

PRC-006-NPCC-3 Automatic Underfrequency Load Shedding

Response to Comments for October 15 – December 1, 2025, Posting

January 6, 2026

NPCC Regional Reliability Standard PRC-006-NPCC-3, Automatic Underfrequency Load Shedding, was posted for a 45-day comment period, which closed December 1, 2025. The Regional Standard Drafting Team (RSDT) extends its appreciation to all industry participants who submitted comments. The RSDT has reviewed all feedback received and has provided responses, organized by commenting entity, as outlined below:

Power Advisors, LLC Comments:

- The reason for eliminating the upper limits is to reduce compliance risk and nothing else. It is not clear what the reliability benefit is. The reliability benefit should be more fully explained when the standard is submitted to FERC for approval.
 - The RSDT disagrees. Eliminating the upper limits in the cumulative requirements is not solely about reducing compliance risk; it directly enhances system reliability by providing greater flexibility for Planning Coordinators and Distribution Providers to design UFLS programs that better arrest and recover declining frequency under extreme contingencies. The previous version of the standard enforced a cumulative upper bound that was lower than the sum of the upper bound for each individual stage. Removal of the cumulative upper bound allows incrementally more load to be shed at several stages. The removal of the upper bound aims to better actualize the planned load shed target of the individual stages. The RSDT discussed the merits of the removal of the cumulative upper bound over the course of several meetings and concluded that the only consequence of shedding more cumulative load is quicker recovery to stable frequency. The benefits of the change as considered by the RSDT are fully explained within the “Rationale for Removal of Upper Margin for Cumulative Load Shed” section of the technical rationale.
- This NPCC standard development effort and the standard itself would have a better cost/benefit outcome if it looked forward and addressed the major reliability and resilience risks outlined in the additional comments section below.
 - The changes proposed by the RSDT were carefully developed to minimize additional efforts required to implement the modified standard.

- The proposed changes to PRC-006-NPCC-2 are meant to clarify compliance issues, but by focusing only on those near-term concerns, NPCC is missing a significant chance to make a meaningful impact to better protect electricity consumers in the NPCC Region from the proven risks of large loads and non-conforming IBR-based generators during system disturbances. The proposed standard will likely reach the FERC just as more pressing issues—like shortening the five-year review window for automatic underfrequency load shedding (UFLS) studies and expanding compensatory load shedding to address non-conforming ride-through capabilities of IBR resources (with PRC-029-1), are being considered by the FERC. The NERC Level 2 Industry Alert and the Characteristics and Risks of Emerging Large Loads reports offer strong reasons for NPCC to pause and reconsider the scope of the RSAR behind these proposed changes.
 - The RSDT agrees that there are emerging risks and pending or anticipated regulatory rulings which may require additional changes to the PRC-006-NPCC-3 standard and thanks you for bringing them to our attention via this comment and your previous participation in the drafting team meetings. The RSDT feels that these concerns are already being addressed at a continent-wide level by NERC and FERC and that any changes to the regional standard should follow the outcomes of those efforts, or the realization of the risk of large loads in the NPCC region which has so far lagged other regions' currently rapid development. The RSDT encourages any entity or individual who feels those risks warrant development, modification, clarification or retirement of an NPCC regional standard to submit an RSAR to the NPCC Manager of Reliability Standards in accordance with the NPCC Regional Standards Process Manual.
 - The RSDT chose to adhere to the scope of the original RSAR as developed by TFSP and has produced a modified standard that effectively and efficiently addresses the objectives of the RSAR, and which has widespread member support. The RSDT feels that any further modification to the PRC-006-NPCC-3 regional standard is better accomplished via a new RSAR focused solely on the emerging risks and regulatory developments.