The problem is that in a number of cases where WECC members have asked for clarification of things such as what will be required to verify "sustainable gross and net real power capability" the answer provided by the Standards Drafting Team has been that individual Regional Procedures will be required to provide that clarity. That is not objectionable, but it will take time for the Regional Reliability Organizations to adopt such Regional Procedures. Thus as a general rule the Regions should be given a year from NERC Board adoption of a standard to develop any required Regional Procedures before the new standard takes effect. It is unlikely that this delay will produce any adverse</p>

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			consequences and the more orderly process may serve the cause of reliability.
<p>Response: The effective date for the three standards in this set is not April 1, 2006. This comment is not applicable to this set of standards since these standards do not include requirements for sustainable gross and net real power capability.</p>			
Public Service Commission of South Carolina	9	Philip D. Riley	<p>Affirmative: The PSCSC must reiterate its view that the approach appears to be compliance-based rather than performance-based. Is the objective having procedures on hand, or a reliable system? The PSCSC maintains that the real objective is reliability, and not readily available procedures. The real measure of success is effective implementation of the procedures such that reliability is not compromised.</p>
<p>Response: Having the documentation is a first step in providing consistency in designing the Bulk Electric System. If a UVLS is needed, it should show up when doing planning assessments under the Version 0 TPL sequence of standards (TPL-001, TPL-002, etc.).</p>			