PRR 157 Comment Received from NYPA on October 2, 2026:

***NYPA would like to request clarification regarding Requirement R6. As written, R6 states that the Transmission Owner (TO) shall verify the operational readiness of the automatic under-frequency relays. NYPA seeks confirmation on whether the TO would be considered non-compliant if a large load fails to provide certified test results for its under-frequency relay performance, especially in cases where the TO/CTO does not own or directly control the relay.***