Consideration of Comments

Project Name: 2010-14.2.2 Phase 2 of Balancing Authority Reliability-based Controls | BAL-004-0

Comment Period Start Date: 9/24/2015

Comment Period End Date: 11/12/2015

Associated Ballot: 2010-14.2.2 Phase 2 of Balancing Authority Reliability-based Controls BAL-004-0 IN 1 ST

There were 17 responses, including comments from approximately 77 different people from approximately 53 different companies representing 8 of the 10 Industry Segments as shown on the following pages.

All comments submitted can be reviewed in their original format on the project page.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, Howard Gugel (via email) or at (404) 446-9693.

Questions

1. **Based on comments received from the SAR posting and the BAL-004-0 Survey posting, the SDT is recommending that BAL-004-0 be retired and WEQ Manual Time Error Correction Business Practice Standard – WEQ-006, should also be retired contemporaneously with BAL-004-0. Do you agree that the BAL-004-0 – Time Error Correction standard should be retired? If not, please explain.**

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

1. Based on comments received from the SAR posting and the BAL-004-0 Survey posting, the SDT is recommending that BAL-004-0 be retired and WEQ Manual Time Error Correction Business Practice Standard – WEQ-006, should also be retired contemporaneously with BAL-004-0. Do you agree that the BAL-004-0 – Time Error Correction standard should be retired? If not, please explain.

John Fontenot - Bryan Texas Utilities - 1 - **Selected Answer:** Yes
Thomas Lyons - Owensboro Municipal Utilities - 3 - **Selected Answer:** Yes
Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO **Selected Answer:** Yes

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC

Group Name: Seattle City Light Ballot Body

Group Member Name	Entity	Region	Segments
Pawel Krupa	Seattle City Light	WECC	1
Dana Wheelock	Seattle City Light	WECC	3
Hao Li	Seattle City Light	WECC	4
Bud (Charles) Freeman	Seattle City Light	WECC	6
Mike haynes	Seattle City Light	WECC	5
Michael Watkins	Seattle City Light	WECC	1,3,4
Faz Kasraie	Seattle City Light	WECC	5
John Clark	Seattle City Light	WECC	6

Selected Answer:	Yes
Answer Comment:	That said, Seattle City Light would like to reiterate that we still feel Standard BAL-004-WECC-02, Automatic Time Error Correction,is a good standard to have. This standard is very effective in automatically correcting time errors, supporting system frequency and reducing primary and secondary inadvertent accumulations. It is our opinion, automatic time error correction programs similar to WECC could help in reliable operations of other Interconnections. Thank you for your affirmative response. This NERC effort for retirement of BAL-004-0 does not change the status of the BAL-004-WECC-02 standard.
Response:	

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:	Yes

Jennifer Losacco - NextEra Energy - Florida Power and Light Co. - 1 - FRCC

Selected Answer:	Yes

Anthony Jablonski - ReliabilityFirst - 10 -

Selected Answer:	Yes
Answer Comment:	**ReliabilityFirst agrees that the practice of using manual TEC to place the Interconnection closer to the settings for automatic underfrequency load shedding does not support or enhance reliability. Therefore, RF believes the BAL-004-0 should be retired as long as sufficient advance notice of retiring the standard and adoption of specific business practices by applicable entities is adopted which will help eliminate any potential adverse unintended consequences.** Thank you for your affirmative response. The Interconnections are continuously monitored by the RCs to assure reliability is maintained at all times. The SDT will recommend that the RCs report to NERC any unintended consequences associated with the retirement of this Standard, allowing for such conditions to be addressed.
Response:	

Terry BIlke - Midcontinent ISO, Inc. - 2 -

Selected Answer:	No
Answer Comment:	While we agree that TECs are primarily a commercial service and that the process should be converted to a procedure in the NERC Operating Manual or a NAESB business practice, we should not stop the implementation of TECs. NIST has demonstrated that there are equipment and processes that use grid frequency as a time reference. While the reliability impact of TECs is miniscule, there are simple things that can be done to reduce the magnitude and impact of TECs. Europe uses clock-day TECs with a 0.01Hz offset and a 30 second window. NERC used to have a unilateral payback process that not only helped manage Inadvertent Interchange, it also reduced the magnitude of Time Error. NERC could keep a simple requirement that sets the maximum offset for TECs and the process could be managed in a procedure similar to the Time Monitoring Procedure in the NERC Operating Manual. See the attached slides for additional information.

Thank you for your comment. The SDT has reviewed your presentation and believes that the White Paper developed by the SDT addresses your issues. The Interconnections are continuously monitored by the RCs to assure reliability is maintained at all times. The SDT will recommend that the RCs report to NERC any unintended consequences associated with the retirement of this Standard, allowing for such conditions to be addressed.

Response:

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6

Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Shannon Weaver	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Brad Perrett	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: No

Answer Comment: *While, fundamentally, we agree that TECs do not rise to the level of Reliability Standard, it doesn't appear that the SDT has done any coordination with NAESB to retire BAL-004 at the same time as the NAESB companion business*

practice, as outlined in the implementation plan. It is our belief that TECs should be relegated to a procedure in the NERC Operating Manual. We are also concerned that the SDT offers no reversion plan, should time drift excessively and NERC is asked to take action. We would be in favor of the SDT presenting an alternative to a Standard for TEC, and, until such alternatives are presented, will be voting no.

Thank you for your comment. The SDT has been in discussions with NAESB concerning their standard. The SDT will be submitting a request to NAESB to retire their WEQ-006 standard.

The Interconnections are continuously monitored by the RCs to assure reliability is maintained at all times. The SDT will recommend that the RCs report to NERC any unintended consequences associated with the retirement of this Standard, allowing for such conditions to be addressed.

Response:

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments

Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Yes

Answer Comment: Duke Energy is in agreement with the retirement of the Time Error Correction standard, BAL-004-0.
Thank you for your affirmative response and clarifying comment.

Response:

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:	Yes
Answer Comment:	While BPA supports the retirement of BAL-004-0, BPA recommends that industry retains the ability for Manual Time Error Corrections to be made outside of a Reliability Standard. Thank you. Thank you for your affirmative response and clarifying comment. The Interconnections are continuously monitored by the RCs to assure reliability is maintained at all times. The SDT will recommend that the RCs report to NERC any unintended consequences associated with the retirement of this Standard, allowing for such conditions to be addressed.
Response:	

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Ron Gunderson	Nebraska Public Power District	MRO	1,3,5

Selected Answer: Yes

Answer Comment: We agree that BAL-004-0 should be retired and the retirement of this particular standard has no reliability impact on the BES.
Thank you for your affirmative response and clarifying comment.

Response:

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
John Shaver	Arizona Electric Power Cooperative, Inc.	WECC	4,5
John Shaver	Southwest Transmission Cooperative, Inc.	WECC	1

Selected Answer: Yes

Answer Comment: 1) We would like to commend the drafting team in its efforts to strengthen its case for the retirement of the Time Error Correction standard. The addition of two new appendices to its white paper provides essential background on time error corrections and alternative methods that registered entities can use to achieve similar results.

Thank you for your comment.

2) While we continue to support the retirement of this standard, as we feel it puts an undue risk on the reliability of the BES, we have concerns regarding the direction taken by the SDT as part of this process. The implementation plan states the retirement of this standard is dependent on the retirement of NAESB standard WEQ-006. While we agree this is necessary, the limited coordination with NAESB we have observed will only delay these efforts. We believe a letter of support from NAESB should be included in the white paper to demonstrate joint collaboration from all aspects of industry and strengthen your conclusions.

Due to processes used by NERC and NAESB, the SDT did not request NAESB to participate in the development of the White Paper. The SDT has contacted NAESB during development and will now submit to NAESB a request to retire the NAESB WEQ-006 business practice. NERC's filing at FERC will highlight that BAL-004-0 retirement is contingent on retirement of NAESB WEQ-006.

3) We also feel the SDT should identify, within the implementation plan, revising the NERC Operating Manual as a listed prerequisite for the retirement of this standard. We feel specific initiation and monitoring criteria listed within the retired standards should be moved to the time error correction section within the Manual. We also recommend the addition of the alternative methods provided within the white paper to complement this revision.

The SDT does not believe that it is within our purview to modify the NERC Operating Manual. The SDT will recommend to the NERC OC that they review the time monitoring reference section of the Operating Manual to determine if any modifications are necessary.

Response:

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7 - NPCC

Group Name: RSC

Group Member Name	Entity	Region	Segments
Paul Malozewski	Hydro One.	NPCC	1
Guy Zito	Northeast Power Coordinating Council	NPCC	NA - Not Applicable
Michael Forte	Con Edison	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Rob Vance	New Brunswick Power	NPCC	1
Robert J. Pellegrini	United Illuminating	NPCC	1
Sylvain Clermont	Hydro Quebec	NPCC	1
Edward Bedder	Orange and Rockland Utilities	NPCC	1
Mark J. Kenny	Eversource Energy	NPCC	1

Gregory A. Campoli	NY-ISO	NPCC	2
Si Truc Phan	Hydro Quebec	NPCC	2
Randy MacDonald	New Brunswick Power	NPCC	2
Kelly Dash	Con Edison	NPCC	3
Michael Jones	National Grid	NPCC	3
David Burke	Orange and Rockland Utilities	NPCC	3
Peter Yost	Con Edison	NPCC	4
Wayne Sipperly	New York Power Authority	NPCC	4
Connie Lowe	Dominion Resources Services	NPCC	4
David Ramkalawan	Ontario Power Generation	NPCC	4
Glen Smith	Entergy Services	NPCC	4
Brian O'Boyle	Con Edison	NPCC	5
Brian Robinson	Utility Services	NPCC	5
Bruce Metruck	New York Power Authority	NPCC	6
Alan Adamson	New York State Reliability Council	NPCC	7
Kathleen M. Goodman	ISO-New England	NPCC	2
Helen Lainis	Independent Electricity System Operator	NPCC	2

Silvia Parada Mitchell	NextEra Energy	NPCC	4

Selected Answer: Yes

Answer Comment: We support the SDT's recommendation to retire BAL-004-0 Time Error Correction standard.
Thank you for your affirmative response and clarifying comment.

Response:

End of report