

Supporting Statement
**FERC-725L, Regional Reliability Standard PRC-006-NPCC-1 --- Automatic
Underfrequency Load-Shedding
Final Rule (in RM12-12) issued February 21, 2012**

The Federal Energy Regulatory Commission (Commission or FERC) requests Office of Management and Budget (OMB) review and approval of **FERC-725L, Regional Reliability Standard PRC-006-NPCC-1 --- Automatic Underfrequency Load-Shedding** as contained in the Final Rule in Docket No. RM12-12-000 “Regional Reliability Standard PRC-006-NPCC-1 --- Automatic Underfrequency Load-Shedding” (<http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13185432>). FERC-725L is a new Commission collection, contained in 18 Code of Federal Regulations (CFR), Part 40.¹

Within this Final Rule, the Commission approves the regional Reliability Standard PRC-006-NPCC-01 (Regional Reliability Standard PRC-006-NPCC-1 --- Automatic Underfrequency Load-Shedding). The North American Electric Reliability Corporation (NERC) submitted this proposed standard to the Commission for review and approval. This regional Reliability Standard applies to generator owners, planning coordinators, distribution providers, and transmission owners in the Northeast Power Coordinating Council Region and is designed to ensure the development of an effective automatic underfrequency load shedding (UFLS) program to preserve the security and integrity of the Bulk-Power System during declining system frequency events in coordination with the NERC continent-wide UFLS Reliability Standard PRC-006-1. The Commission also approves the related violation risk factors, violation severity levels, implementation plan, and effective date proposed by NERC.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Section 215 of the FPA requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards which are subject to Commission review and approval. Once approved, NERC enforces the Reliability Standards subject to Commission oversight.²

¹ The FERC-725L is a new collection that has not yet been imposed. OMB provided a “placeholder” Control No. when they issued its decision on the NOPR.

² 16 USC 824o(e) (2006).

Reliability Standards that NERC proposes to the Commission may include Reliability Standards that a Regional Entity proposes to be effective in that region.³ In Order No. 672, the Commission noted that:

As a general matter, we will accept the following two types of regional differences, provided they are otherwise just, reasonable, not unduly discriminatory or preferential and in the public interest, as required under the statute: (1) a regional difference that is more stringent than the continent-wide Reliability Standard, including a regional difference that addresses matters that the continent-wide Reliability Standard does not; and (2) a regional Reliability Standard that is necessitated by a physical difference in the Bulk-Power System.

When NERC reviews a regional Reliability Standard that would be applicable on an interconnection-wide basis and that has been proposed by a Regional Entity organized on an interconnection-wide basis, NERC must presume that the regional Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest.⁴ In turn, the Commission must give due attention to the technical expertise of NERC and of a Regional Entity organized on an interconnection-wide basis.⁵

On 4/19/2007, the Commission accepted delegation agreements between NERC and each of the eight Regional Entities.⁶ In the order, the Commission accepted Northeast Power Coordinating Council (NPCC) as a Regional Entity organized on less than an interconnection-wide basis. NPCC is not an “interconnection-wide” Regional Entity and the Commission intends for its standards to apply only to that part of the Eastern Interconnection within the NPCC geographical footprint and Quebec.

As a Regional Entity, the NPCC geographic region includes the state of New York, the six New England states (i.e. Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont), some Canadian provinces (i.e. New Brunswick, Nova Scotia, Ontario, Quebec). Overall, NPCC covers an area of approximately 1.2 million square miles and is populated by more than 55 million people. In total, from a net energy for load perspective, NPCC is approximately 45% U.S. and 55% Canadian. With regard to Canada, approximately 70% of Canadian net energy for load is within the NPCC Region. The NPCC’s regional entity division operates under a delegation agreement with the NERC. This agreement recognizes that NPCC meets the qualifications for delegation of certain roles, responsibilities, and authorities of a cross-

3 16 USC 824o(e)(4). A Regional Entity is an entity that the Commission has approved to enforce Reliability Standards under delegated authority from the ERO. See 16 USC 824o(a)(7) and (e)(4).

4 16 USC 824o(d)(3).

5 16 USC 824o(d)(2).

6 North American Electric Reliability Corp., 119 FERC ¶ 61,060 (2007).

border regional entity as defined by Section 215 of the Federal Power Act within the U.S. and throughout Canadian provincial regulatory and/or governmental Memoranda of Understanding (MOUs) or Agreements.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

Prior to the enactment of Section 215 of the Federal Power Act, FERC acted as an economic regulator of the wholesale power markets and the interstate transmission grid. In this regard, the Commission acted to promote greater reliability within the electric system by promoting regional coordination and planning of the interstate grid through regional independent system operators (ISOs) and regional transmission organizations (RTOs).

The passage of the Energy Policy Act of 2005 (EPAcT 2005) added to the Commission's efforts by giving it the authority to strengthen the reliability of the interstate electric transmission grid through new authority pursuant to Section 215 of the Federal Power Act. EPAcT 2005 also provides for a system of mandatory Reliability Standards developed by the ERO, established by FERC, and enforced by the ERO and Regional Entities. The Commission created the Office of Electric Reliability (OER) in 2007 as part of FERC's efforts to promote electric transmission grid reliability. OER oversees the development and review of mandatory Reliability Standards. OER also oversees compliance with the approved mandatory standards by users, owners, and operators of the Bulk-Power System. OER also oversees the ERO's enforcement of compliance with the approved mandatory standards by users, owners, and operators of the Bulk-Power System. OER also maintains a situational awareness monitoring tool to provide wide area visibility of the Bulk-Power System.

NERC states that it designed the regional Reliability Standard to work in conjunction with and to augment NERC's Commission-approved Reliability Standard PRC-006-1⁷ by mitigating the consequences of an underfrequency event while accommodating differences in system transmission and distribution topology among NPCC planning coordinators due to historical design criteria, makeup of load demands, and generation resources.⁸ NERC further stated that the regional Reliability Standard also facilitates uniformity, compliance, and clearly delineates applicable entities' requirements within the NPCC Region to achieve a robust, reliable, and effective UFLS program.⁹ The regional Reliability Standard will achieve a coordinated and comprehensive UFLS region-wide consistent program within the NPCC Region. The Reliability

⁷ See Automatic Underfrequency Load Shedding and Load Shedding Plans Reliability Standards, Order No. 763, 139 FERC ¶ 61,098 (May 7, 2012), approving Reliability Standards PRC-006-1 (Automatic Underfrequency Load Shedding) and EOP-003-2 (Load Shedding Plans)).

⁸ NERC Petition at 29-30

⁹ Id

Standard also provides the regional requirements necessary to achieve and to facilitate the broader program characteristics contained within the requirements of the NERC Reliability Standard PRC-006-1.

Under this regional Reliability Standard, planning coordinators will use the information to ensure compliance with requirements associated with underfrequency load shedding plans.¹⁰ Without this information, it would be difficult to enforce compliance with the regional standard. A lack of compliance with this regional standard may lead to uncontrolled failure of the Interconnection.

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE THE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN

This regional Reliability Standard does not require respondents to file pertinent information with the Commission. However, it does contain reporting and recordkeeping requirements. These requirements may include creating and maintaining a UFLS program for which using current technology is an option that may reduce burden compared to not using the current technology and methodologies already in place.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. OMB recently approved the information collection requirements within a national continent-wide Reliability Standard PRC-006-1¹¹. The requirements within the regional Reliability Standard here do not replace the requirements in the national continent-wide Reliability Standard PRC-006-1. Instead, the regional Reliability Standard PRC-006-NPPC-1 applies an additional criterion met by respondents within the NPCC region.

The Commission is unaware of any other source of information similar to the additional requirements within the approved regional Reliability Standard.

5. METHODS USED TO MINIMIZE THE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES

¹⁰ Reference PRC-0065-NPCC-1 reliability standard for further information

¹¹ OMB approved these requirements on 7/9/2012. These reporting requirements were included in FERC-725A (Final Rule in RM11-20; Order 763); OMB Control No. 1902-0244; ICR Reference No. 201204-1902-001.

This regional Reliability Standard does not contain explicit provisions for the minimization of burden upon small entities (i.e. respondents). All requirements in the regional Reliability Standard apply to every applicable entity. Additionally, the Commission certifies that the approved regional Reliability Standard will not impose a significant economic impact upon a substantial number of small entities according with the regulatory flexibility threshold analysis contained in the Final Rule¹².

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

As stated in response to question #2 above, failure to comply with the information collection requirements may lead to an uncontrolled failure of the Interconnection. Reducing the reporting/record retention frequency may increase the risk of such an uncontrolled failure.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

A substantial amount of the documentation required for a given entity's compliance audits must be maintained (potentially) in excess of the OMB's required retention period. This is due to compliance audits possibly occurring more than three years apart. This occurrence would exceed OMB guidelines within 5 CFR 1320.5(d)(2)(iv) for retaining records no longer than three years. The Commission did not prescribe a set retention period for application to all Reliability Standards because the circumstances of each Reliability Standard vary. Industry (via the ERO's standards development process) developed, proposed, and vetted the proposed reliability standard and reporting/retention requirements.

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE

The ERO, Regional Entities, and others work within a collaborative process to establish Reliability Standards by jointly developing/reviewing drafts, providing responses to comments, and submitting to FERC a final proposed standard for review and subsequent approval. The Commission published this rulemaking within the Federal Register to provide public utilities, state commissions, Federal agencies, and other interested parties an opportunity to submit data, comments, or suggestions¹³.

¹² See Regulatory Flexibility Act Certification section within the final rule for this collection.

¹³ In accordance with 5 CFR 1320.11

The NOPR¹⁴ in this proceeding requested public comments. The Commission sought comments on the technical basis for the 57.8 Hz maximum tripping limit for existing nuclear units established in Requirement R19 of the regional Reliability Standard. In the NOPR, the Commission noted that the NERC petition did not explain the technical basis for establishing 57.8 Hz as the maximum frequency at which existing nuclear units may trip pursuant to Requirement R19.1, other than to state that the regional Reliability Standard was based on the work of an NPCC working group. The NOPR stated that the NERC petition and its attachments did not provide any information as to how the 57.8 Hz limit was developed. The NOPR sought comment from NPCC, NERC, and other interested entities explaining the technical basis for the 57.8 Hz limit established in Requirement R19.1

The Commission also sought comments on the time-frames for actions that result in changes to the NPCC UFLS program. The NOPR observed that NERC's Reliability Standard PRC-006-1, Requirement R3, requires planning coordinator to set the schedule for distribution providers and transmission owners to implement the UFLS program and that regional Reliability Standard PRC-006-NPCC-1, Requirements R5, R16.2, and R19.3, require distribution providers, transmission owners, and generator owners to provide, inform, and transmit exceptions to the UFLS program and justifications for the exceptions to the planning coordinator. The NOPR stated that these Requirements in regional Reliability Standard PRC-006-NPCC-1 do not specify a time-frame for the completion of these actions. The NOPR indicated that Requirements R5, R16.2, and R19.3 address actions that can result in changes to the UFLS program and should occur before the UFLS program is implemented thus making it necessary for entities to provide the required information to the planning coordinator within a specified period of time. The NOPR sought comment on whether Requirements R5, R16.2, and R19.3 should also specify time-frames for completion of the required actions and, if so, the appropriate time-frames for each.

In response to the NOPR, initial comments were filed by NERC, NPCC, New York Independent System Operator (NYISO), PSEG Companies (PSEG)¹⁵, and Dominion Resources Services, Inc. (Dominion)¹⁶.¹³ NERC and NPCC filed reply comments.

Comments

NPCC commented that a maximum frequency threshold trip setting of 57.8 Hz for existing nuclear units provides a margin of 0.2 Hz above the highest frequency at which nuclear units in

¹⁴ See (http://elibrary.ferc.gov/idmws/File_list.asp?document_id=14052753)

¹⁵ PSEG is comprised of PSEG Power LLC and PSEG Energy Resources & Trade LLC.

¹⁶ Dominion filed comments on behalf of Virginia Electric and Power Company, Dominion Energy Kewaunee, Inc., Dominion Nuclear Connecticut, Inc., Dominion Energy Brayton Point, LLC, Dominion Energy Manchester Street, Inc., Elwood Energy, LLC, Kincaid Generation, LLC, and Fairless Energy, LLC.

NPCC's footprint are expected to trip by low coolant flow or underfrequency protection. NPCC further stated that adherence to the 57.8 Hz limit should also result in islands with a 25% generation deficiency being able to survive and maintain automatic UFLS program requirements.

NPCC stated that Requirements R5, R16.2, and R19.3 applied to a limited number of existing nuclear and non-nuclear units whose performance characteristics are already incorporated in the NPCC regional UFLS program, and that planning coordinators within NPCC have the existing technical parameters necessary to incorporate existing unit attributes and compensatory load shedding information into their assessment. NPCC further states that the absence of specific time-frames in these Requirements means that responsible entities must immediately notify planning coordinators upon identification of any non-conformance or changes to underfrequency settings pursuant to these Requirements.

Commission Determination

The Commission accepted NPCC's response regarding the the technical basis for the 57.8 Hz maximum frequency threshold trip setting for existing nuclear units, as set forth in Requirement R19. The Commission found that (as explained by NPCC) a maximum frequency threshold trip setting of 57.8 Hz for existing nuclear units provides a margin of 0.2 Hz above the highest frequency at which the nuclear units in NPCC's footprint are expected to trip by low coolant flow or underfrequency protection. Furthermore, the Commission accepted NPCC's response that adherence to the 57.8 Hz limit should also result in islands with a 25% generation deficiency being able to survive and maintain automatic UFLS program requirements.

The Commission found that NPCC provided adequate justification for not including specific time-frames in Requirements R5, R16.2, and R19.3. According to NPCC, these Requirements apply to a limited number of existing nuclear and non-nuclear units whose performance characteristics are already incorporated in the NPCC regional UFLS program and that planning coordinators within NPCC have the existing technical parameters necessary to incorporate existing unit attributes and compensatory load shedding information into their assessment. NPCC further states that the absence of specific time-frames in these Requirements means that responsible entities must immediately notify planning coordinators upon identification of any non-conformance or changes to underfrequency settings pursuant to these Requirements. The Commission determined that this satisfied the concern raised in the NOPR.

Comments

Reliability Standard PRC-006-NPCC-1, Requirements R3, R16 and R18, address compensatory load shedding. Particularly, Requirement R16.3 requires generator owners of existing non-nuclear units that have non-conforming underfrequency protection set points to, among other

things, “[h]ave compensatory load shedding, as provided by a Distribution Provider or Transmission Owner that is adequate to compensate for the loss of their generator due to early tripping.” Requirement R18 requires that “[e]ach Generator Owner, Distribution Provider or Transmission Owner within the Planning Coordinator area of ISO-NE or the New York ISO shall apply the criteria described in Attachment B to determine the compensatory load shedding that is required in Requirement R16.3 for generating units in its respective NPCC area.” Attachment B, Section 2.5, provides that the “amount of compensatory load shedding shall be equivalent ($\pm 5\%$) to the average net generator megawatt output for the prior two calendar years, as specified by the Planning Coordinator, plus expected station loads to be transferred to the system upon loss of the facility.”

Dominion commented that there are technical difficulties associated with Requirements R16.3 and R18. Dominion stated that shedding additional load equivalent to a non-conforming generator would be extremely difficult to design and coordinate and that the design would have to account for the real-time status and output of the generator. Dominion also states that Requirements R16.3 and R18 are unreasonable because they require non-conforming generators to procure compensatory load shedding service for which Dominion has found no willing provider. Dominion maintains that, as a result, the regional Reliability Standard cannot be practically implemented and may have an adverse impact on the Bulk-Power System. In addition, Dominion observes that several entities raised concerns with the compensatory load shedding provisions during the regional Reliability Standard drafting process. Dominion also maintains that Order No. 763, in which the Commission approved the continent-wide NERC UFLS Reliability Standard PRC-006-1, supports Dominion’s position that it is inappropriate for the regional Reliability Standard “to require a non-conforming generator to obtain compensating load shedding as it is ultimately the planning coordinators responsibility to design the UFLS system to account for such generator.”

PSEG stated that it is inappropriate for planning coordinators to assign responsibility for compensatory load shedding, asserting that it is inconsistent with Order No. 763. PSEG also contend that the regional Reliability Standard contravenes the prohibition in FPA section 215 against setting standards for “adequacy or safety of electric facilities or services” because the regional Reliability Standard requires generator owners with existing non-conforming units to construct additional capacity or acquire off-setting UFLS at their expense. PSEG also states that Requirement R16 imposes obligations upon generator owners that are absent from the NERC Reliability Functional Model. PSEG states that one of the tasks of a generator owner is to “[p]rovide verified generating facility performance characteristics/data,” but that there is no obligation for generators to compensate other entities for performance that does not meet a specific level. PSEG further states that distribution providers and transmission owners in NPCC

do not have tariffs in place that would permit them to charge and/or provide generator owners with compensatory load shedding.

In reply to Dominion's and PSEG's comments, NPCC states that the regional Reliability Standard drafting team considered comments regarding the difficulty of designing and coordinating the shedding of load equivalent to a non-conforming generator, but that the overarching reliability objective of re-establishing a balance between load and generation during possible islanding events made shedding additional load necessary. NPCC states that it is impractical to expect an exact match between compensatory load shedding and unit output but maintains that compensatory load shedding based on an average megawatt output, as provided in Attachment B, aligns the amount of compensatory load shedding with the unit output most likely to be lost when the unit trips prematurely. NPCC further states that requiring compensatory load shedding based on a two year average net generator megawatt output is an effective approach to integrating small non-conforming generators into the design of a UFLS program. In addition, NPCC observes that that Regional Criteria requiring non-conforming generation to secure compensatory load shedding preexist the development of the regional Reliability Standard and that it is a cost effective alternative for generators. With respect to Order No. 763, NPCC states that the regional Reliability Standard is consistent with the Commission's determination that it is appropriate for planning coordinators to consider generators that trip outside of the UFLS set points.

NPCC maintains that the regional Reliability Standard Requirements R1 and R3 are "only intended to communicate the results of locational assessments, and there is no obligation to obtain compensatory load shedding based solely on this information nor does the Planning Coordinator determine whether mitigation is necessary or who will be responsible for providing mitigation." NPCC states that compensatory load shedding is merely an option to bring non-conforming generators into compliance. In response to comments regarding the absence of tariffs that permit for compensatory load shedding service, NPCC states that such concerns are tempered by the fact that all new generators, going forward, must conform with the underfrequency trip performance characteristics in the regional Reliability Standard and that compensatory load shedding only potentially impacts existing, non-conforming, non-nuclear units.

NPCC further stated that the existing compensatory load shedding requirements are presently contained in NPCC Directory #12 and "have been successfully implemented within the region, and non-conforming generators that are already interconnected either have existing contracts to provide compensatory load shedding or have mitigated the conditions that would trip the unit above the performance curve in order to comply with the Regional Criteria." NPCC states that with respect to FPA section 215, compensatory load shedding does not present a resource

adequacy issue but, instead, addresses a generating unit's ability to perform, with the generator having the option of meeting the performance curve, mitigating the operating condition, or obtaining compensatory load shedding. With respect to the NERC Reliability Functional Model, NPCC states that the absence of a task within the functional model does not preclude assigning a new or existing task based on a new or revised Reliability Standard. NPCC states that the functional model only defines the functions that must be performed to ensure the reliability of the bulk electric system and should not be used to restrict a reliability-related activity or Reliability Standard requirements.

In reply to Dominion's and PSEG's comments, NERC states it never intended to suggest that it is inappropriate for planning coordinators to determine whether mitigation is necessary and who will provide mitigation with respect to generators that trip outside the UFLS set points in UFLS programs. NERC states that "[o]n the contrary, the Planning Coordinator is one of the functional entities with responsibility for maintaining the reliability of the Bulk-Power System." NERC maintains that it has stated that it is inappropriate for a Reliability Standard to supplant the planning coordinator's role in establishing UFLS program requirements. However, NERC states that regional Reliability Standard PRC-006-NPCC-1 "reflects the NPCC Planning Coordinators' collective assessment of how to address this concern." Further, NERC claims that the technical concerns raised in the comments are overstated. NERC states that concerns "regarding potential overfrequency excursions due to overcompensating when a generating unit with non-conforming trip setting is off-line would be appropriate if compensatory load shedding was applied to large generating units or if the provision was open-ended with applicability to future generating units not studied by the Planning Coordinator." NERC observes that the compensatory load shedding provisions in the regional Reliability Standard, by contrast, are limited to a "defined amount of generating capacity that is included in Planning Coordinator assessments, [and] does not jeopardize reliability of the Bulk-Power System."

Commission Determination

The Commission rejected the protests made by Dominion and PSEG regarding the compensatory load shedding provisions of regional Reliability Standard PRC-006-NPCC-1. NPCC states that generators already comply with the compensatory load shedding requirements in NPCC Directory #12, which is not disputed by Dominion and PSEG. While Dominion maintains that the regional Reliability Standard will require more generators (i.e., non-NPCC Full Members) to comply with the compensatory load shedding requirement, the fact that there are generators who do so now refutes the assertion that the requirement is technically or practically infeasible. The Commission also agreed with NERC that the concerns regarding overfrequency excursions due to overcompensating for loss of off-line units might be valid only if compensatory load shedding was applied to large generating units or to new generating units, but that is not the case here

since compensatory load shedding only applies to existing, non-conforming, non-nuclear units. The Commission also agreed with NPCC that the NERC Reliability Functional Model does not preclude the assignment of a new or revised task in a Reliability Standard, such as to generator owners. The Commission disagreed with Dominion and PSEG that the regional Reliability Standard is inconsistent with Order No. 763, and agreed with NERC that, while it is inappropriate for a continent-wide Reliability Standard to supplant the planning coordinator's role in establishing UFLS program requirements, the regional Reliability Standard PRC-006-NPCC-1 incorporates the NPCC's planning coordinators' views and experience.

Finally, the Commission rejected the claim that the compensatory load shedding provisions in regional Reliability Standard PRC-006-NPCC-1 contravene FPA Section 215. The Commission stated that it does not find that the regional Reliability Standard implicates the proscription in FPA Section 215 against ordering the "construction of additional generation or transmission capacity or to set and enforce compliance with standards for adequacy or safety of electric facilities or services."

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to the respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission does not consider the information collected within this regional Reliability Standard to be confidential. However, the filer may request privileged treatment of any filing that may contain information harmful to the respondent if released to the general public¹⁷. An entity seeking confidential treatment of the information must ask the Commission to treat this information as confidential and non-public, consistent with the Commission's regulations at 18 CFR 388.112. Generally, the Commission does not consider this information to be confidential.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

The Commission considers the questions within the proposed reliability standard neither sensitive in nature nor private.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

¹⁷ 18 CFR 388.112

FERC-725L, OMB Control No. 1902-0261
Final Rule in RM12-12, Issued: February 21, 2013
RIN: 1902-AE54

This Final Rule approves the regional Reliability Standard PRC-006-NPCC-01. NERC has requested approval for this regional Reliability Standard. NERC states (in its petition) that UFLS requirements had been in place (continent-wide and within NPCC) for years prior to implementation of the Commission-approved Reliability Standards in 2007. Because the UFLS requirements have been in place prior to the development of PRC-006-NPCC-01, the proposed regional Reliability Standard is closely associated with requirements to which the entities adhered. This regional Reliability Standard applies to generator owners, planning coordinators, distribution providers, and transmission owners in the Northeast Power Coordinating Council Region and is designed to ensure the development of an effective automatic underfrequency load shedding (UFLS) program to preserve the security and integrity of the Bulk-Power System during declining system frequency events, in coordination with the NERC continent-wide UFLS Reliability Standard PRC-006-1.

According to the NERC Compliance Registry, there are 2 planning coordinators and 135 generator owners within the United States portion of the NPCC Region. The Commission bases individual burden estimates on the time needed for planning coordinators to incrementally gather data, run studies, and analyze study results to design or update the UFLS programs that are required in the regional Reliability Standard in addition to the requirements of the NERC Reliability Standard PRC-006-1.¹⁸

The Commission estimates the average annual Public Reporting Burden for this information collection as:

¹⁸ The burden estimates for Reliability Standard PRC-006-1 are included in Order No. 763 (Final Rule in RM11-20) and covered in FERC-725A (OMB Control No. 1902-0244). OMB approved those requirements on 7/9/2012 (ICR Reference No. 201204-1902-001).

RM12-12: Regional Reliability Standard PRC-006-NPCC-1 --- Automatic Underfrequency Load-Shedding					
	Number of Respondents (A)	Annual Number of Responses Per Respondent (B)	Total Number of Responses (A)x(B)=(C)	Average Burden Hours per Response (D)	Estimated Total Annual Burden (C)x(D)
PCs ¹⁹ : design and document	2	1	2	8	16
PCs: update and maintain UFLS program database				16	32
GOS ²⁰ : provide documentation and data to the planning coordinator	135	1	135	16	2,160
GOS: record retention				4	540
					2,748

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

Total Capital and Start-up cost: \$0

Total Operation, Maintenance, and Purchase of Services: \$0

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

	Number of Employees (FTEs) or Number of Hours	Estimated Annual Federal Cost
Analysis and Processing of filings ²¹	0	\$0
Paperwork Reduction Act Administrative Cost		\$1,588
FERC Total		\$1,588

19 PC = planning coordinator

20 GO = generator owner

21 Based upon 2012 FTE average salary (\$143,540 or \$69.01/hour)

The Commission bases its estimate of the “Analysis and Processing of filings” cost to the Federal Government on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of any actual filings submitted in response to the information collection.

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

This is the first request for approval concerning this regional Reliability Standard. NERC states (in its petition) that UFLS requirements had been in place (continent-wide and within NPCC) for years prior to implementation of the Commission-approved Reliability Standards in 2007. Because the UFLS requirements have been in place prior to the development of PRC-006-NPCC-01, the regional Reliability Standard is closely associated with requirements to which the entities already adhered.

FERC-725L	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	137	0	0	137
Annual Time Burden (Hr)	2,748	0	0	2,748
Annual Cost Burden (\$)	\$0	0	0	0

The format, label, and definitions of the table above follow the Office of Management and Budget’s online submittal system for information collection requests.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date for OMB approval of the information collection. The information is not collected upon a standard form which would facilitate the display of the expiration date for OMB approval.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

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The Commission does not use the data collected for this reporting requirement for statistical purposes. Therefore, the Commission does not use as stated in item (i) of the certification to OMB "effective and efficient statistical survey methodology." The information collected is case specific to each information collection.