

Notes to UFLS SDT

Supplemental SAR:

Is there a supplemental SAR to expand the scope and address the modifications to EOP-003?

Stephanie will send to Maureen with the response to her comments.

Standard:

Definitions – recommend defining Region. If left undefined, the default is to use the collegiate definition of the word, which does not support the intent of the requirements in the standard.

Rob and Jonathan will propose the definition, apply it to the requirements and scan the existing standards for impact.

Region: The geographic area enclosed within the boundaries associated with an Electric Reliability Organization Regional Entity.

Note: we found many instances of Region and region in other standards. Both are already problems whether we add a definition or not. Capitalized Region, there is no existing definition today; small "r" region defaults to dictionary which is not intended meaning of term. I do not view these as this team's problem to fix.

1/19/10 – the team decided to NOT define Region but rather use Regional Entity geographic footprint in the requirements. Rob and Jonathan will work on the requirements.

1/28/10 – Rob indicated that he will work to incorporate “RE footprint” in the requirements where the word “region” is used after the 1/28 call.

Applicability – entities are registered for compliance based on the compliance registration criteria.

http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf

Brian E M to lead discussion on behalf of the SDT with Craig L. on the issue of DP registration. Completed.

4. Applicability:

4.2. UFLS Entities shall mean all entities that are responsible for the ownership, operation, or control of UFLS equipment as required by the UFLS Program established by the **Planning Coordinators**. Such entities may include one or more of the following:

4.2.1 Transmission Owners.

4.2.2 Distribution Providers.

4.3 Transmission Owners that own Elements identified in the UFLS program design

Brian E M will come up with a proposal to clarify 4.3 (TO's for R10 – that help control...) Will send out by Tues. 1/19/10. GO's are not to be included in the applicability. Brian will send out a proposal by the end of the week (1/22).

1/28/10 – proposed by email on 1/28/10:

A 4.2. UFLS Entities shall mean all entities that are responsible for: 1) the ownership, operation, or control of UFLS equipment; or 2) the automatic switching of Elements as required by the UFLS Program established by the Planning Coordinators. Such entities may include one or more of the following:

4.2.1 Transmission Owners.

4.2.2 Distribution Providers.

B 4.2. UFLS Entities shall mean all entities that are responsible, as required by the UFLS Program established by the Planning Coordinators, for: 1) the ownership, operation, or control of UFLS equipment; or 2) the automatic switching of Elements. Such entities may include one or more of the following:

4.2.1 Transmission Owners.

4.2.2 Distribution Providers.

1/28/10 – the team decided to adopt the proposal in black font above (and keep the qualifier on 4.3). The applicability in the standard was modified. The team conducted a poll the led to adopting the option in black font above. The results as follows:

Scott B. in favor of BF

Steve W. (proxy for Mak Nagle) in favor of BF

Si Truc Phan in favor of BF

Frank G. in favor of BF

Brian E.M. left before the poll but stated that he would support the team's decision

Steve M. in favor of BF

Rob O. in favor of BF and stated that the qualifier to 4.3 must be kept but would concede to wording changes.

Jonathan in favor of BF

The applicability section of the standard and the assignment of responsibility for the requirements are both confusing. Is it the SDT's intent to add a new classification to the compliance registry called "PCG?" If yes, then assigning the responsibility for a requirement to a PCG is correct, but then the PCG should be added to the applicability section of the standard and Requirement R1 is not needed. If the SDT does not intend to have compliance add the PCG to the categories in the compliance registry, then the requirements that assign tasks to a PCG should be reworded so that the requirement, like the measures, assigns each PC to work with its PCG to

The team did not reach agreement on the call and decided to take a vote on this issue at the next conference call. The vote was conducted – the results as follows:

4.1. A Regional Planning Coordinating Group shall mean those Planning Coordinators within each region and or island as identified through compliance registration.

	Option 1: Leave It	Option 2: PCG	Option 3: Each PC
Robert J. O'Keefe	X		
Brian Bartos	X		
Jonathan Glidewell			X
Gary Keenan		X	
Steven Myers	X		
Mak Nagle (Steve Wadas – Proxy)		X	
Brian Evans Mongeon		X	
Tony Rodrigues (not present on 1/15/10)		X	
Si Truc Phan (not present on 1/15/10)	X		
Scott Berry		X	
Frank Gaffney		X	

1/19/10 – Stephanie to pass Option 2 (and proposed definition for PCG) by Dave Cook

Requirements

Requirement R8 – need to add some words to clarify which database is being referenced.

The team added the word “UFLS” in front of database in the requirements, measures.

Etc.

Requirement R10 – is the TO the correct responsible entity here – or should this be the DP?

The SDT decided that the TO’s are the correct responsible entity for this requirement because it is intended to control higher voltages on the transmission system (TO level not the DP level).

Requirement R11 – what is the reliability impact of this requirement?

Rob, Phil and Gary will work on proposing language to modify R11

2/4/10 – Phil proposed language that was agreed on by the team

Measures – the measures don’t provide any clarity on what is expected beyond what is already written in the requirements.

Frank will review the measures and add examples – Stephanie will send out the prior versions of the measures (Oct. 29).

1/19/10 – Frank will true up Measure M10 with the revised R11.

Compliance - Some of the compliance sections are blank and need to be completed prior to posting.

Frank will review the date retention piece of the Compliance Section. Stephanie to send Frank the SDT guidelines.

Variance – Any reason why bulk power system is used rather than BES? Need a separate measure and VSLs – that reference the appropriate requirements – Requirement E4, Parts 4.1 and 4.2 and Requirement E5, Parts 5.1 and 5.2.

Si Truc will draft the VSLs and Measures for the Variance.

Since the variance was developed by the team and not by the respective interconnection through a NERC-approved standard development process applicable to the interconnection, then the variance is subject to stakeholder approval.

EOP-003

Need to update the VSLs

Tony Jablonski will review the VSLs – Stephanie will send the VSLs and latest EOP standard to Tony. (~1 week)

1/19/10 – the team reviewed the revised VSLs – no comments/objections.

Consideration of Comments

- Need to add a summary of changes to the cover page that includes any strong minority issues that were raised and were not resolved. – **Rob will attempt to draft a response that captures the decisions made on the PCG and the vote on 5.1 and 5.2.**
1/19/10 – Rob has a first draft that depends on the PC direction.
- In the summary response to question 1b, it would reinforce the SDT’s position if the SDT clearly stated that the compliance folks have reviewed the concept of having a “group of PCs” responsible and they can support this – of course it would be better still if you could identify whether the term would be added to the compliance registry.
1/19/10 – yet to be determined
- A fill-in-the-blank requirement is a requirement where the specifics are “unseen” – not all requirements assigned to the RE are fill-in-the-blank requirements
1/19/10 – Stephanie will review the consideration of comments
- The Rules of Procedure, section 100 recognize that there are some requirements that will be assigned to REs and NERC :
 - NERC shall comply with each approved reliability standard that identifies NERC or the electric reliability organization as a responsible entity. Regional Entities shall comply with each approved reliability standard that identifies Regional Entities as responsible entities. A violation by NERC or a Regional Entity of such a reliability standard shall constitute a violation of these Rules of Procedure.
- The following sentence confused me with the use of the word, “detailed” – does the SDT really mean that detailed models aren’t useful?
 - The Planning Coordinator is the Functional Model entity best equipped to model adjacent areas which are needed to identify islands as well as simulate regional or inter-regional underfrequency events – detailed and localized views cannot do that.

1/19/10 – Stephanie will delete the words “detailed and”

- Summary response to question 5 – the SDT indicated it made a change to the performance characteristics- it would be helpful to note the old/new requirement numbers and to provide a red line showing the change within the summary.
1/19/10 – Jonthan G. will look into this...
2/4/10 – the team decided that the summary response to question 5 is adequate. No conforming changes have been made. Jonathan will look over the numbering in the summary and confirm that it is correct.
- Response to Q5 comment from Exelon – there is a comment indicating that Phil will provide some additional compliance information . . .
1/19/10 – Stephanie will clean up
- Summary response to question 6 – there is a comment from Phil that says, “The SDT has not clarified this. The SDT has kept this the same as it was in the last posting of

the standard. The only difference is that Requirements R6.4.1 and R6.4.2 have been combined into one part 4.3.1 of Requirement R4.”

1/19/10 – Phil T. will verify if the comment was addressed.

- Summary response to question 6 – the SDT indicates it did not make any changes to what is now R4, but there were some changes, so this statement should be removed.

1/19/10 – Phil T. will verify if the comment was addressed.

- Summary response to question 6 - See suggested rearrangement of paragraphs in the summary response.

1/19/10 – Phil T. will verify if the comment was addressed.

- Response to IRC comments on question 6 don't seem to address the comment, which was to apply the requirement to all generators meeting compliance registration criteria

1/19/10 – Phil T. will verify if the comment was addressed.

- Summary response to Question 8 – think the reference to R3 and R4 in the following should be a reference to R2 and R3:

- In response to a variety of comments the SDT deleted requirement R4 and combined other requirements to simplify the requirements for inter-regional coordination and criteria for selecting islands to be used as a basis for designing a UFLS program. These revised requirements are contained in Requirements R3 and R4 for selecting islands and R6 for inter-regional coordination.

1/19/10 – renumbering of standard is possible if R1 is eliminated – will need to review all of the documentation.

- Response to ERCOT on Question 8 – if the requirement is not clear (and the folks from ERCOT didn't interpret it the same way as the team) then consider adding a few words to the requirement for improved clarity:

Comment 3 - It would be appropriate for the load referenced in the imbalance calculation in requirement R6 to include system (island) losses. The standard should be clearer.

Response: The SDT intentionally excluded island losses from the imbalance definition. The losses within an island are difficult to measure because the losses in the steady-state pre-event condition will change upon formation of the island. The SDT notes that excluding losses results in a slightly more conservative assessment because more generation would have to be online for a given imbalance if losses are included in the equation. In most cases the losses are on the order of 1 to 3 percent; thus while excluding losses is conservative, it is not overly conservative.

1/19/10 – SDT thinks response and the Requirement are adequate

Response to MISO on question 8 - If this is an important aspect of the documentation, the standard should require this - otherwise, some PCs may elect not to do this and there won't be any justification for finding them noncompliant.

This requirement (now R2) requires the group of Planning Coordinators to develop and document their criteria, which the SDT expects would include the rationale for the islands selected for evaluation.

1/19/10 –Stephanie - the following language will be deleted from the response: “which the SDT expects would include the rationale for the islands selected for evaluation.” Done on the call.

- **Response to MISO on question 8** - The measures do not provide any examples of evidence - they merely restate that the responsible entity must have evidence. . .

Response: Requirement R4 has been deleted and the SDT developed Measures for all requirements that include examples of evidence but do not introduce new requirements on entities.

1/19/10 – the team revised the Measures to include examples

- **Response to MRO on question 8** – Expect to receive more comments along these lines based on differing interpretations of annually in the field - it would be better to make the proposed modification. . .

R8 - Since the interpretation of "annually" can vary widely, we suggest this rewording, "each calendar year and within 15 months of the last update".

Response: Since “annually” is not defined a NERC term, it has the meaning “occurring or happening every year or once a year.” as found in a collegiate dictionary. The SDT believes the reliability objective of this requirement is met without specifying details of when during the year the requirement is fulfilled.

1/19/10 – the team thinks this change is not necessary.

- **Response to ATC on question 8** - Could not find a response to ATC’s comment on R14

1/19/10 – Stephanie will follow up

Barry Francis Responses

- Page 3 – may need to revise response based on decisions made to applicability
- Page 11 – the response seems to be missing a few words.

1/19/10 – Rob will follow up

2/4/10 – Rob reported that he reviewed the responses to comments and did not make any changes to the responses as they are adequate.

Implementation Plan

The response to comments indicated that the Gen Verification standard (PRC-024) has a requirement that will result in the PC receiving specific information – so should the implementation for PRC-006 be dependent upon approval and implementation of PRC-024?

The proposed effective date doesn’t give the PCs much time to get organized.

1/19/10 – reviewed and agreed to the implementation plan

Comment Form

Suggest breaking down the questions so that they are more targeted . . . it will be easier to assemble the related comments and make sense of those comments.

2/4/10 – The team decided to break question 1 into three questions divided by VRFs, VSLs and Measures.

Need to revise Question 2 so it is clear that you are asking a question about the acceptability of the expanded scope in the supplemental SAR.

2/4/10 – the team revised Question 2 (now Question 5) into two parts a- asking for input on the expanded SAR and b- asking for input on the revised EOP requirements

Additional Action Items:

2/4/10 - General Comment Form Clean-up – The drafting team will need to update the questions to correctly reference the PCG, UFLS entities, etc. including the revised R11. Rob will lead this effort.

2/4/10 – Stephanie will have to recreate the redline version of the standard based on the changes made to the version 3 of the UFLS standard.