

Lettres reçues du NPCC et de la NERC



Date: June 23, 2020

To: Junji Yamaguchi, Eng.
Unit head – Reliability Standards
and Network Control Frameworks
Hydro Québec

From: Edward Schwerdt
President and CEO
Northeast Power Coordinating Council, Inc.

Subject: NPCC Regional Standard PRC-006-NPCC-2 “Automatic
Underfrequency Load Shedding”

NPCC is responsible for promoting and improving the reliability of the international, interconnected bulk power systems in Northeastern North America through (i) the development of Regional Reliability Standards and compliance assessment and enforcement of continent-wide and Regional Reliability Standards, coordination of system planning, design and operations, and assessment of reliability, and (ii) the establishment of regionally-specific reliability criteria, and the monitoring and enforcement of compliance with such criteria.

On May 8, 2009 the Régie de l'énergie, NPCC, and NERC entered into an agreement, which specifies that NPCC undertake certain reliability standard development and other activities (“2009 Agreement”)¹. Additionally, NPCC has certain delegated or mandated standard development, compliance monitoring, and other authorities and responsibilities in the United States², Ontario³, New Brunswick⁴, and Nova Scotia⁵.

¹ *Agreement on the Development of Electric Power Transmission Reliability Standards and of Procedures and a Program for Monitoring of the Application of These Standards for Québec*, executed May 8, 2009. Available at: http://www.regie-energie.qc.ca/audiences/normes_fiab_tranp_elec/Entente_Regie_NERC_NPCC_5mai09_en.pdf.

² *See Amended and Restated Regional Delegation Agreement between the North American Electric Reliability Corporation (NERC) and the Northeast Power Coordinating Council, Inc.* Available at: https://www.npcc.org/Library/Business%20Plan%20Bylaws/Regional%20Delegation%20Agreements%20DL-NPCC_RDA_Effective_20160101.pdf.

³ *Amended and Restated Memorandum of Understanding between the Independent Electricity System Operator and the North American Electric Reliability Corporation (NERC) and the Northeast Power Coordinating Council, Inc.* Available at: <https://www.npcc.org/Compliance/Ontario/February%205%202010%20MOU.pdf>.

⁴ *Contract for Service between Northeast Power Coordinating Council, Inc. and the New Brunswick Energy and Utilities Board*, executed August 10, 2016.

⁵ *Memorandum of Understanding between Nova Scotia Power Inc., the Northeast Power Coordinating Council, Inc., and the North American Electric Reliability Corporation*, executed May 9, 2010. Available at: <https://www.npcc.org/Compliance/Nova%20Scotia/May%209%202010%20MOU.pdf>.

The 2009 Agreement recognizes the NPCC standards development process “for the purpose of developing specific reliability standards for interconnected networks in northeastern North America in which Québec entities subject to the reliability standards [...] may participate.” In addition, it states that “the Régie has concluded from NPCC's more than four decades of international reliability assurance that NPCC has the expertise to develop, monitor the application of, and assess compliance with electric power transmission reliability standards and criteria.” It further states that “the Régie has resolved, for the reasons set out above, to mandate NERC and NPCC to develop reliability standards that the Régie adopts for electric power transmission in Québec.”

NPCC, in conformance with Section 4.1 of the 2009 Agreement, develops reliability standards in accordance with the NPCC Regional Standard Processes Manual (formerly named NPCC Regional Reliability Standards Development Procedure). The NPCC standards development considers “the comments and opinions submitted by the Québec reliability coordinator, the electric power carriers and users of electric power transmission services in Québec.” NPCC ensures, in conformance with Section 4.2 of the 2009 Agreement, “that any electric power transmission reliability standards specific to Québec, and/or any variant of such standards specific to Québec, which the reliability coordinator deems necessary to ensure the reliability of electric power transmission in Québec, is as stringent as the NERC reliability standards applicable in the rest of North America.”

On May 26, 2020, Hydro-Québec TransÉnergie, in its Reliability Coordinator function, contacted NPCC to indicate that they identified stylistic changes, minor typos, grammatical issues and errors in the Regional Reliability Standard PRC-006-NPCC-2, including the cross-referencing of requirements in the Violation Severity Levels (“VSL”) table. This notification was subsequent to all NERC and Federal Energy Regulatory Commission (“FERC”) approvals.

During NPCC’s consultation with NERC Legal in this matter, NERC indicated that for minor stylistic changes, minor typos, grammatical issues such as punctuation, etc., NERC is now holding them until the next revision of the standard and does not initiate the Errata Process. The Errata Process is now specifically used for issues where clear errors such as incorrect references, decimal points in the wrong place in numbers, etc. could affect the requirements *and adversely impact reliability*. NERC Legal also indicated that FERC approved the standard PRC-006-NPCC-2 with an RD docket “letter order” which means no notice of proposed rulemaking (“NOPR”) or further questions were raised by FERC prior to Commission approval. The standard’s reliability requirements are very clear, augment the NERC Underfrequency Load Shedding (“UFLS”) Continent-wide standard, add more stringent UFLS system and generator performance requirements, and furthermore will support retirement of NPCC’s Directory 12, which will contribute to the efficiency of UFLS study processes in Québec and the NPCC Region. It is important that the standard, like any other, be considered and adopted by the Régie based on the reliability merits. NERC Legal also indicated the standard has been filed with the other Provincial Governmental Authorities.

NPCC agrees the compliance related and stakeholder developed VSLs could be written more concisely. If an abundance of concern over a compliance related element warrants a revision, it would be classified as substantive, not errata, and developed through the NPCC standards development process. The process would begin with a Regional Standards Authorization Request (“RSAR”) and take at least 18 months and as long as 24 months for all the requisite steps and approvals of stakeholders, NERC’s Board of Trustees, and FERC. Also, it is important to note that VSLs are only used when there is a *violation* of a standard’s requirement to help determine penalty and are a compliance element, not a reliability related one. The specificity added in this new version of the standard will further contribute to efficient studies of UFLS performance, full compliance, and benefit reliability of the Québec Interconnection.

In conclusion, NPCC encourages the consideration of the Régie de l’énergie to adopt the PRC-006-NPCC-2 “Automatic Underfrequency Load Shedding” based on the merits of its requirements and contribution to the reliability of Québec. NPCC will also archive the comments received by Hydro-Québec TransÉnergie regarding improvements for the next revision.

July 9, 2020

VIA E-MAIL

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Dear Mr. Yamaguchi:

The North American Electric Reliability Corporation (“NERC”) is in receipt of your May 26, 2020 request for NERC consideration of errors and errata in Standard PRC-006-NPCC-2 - Automatic Underfrequency Load Shedding and provides the following response to your request.

On January 9, 2020, NERC submitted a Notice of Filing regarding Reliability Standard PRC-006-NPCC-2 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 Regional Reliability Standard PRC-006-NPCC-2, the standard was developed in accordance with the processes set forth in the Northeast Power Coordinating Council (“NPCC”) Regional Standard Processes Manual¹ and the NERC Rules of Procedure.² The Regional Reliability Standard PRC-006-NPCC-2 was approved by the NPCC Board of Directors on May 1, 2019. Following development of the standard, NERC posted the standard for a 45-day comment period on its website concluding on June 21, 2019. During this comment period, NERC received no comments identifying concerns or deficiencies regarding the conduct of the NPCC development process. The single commenter agreed that NPCC’s process was open, inclusive, balanced, transparent, and that due process was followed. On September 5, 2019, the NPCC Board of Directors approved the correction of an errata to the proposed Regional Reliability Standard. Finally, on November 5, 2019, the NERC Board of Trustees adopted PRC-006-NPCC-2.

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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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. Through this process, electric industry personnel and other interested parties were able to review and comment upon the technical substance of the Regional Reliability Standard before voting to approve it. NPCC's Standards staff participated as observers in the process of revising the Regional Reliability Standard to provide objective technical input as well as assurance the Regional Reliability Standard process was followed and any stakeholder concerns were addressed. As demonstrated by the completion of the development processes, NPCC and NERC support the Regional Reliability Standard revision.

On May 26, 2020, Hydro-Québec TransÉnergie, in its Reliability Coordinator function, contacted NPCC regarding stylistic changes, minor typos, grammatical issues, and errors in the Regional Reliability Standard PRC-006-NPCC-2, especially the cross-referencing of requirements in the Violation Severity Levels (VSL) table, found while translating the standard.

Consequently, NPCC contacted NERC staff to discuss stylistic changes, minor typographical errors, grammatical issues, and other errors noticed in the Regional Reliability Standard PRC-006-NPCC-2 by Hydro-Québec TransÉnergie, acting in its Reliability Coordinator function. NERC indicated to NPCC that minor stylistic changes, minor typographical errors, or minor grammatical issues not impacting reliability typically are held until the next revision of the standard. As such, these types of minor revisions would not go through the NERC errata process. While facts and circumstances may vary, the errata process is usually only used for issues where clear errors, such as incorrect references or decimal points in the wrong place in numbers, etc., could affect the requirements and impact reliability. NERC also indicated that FERC approved PRC-006-NPCC-2 with a delegated "letter order" without issuing a notice of proposed rulemaking. This means that FERC determined not to initiate a rulemaking process to propose revisions to the standard and approved the standard as submitted. As a result, NERC requests the Régie consider PRC-006-NPCC-2 based on the reliability merits of the standard.

NERC thanks you for the opportunity to submit this information in support of Regional Reliability Standard PRC-006-NPCC-2. Please do not hesitate to contact me if you have any further questions regarding the development of this standard.

Sincerely,

Howard Gugel
NERC Vice President, Engineering and Standards