Unofficial Comment Form

Project 2010-14.2.1 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 draft standards **BAL-005-1 – Balancing Authority Control** and **FAC-001-3 – Facility Interconnection Requirements**, and the recommended retirement of **BAL-006-2 – Inadvertent Interchange**. The electronic form must be submitted by **8 p.m. Eastern, Monday, January 11, 2016.
m. Eastern, 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

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as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn.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 that was posted for a 30-day comment period 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 developed revisions to BAL-005-0.2b, BAL-006-2 and FAC-001-2 standards. The standard were posted for a 45-day comment period and initial ballot from July 30, 2015 through September 14, 2015. The BARC 2.1 SDT also issued a survey to the industry to gather additional information concerning the disposition of the remaining requirements in BAL-006-2. Based on industry comments the BARC 2.1 SDT is proposing additional modifications to the definition of Automatic Generation Control (AGC) and Pseudo Tie, as well as additional modifications to BAL-005 and FAC-001 and retirement of the remaining requirements of BAL-006. With the retirement of the BAL-006 standard the BARC 2.1 SDT is also proposing to develop a Inadvertent Interchange Guideline.

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.

## Questions

1. The BARC 2.1 SDT has modified the definition of AGC and Pseudo Tie. Do you agree that the proposed modifications provide sufficient clarity?If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. If you are not in support of the proposed modifications to BAL-005-1, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

1. If you are not in support of the retirement of BAL-006-2 and the development of a guideline, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

1. If you are not in support of the proposed modifications to FAC-001-3, please provide your objection(s) and proposed solution(s) in the area below.

Comments:

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