

UFLS Approach

Background:

The team has identified two approaches to present UFLS requirements to the industry:

1. A NERC Directive that would require the Regions to develop Regional Standards that meet the performance characteristics set forth in the directive.
2. A continent-wide standard that include the performance characteristics.

The team will present its recommendation based on deliberation of the following considerations to the Standards Committee for a decision.

Discussion:

In order to conclude which of the options is most suitable, the team conducted a brainstorm session on pros and cons for each of the options:

Option 1: NERC Directive

Section 312 (ROP)

2. Regional Reliability Standards that are Directed by a NERC Reliability Standard — Although it is the intent of NERC to promote uniform reliability standards across North America, in some cases it may not be feasible to achieve a reliability objective with a reliability standard that is uniformly applicable across North America. In such cases, NERC may direct regional entities to develop regional reliability standards necessary to implement a NERC Reliability Standard. Such regional reliability standards that are developed pursuant to a direction by NERC shall be made part of the NERC Reliability Standards.

Pros	Cons
wide-spread industry support (based on first comment period)	uncertainty of the process to review/balloted the directive by industry and by FERC
maximize coordination — simplifies coordination by assigning responsibility of coordination at a regional level	uncertainty of the on-going review/feedback process of the characteristics (what if someone wants to change the characteristics — ex. 58 Hz should be something else, etc.) uncertainty of the on-going review process of the regional standards that are to meet the characteristics (is it the five year review program?)
this approach mandates the use of a FERC approved open process to develop the UFLS program (use of the Regional Standards Development Procedures)	uncertainty of completion of regional standards (using a standards process is lengthy — similar to the challenges with the NERC standards process)

FERC will be able to review all the details of the UFLS programs (in the regional standards)	uncertainty of enforcement for the characteristics upon the regions (unsure how to enforce that the Regions develop standards that adhere to the characteristics)
the directive leverages the existing UFLS programs in place in the regions (regions have UFLS programs that work)	changes to the characteristics would require changes to the regional standards that are possibly already approved
FERC would be able to review the coordination details of the programs in their review of Regional Standards	the directive would be a unique circumstance (PRC-006) — extensive work to fully document process for directive but could only possibly used once
this approach leverages the existing regional standards projects that are developing UFLS regional standards (most of the eight regions have initiated UFLS projects)	NERC cannot guarantee that the Regional Standards pass the standards process (are voted in favor).

- Implementation of the program is deferred to the RE's to define in the development of the regional standards

Option 2: UFLS Continent-wide Standard

Pros	Cons
established review method (every five years)	this approach requires coordination of many entities to develop a UFLS program (increasing the complexity of coordination) — potentially detrimental to the program — 73 ish PC's registered according to the Registry — there is no existing forum for the PC's to get together to develop the program
development process/ FERC approved	This approach would not specify how or what process the responsible entity would use to develop the UFLS program
enforcement is straightforward at both levels (characteristics + implementation if we use a statement similar to below)	
FERC would get to comment on the characteristics (alternate would be that they would be reviewed when the Regional Standards are filed).	the implementers of the program may have very limited influence on the schedules and details of the implementation

- Implementation of the program (TO's/DP's) would be included in the cws — “TO's and DP's that are identified by the PC shall comply with the program defined by the PC's”
- Enforcement of coordination is an issue for both approaches — need to consider revising characteristics

- FERC would not be able to determine if coordination has been accomplished (since they would not be reviewing regional standards/regional criteria using this approach)
- There are flaws in the registration of entities that may impact the development — inappropriate entities may be involved because of variations of registered entities — REMOVED FROM OPTION 2 CONS LIST BECAUSE THE TEAM FELT THAT THIS IS AN ISSUE FOR BOTH APPROACHES. REGIONAL STANDARDS WOULD HAVE TO ASSIGN RESPONSIBILITY TO ENTITIES IN THE SAME FLAWED REGISTRY