Unofficial Comment Form

Project 2010-14.1 Phase 1 of Balancing Authority Reliability-based Controls: Reserves
BAL-002-2

Do not use this form for submitting comments. Use the electronic form to submit comments on the proposed revisions to BAL-002-2 Disturbance Control Performance - Contingency Reserve for Recovery from a Balancing Contingency Event. The electronic form must be submitted by 8 p.m. Eastern, Thursday, August 20, 2015.

Documents and information about this project are available on the project page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or 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.

Based on comments received from industry stakeholders the drafting team made the following modifications to the draft standard:

- Modified Requirement R1 to provide additional clarity.
- Modified Requirement R2 to provide for development of a process for Contingency Reserve to be included in an entity’s Operating Plan.
- Added Requirement R3 to provide for the restoration of Contingency Reserve.
- Modified the rationale supporting Requirements R1 and R2 to provide additional information.
- Added rationale to support Requirement R3.
- Added rationale to support the modifications made to the definition of Contingency Reserve.
- Modified the BAL-002-2 Background Document to provide additional clarity.
Questions

1. Please provide any issues you have on this draft of the BAL-002-2 standard and offer a proposed solution for those issues.

Comments: With the requirements as written, the Responsible Entity should include the Reliability Coordinator. As defined in the NERC Reliability Functional Model Version 5 for the Reliability Coordinator, Balancing operations:

“Balancing operations. The Reliability Coordinator ensures that the generation-demand balance is maintained within its Reliability Coordinator Area, which, in turn, ensures that the Interconnection frequency remains within acceptable limits. The Balancing Authority has the responsibility for generation-demand-interchange balance in the Balancing Authority Area. The Reliability Coordinator may direct a Balancing Authority within its Reliability Coordinator Area to take whatever action is necessary to ensure that this balance does not adversely impact reliability.”

Consider incorporating Requirement R3 into Requirement R1 by adding the following Part 1.4:

1.4 Restore its Contingency Reserve to at least its Most Severe Single Contingency before the end of the Contingency Reserve Restoration Period.

Regarding the wording used to define the Most Severe Single Contingency (MSSC), as it reads now the MSSC is defined as “The Balancing Contingency Event, due to a single contingency as identified and maintained in the system models within the Reserve Sharing Group (RSG) or a Balancing Authority’s area that is not part of a Reserve Sharing Group, that would result in the greatest loss ...”.

The process used to find the MSSC uses system models and does allow the modelling of contingencies. For clarity, suggest revising the wording in the definition. The models themselves neither identify contingencies nor are contingencies “maintained in” them. Suggest eliminating the words “...as identified and maintained in the system models within the Reserve Sharing Group (RSG) or a Balancing Authority’s area that is not part of a Reserve Sharing Group...”or replacing the words “identified and maintained in the system models within” with the following: “identified using system models maintained within...”.

We feel the time requirement to declare an EEA of any level prior to 1.1 being waived is an unnecessary operations burden during the Contingency Event Recovery Period. It could result in an entity being non-compliant because complete recovery is delayed by the time it takes to go through the "declaration" process. We feel the new standard is adding an exposure to non-compliance because of the need for the RC to declare an emergency prior to the waiver of the ACE correction requirement in Part 1.1. Within NPCC there are entities that fill both the RC role that declares the EOP-002-3 Energy Emergency Alert level, and the BA role that BAL-002-2 will apply to.

In addition, the wording in the third bullet of Part 1.3.1 (Part 1.3.1 needs identification in the draft) needs clarification. For example, if your MSSC is a resource loss of 400 MW, this Part’s wording would...
suggest that the depletion of "Contingency Reserve to a level below its Most Severe Single Contingency" would refer to a value of less than 400 MW. You might deplete your reserves by 250 MW and still have 150 MW remaining to meet another contingency after the initial event which may be sufficient and not require a waiver. We suspect that the intention is that all of the MSSC determined value of required reserve is depleted before the waiver is allowed.