

## Automatic Underfrequency Load Shedding Discussion – RRS October 2024

- NYSRC EC commented to NERC in the development of a proposed SAR on PRC-006-5 (related to the advent of distributed renewables) that the NERC drafting team should consider a more frequent than five year review of the functionality of the automatic under frequency load shedding programs currently called for in the standard.
  - NYSRC Comments were submitted to NERC in that regard and are under consideration in the NERC IRPS but has not reached the NERC RSTC.
  - The NERC IRPS committee accepted the NYSRC input that the mandatory minimum five year periodicity of Automatic Underfrequency load shedding program reviews ( to test functionality through simulation) may be too long given current rate of change of the electric industry.
  - Consideration of more frequent automatic UFLS studies was added to the draft SAR.
  - However, that work is currently low priority due to the FERC Extreme Weather and IBR mandatory work which has been given higher priority in the NERC standards development process.
- The New York registered entities are subject to the NPCC version of the [PRC-006-NPCC-2](#) (see R 5) standard and even if the input were acted upon in NERC PRC-006- 5, it would take a long time to migrate a more frequent study requirement into the NPCC version of the standard, unless the work is initiated separately, perhaps through a RSAR submittal to NPCC.
  - The EC considered this matter and the long time it might take to get the NPCC PRC-006 standard changed and advised that this might be also too slow given the pace of changes with respect to solar and battery penetration on the distribution system and suggested that the matter be brought to the RRS for an initial discussion
- The EC requests that this matter be considered by the RRS in the form of development of a New York Reliability Council Rule to supplement the applicable PRC-006-NPCC-2 standard to perform the more frequent analysis of the ability of the New York system to verify that automatic underfrequency load shedding will continue to work as the penetration of renewables increases.
- Potential Action:
  - Assign a sub team of RRS to develop a draft new rule addressing the need for more frequent (than five-year) analysis for consideration by the RRS.