

Unofficial Comment Form

WECC-0157

PRC-006-5 Automatic Underfrequency Load Shedding, Update to the WECC Regional Variance

Posting for Comment 1

<u>Do not</u> use this form for submitting comments. Use the hyperlink or <u>Submit Comments</u> button under the "Submit and Review Comments" accordion on the project page to submit comments on **Project WECC-0157**: PRC-006-5 Automatic Underfrequency Load Shedding, Update to the WECC Regional Variance by 6:00 p.m. Mountain Time November 1, 2025.

All documents associated with the project and posting can be found on the <u>Project Page</u> under the "Posting 1 for Comment" accordion. If you have questions, please contact <u>Donovan Crane</u>, Senior Engineer, Standards.

Background Information

When the WECC variance was developed Requirement R15 language that allowed Corrective Action Plans to be developed was inadvertently left out. The proposed change(s) will allow the appropriate entities to collaborate on opportunities to provide effective remediation activities in a timely manner if there are deficiencies noted within a UFLS assessment activity. The goal is to consider how to incorporate the nation-wide Requirement R15 into the WECC Variance that will allow effective mitigation of a UFLS assessment not meeting performance criteria within the WECC Interconnection.

Questions

- 1. Do you agree with the Drafting Team's language used in the addition of D.B.15. in the WECC Variance of the NERC Standard. Yes/No with a narrative explanation
- 2. The failure of the WECC Off Nominal Frequency Plan can be due to either an inadequate plan, or to individual UFLS entities failing to adequately implement the plan. Should the requirement D.B.15 separately address the need for both of these aspects?
 - All PCs shall to participate in the revision of the WECC Off Nominal Frequency Plan
 - Individual PCs shall develop CAPs to implement changes within their Planning Coordinator area if there are deficiencies within their PC area.

Yes/No with a narrative explanation

3. Do you have any other comments or suggestions that the drafting team may not have thought of or included in this document? Yes/No with a narrative explanation