NPCC Members and Entities of the NERC Registered Ballot Body,

The “Additional Ballot” for the subject standard project had previously passed. The SDT made no substantive changes and is moving to the final ballot which concludes at 8 pm on February 8, 2016. The original issues we pointed out in NPCC’s comments below remain, so NPCC’s ballot position will not change, as highlighted below.

If you have any questions please contact me.

Thank you,

Guy V. Zito
Assistant Vice President-_standards
Northeast Power Coordinating Council Inc.
1040 Avenue of the Americas, 10th Floor
New York, NY 10018
212-840-1070
212-302-2782 fax

NPCC Entities and Members of the NERC Registered Ballot Body,

NPCC Regional Standards Committee (RSC) in coordination with a working group on coordination of operations has conducted a review of the subject project and three standards currently in an “Additional Ballot” period until 8pm January 11, 2016. The RSC has reached a consensus on two of the three standards posted.

**BAL-005-1 Balancing Authority Control (Negative)** there is an issue with R3 which, as written, would require a meter accuracy of 0.001 Hz and an availability for 99.95% of the time. The SDT did not mean for this to be understood as requiring an entity to check to ensure their meter accuracy is acceptable 99.95% of the time. NPCC will be submitting a suggested revision to clarify the intent of R3. NPCC as the Regional Entity will cast a Negative vote.

**BAL-006 Inadvertent Interchange (Affirmative for Retirement).** NPCC as the Regional Entity will cast an Affirmative vote

The RSC has not reached a consensus balloting position on FAC-001-3 Facility Interconnection Requirements. A number of concerns have been raised. Some of which are:

R3.3 and 4.3 should not be moved to FAC-001-3 and should remain in BAL-005-0.2b and be revised to capture the intent.
R3.3 and 4.3 should be the responsibility of the interconnecting entity to ensure their facility is within a BA’s metered boundary.

NPCC RSC is in agreement that all interconnecting entities must be within the metered boundary of a Balancing Authority however the question of who is responsible for ensuring this analysis or verification and which standard seems to be the most logical place for the requirement are the points of contention. NPCC as the Regional Entity is neutral on which standard the requirement should reside or who should be responsible for ensuring the interconnecting entity will be in a BA’s metered boundary. **NPCC will be casting an Abstention on the FAC-003-1.**

NPCC Standards staff will be posting the consensus comments the NPCC RSC submits to NERC on the NPCC website. Please ensure you cast your ballots by 8pm January 11, 2016.

If you have any questions please contact me.

Guy V. Zito  
Assistant Vice President Standards  
Northeast Power Coordinating Council, Inc.  
1040 Avenue of the Americas, 10th Floor  
New York, NY 10018  
212-840-1070  
212-302-2782 Fax  
gzito@npcc.org