



NERC Standard: PRC-010-0
NERC Standard: PRC-011-0
NERC Standard: PRC-021-1
NERC Standard: PRC-022-1

Acceptable Corroborating Evidence:
“Standards Pertaining to Under Voltage
Load Shedding Programs Do Not Apply in
New England at This Time”

ISO New England Inc.

Reliability & Operations Compliance

Corroborating Evidence Interpretation No. 6, Revision 1

Effective Date – January 8, 2010

Background:

ISO New England Inc. (“ISO-NE”) is the not-for-profit corporation responsible for the reliable operation of New England’s bulk power generation and transmission system. It also administers the region’s wholesale electricity markets and manages the comprehensive planning of the regional bulk power system. ISO-NE is an organization that has registered with the North American Electric Reliability Corporation (“NERC”) as a Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Operator, Transmission Service Provider, Planning Authority, Resource Planner, and Transmission Planner.

The Northeast Power Coordinating Council (“NPCC”) is NERC’s delegated authority for the administration of the NERC Compliance Monitoring and Enforcement Program (CMEP) within NPCC’s boundaries of Eastern North America.

NPCC, in its role of administering the CMEP, performs periodic audits of registered entities that are users, owners, or operators of the New England Bulk Power System. In the conduct of such audits the NPCC auditors have frequently sought corroborating evidence or other information from ISO-NE, based on ISO-NE’s substantial authorities and responsibilities as both a Regional Transmission Organization (“RTO”) and as defined by its aforementioned registrations with NERC. The corroborating evidence sought by NPCC is used to determine that the entity undergoing the audit has complied with certain requirements of the NERC Reliability Standards that specify a required action on the part of the New England based entity relative to the rules and procedures emanating from ISO-NE’s FERC approved Transmission Tariff (“ISO Tariff”).

Given the repetitive nature of many of these requests, NPCC and ISO-NE have joined to provide an agreed to set of “Corroborating Evidence Interpretations” in order to satisfy the requirements of applicable NERC Reliability Standards. These interpretations do not preclude other evidence that may be introduced by the registered entity and accepted by the NPCC auditing body. In addition, these interpretations may not be construed as modifying or contradicting any part of any ISO Procedure or any part of the ISO’s Tariff. In the event that a Participant believes that any part of these Interpretations does conflict with the ISO’s Procedures or Tariff, the ISO urges the Participant to bring that matter to its attention immediately.”

Document Control:

As a minimum, all Corroborating Evidence Interpretations will be reviewed on an annual basis. Any required updates, annual or otherwise, will be processed in accordance with the following:

The Corroborating Evidence Interpretations shall be given a Revision Number and an Effective Date. The current Revision will remain in effect until such time as ISO-NE and NPCC agree to updates of these documents. At the time of the update a new Revision Number and Effective Date will be assigned.

Relevant NERC Standards:

NERC Standard: PRC-010-0 – Assessment of the Design and Effectiveness of UVLS Program

Purpose: Provide System preservation measures in an attempt to prevent system voltage collapse or voltage instability by implementing an Undervoltage Load Shedding (UVLS) program.

NERC Standard: PRC-011-0 – UVLS System Maintenance and Testing

Purpose: Provide System preservation measures in an attempt to prevent system voltage collapse or voltage instability by implementing an Undervoltage Load Shedding (UVLS) program.

NERC Standard: PRC-021-1 – Under-Voltage Load Shedding Program Data

Purpose: Ensure data is provided to support the Regional database maintained for Under-Voltage Load Shedding (UVLS) programs that were implemented to mitigate the risk of voltage collapse or voltage instability in the Bulk Electric System (BES).

NERC Standard: PRC-022-1 – Under-Voltage Load Shedding Program Performance

Purpose: Ensure that Under-Voltage Load Shedding (UVLS) programs perform as intended to mitigate the risk of voltage collapse or voltage instability in the Bulk Electric System (BES).

Applicability: As stated in the individual standards, but in general the standards are applicable to all Transmission Owners, Distribution Providers, Load Serving Entities and Transmission Operators that own or operate a UVLS program.

Explanation of Why This Requirement Does Not Apply to Transmission Owners, Distribution Providers, Load Serving Entities and Transmission Operators in New England

Although there are Under-Voltage Load Shedding Programs (UVLS) provided by Market Participants operating within the New England Area, none are intended to mitigate the risk of voltage collapse or voltage instability of the Bulk Electric System (BES). Those Undervoltage Load Shedding Programs existing within the New England Area are intended to provide local protection only.

A “NPCC Assessment of Under-Voltage Load Shedding (UVLS)” report was published on November 29, 2005. This report provided conclusions and recommendations based on limited steady-state analysis conducted by the SS-37 Working Group. The SS-37 report did not recommend general use of, and drew no conclusion about, the practicality of UVLS schemes. The report left it to individual Areas to assess the benefits against the costs and risks of deployment of UVLS schemes in specific situations. Further, the SS-37 report concluded that UVLS schemes cannot be universally and unconditionally applied as a means to limit cascading outages, as they can potentially have a counterproductive effect. In addition, the final conclusion of the SS-37 report stated, “If UVLS schemes are found to be potentially beneficial, more detailed steady state and transient stability studies will be required to thoroughly assess if a UVLS scheme should be pursued.”

On January 31, 2007 the NPCC Task Force on System Studies (TFSS) recommended not to pursue further generic studies of UVLS¹. TFSS stated that further action should only be taken if a member system in the Eastern Interconnection proposes a specific UVLS application, which can then be studied in more detail.

¹ Letter, David Conroy, Chair-TFSS to Guy Zito, Assist. V.P. Standards, Re- UVLS Study Recommendations..