

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Regional Reliability Standard BAL-002-WECC-2—Contingency Reserve)

Docket No. RM13-13-000

**JOINT COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION AND
WESTERN ELECTRICITY COORDINATING COUNCIL
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

The North American Electric Reliability Corporation (“NERC”)¹ and the Western Electricity Coordinating Council (“WECC”) hereby provide these comments in response to the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) July 18, 2013, Notice of Proposed Rulemaking (“NOPR”)² proposing to approve regional Reliability Standard BAL-002-WECC-2 (Contingency Reserve).

I. Background

On April 12, 2013, NERC and WECC submitted a petition for approval of proposed regional Reliability Standard BAL-002-WECC-2 and the associated violation risk factors and violation severity levels, effective date, and implementation plan. Proposed WECC regional Reliability Standard BAL-002-WECC-2 includes a new methodology for calculating minimum contingency reserve based on the greater of the most severe single contingency or the sum of three percent of load plus three percent of net generation.

On July 18, 2013, the Commission issued a NOPR proposing to approve proposed regional Reliability Standard BAL-002-WECC-2 and proposing to direct NERC, in consultation

¹ The Federal Energy Regulatory Commission certified NERC as the electric reliability organization (“ERO”) in its order issued on July 20, 2006, in Docket No. RR06-1-000. *North American Electric Reliability Corporation*, 116 FERC ¶ 61,062 (2006).

² *Regional Reliability Standard BAL-002-WECC-2—Contingency Reserve*, 144 FERC ¶ 61,048 (2013).

with WECC, to submit an informational filing following implementation of the proposed regional Reliability Standard that addresses the adequacy of contingency reserve in the Western Interconnection.³

II. Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:⁴

Charles A. Berardesco*
Senior Vice President and General Counsel
Holly A. Hawkins*
Assistant General Counsel
Stacey Tyrewala*
Senior Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@nerc.net

Mark G. Lauby*
Vice President and Director of Standards
Howard Gugel*
Director of Standards Development
North American Electric Reliability
Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595 – facsimile
mark.lauby@nerc.net
howard.gugel@nerc.net

Sandy Mooy*
Associate General Counsel
Chris Albrecht*
Legal Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 582-0353
calbrecht@wecc.biz
smooy@wecc.biz

III. Comments

NERC and WECC support the Commission's proposal in the NOPR to approve the WECC regional Reliability Standard BAL-002-WECC-2 as submitted. NERC and WECC will

³ NOPR at PP 26, 30.

⁴ Persons to be included on the Commission's service list are identified by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission's regulations, 18 C.F.R. § 385.203 (2013), to allow the inclusion of more than two persons on the service list in this proceeding.

continue to assess the minimum contingency reserve levels in the Western Interconnection following implementation of the new methodology.

The Commission proposes in the NOPR to direct NERC to submit an informational filing assessing whether the new methodology for calculating minimum contingency reserve levels has had an adverse impact on reliability in the Western Interconnection, including the data used to make this assessment.⁵ NERC commits to submitting such an informational filing in order to clarify on the record the effect of the proposed regional Reliability Standard on reliability in the Western Interconnection. NERC also commits to including the data and any other information deemed relevant that NERC and WECC use to assess the sufficiency of the minimum contingency reserve levels, noting that such data may be provided as confidential or privileged information pursuant to 18 C.F.R. § 388.112 (2013). The provision of this information should allow for an appropriate assessment of the impact of the new methodology for calculating minimum contingency reserve levels. For these reasons, NERC and WECC support the Commission's proposal to approve the WECC regional Reliability Standard BAL-002-WECC-2 as submitted.

⁵ NOPR at P 30.

IV. Conclusion

For the reasons set forth above, NERC and WECC respectfully request that the Commission issue an order consistent with the comments herein.

Respectfully submitted,

/s/ Stacey Tyrewala

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Assistant General Counsel
Stacey Tyrewala
Senior Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099 – facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

Sandy Mooy*
Associate General Counsel
Chris Albrecht*
Legal Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 582-0353
calbrecht@wecc.biz
smooy@wecc.biz

*Counsel for the Western Electricity
Coordinating Council*

Date: September 23, 2013