

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Regional Reliability Standard)	
PRC-006-NPCC-1 Automatic)	Docket No. RM12-12-000
Underfrequency Load Shedding)	

**COMMENTS OF THE
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

I. INTRODUCTION

The New York Independent System Operator (“NYISO”) respectfully submits these comments in support of the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Notice of Proposed Rulemaking (“NOPR”), dated September 20, 2012.¹ In its NOPR, the Commission proposes to approve regional Reliability Standard PRC-006-NPCC-1 (Automatic Underfrequency Load Shedding) developed by the Northeast Power Coordinating Council (“NPCC”) and approved by the North American Electric Reliability Corporation (“NERC”). The Commission also proposes to approve the associated violation risk factors (“VRFs”) and violation severity levels (“VSLs”), implementation plan, and effective dates proposed by NERC. The NYISO supports the Commission’s efforts on this matter and also appreciates this opportunity to offer comments.

II. COMMUNICATIONS AND CORRESPONDENCE

All communications and services in this proceeding should be directed to:

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs

¹ Regional Reliability Standard PRC-006-NPCC-1 Automatic Underfrequency Load Shedding, 140 FERC ¶ 61,203 (September 20, 2012) (“NOPR”)

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III. COMMENTS

The NYISO supports the Commission's proposed approval of regional Reliability Standard PRC-006-NPCC-1 and the associated VFRs and VSLs, effective dates and implementation plan

NERC regional Reliability Standard PRC-006-NPCC-1 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 frequency events. The regional reliability standard is designed to work in coordination with and augment NERC's continent-wide UFLS Reliability Standard PRC-006-1. The NYISO supports this standard as NYISO staff was involved in the drafting of the regional standard and the NYISO voted to support the standard at NPCC as it is effectively designed to mitigate the consequences of an underfrequency event. The proposed standard satisfies the factors set forth in Order No. 672 for the criteria required for approval of a regional Reliability Standard because it adds specificity not contained in the NERC continent wide UFLS Reliability Standard PRC-006-1.

Accordingly, the NYISO requests that FERC approve the proposed Regional Reliability Standard PRC-006-NPCC-1 (Automatic Underfrequency Load Shedding) without modification.

IV. CONCLUSION

WHEREFORE, for the reasons stated above, the NYISO requests that the Commission consider these comments and approve the regional Reliability Standard, as discussed above.

Respectfully submitted,

/s/ Nathan D. Markey

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 26th day of November, 2012.

/s/ Joy A. Zimmerlin

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