From:
 Guy V. Zito

 To:
 rsballot

 Cc:
 rscmembers

Subject: NERC Ballot- Project 2017-06 Modifications to BAL-002-2 | Initial Ballot and Non-binding Poll Open through May 7, 2018

Date: Monday, May 7, 2018 7:36:20 AM

Attachments: image001.png
Importance: High

NPCC Members and Entities of the NERC Registered Ballot Body,

The subject standard is currently being balloted through 8pm May 7, 2018 as noted in the below. The revision to the standard was developed in response to a FERC Rule and associated directives involving recovery from a Balancing Contingency Event.

The FERC Directives were as follows:

- to notify the Reliability Coordinator of the conditions set forth in Requirement R1, Part 1.3.1 preventing it from complying with the 15-minute ACE recovery period; and
- to provide the Reliability Coordinator with its ACE recovery plan, including a target recovery time.

The Regional Standards Committee (RSC) has **not** reached consensus on a ballot position. The issues precluding support of some members of the RSC are as follows- It is believed the proposed change will distract operators from their primary tasks in order to develop and discuss a plan following a contingency during an EEA. The provisions being changed deal with exclusions to compliance and some are suggesting this be dealt with in the compliance realm with either an exception or a CMEP Practice Guide for auditors. Under these situations the BA may likely need to perform dozens of tasks in a 15 minute period due to capacity emergencies, multiple contingencies, etc. Some have stated the proposed standard is overly complex and should be restricted to recovery from defined BA events within 15 mins., restore reserves within 90 mins., and establish some minimal reporting requirements for specific situations. Also, some expressed a view that duplication with EOP-011 R2 would exist, however this is subject to interpretation.

After reviewing the draft, in NPCC's view, the FERC directives are addressed and support reliable operation, however due to the concerns expressed there could be some unnecessary excess burden to the System Operators with little or potentially adverse impact on their ability to perform their tasks. NPCC is also concerned with the suggestion that alternately this could be dealt with as compliance exceptions or with CMEP processes which could inadvertently create inefficiencies or ERO alignment issues (e.g. non-uniformity during audit). As such, NPCC as the Regional Entity, in being respectful to the position of the members performing these proposed tasks while also recognizing the NERC SDT addressed the FERC Directives in the Order 835, intends to cast an ABSTENTION for this ballot. If you have any questions please contact me.

Thanks.

Guy V. Zito, Chair RSC NPCC AVP-Standards

From: NERC Standards Announcements (Do Not Reply) < NERC-Standards Announcements-

DoNotReply@nerc.net>

Sent: Friday, April 27, 2018 9:14 AM

To: Nasheema Santos < Nasheema. Santos@nerc.net >

Cc: Darrel Richardson < <u>Darrel.Richardson@nerc.net</u>>; Soo Jin Kim < <u>Soo.Jin.Kim@nerc.net</u>>; Chris Larson

<Chris.Larson@nerc.net>

 $\textbf{Subject:} \ \textbf{Project 2017-06 Modifications to BAL-002-2} \ | \ \textbf{Initial Ballot and Non-binding Poll Open through May} \\$

7, 2018



Standards Announcement

Reminder

Project 2017-06 Modifications to BAL-002-2



Initial Ballot and Non-binding Poll Open through May 7, 2018

Now Available

The initial ballot and non-binding poll of the associated Violation Risk Factors and Violation Severity Levels for BAL-002-3 Disturbance Control Standard—Contingency Reserve for Recovery from a Balancing Contingency Event are open through 8 p.m. Eastern, Monday, May 7, 2018.

Balloting

Members of the ballot pools associated with this project can log in and submit their votes by accessing the Standards Balloting and Commenting System (SBS) <u>here</u>. If you experience difficulties navigating the SBS, contact <u>Wendy Muller</u>.

- If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at https://support.nerc.net/ (Monday Friday, 8 a.m. 5 p.m. Eastern).
- Passwords expire every **6 months** and must be reset.
- The SBS **is not** supported for use on mobile devices.
- Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the <u>Standard Processes Manual</u>.

For more information or assistance, contact Principal Technical Advisor, <u>Darrel Richardson</u> (via email) or at (609) 613-1848.

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