Unofficial Comment Form
Project 2010-14.1 Balancing Authority Reliability-based Control
BAL-002-2 – Contingency Reserve for Recovery from a Balancing Contingency Event

Please do not use this form to submit comments on the proposed revisions to BAL-002-2 Contingency Reserve for Recovery from a Balancing Contingency Event. Comments must be submitted on the electronic comment form by 8 p.m. ET on April 25, 2013.

If you have questions please contact Darrel Richardson (via email) or by telephone at (609) 613-1848.

Background Information:
Since loss of generation occurrences so often impacts all Balancing Authorities throughout an Interconnection, BAL-002 was created to specify recovery actions and time frames. The original Standards Authorization Request (SAR) approved by the Industry presumes there is presently sufficient contingency reserve in all the North American Interconnections. The underlying goal of the SAR was to update the Standard to make the measurement process more objective and to provide information to the Balancing Authority or Reserve Sharing Group such that the parties would better understand the use of contingency reserve to balance resources and demand following a Reportable Contingency Event. The primary objective of BAL-002-2 is to measure the success of recovering from contingency events.

Questions
You do not have to answer all questions. Enter all comments in plain text format. Bullets, numbers, and special formatting will not be retained. Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. The BARC SDT has modified the definition for Balancing Contingency Event based on comments received from the industry. Do you agree that the modifications provide additional clarity? If not, please explain in the comment area below.
   Yes [x]  No [ ]
   Comments:

2. The BARC SDT has modified the current definition for Contingency Reserve. Do you agree that the modified definition provides for greater clarity? If not, please explain in the comment area below.
Yes

No

Comments: The last sentence in the definition is not needed, and should be removed. “The capacity may be provided by resources such as Demand Side Management (DSM), Interruptible Load and unloaded generation.” is the “How” to meet the contingency reserve requirement, which does not belong in a definition. Suggest to remove this sentence.

3. The BARC SDT has created a definition for Reserve Sharing Group Reporting ACE. Do you agree with this definition? If not, please explain in the comment area below.

   Yes
   No

Comments: There is no need to define the term Reserve Sharing Group Reporting ACE. This term is not referenced or used in the Standard at all. If the RSG is obligated to meet the DCS requirement and needs to return its ACE to zero or the Pre-Reportable Contingency Event value, then the Standard is not explicit nor complete enough to place this obligation on the RSG.

4. The BARC SDT has added language to the proposed requirements in the standard and to the definition for Contingency Reserve to resolve any conflicts between this standard and the EOP standards. Do you agree that this modification was necessary and that any possible issues are now resolved? If not, please explain in the comment area.

   Yes
   No

Comments:

5. The BARC SDT has developed Requirement R2 which requires entities to have Contingency Reserve at least equal to its MSSC. This requirement was added to address, in conjunction with Requirement R1, the FERC Directive for a continent wide Contingency Reserve policy. Do you agree that this addresses the FERC Directive? If not, please explain in the comment area.

   Yes
   No

Comments:

6. The BARC SDT has assigned both Requirement R1 and Requirement R2 a “medium” VRF. Do you agree with the proposed VRF? If not, please explain in the comment area below.
7. The BARC SDT has assigned both Requirement R1 and Requirement R2 a Time Horizon of “Real-time Operations”. Do you agree with the Time Horizon the SDT has chosen? If not, please explain in the comment area below.

☐ Yes
☐ No
Comments:

8. The BARC SDT has developed VSLs for Requirement R1 and Requirement R2. Do you agree with the VSLs in this standard? If not, please explain in the comment area.

☐ Yes
☐ No
Comments:

9. The BARC SDT has made significant modifications to the Background Document based on industry comments received. Do you agree that these modifications provide additional clarity as to the development of this standard? If not, please explain in the comment area.

☐ Yes
☐ No
Comments:

10. If you are not in support of this draft standard, what modifications do you believe need to be made in order for you to support the standard? Please list the issues and your proposed solution to the issue.

Comments: There isn’t an appropriate technical justification for requiring a 500 MW threshold. If the justification is simply to obtain more data samples, a 1600 data request is more appropriate than an enforceable Standard. Suggest reverting back to the 80% threshold which has thus far, shown to provide for an adequate level of reliability.

The Standard can be simplified by replacing the existing requirements with ones that read:

- recover from a Reportable Event within 15 minutes;
- replenish reserves within 90 minutes.