Unofficial Comment Form
Project 2010-14.2 Balancing Authority Reliability-based Control
Standard Authorization Request for BAL-005 and BAL-006

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standards Authorization Request (SAR). The electronic comment form must be completed by 8:00 p.m. ET on August 14, 2014.

If you have questions please contact Darrel Richardson via email or by telephone at darrel.richardson@nerc.net or 609-613-1848.

The project page may be accessed by clicking here.

Background Information

This posting is soliciting informal comment.

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). 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as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn.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 BARC 2 PRT recommendations for BAL-005-0.2b and BAL-006-2 were posted for a 45-day comment period from February 21, 2014 through April 7, 2014. There were 23 sets of responses, including comments from approximately 84 different people from approximately 62 companies, representing 8 of the 10 Industry Segments.

The BARC 2 PRT carefully reviewed and considered the comments received during the posting period and, based on stakeholder comments, made revisions to its recommendations. To support implementation of these recommendations, the BARC 2 PRT developed a new SAR intended to supersede the original SAR, which contains outdated information. To further support its recommendations, the BARC 2 PRT developed redlined versions of the standards. Many improvements suggested by stakeholders during the comment period were incorporated into the final recommendations and redlined standards being provided.

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1 The Standards Committee subsequently appointed an eleventh SME to the BARC 2 PRT.
The recommendations of the BARC 2 PRT are in the Periodic Review Templates and SAR. The redlined standards are posted on the project page and will be included as part of the SAR for this project. Additional documents developed to support the team’s recommendations have been posted on the project page, including 1) the BARC 2 PRT’s consideration of comments on the draft recommendation; 2) a list of directives and stakeholder-identified issues associated with the standards; and 3) the IERP recommendations associated with the standards, containing the BARC 2 PRT’s consideration of those recommendations.

This project addresses directives in Paragraphs 406², 415³, 418⁴, 419⁵, 428⁶ and 438⁷ of 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.

² "Given that most of the commenters’ concerns over the inclusion of DSM as part of regulating reserves relate to the technical requirements, the Commission clarifies that to qualify as regulating reserves, these resources must be technically capable of providing the service. In particular, all resources providing regulation must be capable of automatically responding to real-time changes in load on an equivalent basis to the response of generation equipped with automatic generation control. From the examples provided above, the Commission understands that it may be technically possible for DSM to meet equivalent requirements as conventional generators and expects the Reliability Standards development process to provide the qualifications they must meet to participate. These qualifications will be reviewed by the Commission when the revised Reliability Standard is submitted to the Commission for approval."

³ "Both Xcel and FirstEnergy question Requirement R17 but do not oppose the Commission’s proposal to approve this Reliability Standard. Earlier in this Final Rule, we direct the ERO to consider the comments received to the NOPR in its Reliability Standards development process. Thus, the comments of Xcel and FirstEnergy should be addressed by the ERO when this Reliability Standard is revisited as part of the ERO’s Work Plan."

⁴ "The Commission adopts the NOPR proposal to require the ERO to modify the Reliability Standards to include a Measure that provides for a verification process over the minimum required automatic generation control or regulating reserves a balancing authority maintains."

⁵ "FirstEnergy has a number of suggestions to improve the existing Reliability Standard and the ERO is directed to consider those suggestions in its Reliability Standards development process."

⁶ "The Commission directs the ERO to develop a modification to BAL-006-1 that adds Measures concerning the accumulation of large inadvertent imbalances and Levels of Non-Compliance. . . . We are concerned that large imbalances represent dependence by some balancing authorities on their neighbors and are an indication of less than desirable balancing of generation with load. The Commission also notes that the stated purpose of this Reliability Standard is to define a process for monitoring balancing authorities to ensure that, over the long term, balancing authorities do not excessively depend on other balancing authorities in the interconnection for meeting their demand or interchange obligations."

⁷ "Since the ERO indicates that the reliability aspects of this issue will be addressed in a Reliability Standards filing later this year, the Commission asks the ERO, when filing the new Reliability Standard, to explain how the new Reliability Standard satisfies the Commission’s concerns."
This posting is soliciting comment on a Standard Authorization Request (SAR).

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Question

1. Do you have any specific questions or comments relating to the scope of the proposed SAR?

☐ Yes
☐ No

Comments: BAL-006 Requirement R4 was recommended to be retired by the independent Expert Recommendation Report (IERR) as it was only for energy accounting. The Periodic Review Team (PRT) disagreed with the IERR claiming that there was a reliability concern if adjacent BAs did not agree to NSI and NAI in a timely manner. The accounting occurs after the fact. Can the PRT provide examples of what reliability issues the revised requirement would guard against? What would a new “timely basis” be? As long as the agreement between BAs continues to be after the fact, regardless of the “timely basis”, there isn’t a potential reliability issue and agrees with the IERR recommendation in favor of retiring the requirement. The new definition of Inadvertent Interchange will still be covered by the revised requirements R1 and R2 if requirement R4 is retired as per the IERR recommendation.

2. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here.

☐ Yes
☐ No

Comments:

3. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

Comments:
4. If you have any other comments on this SAR that you haven’t already mentioned, please provide them here.

Comments: