

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Development Steps Completed

1. The NERC Board of Trustees (“Board”) adopted PRC-004-4 and PRC-010-1 and retired PRC-022-1 on November 13, 2014.
2. The NERC Standards Committee authorized the initial posting of the standard on February 18, 2015.
3. Draft 1 of PRC-010-2 was posted for a 45-day formal comment period from February 20 – April 7, 2015 and an initial ballot in the last ten days of the comment period from March 27 – April 7, 2015.

### Description of Current Draft

The UVLSSDT is posting Draft 2 of PRC-010-2 – Undervoltage Load Shedding for a 10-day final ballot.

Anticipated Actions	Date
45-day formal comment period with ballot	February 2015
10-day final ballot	April 2015
Board adoption	May 2015

### Project Development Background

The undervoltage load shedding (UVLS) standard drafting team (SDT) was tasked with addressing Misoperation of UVLS equipment during the development of version one of PRC-010 and version three of PRC-004 in Project 2010-05.1 (i.e., Misoperation). This project has been named phase 2 of Project 2008-02 (i.e., UVLS) for clarity purposes. Each SDT for these two projects outlined work necessary to address Misoperation of UVLS equipment. This work was deferred, at the time, because both PRC-010-1 and PRC-004-3 contained dependencies with other projects requiring their completion. This phase two is a continuation of the work performed under the Standards Authorization Request (SAR) for Project 2008-02.

The revisions proposed in Reliability Standard PRC-010-2 meet the following objectives:

- Address the UVLS Misoperation the remaining work due to the retirement of PRC-022-1 (Undervoltage Load Shedding Program Performance) during the development of PRC-010-1 (Undervoltage Load Shedding)

- Ensure the performance of the UVLS equipment (i.e., operation or non-operation) within the UVLS Program is assessed and, if necessary, mitigated

## Basis for Revision

Originally, Misoperation of UVLS equipment was planned to be appended to a future version of PRC-004 (Protection System Misoperation Identification and Correction). The SDT is proposing a two-prong approach by revising both PRC-004 and PRC-010 to address the concern of identifying Misoperations of UVLS equipment in PRC-022-1.

First, the SDT proposes an addition to the Applicability section of PRC-004 to include UVLS that is intended to trip one or more Bulk Electric System (BES) Elements. This is consistent with previous communication to industry about addressing Misoperation of UVLS equipment.<sup>1</sup> Entities will be required to address UVLS that trips a BES Element similarly to other Protection Systems in PRC-004. While the revision to PRC-004 consistent with the communicated approach, the SDT determined that the proposed revision fails to address the performance (operation or non-operations) of UVLS Program equipment not covered by the strict processes of PRC-004.

Second, the SDT is proposing clarifying revisions in PRC-010-2, Requirements R4 and R5 to address UVLS Program equipment performance. These revisions are not requiring UVLS entities to address UVLS protective relays not covered by the strict processes of PRC-004; however, PRC-010-2 is requiring UVLS entities to address the deficiencies (e.g., Misoperations) identified in the assessment performed by Planning Coordinator or Transmission Planner in Requirement R4. Deficiencies include the performance (operation or non-operation) issues of UVLS Program equipment. These deficiencies, if any, are addressed by the UVLS entities through a Corrective Action Plan (CAP) developed in Requirement R5 and executed by the UVLS entities in Requirement R2 of PRC-010.

The term “Misoperation” as defined by the Glossary of Terms Used in NERC Reliability Standards is not used within the Requirements of PRC-010; however, the term is used in the Guidelines and Technical Basis section of the standard to provide clarity that UVLS Program equipment deficiencies include Misoperations that are to be corrected by UVLS entities. The PRC-010-2 Reliability Standard mandates that UVLS entities are to correct the deficiencies identified by the Planning Coordinator or Transmission Planner, such as Misoperation of UVLS equipment. Deficiencies are identified through either the periodic assessment or an assessment performed following an event and included in a CAP to the UVLS entity. The structure used by the SDT allows the Planning Coordinator and Transmission Planner to assess UVLS equipment for Misoperation under PRC-010 rather than the Generator Owner, Transmission Owner, and Distribution Provider applicable to the strict processes of PRC-004.

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<sup>1</sup> Refer to Implementation Plan for PRC-010-1 (<http://www.nerc.com/pa/stand/Pages/PRC0101RI.aspx>) and PRC-010-1 (<http://www.nerc.com/pa/Stand/Pages/ReliabilityStandards.aspx>), Introduction in the Guidelines and Technical Basis, last paragraph.

The two-pronged approach ensures that any UVLS Program equipment containing a deficiency is identified and corrected under PRC-010 and UVLS that trips a BES Element is corrected under PRC-004 to address the requirements in the retired PRC-022-1.

When this standard receives Board adoption, the rationale boxes in the Supplemental Material section of the standard will remain. The rationale box for Requirement R4 will be removed.

## A. Introduction

1. **Title:** Undervoltage Load Shedding
2. **Number:** PRC-010-2
3. **Purpose:** To establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs (UVLS Programs).
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1 Planning Coordinator.
    - 4.1.2 Transmission Planner.
    - 4.1.3 Undervoltage load shedding (UVLS) entities – Distribution Providers and Transmission Owners responsible for the ownership, operation, or control of UVLS equipment as required by the UVLS Program established by the Transmission Planner or Planning Coordinator.
5. **Effective Date:** See Project 2008-02.2 Implementation Plan.

## B. Requirements and Measures

- R1. Each Planning Coordinator or Transmission Planner that is developing a UVLS Program shall evaluate its effectiveness and subsequently provide the UVLS Program's specifications and implementation schedule to the UVLS entities responsible for implementing the UVLS Program. The evaluation shall include, but is not limited to, studies and analyses that show: *[Violation Risk Factor: High] [Time Horizon: Long-term Planning]*
  - 1.1. The implementation of the UVLS Program resolves the identified undervoltage issues that led to its development and design.
  - 1.2. The UVLS Program is integrated through coordination with generator voltage ride-through capabilities and other protection and control systems, including, but not limited to, transmission line protection, autoreclosing, Remedial Action Schemes, and other undervoltage-based load shedding programs.
- M1. Acceptable evidence may include, but is not limited to, date-stamped studies and analyses, reports, or other documentation detailing the effectiveness of the UVLS Program, and date-stamped communications showing that the UVLS Program specifications and implementation schedule were provided to UVLS entities.
- R2. Each UVLS entity shall adhere to the UVLS Program specifications and implementation schedule determined by its Planning Coordinator or Transmission Planner associated

with UVLS Program development per Requirement R1 or with any Corrective Action Plans per Requirement R5. *[Violation Risk Factor: High] [Time Horizon: Long-term Planning]*

- M2.** Acceptable evidence must include date-stamped documentation on the completion of actions and may include, but is not limited to, identifying the equipment armed with UVLS relays, the UVLS relay settings, associated Load summaries, work management program records, work orders, and maintenance records.
- R3.** Each Planning Coordinator or Transmission Planner shall perform a comprehensive assessment to evaluate the effectiveness of each of its UVLS Programs at least once every 60 calendar months. Each assessment shall include, but is not limited to, studies and analyses that evaluate whether: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
  - 3.1.** The UVLS Program resolves the identified undervoltage issues for which the UVLS Program is designed.
  - 3.2.** The UVLS Program is integrated through coordination with generator voltage ride-through capabilities and other protection and control systems, including, but not limited to, transmission line protection, autoreclosing, Remedial Action Schemes, and other undervoltage-based load shedding programs.
- M3.** Acceptable evidence may include, but is not limited to, date-stamped reports or other documentation detailing the assessment of the UVLS Program.

**Rationale for Requirement R4:** Refer to the Supplemental Section at the end of the document for the rationale.

- R4.** Each Planning Coordinator or Transmission Planner shall, within 12 calendar months of an event that resulted in a voltage excursion for which its UVLS Program was designed to operate, perform an assessment to evaluate: *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*
  - 4.1.** Whether its UVLS Program resolved the undervoltage issues associated with the event, and
  - 4.2.** The performance (i.e., operation and non-operation) of the UVLS Program equipment.
- M4.** Acceptable evidence may include, but is not limited to, date-stamped event data, event analysis reports, or other documentation detailing the assessment of the UVLS Program and associated equipment.
- R5.** Each Planning Coordinator or Transmission Planner that identifies deficiencies during an assessment performed in either Requirement R3 or R4 shall develop a Corrective Action Plan to address the deficiencies and subsequently provide the Corrective Action Plan, including an implementation schedule, to UVLS entities within three

calendar months of completing the assessment. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

- M5.** Acceptable evidence must include a date-stamped Corrective Action Plan that addresses identified deficiencies and may also include date-stamped reports or other documentation supporting the Corrective Action Plan. Evidence should also include date-stamped communications showing that the Corrective Action Plan and an associated implementation schedule were provided to UVLS entities.
- R6.** Each Planning Coordinator that has a UVLS Program in its area shall update a database containing data necessary to model the UVLS Program(s) in its area for use in event analyses and assessments of the UVLS Program at least once each calendar year. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- M6.** Acceptable evidence may include, but is not limited to, date-stamped spreadsheets, database reports, or other documentation demonstrating a UVLS Program database was updated.
- R7.** Each UVLS entity shall provide data to its Planning Coordinator according to the format and schedule specified by the Planning Coordinator to support maintenance of a UVLS Program database. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- M7.** Acceptable evidence may include, but is not limited to, date-stamped emails, letters, or other documentation demonstrating data was provided to the Planning Coordinator as specified.
- R8.** Each Planning Coordinator that has a UVLS Program in its area shall provide its UVLS Program database to other Planning Coordinators and Transmission Planners within its Interconnection, and other functional entities with a reliability need, within 30 calendar days of a written request. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- M8.** Acceptable evidence may include, but is not limited to, date-stamped emails, letters, or other documentation demonstrating that the UVLS Program database was provided within 30 calendar days of receipt of a written request.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances

where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The Planning Coordinator, Transmission Planner, Distribution Provider, and Transmission Owner shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The applicable entity shall retain documentation as evidence for six calendar years.

If an applicable entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

**1.3. Compliance Monitoring and Assessment Processes**

“Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.

**1.4. Additional Compliance Information**

None.

### Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	High	N/A	N/A	N/A	The applicable entity that developed the UVLS Program failed to evaluate the program’s effectiveness and subsequently provide the UVLS Program’s specifications and implementation schedule to UVLS entities in accordance with Requirement R1, including the items specified in Parts 1.1 and 1.2.



R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R2	Long-term Planning	High	N/A	N/A	<p>The applicable entity failed to adhere to the UVLS Program specifications in accordance with Requirement R2.</p> <p>OR</p> <p>The applicable entity failed to adhere to the implementation schedule in accordance with Requirement R2.</p>	<p>The applicable entity failed to adhere to the UVLS Program specifications and implementation schedule in accordance with Requirement R2.</p>
R3	Long-term Planning	Medium	N/A	N/A	N/A	<p>The applicable entity failed to perform an assessment at least once during the 60 calendar months in accordance with Requirement R3, including the items specified in Parts 3.1 and 3.2.</p>

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R4	Operations Planning	Medium	The applicable entity performed an assessment in accordance with Requirement R4 within a time period greater than 12 calendar months but less than or equal to 13 calendar months after an applicable event.	The applicable entity performed an assessment in accordance with Requirement R4 within a time period greater than 13 calendar months but less than or equal to 14 calendar months after an applicable event.	The applicable entity performed an assessment in accordance with Requirement R4 within a time period greater than 14 calendar months but less than or equal to 15 calendar months after an applicable event.	The applicable entity performed an assessment in accordance with Requirement R4 within a time period greater than 15 calendar months after an applicable event.  OR The applicable entity failed to perform an assessment in accordance with Requirement R4.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	Operations Planning	Medium	The applicable entity developed a Corrective Action Plan and provided it to UVLS entities in accordance with Requirement R5 but was late by less than or equal to 15 calendar days.	The applicable entity developed a Corrective Action Plan and provided it to UVLS entities in accordance with Requirement R5 but was late by more than 15 calendar days but less than or equal to 30 calendar days.	The applicable entity developed a Corrective Action Plan and provided it to UVLS entities in accordance with Requirement R5 but was late by more than 30 calendar days but less than or equal to 45 calendar days.	The applicable entity developed a Corrective Action Plan and provided it to UVLS entities in accordance with Requirement R5 but was late by more than 45 calendar days.  OR The responsible entity failed to develop a Corrective Action Plan or provide it to UVLS entities in accordance with Requirement R5.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R6	Operations Planning	Lower	The applicable entity updated the database in accordance with Requirement R6 but was late by less than or equal to 30 calendar days.	The applicable entity updated the database in accordance with Requirement R6 but was late by more than 30 calendar days but less than or equal to 60 calendar days.	The applicable entity updated the database in accordance with Requirement R6 but was late by more than 60 calendar days but less than or equal to 90 calendar days.	The applicable entity updated the database in accordance with Requirement R6 but was late by more than 90 calendar days.  OR The applicable entity failed to update the database in accordance with Requirement R6.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R7	Operations Planning	Lower	<p>The applicable entity provided data in accordance with Requirement R7 but was late by less than or equal to 30 calendar days per the specified schedule.</p> <p>OR</p> <p>The applicable entity provided data in accordance with Requirement R7 but the data was not provided according to the specified format.</p>	<p>The applicable entity provided data in accordance with Requirement R7 but was late by more than 30 calendar days but less than or equal to 60 calendar days per the specified schedule.</p>	<p>The applicable entity provided data in accordance with Requirement R7 but was late by more than 60 calendar days but less than or equal to 90 calendar days per the specified schedule.</p>	<p>The applicable entity provided data in accordance with Requirement R7 but was late by more than 90 calendar days per the specified schedule.</p> <p>OR</p> <p>The applicable entity failed to provide data in accordance with Requirement R7.</p>

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R8	Operations Planning	Lower	The applicable entity provided its UVLS Program database in accordance with Requirement R8 but was late by less than or equal to 15 calendar days.	The applicable entity provided its UVLS Program database in accordance with Requirement R8 but was late by more than 15 calendar days but less than or equal to 30 calendar days.	The applicable entity provided its UVLS Program database in accordance with Requirement R8 but was late by more than 30 calendar days but less than or equal to 45 calendar days.	The applicable entity provided its UVLS Program database in accordance with Requirement R8 but was late by more than 45 calendar days.  OR The applicable entity failed to provide its UVLS Program database in accordance with Requirement R8.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

Version	Date	Action	Change Tracking
0	February 8, 2005	Adopted by NERC Board of Trustees	
0	April 1, 2005	Effective Date	
0	February 7, 2013	Adopted by NERC Board of Trustees	R2 and associated elements for retirement as part of the Paragraph 81 project (Project 2013-02) pending applicable regulatory approval.
1	November 13, 2014	Adopted by NERC Board of Trustees	Revisions made under Project 2008-02: Undervoltage Load Shedding (UVLS) & Underfrequency Load Shedding (UFLS) to address directive issued in FERC Order No. 763.
2		Adopted by NERC Board of Trustees	Revisions made under Project 2008-02.2: Undervoltage Load Shedding (UVLS): Misoperation to include UVLS equipment.

## Guidelines and Technical Basis

### Introduction

The standard drafting team provides the following discussion to support the approach to the standard. The information is meant to enhance the understanding of the reliability needs and deliverable expectations of each requirement, supported as necessary by technical principles and industry experience.

### Guidelines for UVLS Program Definition

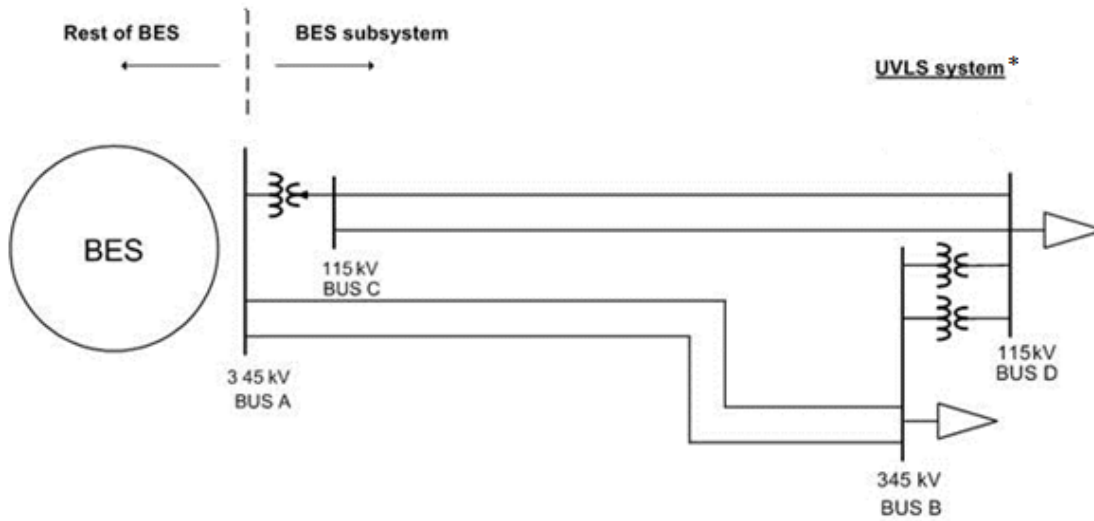
The definition for the term, “Undervoltage Load Shedding Program” or “UVLS Program” includes automatic load shedding programs that utilize only voltage inputs at locations where action is taken to shed load. As such, the failure of a single component is unlikely to affect the reliable operation of the program.

The UVLS Program definition excludes centrally controlled undervoltage-based load shedding, which utilizes inputs from multiple locations and may also utilize inputs other than voltages (such as generator reactive reserves, facility loadings, equipment statuses, etc.). The design and characteristics of a centrally controlled undervoltage-based load shedding system are the same as that of a Remedial Action Scheme (RAS), wherein load shedding is the remedial action. Therefore, just like for a RAS, the failure of a single component can compromise the reliable operation of centrally controlled undervoltage-based load shedding.

To ensure that the applicability of the standard includes only those undervoltage-based load shedding systems whose performance has an impact on system reliability, a UVLS Program must mitigate risk of one or more of the following: voltage instability, voltage collapse, or Cascading impacting the Bulk Electric System (BES). An example of a program that would not fall under this category is undervoltage-based load shedding installed to mitigate damage to equipment or local loads that are directly affected by the low voltage event.

Figure 1 below is an example of a BES subsystem for which a UVLS system could be used as a solution to mitigate various issues following the loss of the 345 kV double circuit line between buses A and B. If the consequence of this Contingency does not impact the BES by leading to voltage instability, voltage collapse, or Cascading, a UVLS system (installed at either, or both, bus B and D) used to mitigate this Contingency would not fall under the definition of a UVLS Program. However, if this same UVLS system is used to mitigate an Adverse Reliability Impact outside this contained area, it would be classified as a wide-area undervoltage problem and would fall under the definition of UVLS Program.





\*UVLS systems may be installed at either, or both, bus B and D

**Figure 1: UVLS Subsystem**

## Guidelines for Requirements

Table 1 provides a high-level overview of the requirements contained in the standard.

Table 1: High-Level Requirement Overview						
Requirement	Entity	Evaluate Program Effectiveness	Adhere to Program Specifications and Schedule	Perform Program Assessment (Periodic or Performance)	Develop a CAP to Address Program Deficiencies	Update and/or Share Program Data
R1	PC or TP	X				
R2	UVLS entity		X			
R3	PC or TP	X		X		
R4	PC or TP	X		X		
R5	PC or TP				X	
R6	PC					X
R7	UVLS entity					X
R8	PC					X

## Guidelines for Requirement R1

A UVLS Program may be developed and implemented to either serve as a safety net system protection measure against unforeseen extreme Contingencies or to achieve specific system

performance for known transmission Contingencies for which dropping of load is allowed under Transmission Planning (TPL) Reliability Standards. Regardless of the purpose, it is important that the UVLS Program being implemented is effective in terms that it mitigates undervoltage conditions impacting the Bulk Electric System (BES), leading to voltage instability, voltage collapse, or Cascading. Consideration should be given to voltage set points and time delays, rate of voltage decay or recovery, power flow levels, etc. when designing a UVLS Program.

For the UVLS Program to be effective in achieving its goal, it is also necessary that the UVLS Program is coordinated with generator voltage ride-through capabilities and other protection and control systems that may have an impact on the performance of the UVLS Program. Some of these protection and control systems may include, but are not limited to, transmission line protection, RAS, other undervoltage-based load shedding programs, autoreclosing, and controls of shunt capacitors, reactors, and static voltampere-reactive systems (SVSs).

For example, if the purpose of a UVLS Program is to mitigate fault-induced delayed voltage recovery (FIDVR) events in a large load center that also includes local generation, it is important that such a UVLS Program is coordinated with local generators' voltage ride-through capabilities. Generators in the vicinity of a load center are critical to providing dynamic voltage support to the system during FIDVR events. To maximize the benefit of on-line generation, the best practice may be to shed load prior to generation trip. However, occasionally, it may be best to let generation trip prior to load shed. Therefore, the impact of generation tripping should be considered while designing a UVLS Program.

Another example that can be highlighted is the coordination of a UVLS Program with automatic shunt reactor tripping devices if there are any on the system. Most likely, any shunt reactors on the system will trip off automatically after some time delay during low voltage conditions. In such cases, shunt reactors should be tripped before the load is shed to preserve the system. This may require coordination of time delays associated with the UVLS Program with shunt reactor tripping devices.

The examples given above demonstrate that, for a UVLS Program to be effective, proper consideration should be given to coordination of a UVLS Program with generator ride-through capabilities and other protection and control systems.

## **Guidelines for Requirement R2**

Once a Planning Coordinator (PC) or Transmission Planner (TP) has identified a need for a UVLS Program, the Planning Coordinator or Transmission Planner will develop a program that includes specifications and an implementation schedule, which are then provided to UVLS entities per Requirement R1. Specifications may include voltage set points, time delays, amount of load to be shed, and the location at which load needs to be shed. If UVLS entities do not implement the UVLS Program according to the specifications and schedule provided, the UVLS Program may not be effective and may not achieve its intended goal. The UVLS entity must document that all necessary actions were completed to implement the UVLS Program.

Similarly, when a Corrective Action Plan (CAP) to address UVLS Program deficiencies is developed by the Planning Coordinator or Transmission Planner and provided to UVLS entities per Requirement R5, UVLS entities must comply with the CAP and its associated implementation schedule to ensure that the UVLS Program is effective. The UVLS entity is required to complete the actions specified in the CAP, document the plan implementation, and retain the appropriate evidence to demonstrate implementation and completion.

Deferrals or other relevant changes to the UVLS Program specifications or CAP need to be documented so that the record includes not only what was planned, but what was implemented. Depending on the planning and documentation format used by the responsible entity, evidence of a successful execution could consist of signed-off work orders, printouts from work management systems, spreadsheets of planned versus completed work, timesheets, work inspection reports, paid invoices, photographs, walk-through reports, or other evidence.

For example, documentation of a CAP provides an auditable progress and completion confirmation for the identified UVLS Program deficiency:

**CAP Example 1** - Corrective actions for a quick triggering problem; preemptive actions for similar installations:

The PC or TP obtains fault records from a UVLS entity that participates in its UVLS Program that indicate a group of UVLS relays triggered at the appropriate undervoltage level but with shorter delays than expected. The PC or TP directed the UVLS entity to schedule on-site inspections within three weeks. The results of the inspection confirmed that the delay-time programmed on the relays was 60 cycles instead of 90 cycles. The PC or TP then directed the UVLS entity to correct to a 90-cycle time delay setting of the UVLS relays identified to have shorter time delay settings within eight weeks.

Applicability to other UVLS relays: The PC or TP then developed a schedule with the UVLS entity to verify and adjust all remaining UVLS relays time delay settings within a one-year period.

The PC or TP verified completion of verification and adjustment of the time delay settings for all of the UVLS entity's equipment that participates in the PC or TP UVLS Program

**CAP Example 2** - Corrective actions for a firmware problem; preemptive actions for similar installations:

The PC or TP obtains fault records on 6/4/2014 from a UVLS entity that participates in its UVLS Program. The UVLS entity also provided the fault records to the manufacturer, who responded on 6/11/2014 that the Misoperation<sup>2</sup> of the UVLS relay was caused by a bug in version 2 firmware, and recommended installing version 3 firmware. The PC or TP approved the UVLS entity's plan to schedule Version 3 firmware installation on 6/12/2014.

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<sup>2</sup> Misoperation of Protection Systems reporting was initiated by the NERC Board of Trustees adopted NERC Rules of Procedure, Section 1600, Request for Data or Information. Refer to: *Request for Data of Information, Protection System Misoperation Data Collection*, August 14, 2014. [http://www.nerc.com/pa/RAPA/ProtectionSystemMisoperations/PRC-004-3%20Section%201600%20Data%20Request\\_20140729.pdf](http://www.nerc.com/pa/RAPA/ProtectionSystemMisoperations/PRC-004-3%20Section%201600%20Data%20Request_20140729.pdf).

Applicability to other UVLS relays: The PC or TP then developed a schedule with the UVLS entity to install firmware version 3 at all of the UVLS entity's UVLS relays that are determined to be programmed with version 2 firmware. The completion date was scheduled no-later-than 12/31/2014.

The firmware replacements were completed on 12/4/2014.

### **Guidelines for Requirement R3**

In addition to the initial studies required to develop a UVLS Program, periodic comprehensive assessments (detailed analyses) are required to ensure its continued effectiveness. This assessment is required to be completed at least once every 60 calendar months to capture the accumulated effects of minor changes to the system that have occurred since the last assessment was completed. However, at any point in time, a Planning Coordinator or Transmission Planner may also determine that a material change<sup>3</sup> to system topology or operating conditions affects the performance of the UVLS Program and therefore necessitates the same comprehensive assessment. Regardless of the trigger, each assessment should include an evaluation of each UVLS Program to ensure the continued integration through coordination.

This comprehensive assessment complements the TPL-001-4 annual assessment requirement to evaluate the impact of protection systems. The 60-month period is the same time frame used in TPL-001-4 and in PRC-006-1.

As specified in Requirement R3, a comprehensive assessment must be performed at least once every 60 calendar months. If a Planning Coordinator or Transmission Planner conducts a comprehensive assessment sooner for the reasons discussed above, the 60-month time period would restart upon completion of this assessment.

### **Guidelines for Requirement R4**

After a voltage excursion event, the goal of the assessment required in Requirement R4 is to evaluate: (1) whether the UVLS Program resolved the undervoltage issues, and (2) the performance of the UVLS Program equipment. The assessment should include event data analysis, such as the relevant sequence of events leading to the undervoltage conditions (e.g., Contingencies, operation of protection systems, and RAS) and field measurements useful to analyzing the behavior of the system. A comprehensive description of the UVLS Program operation should be presented, including conditions of the trigger (e.g., voltage levels, time delays) and amount of load shed for each affected substation. Assessment of the event is performed to evaluate the level of performance of the program for the event of interest and to identify deficiencies to be included in a CAP per Requirement R5. Misoperation of UVLS equipment is addressed as a deficiency. Reporting of UVLS equipment Misoperations are

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<sup>3</sup> It is understood that the term material change is not transportable on a continent-wide basis. This determination must be made by the Planning Coordinator or Transmission Planner and should be accompanied by documentation to support the technical rationale for determining material changes.

addressed by the NERC *Request for Data and Information, Protection System Misoperation Data Collection*.<sup>4</sup>

The studies and analyses showing the effectiveness of the UVLS Program can be similar to what is required in Requirements R1 and R3, but should include a clear link between the evaluation of effectiveness (in studies using simulations) and the analysis of the event (with measurements and event data) that actually occurred. For example, differences between the expected and actual system behavior for the event of interest should be discussed and modeling assumptions should be evaluated. Important discrepancies between the simulations and the actual event should be investigated.

Considering the importance of an event that involves the operation of a UVLS Program, the 12-calendar-month period provides adequate time to analyze the event and perform an assessment while identifying deficiencies within a reasonable time. This time period is also required in PRC-006-1.

### **Guidelines for Requirement R5**

Requirement R5 promotes the prudent correction of an identified problem during the assessment of a UVLS Program. Per Requirements R3 and R4, an assessment of an active UVLS Program is triggered:

- Within 12 calendar months of an event that resulted in a voltage excursion for which the program was designed to operate
- At least once every 60 calendar months. The default time frame of 60 calendar months or less between assessments has the intention to assure that the cumulative changes to the network and operating condition affecting the UVLS Program are evaluated

Since every UVLS is unique, if material changes are made to system topology or operating conditions, the Planning Coordinator or Transmission Planner will decide the degree to which the change in topology or operating condition becomes a material change sufficient to trigger an assessment of the existing UVLS Program.

A CAP is a list of actions and an associated timetable for implementation to remedy a specific problem. It is a proven tool for resolving operational problems. Per Requirement R5, the Planning Coordinator or Transmission Planner is required to develop a CAP and provide it to UVLS entities to accomplish the purpose of this requirement, which is to prevent future deficiencies in the UVLS Program, thereby minimizing risk to the system. Determining the cause of the deficiency is essential in developing an effective CAP to avoid future re-occurrence of the same problem. A CAP can be revised if additional causes are found.

Based on industry experience and operational coordination timeframes, three calendar months from the date an assessment is completed is a reasonable time frame for development of a CAP, including time to consider alternative solutions and coordination of resources. The “within three

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<sup>4</sup> Id.

calendar months” time frame is solely to develop a CAP, including its implementation schedule, and provide it to UVLS entities. It does not include the time needed for its implementation by UVLS entities. This implementation time frame is dictated within the CAP’s associated timetable for implementation, and the execution of the CAP according to its schedule is required in Requirement R2.

### **Guidelines for Requirements R6–R8**

An accurate UVLS Program database is necessary for the Planning Coordinator or Transmission Planner to perform system reliability assessment studies and event analysis studies. Without accurate data, there is a possibility that annual reliability assessment studies that are performed by the Planning Coordinator or Transmission Planner can lead to erroneous results and therefore impact reliability. Also, without the accurate data, it is very difficult for the Planning Coordinator or Transmission Planner to duplicate a UVLS event and determine the root cause of the problem.

To support a UVLS Program database, it is necessary for each UVLS entity to provide accurate data to its Planning Coordinator. Each UVLS entity will provide the data according to the specified format and schedule provided by the Planning Coordinator. This is required in order for the Planning Coordinator to maintain and support a comprehensive UVLS Program database. By having a comprehensive database, the Planning Coordinator can embark on a reliability assessment or event analysis/benchmarking studies, identify the issues with the UVLS Program, and develop Corrective Action Plans.

The UVLS Program database may include, but is not limited to the following:

- Owner and operator of the UVLS Program
- Size and location of customer load, or percent of connected load, to be interrupted
- Corresponding voltage set points and clearing times
- Time delay from initiation to trip signal
- Breaker operating times
- Any other schemes that are part of or impact the UVLS Programs, such as related generation protection, islanding schemes, automatic load restoration schemes, underfrequency load shedding (UFLS), and RAS

Additionally, the UVLS Program database is required to be updated annually (once every calendar year) by the Planning Coordinator. The intent here is for UVLS entities to review the data annually and provide changes to the Planning Coordinators so that Planning Coordinators can keep the databases current and accurate for performing event analysis and other assessments.

Finally, a Planning Coordinator is required to provide information to other Planning Coordinators and Transmission Planners within its Interconnection, and other functional entities with a reliability need, within 30 calendar days of receipt of a written request. Thirty calendar days was selected as the time frame as it is considered to be reasonable and well- accepted by the industry. Also, this requirement of sharing the database with applicable functional entities supports the

directive provided by FERC that requires an integrated and coordinated approach to UVLS programs (Paragraph 1509 of FERC Order No. 693).

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

### Rationale for Applicability

This standard is applicable to Planning Coordinators and Transmission Planners that have or are developing a UVLS Program, and to Distribution Providers and Transmission Owners responsible for the ownership, operation, or control of UVLS equipment as required by the UVLS Program established by the Transmission Planner or Planning Coordinator. These Distribution Providers and Transmission Owners are referred to as UVLS entities for the purpose of this standard.

The applicability includes both the Planning Coordinator and Transmission Planner because either may be responsible for designing and coordinating the program based on agreements, memorandums of understanding, or tariffs.

The phrase “Planning Coordinator or Transmission Planner” provides the latitude for applicability to the entity that will perform the action. The expectation is not that both parties will perform the action, but rather that the Planning Coordinator and Transmission Planner will engage in discussion to determine the appropriate responsible entity.

### Rationale for R1

In Paragraph 1509 from Order No. 693, FERC directed NERC to require an integrated and coordinated approach to all protection systems. The drafting team agrees that a lack of coordination among protection systems is a key risk to reliability, and that each Planning Coordinator or Transmission Planner that develops a UVLS Program should evaluate the program’s viability and effectiveness prior to implementation. This evaluation should include studies and analyses used when developing the program that show implementation of the program resolves the identified undervoltage conditions that led to its design. These studies and analyses should also show that the UVLS Program is integrated through coordination with generator voltage ride-through capabilities and other protection and control systems. Though presented as separate items, the drafting team recognizes that the studies that show coordination considerations and that the program addresses undervoltage issues may be interrelated and presented as one comprehensive analysis.

In addition, Requirement R1 also requires the Planning Coordinator or Transmission Planner to provide the UVLS Program’s specifications and implementation schedule to applicable UVLS entities to implement the program. It is noted that studies to evaluate the effectiveness of the program should be completed prior to providing the specifications and schedule.



## **Rationale for R2**

UVLS entities must implement a UVLS Program or address any necessary corrective actions for a UVLS Program according to the specifications and schedule provided by the Planning Coordinator or Transmission Planner. If UVLS entities do not implement the UVLS Program according to the specifications and schedule provided, the UVLS Program may not be effective and may not achieve its intended goal.

## **Rationale for R3**

A periodic comprehensive assessment (detailed analysis) should be conducted to identify and catalogue the accumulated effects of minor changes to the system that have occurred since the last assessment was completed, and should include an evaluation of each UVLS Program to ensure the continued integration through coordination. This comprehensive assessment supplements the NERC Reliability Standard TPL-001-4 annual assessment requirement to evaluate the impact of protection systems.

Based on the drafting team's knowledge and experience, and in keeping with time frames contained in similar requirements from other PRC Reliability Standards, 60 calendar months was determined to be the maximum amount of time allowable between assessments. Assessments will be performed sooner than the end of the 60-calendar month period if the Planning Coordinator or Transmission Planner determines that there are material changes to system topology or operating conditions that affect the performance of a UVLS Program. Note that the 60-calendar-month time frame would reset after each assessment.

## **Rationale for R4**

A UVLS Program not functioning as expected during a voltage excursion event for which the UVLS Program was designed to operate presents a critical risk to system reliability. Therefore, a timely assessment to evaluate (1) whether the UVLS Program resolved the undervoltage issues and (2) the performance of the UVLS Program equipment associated with the applicable event is essential. The 12 calendar months (from the date of the event) provides adequate time to coordinate with other Planning Coordinators, Transmission Planners, Transmission Operators, and UVLS entities, simulate pre- and post-event conditions, and complete the performance assessment.

## **Rationale for R5**

If program deficiencies are identified during an assessment performed in either Requirement R3 or R4, the Planning Coordinator or Transmission Planner must develop a Corrective Action Plan (CAP) to address the deficiencies. Based on the drafting team's knowledge and experience with UVLS studies, three calendar months was determined to provide a judicious balance between the reliability need to address deficiencies expeditiously and the time needed to consider potential

solutions, coordinate resources, develop a CAP and implementation schedule, and provide the CAP and schedule to UVLS entities.

It is noted that the three-month time frame is only to develop the CAP and provide it to UVLS entities and does not encompass the time UVLS entities have to implement the CAP. Requirement R2 requires UVLS entities to execute the CAP according to the schedule provided by the Planning Coordinator or Transmission Planner.

### **Rationale for R6**

Having accurate and current data is required for the Planning Coordinator to perform undervoltage studies and for use in event analyses. Requirement R6 supports this reliability need by requiring the Planning Coordinator to update its UVLS Program database at least once each calendar year.

### **Rationale for R7**

Having accurate and current data is required for the Planning Coordinator to perform undervoltage studies and for use in event analyses. Requirement R7 supports this reliability need by requiring the UVLS entity to provide UVLS Program data in accordance with specified parameters.

### **Rationale for R8**

Requirement R8 supports the integrated and coordinated approach to UVLS programs directed by Paragraph 1509 of Order No. 693 by requiring that UVLS Program data be shared with neighboring Planning Coordinators and Transmission Planners within a reasonable time period. Requests for the database should also be fulfilled for those functional entities that have a reliability need for the data (such as the Transmission Operators that develop System Operating Limits and Reliability Coordinators that develop Interconnection Reliability Operating Limits).

## Frequently Asked Questions

To succinctly address common comment themes that require drafting team response on Project 2008-02 UVLS (proposed PRC-010-1), the drafting team provides the following discussion in the construct of an FAQ format.

### Introduction

This Frequently Asked Questions (FAQ) document was created during the development of PRC-010-1 (*Undervoltage Load Shedding*)<sup>5,6</sup> to succinctly address common comment themes with respect to the approach and intent of the Project 2008-02 Undervoltage Load Shedding (UVLS)<sup>7</sup> standard drafting team (“drafting team”). This FAQ document is the outcome of comments received during comment periods and multiple outreach sessions with industry. All comments submitted by industry during comment periods may be reviewed on the project page.

Subsequent to the adoption of PRC-010-1, the UVLS drafting team made minor revisions to the standard address the UVLS Misoperation identification and correction.<sup>8</sup> This FAQ document was amended to reflect up the approach and intent of the drafting team during the development of PRC-010-2 concerning Misoperation of UVLS equipment.

### Purpose of Standard Revision

#### *1) What is the basis for a revision of the existing UVLS standards?*

The initial input into a revision of the existing UVLS standards is FERC [Order No. 693](#),<sup>9</sup> Paragraph 1509, which directed the ERO to develop a modification of PRC-010-0 that “requires that an integrated and coordinated approach be included in all protection systems on the Bulk-Power System, including generators and transmission lines, generators’ low voltage ride through capabilities, and UFLS and UVLS programs.” In addition, [The Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations](#)<sup>10</sup> (“August 14 Blackout Report”) showed that proper coordination would have mitigated effects if UVLS was used as a tool.

Additional inputs included 1) recommendations from the NERC System Protection and Control Subcommittee (SPCS) in its December 2010 [Technical Review of UVLS-Related Standards](#)<sup>11</sup> to combine the four existing UVLS standards, revise the applicability to entities responsible for UVLS program design, implementation, and coordination, specifically include a requirement for

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<sup>5</sup> (<http://www.nerc.com/layouts/PrintStandard.aspx?standardnumber=PRC-010-1&title=Undervoltage%20Load%20Shedding>).

<sup>6</sup> Adopted by the NERC Board of Trustees on November 14, 2014.

<sup>7</sup> (<http://www.nerc.com/pa/Stand/Pages/Project-2008-02-Undervoltage-Load-Shedding.aspx>).

<sup>8</sup> Refer to Project 2010-05.1, which developed PRC-004-3 (Protection System Misoperation Identification and Correction) concurrently with the development of PRC-010-1. ([http://www.nerc.com/pa/Stand/Pages/Project2010-05\\_Protection\\_System\\_Misoperations.aspx](http://www.nerc.com/pa/Stand/Pages/Project2010-05_Protection_System_Misoperations.aspx)).

<sup>9</sup> ([http://www.nerc.com/docs/docs/ferc/order\\_693.pdf](http://www.nerc.com/docs/docs/ferc/order_693.pdf)).

<sup>10</sup> (<http://energy.gov/sites/prod/files/oeprod/DocumentsandMedia/BlackoutFinal-Web.pdf>).

<sup>11</sup> ([http://www.nerc.com/docs/pc/spctf/PRC-010\\_022%20Report\\_Approved\\_20101208.pdf](http://www.nerc.com/docs/pc/spctf/PRC-010_022%20Report_Approved_20101208.pdf)).

assessment of coordination between UVLS programs and all other protection systems, and differentiate post-event validation of UVLS program design from verifying correct operation of UVLS equipment; 2) the existing UVLS standards were not in the current results-based format; 3) the preceding revision of the underfrequency load shedding (UFLS) standards had similar types of requirements and had been completed under the construct of a consolidation; and 4) the Independent Expert Review Panel recommendations, which included an evaluation of the existing standards' applicability and level of specificity.

The drafting team agrees that a lack of coordination among protection systems is a key risk to reliability. As part of the revision to address this, the drafting team also agreed that an evaluation and consolidation of the existing UVLS standards was necessary to meet current Reliability Standard development initiatives and to provide clear, comprehensive requirements to address the application and coordination of UVLS.

***2) UVLS programs are not mandatory—is compliance for an optional tool necessary?***

The drafting team asserts that a key takeaway from the August 14 Blackout Report is that coordination of UVLS with other protection systems could have mitigated the effects if UVLS was used as a tool. Although the use of UVLS is not mandatory, if it is determined that this system preservation measure is necessary to support reliability and a UVLS program is installed, the program needs to be properly coordinated, implemented, and assessed due to the inherent associated reliability risks. As such, there needs to be a level of performance required to properly protect system reliability. Of note, PRC-010-1 and PRC-010-2 apply to the defined term “UVLS Program,” which limits the standard’s applicability to only those undervoltage-based load shedding programs whose performance has an impact on system reliability.<sup>12</sup>

**Coordination with Project 2009-03 Emergency Operations**

***3) EOP-003-2 has potential redundant requirements with proposed PRC-010-1—how is this being addressed?***

As part of its five-year review, Project 2009-03 – Emergency Operations (EOP) identified EOP-003-2 (*Load Shedding Plans*),<sup>13</sup> Requirements R2, R4, and R7 as being more properly covered by Project 2008-02 – UVLS. Both projects were strategically coordinated to move in lockstep from a timing perspective to address these requirements. Project 2009-03 – EOP proposed to revise and consolidate EOP-001-2.1b (*Emergency Operations Planning*),<sup>14</sup> EOP-002-3 (*Capacity and Energy Emergencies*),<sup>15</sup> and EOP-003-2 to create EOP-011-1, will retire the noted EOP-003-2

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<sup>12</sup> The term “UVLS Program” used herein was adopted by the NERC Board of Trustees on November 14, 2014.

<sup>13</sup> (<http://www.nerc.com/layers/PrintStandard.aspx?standardnumber=EOP-003-2&title=Load%20Shedding%20Plans>).

<sup>14</sup> (<http://www.nerc.com/layers/PrintStandard.aspx?standardnumber=EOP-001-2.1b&title=Emergency%20Operations%20Planning>).

<sup>15</sup> (<http://www.nerc.com/layers/PrintStandard.aspx?standardnumber=EOP-002-3&title=Capacity%20and%20Energy%20Emergencies>).

requirements (among other revisions), and the Project 2008-02 – UVLS *Mapping Document* will show how PRC-010-1 encompasses the retired content accordingly. Slated to have aligning effective dates, both EOP-011-1 (*Emergency Operations*)<sup>16</sup> and PRC-010-1 will be posted and balloted separately but concurrently, so that industry stakeholders will be able to clearly evaluate the transition. Please see the posted Project 2008-02 UVLS Project Coordination Plan for more information.

## **“UVLS Program” Definition**

### ***4) Why is the introduction of the new defined term “UVLS Program” necessary?***

The drafting team found it necessary to introduce the term “UVLS Program” for inclusion in the [\*Glossary of Terms Used in NERC Reliability Standards\*](#)<sup>17</sup> (“NERC Glossary”) because different types of UVLS systems need to be treated appropriately with respect to reliability requirements. Therefore, the term establishes which UVLS systems PRC-010-1 will apply to an: “automatic load shedding program consisting of distributed relays and controls used to mitigate undervoltage conditions impacting the Bulk Electric System (BES), leading to voltage instability, voltage collapse, or Cascading. Centrally controlled undervoltage-based load shedding is not included.”

The definition excludes locally-applied relays that are designed to protect a contained area or, in other words, are not designed to mitigate wide-area voltage collapse. This exclusion is not explicit in these terms in the enforceable language of the definition since the meaning and measurement of “local” or “wide-area” varies greatly on a continent-wide basis and could potentially be interpreted differently by auditors and the applicable functional entities. Therefore, the definition as written is meant to provide flexibility for the Planning Coordinator or Transmission Planner to determine if a UVLS system falls under the defined term with respect to its impact on the reliability of the BES (voltage instability, voltage collapse, or Cascading). To further support the intended exclusion, further discussion and an example are provided on in the PRC-010-1 and PRC-010-2 Guidelines and Technical Basis section under the heading “Guidelines for UVLS Program Definition.”

The definition does explicitly note that the term excludes centrally controlled undervoltage-based load shedding. This type of load shedding is excluded because the drafting team asserts that the design and characteristics of centrally controlled undervoltage-based load shedding are commensurate with those of a Special Protection System (SPS) or Remedial Action Scheme (RAS) and should therefore be subject to SPS or RAS-related Reliability Standards. See PRC-010-1 and PRC-010-2 Guidelines and Technical Basis section under the heading “Guidelines for UVLS Program Definition” for further discussion.

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<sup>16</sup> ([http://www.nerc.com/ layouts/PrintStandard.aspx?standardnumber=EOP-011-1&title=Emergency%20Operations](http://www.nerc.com/layouts/PrintStandard.aspx?standardnumber=EOP-011-1&title=Emergency%20Operations)).

<sup>17</sup> ([http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary\\_of\\_Terms.pdf](http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf)).

***5) If the definition excludes certain types of UVLS, does this preclude an “integrated” approach (FERC Order No. 693, Paragraph 1509)?***

The defined term “UVLS Program” clarifies which UVLS systems are subject to the requirements in PRC-010-1 and PRC-010-2. The resulting exclusions from these versions of the standard do not preclude an “integrated” approach because the standard requires that an entity coordinate with all other protection and control systems as necessary, which may include other types of UVLS (i.e., locally-applied UVLS relays and centrally controlled undervoltage-based load shedding).

***6) Where will centrally controlled undervoltage-based load shedding be covered?***

As explained immediately above, the Requirements of PRC-010-1 and PRC-010-2 are applicable to the proposed NERC Glossary term “UVLS Program,” which excludes centrally controlled undervoltage-based load shedding because its design and characteristics are commensurate with those of an SPS or RAS. However, the NERC Glossary during the development of PRC-010-1 definition of “Special Protection System” excluded UVLS. Therefore, the work under Project 2010-05.2 – Special Protection Systems (Phase 2 of Protection Systems) combined the NERC Glossary definition of “Special Protection System” into the single term “Remedial Action Scheme.”<sup>18</sup> The definition revisions specifically excluded UVLS Programs, therefore including centrally controlled undervoltage-based shedding.

Consequently, the introduction of the term “UVLS Program” and the conforming revision to the term “Remedial Action Scheme” explicitly clarifies that RAS-related standards are applicable to centrally controlled undervoltage-based load shedding. The implementation plan for the revised definition of “Remedial Action Scheme” will address entities that will have newly identified RAS resulting from the application of the defined term.

Similar to the coordination effort with Project 2009-03 – EOP explained above, Project 2008-02 – UVLS and Project 2010-05.2 – SPS were coordinated to ensure that the effective dates of the adopted definitions of “Remedial Action Scheme” and “UVLS Program,” the PRC-010-1 and PRC-010-1 Reliability Standards, and all associated retirements align.

***7) Is the term “UVLS Program” inclusive of a collection of independent UVLS relays?***

No; multiple independent relays do not constitute a program. While the definition stipulates that a UVLS Program consists of distributed relays and controls, the definition specifies that it must be “[a]n automatic load shedding program, consisting of distributed relays and controls, used to mitigate undervoltage conditions impacting the Bulk Electric System(BES), leading to voltage instability, voltage collapse, or Cascading. Centrally controlled undervoltage-based load shedding is not included.”

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<sup>18</sup> Adopted by the NERC Board of Trustees on November 14, 2014.

## Applicability

### ***8) What is meant by the phrase “Planning Coordinator or Transmission Planner”?***

The PRC-010-1 and PRC-010-2 Reliability Standards are applicable to both the Planning Coordinator and Transmission Planner because either may be responsible for designing and coordinating the program based on agreements, memorandums of understanding, or tariffs. The phrase “Planning Coordinator or Transmission Planner” provides the flexibility for applicability to the entity that will perform the action. The expectation is not that both parties will perform the action, but rather that the Planning Coordinator and Transmission Planner will engage in discussion to determine the appropriate responsible entity. In addition, the requirements containing this phrase have specific language to qualify the responsible entity. For example, Requirement R1 states: “Each Planning Coordinator or Transmission Planner *that is developing* a UVLS Program shall . . .” This language provides clarity that the applicable entity would be the one that is developing the program.

### ***9) Why is the Transmission Operator not included?***

While the Transmission Operator may be involved with UVLS Program activities, the drafting team did not identify any required performance for the Transmission Operator that was necessary to capture within PRC-010-1 and PRC-010-2, since the Transmission Operator does not have the resources necessary to implement program specifications. If responsibilities are delegated to the Transmission Operator by the Transmission Owner, the Transmission Owner is still the accountable party.

To the extent that the Transmission Operator is required to have knowledge of system relays and protection systems, the drafting team notes that this requirement is covered under PRC-001-1.1 (*System Protection Coordination*),<sup>19</sup> Requirement R1. It is also noted that manual load shedding, for which the Transmission Operator is responsible, is not in the purview of PRC-010-1 and PRC-010-2, as it is covered under current EOP-003-2 and will subsequently be covered by proposed EOP-011-1 (see Project 2009-03 – Emergency Operations).

### ***10) What about UVLS schemes owned by Transmission Owners, Distribution Providers, or Transmission Operators that are not required by the planner?***

The PRC-010-1 and PRC-010-2 Reliability Standards are applicable to the term “UVLS Program.” The drafting team notes that, by its defining attributes, a UVLS Program would be required and developed by a Planning Coordinator or Transmission Planner. The nature of a UVLS scheme developed or required by a Distribution Provider, Transmission Operator, or Transmission Owner

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<sup>19</sup> <http://www.nerc.com/layers/PrintStandard.aspx?standardnumber=PRC-001-1.1&title=System%20Protection%20Coordination>.

would not meet the attributes of the defined term and would therefore not have the design and characteristics necessary to be subject to the requirements of PRC-010-1 and PRC-010-2.

## **Requirements R1, R3, R4, and R5**

### ***11) What is required to evaluate the coordination referenced in Requirement R1, part 1.2?***

Requirement R1 requires each Planning Coordinator or Transmission Planner that develops a UVLS Program to evaluate the program's viability and effectiveness prior to implementation. This evaluation should include studies and analyses used when developing the program that show implementation of the program resolves the identified undervoltage issues that led to its design. These studies and analyses should also show that the UVLS Program is integrated through coordination with generator voltage ride-through capabilities and other protection and control systems. As such, the requirement is meant to provide flexibility for an entity to make the proper determinations, including the considerations for coordination, with respect to program effectiveness based on system characteristics. For further guidance on and examples of coordination considerations, please see the portion of the Guidelines and Technical Basis section under the Requirement R1 heading.

### ***12) Requirements R1, R3, and R4 seem to all require evaluations of program effectiveness—how are they different?***

Requirements R1, R3, and R4 do require evaluations of program effectiveness, but they are each at distinct points in time.

Requirement R1 requires evaluation of program effectiveness (by way of the qualifying parts) at the onset of program development, or during the initial planning stage, prior to implementation. Requirement R3 requires the same objectives of an evaluation of effectiveness, but at the point of a mandatory periodic review (at least once every 60 calendar months). Requirement R4 addresses the performance of a UVLS Program after an event (for applicable voltage excursion) to evaluate whether the UVLS Program resolved the undervoltage issues associated with the event.

It is noted that, because of the separate activities of each requirement, UVLS Program deficiencies found as a result of the assessments performed in Requirement R3 or R4 would not be violations of Requirement R1.

### ***13) Requirement R4 would require the Planning Coordinator or Transmission Planner to review all voltage excursions—isn't this unduly burdensome?***

While Requirement R4 essentially requires the Planning Coordinator or Transmission Planner to review all voltage excursions to see if they fall below the initializing set points of the UVLS Program, the drafting team contends that it will be clearly evident if voltage falls below the UVLS



threshold because either a) UVLS devices will operate; or b) the system will experience the adverse conditions the UVLS Program was installed to mitigate.

In addition, the drafting team acknowledges that the Planning Coordinator or Transmission Planner may not have the ability to know when voltage excursions are occurring since they are not operating entities. However, a process for the Transmission Operator, Transmission Owner, or Distribution Provider to notify the Transmission Planner or Planning Coordinator of such voltage excursion events is consistent with standard utility practice.

***14) PRC-022-1 required the analysis of UVLS Misoperations. How is this addressed in PRC-010-1?***

One of the recommendations in the SPCS report was to clearly differentiate between the post-event process of validating the effectiveness of the UVLS program design, its coordination with other protection and control systems, and the potential need to modify the program design (activities addressed in PRC-010-1) and the process of verifying correct operation of UVLS equipment. Because PRC-010-1 was not specific concerning the Misoperation of UVLS equipment, the drafting team made a subsequent revision creating PRC-010-2. Version two (PRC-010-2) now requires that the assessment according to Requirement R4 include the performance (i.e., operation or non-operation) of the UVLS Program equipment.

Relative to the assessment, Requirement R5 requires that a Corrective Action Plan be developed to address any identified deficiencies. This structure ensures that UVLS Program equipment is assessed to identify any Misoperation which could affect BES reliability. Although, the UVLS drafting team maintained during development of PRC-010-1 that verifying correct operation of UVLS equipment should be addressed in PRC-004, the drafting team included UVLS that is intended to trip one or more BES Elements in the proposed PRC-004-5.

**Requirements R6, R7, and R8**

***15) Do Requirements R6, R7, and R8 overlap with the requirements of MOD-032-1?***

While both MOD-032-1 (*Data for Power System Modeling and Analysis*)<sup>20</sup> and Requirements R6, R7, and R8 of PRC-010-1 and PRC-010-2 address data requirements, MOD-032-1 establishes overarching modeling data requirements with respect to consistency in format and reporting procedures, whereas the PRC-010-1 and PRC-010-2 requirements address the need to maintain and share data and databases for the purposes of studies for use in event analyses for UVLS Programs specifically. While Reliability Standards in general may have overlap in this manner, the activities in these requirements remain distinctly different.

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<sup>20</sup> (<http://www.nerc.com/layers/PrintStandard.aspx?standardnumber=MOD-032-1&title=Data%20for%20Power%20System%20Modeling%20and%20Analysis>).

***16) Requirements R6, R7, and R8 appear to be administrative – doesn't this conflict with Paragraph 81 criteria?<sup>21</sup>***

Proper maintenance and timely sharing of UVLS Program data as required by Requirements R6, R7, and R8 is necessary to inform the Planning Coordinator or Transmission Planner's studies and analyses. While administrative tasks are required, the tasks have a core reliability-based need.

In addition, Requirements R6, R7, and R8 were written to emulate FERC-approved PRC-006-2 (*Automatic Underfrequency Load Shedding*)<sup>22,23</sup> data requirements. While some of these analogous requirements in PRC-006-2 are listed as candidates for Phase 2 of the Paragraph 81 project, they are not yet approved as meeting the criteria; furthermore, the Independent Expert Review Panel has recommended that these Paragraph 81 candidates not be included for deletion, citing that "there should be a clear expectation for Planning Coordinators to share data necessary to determine their UFLS program parameters."

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<sup>21</sup> Refer to Standards Independent Expert Review Project (IERP). ([http://www.nerc.com/pa/Stand/Standard%20Development%20Plan/Standards\\_Independent\\_Experts\\_Review\\_Project\\_Report-SOTC\\_and\\_Board.pdf](http://www.nerc.com/pa/Stand/Standard%20Development%20Plan/Standards_Independent_Experts_Review_Project_Report-SOTC_and_Board.pdf)).

<sup>22</sup> (<http://www.nerc.com/layouts/PrintStandard.aspx?standardnumber=PRC-006-2&title=Automatic%20Underfrequency%20Load%20Shedding>).

<sup>23</sup> Adopted by the NERC Board of Trustees on November 14, 2014.