Unofficial Comment Form

Project 2010-14.2.1 Balancing Authority Reliability-based Controls

Do not use this form for submitting comments. Use the electronic form to submit comments on the draft standards BAL-005-1 – Balancing Authority Control and FAC-001-3 – Facility Interconnection Requirements, and the recommended retirement of BAL-006-2 – Inadvertent Interchange. The electronic form must be submitted by 8 p.m. Eastern, Monday, January 11, 2016.

Documents and information about this project are available on the project page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

Background Information

On September 19, 2013, the NERC Standards Committee appointed ten subject matter experts to serve on the BARC 2 periodic review team (BARC 2 PRT).¹ As part of its review, the BARC 2 PRT used background information on the standards and the questions set forth in the Periodic Review Template developed by NERC and approved by the Standards Committee, along with associated worksheets and reference documents, to determine whether BAL-005-0.2b and BAL-006-2 should be: (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn. The recommendations of the BARC 2 PRT are in the Periodic Review Templates and SAR.

The Standards Committee approved a revised SAR that was posted for a 30-day comment period from July 16, 2014 through August 14, 2014. The BARC Phase 2.1 standard drafting team (BARC 2.1 SDT) reviewed the comments received from the SAR posting and developed revisions to BAL-005-0.2b, BAL-006-2 and FAC-001-2 standards. The standard were posted for a 45-day comment period and initial ballot from July 30, 2015 through September 14, 2015. The BARC 2.1 SDT also issued a survey to the industry to gather additional information concerning the disposition of the remaining requirements in BAL-006-2. Based on industry comments the BARC 2.1 SDT is proposing additional modifications to the definition of Automatic Generation Control (AGC) and Pseudo Tie, as well as additional modifications to BAL-005 and FAC-001 and retirement of the remaining requirements of BAL-006. With the retirement of the BAL-006 standard the BARC 2.1 SDT is also proposing to develop a Inadvertent Interchange Guideline.

This project addresses directives from FERC Order 693, and provides additional clarity to many requirements, as well as retiring requirements that meet the criteria developed in the Paragraph 81 project.

¹ The Standards Committee subsequently appointed an eleventh SME to the BARC 2 PRT.
Questions

1. The BARC 2.1 SDT has modified the definition of AGC and Pseudo Tie. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain in the comment area below.

   ☒ Yes
   ☐ No

Comments:

The phrase “..help maintain the Reporting ACE in that of a Balancing Authority Area ...” in the revised definition reads a bit awkward. We interpret the definition is meant to be:

“A process designed and used to adjust a Balancing Authority Areas’ Demand and resources to help maintain the Reporting ACE of a Balancing Authority within the bounds required by applicable NERC Reliability Standards.”

Please check and revise as appropriate.

2. If you are not in support of the proposed modifications to BAL-005-1, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

We continue to disagree with the majority of the requirements in the standard that stipulate the capabilities that a BA must have in order to perform its reliability tasks. In our view, these are more suited for inclusion in the Organization Certification Requirements as opposed to in Reliability Standards. The ongoing process to ensure accuracy of operating information and tools is an essential component of any operating entity which provide such services and register with NERC as the responsible entity for complying with applicable Reliability Standards. To have explicit requirements for having accuracy metering data at specific scan rate and availability (R1, R3 and R5), flagging missing or invalid data (R4), having a process in place to detect and mitigate inaccurate or missing information (R6), and using common source information between adjacent BAs (R7) are the fundamental organization requirements to enable a BA (and any operating entity) perform its reliability tasks to meet its basic obligations.

If arguments are made to have these requirements specifically stipulated, then such argument can be extended to include every data and tool that an operating entity (including RC, TOP and GOP) uses to perform all of its tasks. If that’s the case, there will be no end to the scope of this extension as this may include such data as PMU data, RTU data, voltage, current, MW, Mvar, frequency, etc.,
and tools such as on-line contingency analysis, EMS programs, line loading estimators, load flow programs, dynamic simulation software, etc. For years, operating entities have been relying on these data and tools to perform their tasks, and there have not been any notable events that occurred due to inaccurate data or tool capability.

We therefore once again urge the drafting team to consider retiring Requirements R1, R3, R4, R5 and R7 from BAL-005, and map them into Organization Certification Requirements. While argument can be made to retain R6 as it drives the proper behavior to ensure data errors are detected and mitigated, consideration may be given to also include this in the Organization Certification Requirements.

R1 from BAL-005-0.2b should be retained in BAL-005-1 and re-written as follows:
“The Balancing Authority shall ensure that any new or modified generation or transmission operating within its Balancing Authority Area is included within its metered boundaries.”

CO-1 recommend the following wording for R3:
R3. Each Balancing Authority shall use frequency metering equipment for the calculation of Reporting ACE:
3.1 that is available a minimum of 99.95% for each calendar year
3.2 that is rated to, and has a metering accuracy with a precision to ± 0.001 Hz.
3.3 checked for accuracy once each calendar year
There was concerns about what quality the ± 0.001 Hz was being applied to.

In the definition of Actual Net Interchange, strike the last sentence since it is too prescriptive. We believe a BA should have the flexibility to either include or exclude the actual transfers across DC tie lines based on the modeling of the facility.

3. If you are not in support of the retirement of BAL-006-2 and the development of a guideline, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

We support the retirement of BAL-006-2.

4. If you are not in support of the proposed modifications to FAC-001-3, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

The added requirements 3.3 and 4.3 are not clear. The drafting team copied R3.2 approach but it not work for 3.3. In R3.2 the Transmission Owner is notifying the other reliability entities that new or modified interconnection is being pursued. Technically that would include a notice to the BA.
But an explicit sub-requirement is needed. Concerns with R3.3 are:

1. Use of word confirming. Confirming is beyond notification; a confirmation requires the TO to maintain the response from the BA and possibly go further and verify the BA is truthful. The SDT reply to the last comments indicated it was really concerned that the BA would not be aware of changes made by TO.

2. The use of phrase “those responsible for the reliability of affected systems” is not needed and should be replaced with ‘responsible Balancing Authority’ since that is the only reliability function implicated by this subrequirement.

3. The BA should be required to provide the procedure for notification from a TO when a new or modified interconnection is being pursued. Then the TO can align its Interconnection requirements document to the BA process.

We do not support the proposed changes to R3 and R4. The SDT, in the rationale boxes stated “It is the responsibility of the party interconnecting to make appropriate arrangements with a Balancing Authority to ensure its Facilities are within the BA’s metered boundaries”. We do not believe it is appropriate to shift the compliance responsibility of one entity to another and therefore suggests the SDT also include Distribution Provider in the applicability section and then develop a requirement to read “Entity seeking to interconnect (TO, GO or DP) shall confirm with those responsible for the reliability of affected systems that its newly installed or modified Facility is within a Balancing Authority Area’s metered boundaries”.

Requirement 3.3 and 4.3 should not be moved to FAC-001-3. The BA is in the best position to know its metered boundaries and confirm if any new or modified transmission or generation project is within those metered boundaries. The proposed R3.3 and R4.3 should remain in BAL-005, but be assigned to the BA. R1 from BAL-005-0.2b should be retained and re-written as follows:

“The Balancing Authority shall ensure that any new or modified generation or transmission operating within its Balancing Authority Area is included within its metered boundaries.”

Alternatively the proposed R3.3 and R4.3 could be moved to FAC-002-2. FAC-002-2 is more appropriate than FAC-001-2 for this requirement because FAC-002-2 applies to TOs and GOs “seeking to interconnect” new or modified facilities. Therefore FAC-002-2 is more in line with the SDT’s rationale that “It is the responsibility of the party interconnecting to make appropriate arrangements with a Balancing Authority to ensure its Facilities are within the BA’s metered boundaries...”