

**Lettre de la NERC attestant du suivi du processus de
développement des normes et de l'évaluation du
contenu technique de PRC-006-3**

March 29, 2018

VIA E-MAIL

Majid Fassi Fehri
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Reliability Standards and Network Control Frameworks
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**RE: Reliability Standard PRC-006-3, Automatic Underfrequency Load Shedding
Regional Variance for the Quebec Interconnection**

Dear Mr. Fassi Fehri:

The North American Electric Reliability Corporation (“NERC”) is in receipt of your March 23, 2018 request for additional information regarding the development and technical basis of Reliability Standard PRC-006-3, Automatic Underfrequency Load Shedding, which contains a revised Regional Variance for the Quebec Interconnection, and provides the following response to your request.

On September 5, 2017, NERC submitted a Notice of Filing regarding Reliability Standard PRC-006-3 to the Régie de l’énergie du Québec. As explained in more detail therein, all procedural requirements were followed in the development of this standard. As Reliability Standard PRC-006-3 reflects only revisions to the Variance for the Quebec Interconnection, the standard was developed in accordance with the processes set forth in the Northeast Power Coordinating Council (“NPCC”) Regional Standard Processes Manual,¹ as specified in the NERC Rules of Procedure.² Following development of the standard, NERC posted the standard for a 45-day procedural comment period on its website. During this comment period, NERC received no comments identifying concerns or deficiencies regarding the conduct of the NPCC development process. The standard containing the revised Quebec Variance was adopted by the NPCC Board of Trustees on May 3, 2017 and by the NERC Board of Trustees on August 10, 2017. The full record of standard development, including documents from the public postings and ballot periods conducted pursuant to these processes, is attached to NERC’s September 5, 2017 filing as Exhibit C.

¹ The NPCC Regional Standard Processes Manual is available at http://www.nerc.com/FilingsOrders/us/Regional%20Delegation%20Agreements%20DL/NPCC_RSDP_20141223.pdf.

² The NERC Rules of Procedure are available at <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

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The purpose of the revision to the Quebec Variance in Reliability Standard PRC-006-3 is to recognize the unique characteristics of the Quebec Interconnection. The previous version of the Quebec Variance contained in Reliability Standard PRC-006-2 was not representative of realistic generation and island scenarios, nor was it beneficial to maintaining continuity of service for Hydro Québec customers at lower levels of generation deficiency.

Under both the NERC and NPCC standard development processes, the technical content of Reliability Standards is developed by electric industry personnel with expertise in the relevant subject matter area before being posted for public comment and the approval of the ballot body. The drafting team for Reliability Standard PRC-006-3 included Dean Latulipe from National Grid US, who is the chair of the NPCC working group SS38 “Working Group on Inter-Area Dynamic Analysis.” This working group conducts the five-year assessments of the UFLS program in the NPCC region that are required under Reliability Standard PRC-006-2. The last UFLS assessment for the NPCC region started in 2013 and completed in 2014; another assessment is currently underway. Mr. Latulipe participated in drafting the revision to the Reliability Standard PRC-006-3 Quebec Variance with Hydro Québec representatives Vincent Morissette and Jeanette Gauthier. The proposed standard was then posted for public comment and ballot. Through this process, electric industry personnel and other interested parties were able to review and comment upon the technical substance of the Variance before voting to approve it. NPCC’s Assistant Vice President of Standards Guy V. Zito and other members of NPCC’s Standards staff also participated in the process of revising the Quebec Variance to provide objective technical observance as well as assurance the Reliability Standards process was followed and any stakeholder concerns were addressed. NPCC and NERC support the Variance revision.

NERC thanks you for the opportunity to submit this information in support of Reliability Standard PRC-006-3. Please do not hesitate to contact me if you have any further questions regarding the development of this standard.

Sincerely,

Lauren A. Perotti
*Counsel for North American Electric
Reliability Corporation*

cc: Guy V. Zito, Assistant Vice President of Standards, NPCC
Kristin McKeown, General Counsel, NPCC