



NORTHEAST POWER COORDINATING COUNCIL, INC.  
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782

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### **The Task Force on Coordination of Operation (TFCO) Response to Comments Received in the Open Process Posting of revised Directory#5 Reserve.**

The TFCO would like to thank those who provided comments on the proposed revisions to Directory#5 and the Directory#5 Criteria Cost Effectiveness and Resilience Survey which were posted from April 2, 2019 to May 17, 2019.

The TFCO responses to individual comments are provided below.

#### *Comments from New Brunswick Power:*

##### **Comment 1:**

R1, R2 and R3: There is an implied “or” for these requirements. Suggest using exception sub requirements for clarity.

##### **TFCO Response:**

TFCO agrees that there could be the potential for the misinterpretation of **R1**, **R2** and **R3** as currently written as separate requirements. Combining the contents of these requirements into a single requirement (**R1**) addresses this concern:

**“R1.** Each Balancing Authority shall have **ten-minute reserve** available to it that is at least equal to its first contingency loss. NPCC **ten-minute reserve** meets the requirements for the Contingency Reserve requirements within the NERC standards.

- If a Balancing Authority becomes deficient in **ten-minute reserve** or forecasts a deficiency, it shall restore its **ten-minute reserve** as soon as possible and within the duration specified in the appropriate NERC standard.
- If a Balancing Authority cannot restore its **ten-minute reserve** with the duration specified in the appropriate NERC standard, it shall minimize the magnitude and duration of the **ten-minute reserve** deficiency.”

##### **Comment 2:**

R2: In reviewing BAL-002, the standard does not explicitly allow for a shortage of reserve.

This may be an opportunity to implement an allowance for unplanned shortages.

Draft versions of BAL-002 had allowed for 99.77% or 5 hours per quarter. This may be considered acceptable from a NERC perspective.

**TFCO Response:**

TFCO agrees that the most current version of the standard (BAL-002-3) does not explicitly allow for reserve shortages. However, TFCO does not agree that adding an arbitrary allowance for unplanned shortages would provide a reliability benefit.

**Comment 3:**

R3: R2 at present does not provide a specific reserve recovery time. Consider referencing EEA process when short of reserve.

**TFCO Response:**

TFCO feels that the reference to “appropriate NERC standards” appropriately covers the EEA process in lieu of providing a specific reserve recovery time in the requirements, as EOP-011-1 includes the NERC EEA process.

**Comment 4:**

R4, R5: Similar to R1, R2 and R3 above.

**TFCO Response:**

TFCO agrees that there could be the potential for the misinterpretation of **R4** and **R5** as currently written as separate requirements. Combining the contents of these requirements into a single requirement (**R2**) addresses this concern:

- “R2.** Each Balancing Authority shall have thirty-minute reserve available to it that is at least equal to one-half its second contingency loss.
- A Balancing Authority deficient in thirty-minute reserve for four hours, or forecasting a deficiency of any duration beyond a four-hour horizon, shall eliminate the deficiency if possible (exclusive of shedding load), or minimize the magnitude and duration of the deficiency.”

*Comments from Consolidated Edison:*

**Comment 1:**

The SDT has revised Applicability Section 1.6.2 to remove the language that indicates the Directory is only applicable to facilities that are identified as BPS elements.

The reason for the removal is based on CO-11 guidance that Directory 5 is assumed to apply on a “System Wide” basis.

However the SDT has proposed asset specific changes to the Requirements of the Directory that challenge the “System Wide” assumption.

Specifically R11 and R12 are proposed to become asset-specific and apply to resources.

Resources are defined by NPCC as generators or demand-side resources.

R11 and R12 should be revised as follows:

R11 The Balancing Authority shall specify the following criteria for resources to be eligible to provide synchronized reserve, ten-minute reserve, or thirty-minute reserve:

R11.1. Requirements for metering and testing

R11.2. Requirements for continuously meeting the dispatch instructions

R11.3. Requirements for operating capabilities and response rates

**TFCO Response:**

TFCO agrees with the proposed rewording for **R11, R11.1, R11.2 and R11.3**. While the resources are ultimately responsible for meeting the criteria, the Balancing Authority must specify and ensure that the requirements needed in order to provide synchronized reserve, ten-minute reserve and/or thirty-minute reserve are met.

R12 The Balancing Authority is responsible to ensure that resources allocating inter-Balancing Area reserve do not offer the same reserve to more than one acquiring Balancing Authority for the same scheduling interval.

**TFCO Response:**

TFCO disagrees with the proposed rewording for **R12** and will keep the wording as is in the posted document. TFCO did not intend to make individual resource specific requirements differ, and will therefore change the wording from “A resource allocating ...” to “Resources allocating...” in order to clarify.

Given that the **R11** concerns have been addressed by reverting the requirements back to the Balancing Authority, the concerns regarding the Applicability Section 1.6.2 should no longer need to be addressed.

*Comments from National Grid:*

**Comment 1:**

Section 3. NERC ERO Reliability Standard Requirements: Suggestion to remove the standard version to minimize the need to make future changes for version changes. Example: reference BAL-002 instead of BAL-002-3.

**TFCO Response:**

TFCO agrees and standard versions will be removed from the ERO Standards requirements section.

**Comment 2:**

Section 5 R1: Is it necessary to include, "NPCC ten-minute reserve meets the requirements for Contingency Reserve requirements within the NERC standards?"

If yes, suggestion to reference the specific NERC standards.

**TFCO Response:**

TFCO believes it is essential to ensure that NPCC **ten-minute reserve** is at least equivalent to NERC’s defined Contingency Reserve. From a compliance perspective, it is believed to be important to ensure that there is no doubt that NPCC’s **ten-minute reserve** does so. In addition, references to specific NERC standards are included in the Reference section of Directory 5.

**Comment 3:**

Section 5 R2: Suggestion to be specific regarding the "appropriate NERC standard."  
Suggestion to list the standard.

**TFCO Response:**

TFCO disagrees and rejects over-specificity of the requirements in order to minimize the need to make future changes, should NERC develop additional standards that are appropriate.

In addition, TFCO noted that Section 5.5.2, "Restoration of Synchronized Reserve Available Within Ten Minutes" of the currently effective Directory was inadvertently omitted in the reformatted version and rewords a new **R5** as follows:

**"R5. If a Balancing Authority becomes deficient in *synchronized reserve* available within ten minutes, it shall restore its *synchronized reserve* available within ten minutes in accordance with **R1** for the restoration of *ten-minute reserve*."**

**Comment 4:**

Section 5 R11 and R12. The requirements should be specific regarding applicability.

Example: "A Balancing Authority shall..."

**TFCO Response:**

TFCO agrees. Please see the response to Consolidated Edison comment #1 (above).

**Responses to Directory#5 Criteria Cost Effectiveness and Resilience Survey:**

*Ontario Power Generation Response:*

**Question #1:**

*Do you agree that the Directory #5 reliability criteria are important to enhancing NPCC's BPS reliability and system resilience?*

Yes.

**Question #2:**

*Are there any cost effective alternatives to achieving a similar or greater level of NPCC BPS reliability, system resilience and performance than provided by the criteria as described in the table?*

OPG agrees with Directory #5 applicability on a system-wide bases as opposed to element basis and suggest the following:

**1.6.2 Applicability of NPCC Criteria**

“Requirements to abide by an NPCC Directory may **also** reside in external tariff requirements, bilateral contracts and other agreements between facility owners and/or operators, and their assigned Reliability Coordinator, Planning Coordinator, Transmission Operator, Balancing Authority and/or Transmission Owner as applicable and may be enforceable through those external tariff requirements, bilateral contracts and other agreements. NPCC will not enforce compliance to the NPCC Directory requirements in this document on any entity that is not an NPCC Full Member.”

The word “also” implies in addition to BPS identified elements list, in accordance with NPCC Document A10 “Classification of Bulk Power System Elements”; this reference has just been removed and therefore the word “also” should be removed.

**TFCO Response:**

TFCO disagrees with modifying the Applicability of NPCC Criteria in Section 1.6.2 as the changes are non-substantive and that the language is boilerplate from the NPCC Directory Development and Revision Manual, Section III, “Applicability of NPCC Criteria.” In addition, the group feels that numerous opportunities were available to submit changes during the TFCP/CP-11 comprehensive review of the NPCC Classification of BPS Elements (Document A-10) review effort in 2017 and 2018.

Requirement R11 has now shifted to resource compliance obligation to abide by Balancing Authority requirements. Should any reference be made regarding the compliance obligations that are triggering Balancing Authority requirements R11.1, 11.2, & 11.3?

**TFCO Response:**

TFCO agrees. Please see the response to Consolidated Edison comment #1 (above).