

Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1) Submit request to Herb Schrayshuen (herb@poweradvisorsllc.com) via the NYSRC site www.nysrc.org

Item	Information
1. PRR No. & Title of Reliability Rule or Requirement change	PRR 157 Mandatory Under-Frequency Load Shedding (UFLS) Design Requirements for Large Load Facilities.
2. Rule Change Requester Information	
Name	Martin Paszek and David Allen
Organization	Con Edison and RRS Chair
3. New rule or revision to existing rule?	New Rule - Reliability Rule B-6: Integration of Large Loads into the UFLS Program
4. Need for rule change, including advantages and disadvantages	<p>The current New York State automatic UFLS program implementation (under PRC-006-5 and PRC-006-NPCC-2) relies on Transmission Owners (TOs) to meet aggregate load-shed targets. Historically, TOs meet these targets by utilizing wide-area distribution feeders. This "feeder-level" approach lacks precision and frequently results in the disconnection of Essential Community Services—such as hospitals, police stations, and fire departments—because they are co-located on the same distribution infrastructure as residential and commercial consumers.</p> <p>Concurrently, there is a significant increase in Large Load Facilities (e.g., data centers, large-scale industrial processors, etc.) connecting to the BPS via dedicated infrastructure. These facilities represent concentrated blocks of non-essential demand that have often been excluded from the automatic UFLS "feeder-trip" rotation.</p> <p>This rule change is necessary to mandate that the NYISO and TOs incorporate these Large Load Facilities into the UFLS program through Interconnection Agreements and Technical Design Requirements. By requiring these facilities to install autonomous UFLS relaying and placing them at the front of the tripping hierarchy (Stage 1), the grid can achieve the required MW relief while shielding critical life-safety infrastructure from unnecessary outages.</p> <p>Advantages Protection of Public Health and Safety: Minimizes the risk of power loss to hospitals and emergency services by utilizing non-essential large loads as the primary source of frequency relief.</p> <p>Engineering Precision: Allows for "surgical" load shedding of concentrated MW blocks at the point of interconnection, rather than the broad, indiscriminate tripping of entire zip codes.</p> <p>Fairness in Design: Ends the "loophole" where large-scale industrial/commercial users remain energized while the community at large suffers outages to maintain system stability.</p> <p>Disadvantages None</p>
5. Related NYSRC rules	Not Applicable
6. Section A – Reliability Rule Elements	

1. Reliability Rule	The NYS Bulk Power System shall be designed and planned such that Large Load Facilities contribute to frequency stability and resilience through mandatory participation in the automatic Under-Frequency Load Shedding (UFLS) program. This design requirement ensures that concentrated, non-essential loads are prioritized for shedding during extreme frequency excursions to minimize the risk of disconnecting Essential Community Services (e.g., hospitals, fire and police stations, and critical municipal infrastructure).
2. Associated NERC & NPCC Standards and Criteria	PRC-006 and PRC-006-NPCC
3. Applicability	
7. Section B – Requirements <p>R1. The NYISO (NYISO staff commented that it felt R1/M1 should fall to individual TO via IA process) shall establish statewide criteria requiring that Non-Essential Large all single customer load facilities load facilities at or above 25 MW (>25 MW) that do not directly support essential community and government services and infrastructure (i.e., hospitals, fire, police, and ??) are Large Load Facilities that are required to (RRS noted potential issues may arise over definitional language and threshold MW levels) be integrated into the NYCA automatic UFLS program as a condition for interconnection.</p> <p>R2. Transmission Owners (TOs) shall update their technical requirements and Interconnection Agreements to mandate that these Large Load Facilities install and maintain, or cause to be installed and maintained, autonomous Under-Frequency relaying whenever they equal or exceed 25 MW.</p> <p>R3. TOs shall prioritize these Large Load Facilities by assigning them to Stage 1 (59.5 Hz) of the UFLS program. This ensures these non-essential loads are shed prior to the activation of distribution feeders serving Essential Community and government services and infrastructure (hospitals, fire, police).</p> <p>R4. The TO shall verify the operational readiness of these relays via certified test results provided by the facility owner on an annual basis.</p>	
8. Section C – Compliance Elements	
1. Measures	<p>M1. NYISO Criteria Documentation (Relates to R1): The NYISO shall provide a copy of its established statewide criteria and/or technical procedures that mandate requiring the integration of all single customer load facilities at or above 25 MW that do not directly support essential community and government services and infrastructure (i.e., hospitals, fire, police, and ??) be identified as Large Load Facilities that are required to (RRS noted potential issues may arise over definitional language and threshold MW levels) be integrated Non-Essential Large Load Facilities (> 25 MW) into the NYCA UFLS program. This documentation must explicitly state that such participation is a condition for interconnection.</p> <p>M2. TO Technical Requirements & Agreements (Relates to R2): Each Transmission Owner (TO) shall provide evidence (such as a standard Interconnection Agreement template, a technical bulletin, or a filed Tariff change) showing that it has mandated the installation and maintenance of autonomous Under-Frequency relaying for all such Large Load Facilities.</p> <p>M3. UFLS Program Tables & Mapping (Relates to R3): Each TO shall provide its annual UFLS program table or mapping document to the NYISO/NYSRC. This evidence must demonstrate that identified Non-Essential all identified Large Load Facilities are assigned to Stage 1 (59.53 Hz) of the shedding hierarchy, prioritizing them over feeders serving</p>

Commented [DA1]: RRS member comment: Is “non-essential” defined in NYSRC and/or should it be?

Commented [DA2]: NYISO staff commented that it felt R1/M1 should not specify the NYISO but should fall to individual TO via IA process or NYSRC.

Commented [DA3]: RRS discussion on June 4 noted potential issues/difficulty may arise over definitional language and threshold MW levels. Martin P. indicated that 25 MW value was a placeholder for a threshold level.

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Commented [DA4]: Do we need to specify that interconnection to the transmission or distribution system?

Commented [DA5]: This language suggest that this rule be applied retroactively to existing loads.

Commented [DA6]: There was a comment at RRS regarding whether rule should extend to manual load shed requirements as well.

	Essential Community Services. M4. Annual Verification Records (Relates to R4): Each TO shall provide a summary report or a sample of certified relay test results collected from <u>all identified</u> Large Load Facilities within the previous calendar year. This report shall serve as evidence that the TO is actively verifying the operational readiness of the required equipment on an annual basis.
2. Levels of Non-Compliance	TBD
3. Compliance Monitoring Process (See Policy 4):	TBD
3.1 Compliance Monitoring Responsibility	TBD
3.2 Reporting Frequency	TBD
3.3 Compliance Reporting Requirements	TBD
9. Comments	This <u>revised</u> first draft of the proposed rule aims to implement the recommendations developed by the Reliability Rules Subcommittee and the Under Frequency Load Shed Working Group in its July 30, 2025 White Paper <i>“Review of Under Frequency Load Shed Programs in Consideration of Rapidly Changing Resource Mix and Integration of Large Loads”</i> via a single Statewide implementation. After initial discussion and input from the RRS members occurs, additional input from the Large Load Working Group will be solicited before the Reliability Rules Subcommittee seeks feedback from the EC or takes any action on the PRR.
10. Date Rule Adopted	
11. PRR Revision Dates	May 12, 2026, <u>June 5, 2026, and July 1, 2026</u>
12. Implementation Plan	Effective Upon EC Approval