Unofficial Comment Form
Project 2010-14.1 Balancing Authority Reliability-based Control
BAL-013-1 – Large Loss of Load Performance

Please do not use this form to submit comments on the proposed BAL-013-1 Large Loss of Load Performance standard. Comments must be submitted on the electronic comment form by 8 p.m. April 25, 2013. If you have questions please contact Darrel Richardson (via email) or by telephone at (609) 613-1848.

Background Information:
Since losses of large loads occur and impact all Balancing Authorities’ throughout an Interconnection, BAL-013-1 was created to specify recovery actions and time-frames. The original Standards Authorization Request (SAR) approved by the Industry presumed 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 and return Interconnection frequency within defined limits following a Large Loss of Load Event. The primary objective of BAL-013-1 is to measure the success of implementing a Contingency Reserve plan.

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 Requirement R1 to provide additional clarity. Do you agree that the modifications now provide sufficient clarity for an entity to comply with this standard? If not, please explain in the comment area below.
   - [x] Yes
   - [ ] No
   Comments: Refer to the response to Question 5 below.

2. The BARC SDT has assigned Requirement R1 a “medium” VRF. Do you agree with the proposed VRF? If not, please explain in the comment area below.
   - [ ] Yes
   - [x] No
   Comments: Refer to the response to Question 5 below.
3. The BARC SDT has assigned Requirement R1 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: Refer to the response to Question 5 below.

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

☐ Yes
☒ No
Comments: Refer to the response to Question 5 below.

5. 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: The inclusion of the definition for Reserve Sharing Group Reporting ACE is unnecessary and should be removed. Referring to BAL-002-2, the definition does not need to appear in both BAL-002-2 and BAL-013-1.

There will be unintended reliability problems by implementing the Standard as is. It is understood that there is a FERC Directive to make DCS applicable to unexpected loss of load, there has been no highlighted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are typically caused by coincident transmission contingencies. “Knee jerk” adjustments to generation in order to bring the ACE to zero may well lead to further transmission issues. We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE. We would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms, but similar to events greater than MSSC, they should not factor into the compliance evaluation.

6. If you have any other comments on BAL-013-1 that you haven’t already mentioned above, please provide them here:

Comments: