Unofficial Comment Form  
Project 2017-06 Modifications to BAL-002-2

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Project 2017-06 Modifications to BAL-002-2. Comments must be submitted by 8 p.m. Eastern, Monday, May 7, 2018.

Additional information is available on the project page. If you have questions, contact Principal Technical Advisor, Darrel Richardson (via email) or at (609) 613-1848.

Background
On January 19, 2017, FERC issued an order directing the ERO to develop modifications to standard BAL-002-2 to address their concerns regarding the 15-minute recovery period set forth in Requirement R1. In the order, FERC stated:

“Accordingly, we direct NERC to develop modifications to Reliability Standard BAL-002-2, Requirement R1 to require Balancing Authorities (BA) or Reserve Sharing Groups (RSG): (1) 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 (2) to provide the reliability coordinator with its ACE recovery plan, including a target recovery time. NERC may also propose an equally efficient and effective alternative.”

Please provide your responses to the questions listed below along with any detailed comments.

Questions

1. The SDT has modified Requirement R1 to address the Commission’s concerns identified in FERC Order 835. Do you agree that the proposed modifications clearly state the intentions of the SAR? If not, please state your concerns and provide specific language on the proposed revision.

☐ Yes
☒ No

Comments:

While the proposed changes appear to clearly state the intention of the SAR, certain parts appear to be redundant with some of the existing requirements while other parts seem unnecessary if an alternative means, such as an exception to compliance, is developed.

Firstly, Point (i) in the forth bullet under Part 1.3.1 is unnecessary:
a. The first bullet under Part 1.3.1 implies that a BA’s RC is already aware of the EEA declaration (since it makes that declaration itself!)
b. The RC is already notified of its BA’s emergency condition via EOP-011, Requirement R2 (Part 2.2.1).

Secondly, regarding Point (ii) in Part 1.3.1, a BA’s priority under either an EEA or a capacity or energy emergency is to mitigate the emergency condition to return the BA Area to normal state. Developing and notifying its RC a plan to recover ACE under either condition should not be a priority as such a task may actually jeopardize reliability. A BA should be allowed time to manage its EEA and/or emergency. Only when such issues are duly addressed and the BA is out of EEA and/or emergency should it be required to notify its RC of an ACE recovery plan, including target recovery time, or the actions being undertaken to recover ACE.

We therefore urge the SDT to seek an alternative means (such as an exception to compliance) to meet the FERC directive on providing an ACE recovery plan, or to create a Part 1.4 that will require a BA to notify its RC of an ACE recovery plan, including target recovery time or its actions being undertaken to recover ACE, after it has recovered from an EEA or a capacity or energy emergency.

2. Do you have any other comments for drafting team consideration?

☐ Yes
☒ No

Comments: