Comment Form

Project 2010-14.1 Balancing Authority Reliability-based Control
BAL-002-2 – Contingency Reserve for Recovery from a 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 Contingency Event. Comments must be submitted using the electronic comment form by 8 p.m. July 3, 2012. If you have questions please contact Darrel Richardson (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 implementing a Contingency Reserve Plan.
You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. The BARC SDT has developed five new terms to be used with this standard.

   **Balancing Contingency Event:**
   Any single event described in subsections (A), (B), or (C) below, or any series of such otherwise single events with each separated from the next by less than one minute.

   **A. Sudden Loss of Generation:**
   a. Due to
      i. unit tripping,
      ii. loss of generator interconnection facilities resulting in isolation of the generator from the Bulk Electric System or from the Responsible Entity’s electric system, or
      iii. sudden unplanned outage of transmission facilities;
   b. And, that causes an unexpected change to the Responsible Entity’s ACE;
   c. Provided, however, that normal, recurring operating characteristics of a unit do not constitute sudden or unanticipated losses and may not be subject to this definition.

   **B. Sudden Loss of Non-Interruptible Import:**
   a. A sudden loss of a non-interruptible import, due to forced outage of transmission equipment, that causes an unexpected change to the Responsible Entity’s ACE.

   **C. Unexpected Failure of Generation to Maintain or Increase:**
   a. Due to
      i. inability to start a unit the Responsible Entity planned to bring online at that time (for reasons other than lack of fuel), or
      ii. internal plant equipment problems that force the generator to be ramped down or taken offline;
   b. And that, even if not an immediate cause of an unexpected change to the Responsible Entity’s ACE, will, in the Responsible Entity’s judgment, leave the Responsible Entity unable to maintain its ACE following the failure unless it deploys contingency reserve.

   **Most Severe Single Contingency (MSSC):**
   The Balancing Contingency Event that would result in the greatest loss (measured in MW) of generation output used by the Balancing Authority, or the greatest loss of activated Direct Control Load Management used by the Balancing Authority, to meet firm system load and non-interruptible export obligation (excluding export obligation for which contingency reserve obligations are being met by the sink Balancing Authority).
Reportable Contingency Event:

Any Balancing Contingency Event greater than or equal to the lesser amount of 80 percent of the Balancing Authority’s Most Severe Single Contingency or 500 MW.

Contingency Event Recovery Period:

A period not exceeding 15 minutes following the start of the Balancing Contingency Event. The start of the Balancing Contingency Event is the point in time where the first change in MW is observed due to the event.

Contingency Reserve Restoration Period:

A period not exceeding 90 minutes following the end of the Contingency Event Recovery Period, during which the Amount of Contingency Reserve deployed to recover from a Balancing Contingency Event is to be restored.

Pre-Reportable Contingency Event ACE Value:

The value of ACE immediately prior to a Reportable Contingency Event when there are no previous Reportable Contingency Events for which the Contingency Event Recovery Period is not yet completed,

or

The value of ACE that the Balancing Authority or Reserve Sharing Group must attain to fully meet its ACE recovery requirement with respect to the immediately previous Reportable Contingency Event for which the Contingency Event Recovery Period is not yet completed.

Do you agree with the proposed definitions in this standard? If not, please explain in the comment area below.

☐ Yes
☒ No

Comments: In order to address the proper treatment of slowly evolving generation losses, the second sentence of the definition of Contingency Event Recovery Period should be revised to read:

“...The start of the Balancing Contingency Event is the point in time where the first change in MW is observed due to the event that occurs within the first minute in which the change in MW output exceeds the size of the applicable Reportable Contingency Event.”

For the Reportable Contingency Event, the 500MW reporting threshold would be a reduction in the DCS threshold for some Balancing Authorities. This could present a double jeopardy situation with the NPCC spinning reserve requirement determination.

2. The proposed Purpose Statement for the draft standard is:
To ensure the Balancing Authority or Reserve Sharing Group utilizes its Contingency Reserve to balance resources and demand and return the Balancing Authority’s or Reserve Sharing Group’s Area Control Error to defined values (subject to applicable limits) following a Reportable Contingency Event.

Do you agree with this purpose statement? If not, please explain in the comment area below.

☐ Yes
☐ No

Comments:

3. The BARC SDT has developed Requirement R1 to determine whether a Balancing Authority (BA) or Reserve Sharing Group (RSG) has implemented its Contingency Reserve plan and determine whether a BA or RSG met ACE recovery equal to the BA’s or RSG’s Most Severe Single Contingency.

R1. Each Balancing Authority or Reserve Sharing Group experiencing a Reportable Contingency Event shall implement its Contingency Reserve plan so that the Balancing Authority or Reserve Sharing Group can demonstrate that, within the Contingency Event Recovery Period:

- The Balancing authority or Reserve Sharing Group returned its ACE to
  - Zero, less the sum of the magnitudes of all subsequent Balancing Contingency Events that occur within the Contingency Event Recovery Period, if its ACE just prior to the Reportable Contingency Event was positive or equal to zero, or
  - Its Pre-Reportable Contingency Event ACE Value, less the sum of the magnitudes of all subsequent Balancing Contingency Events that occur within the Contingency Event Recovery Period, if its ACE just prior to the Reportable Contingency Event was negative.

- Provided, however, that in either of the foregoing cases, if the Reportable Contingency Event (individually or when combined with any previous Balancing Contingency Events that have not completed their Contingency Reserve Restoration Periods) exceeded the Balancing Authority’s or Reserve Sharing Group’s Most Severe Single Contingency (MSSC), then the Balancing Authority or Reserve Sharing Group need only demonstrate ACE recovery of at least equal to its MSSC, less the sum of the magnitudes of all Previous Balancing Contingency Events that have not completed their Contingency Reserve Restoration Periods.

Do you agree with this Requirement? If not, please explain in the comment area below.

☐ Yes
Comments: Requirement R1 has the proper concepts, but the bullets should be rewritten for clarity. Suggested rewording:

- The Balancing Authority or Reserve Sharing Group:
  - If its ACE was positive or equal to zero just prior to the Reportable Contingency Event returned its ACE to zero less the sum of the magnitudes of all subsequent Balancing Contingency Events that occur within the Contingency Event Recovery Period, Or
  - If its ACE was negative just prior to the Reportable Contingency Event returned its ACE to its Pre-Reportable Contingency Value less the sum of the magnitudes of all subsequent Balancing Contingency Events that occur within the Contingency Event Recovery Period.

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

☐ Yes
☐ No

Comments:

5. The BARC SDT has developed a document “BAL-002-2 Contingency Reserve for Recovery from a Balancing Contingency Event Standard Background Document” which provides information behind the development of the standard. Do you agree that this new document provides sufficient clarity as to the development of the standard? If not, please explain in the comment area.

☐ Yes
☐ No

Comments:

6. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement please identify the conflict here.

Comments:

7. Do you have any other comment on BAL-002-2, not expressed in the questions above, for the BARC SDT?

Comments: Violation Severity Levels have not been provided.
The Standard does not address whether load shedding should be used if necessary to be compliant.