Unofficial Comment Form
Project 2010-14.2.2 Phase 2 of Balancing Authority
Reliability-based Controls
Recommended Retirement of BAL-004-0

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the recommendation to retire BAL-004-0 – Time Error Correction. The form must be completed and submitted by 8 p.m. Eastern, Thursday, November 12, 2015.

If you have questions, contact Senior Standards Developer, Darrel Richardson, (via email) or at (609) 613-1848.

The project page can be accessed by clicking here.

Background Information
This posting solicits comments on the recommendation of the Balancing Authority Reliability-based Controls 2.2 standard drafting team (BARC 2.2 SDT) to retire BAL-004-0 – Time Error Correction. To support its recommendation, the BARC 2.2 SDT has posted “Time Error Correction and Reliability White Paper”.

The BARC 2.2 SDT reviewed the findings of the BARC 2 Primary Review Team. A survey was posted for comment August 12-25, 2015 to gain a better perspective as to any concerns the industry may have if the practice of manual Time Error Correction (TEC) was eliminated. The survey responses indicated support for retirement of manual TEC as a standard. Upon further review the BARC 2.2 SDT determined that manual TEC would not support the reliability of the BPS. Conducting manual TEC in any form directly contradicts NERC Reliability Principle 2: “The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.” The practice of using manual TEC to place the Interconnection closer to the settings for automatic underfrequency load shedding does not support or enhance reliability. Therefore, BAL-004-0 should be retired.

The survey responses also indicated that the accompanying North American Energy Standard Board (NAESB) WEQ Manual Time Error Correction Business Practice Standard – WEQ-006, should be retired contemporaneously with BAL-004-0. The BARC 2.2 SDT’s recommendation for retirement of BAL-004-0 is contingent on simultaneous retirement of NAESB WEQ-006 to ensure clarity and to avoid inadvertent, uncoordinated, manual TEC. The BARC 2.2 SDT has been coordinating with NAESB on this issue. Upon retirement of BAL-004-0 and NAESB WEQ-006, currently or soon to be effective Reliability Standards BAL-003-1 and BAL-001-2 will incent continued adherence to a frequency approximating 60 Hz over long-term averages.
Questions

1. Based on comments received from the SAR posting and the BAL-004-0 Survey posting, the SDT is recommending that BAL-004-0 be retired and WEQ Manual Time Error Correction Business Practice Standard – WEQ-006, should also be retired contemporaneously with BAL-004-0. Do you agree that BAL-004-0 – Time Error Correction standard should be retired? If not, please explain.

   ☒ Yes
   ☐ No

Comments: We support the SDT's recommendation to retire BAL-004-0 Time Error Correction standard.