Unofficial Comment Form

Project 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the proposed revisions to **BAL-005-1 – Balancing Authority Control, BAL-006-3 – Inadvertent Interchange, FAC-001-3 – Facility Interconnection Requirements**. The electronic form must be submitted **by 8 p.m. Eastern, Monday, September 14, 2015m. E
astern, Thursday, August 20, 2015.**

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-20101421-Phase-2--Balancing-Authority-Reliabilitybased-Controls--BAL0051-and-BAL006.aspx). If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

## Background Information

This posting is soliciting formal comments on the draft standards BAL-005-1 Balancing Authority Control, BAL-006-3 Inadvertent Interchange and FAC-001-3 Facility Interconnection Requirements.

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).[[1]](#footnote-1) 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as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn.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 recommendations of the BARC 2 PRT are in the Periodic Review Templates and SAR.

The Standards Committee approved a revised SAR to be posted for a 30-day comment period on June 10, 2014. The SAR was posted for comment from July 16, 2014 through August 14, 2014. The BARC Phase 2.1 standard drafting team (BARC 2.1 SDT) reviewed the comments received from the SAR posting and has developed revisions to BAL-005-0.2b, BAL-006-2 and FAC-001-2 standards. The BARC 2.1 SDT has completely re-written the BAL-005 standard, moved one requirement from the current BAL-005 standard into the proposed FAC-001-3 standard and moved one requirement from the current BAL-006 standard into the proposed BAL-005-1 standard. The balance of the requirements in the BAL-006-3 standard will be reviewed for revision and posted at a later date.

This project addresses directives from 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.

This posting is soliciting comment on three standards; 1) BAL-005-1 Balancing Authority Control; 2) BAL-006-3 Inadvertent Interchange; and 3) FAC-001-3 Facility Interconnection Re1quirements.

## Questions

1. The SDT has modified the definition of Automatic Generation Control (AGC). Do you agree that this modified definition better represents the SDT intent to making resources more inclusive than just the traditional generation resources?If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has moved the BAL-005-0.2b Requirement R1 to FAC-001 since it provides for identifying interconnection Facilities and not for calculating Reporting ACE. Do you agree with moving this requirement into the FAC-001-3 standard?If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has moved the BAL-006-2 Requirement R3 into BAL-005-3 since this requirement directly impacts an entity’s ability to calculate an accurate Reporting ACE. Do you agree with moving this requirement into the proposed BAL-005-1 standard?If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any issues you have on this draft of the BAL-005-1 standard and a proposed solution.

Comments:

1. Please provide any issues you have on the proposed change to the BAL-006-3 standard and a proposed solution.

Comments:

1. Please provide any issues you have on the proposed change to the FAC-001-3 standard and a proposed solution.

Comments:

1. The Standards Committee subsequently appointed an eleventh SME to the BARC 2 PRT. [↑](#footnote-ref-1)