



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

July 31, 2007

Via Electronic Mail and Overnight Delivery

Gerard Adamski
Director of Standards
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, New Jersey 08540-5721

Re: Portland General Electric Company
Request for Interpretation of NERC Standard BAL-005-0 R.17

Dear Mr. Adamski:

Portland General Electric Company (PGE) is seeking interpretation of Requirement 17 of North American Electric Reliability Corporation (NERC) Reliability Standard BAL-005-0. This requirement is applicable to PGE in its registered role as a Balancing Authority by FERC Order No. 693.¹ PGE is submitting this request for interpretation under the guidelines set out in “Interpretations of Standards” under the “Special Procedures” section of Version 6.1 of NERC’s Reliability Standards Development Procedure.

Requirement 17 of BAL-005-0 reads as follows:

R17. Each Balancing Authority shall at least annually check and calibrate its time error and frequency devices against a common reference. The Balancing Authority shall adhere to the minimum values for measuring devices as listed below:

Device	Accuracy
Digital frequency transducer	≤ 0.001 Hz
MW, MVAR, and voltage transducer	≤ 0.25 % of full scale
Remote terminal unit	≤ 0.25 % of full scale
Potential transformer	≤ 0.30 % of full scale
Current transformer	≤ 0.50 % of full scale

¹ Mandatory Reliability Standards for the Bulk-Power System, 118 FERC ¶ 61,218, Issued March 16, 2007.



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PGE has reviewed the Request for Clarification of this requirement received by NERC on December 21, 2006. PGE has also reviewed the new version of the Standard, BAL-005-1, which includes the clarification proposed by NERC's Resources Subcommittee and approved by the Board of Trustees on May 2, 2007.² This clarification addresses the first sentence of the Requirement, and explains that the phrase "annually check and calibrate" applies only to devices within the operations control room. However, PGE believes that this clarification still leaves several areas of ambiguity regarding this standard, specifically:

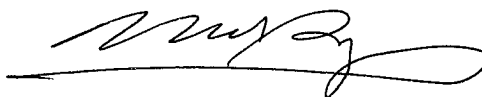
Which equipment is included in the phrase "measuring devices as listed below", in particular, does this phrase apply:

- (a) only to equipment within the operations control room?
- (b) only to equipment that provides values used to calculate AGC ACE?
- (c) only to equipment that provides values to PGE's SCADA system?
- (d) only to the equipment owned or operated by the BA?
- (e) only to new or replacement equipment?
- (f) to all such equipment that a BA owns or operates?

PGE's understanding is that this standard is intended to apply to the BA's new or replacement equipment which provides values used to calculate AGC ACE. Applying this standard more widely – for example, applying it to existing equipment – could cause PGE and other utilities within the region to spend significant amounts of money with little or no actual improvement to system reliability.

Thank you for the opportunity to seek clarification through NERC's interpretation process. If you have any questions regarding this request for interpretation, please do not hesitate to contact me.

Sincerely,



Mike Ryan
Manager, Control Area and Scheduling Operations
Portland General Electric Co.
(503) 464-8793
mike.ryan@pgn.com

² Information on Board of Trustees activity is taken from Draft Minutes of the May 2, 2007, Board of Trustees Meeting, posted on NERC's website.