

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Please use this form to submit comments on the of BAL-004-1, Time Error Correction Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “BAL-004-1” in the subject line. If you have questions please contact Barbara Bogenrief at [barbara.bogenrief@nerc.net](mailto:barbara.bogenrief@nerc.net) or 609-452-8060.

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           **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities



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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

We believe the timing of time error corrections is reliability-related, however we question whether we need to do time error corrections, which can put the system at risk, at all. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Include the difference listed in the SAR, the administration of any automatic time error correction should be considered and perhaps implemented by the MISO as the "Enhanced Scheduling Agent". Comments

6. Do you have any other comments on the proposed SAR?

Yes

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No

If a NAESB Standard is going to be referenced then the material referenced ought to be included in the SAR. Not everyone has access to the NAESB site. Will the time keeper's system run the automatic time error correction system and initiate the time error correction, or will each BA have a way to initiate an automatic time error correction through the time keeper? Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jim Cyrulewski	
Organization:	ITCTransmission	
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services, Inc.	
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E-mail:	edavis@entergy.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Overall we agree with the intent of the SAR. The following are comments and suggestion for enhancing the scope of work. The following numbers are references to the numbers in the Brief Description section of the SAR.

In item (3) please identify which NAESB BP standard Manual TE Correction, by exact and complete title reference, is going to be included in this NERC standard. We ask this because there is a new NAESB Time Error Correction standard being developed that does not include ERCOT.

In item (3) there is the intent to include the NAESB Time Error Correction standard in this NERC standard. Does (3) mean NAESB is going delete significant portions of their Time Error Correction Standard? The question of NERC/NAESB coordination for these Time Error Correction standards is explored further in Question 6 below.

In item (3) there is the statement that the methodology to implement time error correction is to off-set frequency. Today, there are two methods for manual time error corrections: 1) frequency offset, 2) schedule offset. Are the authors proposing to eliminate "schedule offset"? If not, please so state. We are against eliminating schedule offset.

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Item (4) contains the statement that the scope will include the addition of automatic time error correction requirements and measures. We assume this general statement means the authors wish this standard to include Automatic Time Error Correction to all the Interconnections. Speaking as a member of the Eastern Interconnection, we suggest one can not add automatic time error correction to the Eastern Interconnection when an appropriate and approved methodology does not exist for automatic time error correction for the Eastern Interconnection? Does the author really mean to develop a methodology and process that would then be applicable to the EI, or to apply an existing method to the EI? Please be specific about the scope of work and the intent of this Item.

Item (5) (add manual time error correction requirements and measures) sounds very similar to item (3) (add NAESB v0 manual time error correction standard). What is the real purpose of (3) and (5)? Is the requestor proposing to add (3) and then modify the NAESB manual time error correction BPs in (5)? Should (3) and (5) be combined? This also impacts the NERC/NAESB coordination issue.

We assume the authors know the three terms they wish to add to the NERC Glossary as stated in Item (6). What are the three terms to be added to the glossary? Please identify them in this SAR.

Item (7) indicates there is a need to include a Regional Difference to not initiate a manual time error correction for the Eastern Interconnection during certain hours. The NAESB standard already includes that requirement so there is no need to include an EI Regional Difference. Please delete this EI Regional Difference identified in all places of the SAR.

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

In general we agree with this philosophy. However, we are not sure what this statement means in the context of this SAR. Please see our response to Question 6.

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

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The Western Interconnection has an automatic time error correction while the Eastern Interconnection does not. One of the Interconnections should need a regional difference.

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

We agree that there are reliability concerns with the Time Error Correction process. We have several concerns with some of the details of this SAR including: existing and future coordination with NAESB standards, the scope of work contained in the SAR, and the assumption that there is an Automatic Time Error Correction process applicable to the Eastern Interconnection.

The authors state they intend to include the NAESB WEQBPS-004 standard into this NERC standard. A continuing concern of the industry is how NERC and NAESB will coordinate changes to standards. In this case, it is not clear how that NERC/NAESB coordination for these two Time Error Correction standards is expected to occur. Will NAESB delete all of the requirements in its WEQBPS-004, except the definitions of on-peak and off-peak hours? Will the NAESB and NERC standards, at least initially, contain the same requirements? Will there be a coordination development requirement be placed on the NERC and NAESB standards for all future changes to either the NERC or NAESB Time Error Correction standards?

In this particular case FERC jurisdictional utilities are required by FERC in Order 676 to comply with NAESB business practice standard WEQBPS-004. Therefore coordination, modification, and compliance with two uncoordinated, mandatory sets of standards will cause havoc in the industry.

In this particular case FERC jurisdictional utilities are required by FERC in Order 676 to comply with NAESB business practice standard WEQBPS-004. Therefore, NAESB can not just delete WEQBPS-004. NAESB must petition FERC to somehow unapprove WEQBPS-004.

Until FERC unapproves WEQBPS-004 the industry will have ongoing issues concerning the coordination, modification, and compliance with two possibly uncoordinated and mandatory sets of standards concerning the same process.

The scope of work has been discussed in the response to Question 3 above.

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The development of an Automatic Time Error Correction process applicable to the Eastern Interconnection is not discussed in this SAR. Therefore, we must assume that the author intends to apply the Western Interconnection Automatic Time Error Correction process to the Eastern Interconnection without discussion, review or modification. We disagree with that approach. We strongly suggest that the process applicable to the Eastern Interconnection be fully developed and vetted by the Eastern Interconnection participants.

Comments

RE SRC - IRC Comments on NERC BAL-004-1 Time Error Correction  
MessageFrom: Terry Bilke [TBilke@midwestiso.org]  
Posted At: Friday, June 30, 2006 1:16 PM  
Conversation: SRC - IRC Comments on NERC BAL-004-1 Time Error Correction  
Posted To: Standards

Subject: RE: SRC - IRC Comments on NERC BAL-004-1 Time Error Correction

The intent of the TEC and Inadvertent Interchange SARs (as well as the "ACE special cases") was to bring at least portions of what was in Policy 1 back, such that future development of these standards (i.e. automatic time error correction) would be done jointly by NERC and NAESB to produce a single document that guides the process. Technically speaking, only FERC-jurisdictional BAs need to participate in TEC or pay back inadvertent. NAESB can also change the standard, which would require changes to the tools developed and paid for by the NERC community.

The SRC actually pushed back on these standards going to NAESB, and if memory serves, NAESB agreed to bring them back to a joint process. The NERC RS is not asking for two standards. It proposing retention of what existed prior to parsing this out and ensuring future changes in inadvertent interchange payback/reporting and TEC be done jointly to produce a single reference for operators that applies to all BAs, not just those that are under FERC jurisdiction.

Thanks,

Terry

---

From: dicapram@pj.m.com [mailto:dicapram@pj.m.com]  
Sent: Thursday, June 29, 2006 12:30 PM  
To: cyeung@spp.org; sarcomm@nerc.com  
Cc: anita.lee@aeso.ca; ben@benli.ca; Terry Bilke; rdelillo@nyiso.com; cmonroe@spp.org; cmendrala@iso-ne.com; don.tench@ieso.ca; Ed Skiba; GCampoli@nyiso.com; jnorden@iso-ne.com; jdumas@ercot.com; jsimonelli@iso-ne.com; kgoodman@iso-ne.com; khaqan.khan@ieso.ca; mbabula@iso-ne.com; mcalimano@nyiso.com; mycon@sympati.co.ca; ntraweek@caiso.com; pbrandien@iso-ne.com; William Phillips; pshafeei@nyiso.com; Robert Rhodes; rodri go.navi a@aeso.ca; ron.falsetti@ieso.ca; bowet@pj.mexch01.pj.m.com; Gregory A. Troxell; willsojd@pj.mexch01.pj.m.com  
Subject: SRC - IRC Comments on NERC BAL-004-1 Time Error Correction

Time Error Correction has been a part of the Industry's Control practices for a long time. This SAR states that TEC's are critical to reliability because:

- a.. The Scheduled Frequency term is part of the ACE equation
  - b.. TEC's force BAs to 'promptly' pay back their frequency deviations (sic)
- I would ask the SRC to challenge the SAR Requestor (NERC's Resources Subcommittee) to define what reliability concerns they have, and not the justification they put forth. How can the Subcommittee justify this SAR when it is common knowledge that a leading cause of risk during load pickup periods is the use of TECs for Fast Time.

RE SRC - IRC Comments on NERC BAL-004-1 Time Error Correction

I would like to see the SRC ask the Subcommittee to identify what reliability issue is solved by TECs. Certainly time error shows that the frequency was off schedule. Certainly time error shows that some BA is not operating close to zero ACE. If the issue is line loading then why not rely on the SOL/IROL standards to deal with that issue? TECs will not stop parallel flows. TECs may indeed exacerbate parallel flows.

If the issue is frequency deviation, why not rely on BAL 007-011 to deal with that? I would challenge the Subcommittee to identify the issue they want solved.

All of the IRC members comply with TEC procedures, so this is not a matter of whether the IRC will meet this standard. My concern is that if the Industry allows a series of important but not critical reliability standards, then what justification will we have when other 'important' standards are proposed that we can't and shouldn't comply with?

The JIC correctly placed this standard and standards BAL005 and BAL006 in the domain of NAESB. Why do we need two identical standards? I would contend that these errors (Time Error / Inadvertent Interchange) are market issues not reliability issues. Indeed Time Error and Inadvertent Interchange are directly related to one another why do we need both standards? (The answer one would posit is that Frequency does not get accumulated in on and off peak buckets. But then the only reason we keep on and off peak Inadvertent is because of the cost differences between on and off peak!!!!)

To keep on track with a goal of forcing NERC standards to stay within the statutory limits posed by Congress, the SRC should strongly consider remanding this SAR and SAR 006 back for more justification.

Just a thought.

AI

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
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Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	Registered Ballot Body Segment	
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

We are unable to find enough justification for the reliability-related need in the proposed SAR. We would appreciate that the requestor further elaborates on what reliability issue is addressed with the use of automatic Time Error Correction. For example, time error indicates that the frequency was off schedule, and it certainly shows that some BA is not operating close to zero ACE. But what is the root cause of the time error that this standard seeks to correct? If the problem causing time error is line loading then why not rely on the SOL/IROL standards to deal with that issue? Time Error Corrections themselves will not stop parallel flows. And in fact Time Error Corrections may instead exacerbate parallel flows. Also, it's not obvious that the need is not already met by other approach such as today's operating practice.  
Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

It's is not obvious to us what the three new terms are, hence we're unable to agree with the scope. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

(i) BAL-004 and the current time error correction practice have been in place for years without any major issues. Revising this standard to incorporate automatic time error while the industry is putting in very intensive effort to revise critical standards to meet statutory requirements appears to be unnecessary and will stretch the already scarce resource thinner. We recommend this revision be deferred in favor of putting scarce resource to revising the needed ones.

(ii) There is no mention of the tool and cost to facilitate automatic time error correction. If the proposed approach is viewed as "nice to have" as opposed to necessary (a requirement that the existing practice already meets), the industry needs to know the extra tool requirements and associate cost to decide if the need is justified. While SAR may not be a suitable place to discuss tool requirements and cost, they need to be communicated to the industry somehow. Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

ISO-NE believes that this should not be a reliability standard. Time error correction has become less important over the years with the advent of atomic clocks which don't rely on "zero crossings" frequency dependency. Time error correction does not promote reliability but improper implementation of it can potentially degrade reliability. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

While WECC has successfully implemented automatic time error via primary inadvertent payback, one should not conclude necessarily that the Eastern Interconnection puts the same priority on reducing time error correction and managing inadvertent. An Eastern Interconnection consensus on whether the costs associated with implementation are worth the perceived benefit needs to be further

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reviewed but at this time ISO-NE strongly believes that this is a low priority item in the standards development area, if it should even remain a standard. See the detailed comments below Comments

### 6. Do you have any other comments on the proposed SAR?

Yes

No

It is not clear why this standard would support Interconnection reliability. ISO-NE believes that more emphasis and concentration should be focused on the other balancing standards that deal with under/overgeneration, unscheduled flows and balancing these flows.

R1.4 calls for mandatory participation in automatic time error correction. WECC has successfully deployed automatic time error correction (ATEC). An informal discussion with WECC personnel indicates that the driving force for its implementation was two-fold: reduce the number of manual time error corrections, and, to bring some equity to the issue of inadvertent. The WECC implementation attempts to force control areas creating primary inadvertent to pay it back, or receive payment for it, relatively soon when energy costs are expected to be comparable. WECC has not formally computed implementation and ongoing costs related to ATEC. It is clear that ATEC is successful in achieving the goals at some cost. Before endorsing this effort, a consensus for the Eastern Interconnection needs to be reached by answering all of the following questions, and possibly additional follow-up questions. Why does the Eastern Interconnection wish to deploy ATEC? What is the expected implementation cost per control area? What will the ongoing costs be to each control area? What additional efforts will be required of NERC Staff to support this project? What would the implementation schedule look like? How many control areas must be ready to support it before it can begin? What data quality problems are there related to scheduling error? Does the existence of the scheduling agent function create any special difficulties for ATEC? Is ATEC coordinated with or at odds with the BAAL limits being proposed and tested during the field trial? If the consensus of the Eastern Interconnection is that the magnitudes of hourly inadvertent are a problem right now and ATEC is to help fix it, how can a Balancing Standard that will effectively widen the spectrum of ACE values, and seemingly inevitably create larger quantities of hourly inadvertent due to the prospective demise of CPS 2, be reconciled with the ATEC effort? Is there a fundamental contradiction here? Is this an instance of poor coordination among standards? If inadvertent is not so important that the BAAL limits are sufficient for reliability interests, why do it?

R1.6 calls for Balancing Authorities to synchronize their time errors. Do all control areas presently have their own time deviation meter? Do some Balancing Authorities merely integrate their frequency values sampled at EMS sampling speed for a time error estimate. There is no other place in the present or draft standards stating that a Balancing Authority must have a time deviation device. If a time deviation device is required, what is the purchase and ongoing cost related to it?

R3.6 has what is basically a control ACE formula. Have the issues of reporting ACE for CPS versus control ACE been addressed fully? Term "TOB" speaks of bilateral inadvertent payback created prior to the implementation of the ATEC procedure.

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Currently, several areas have 5 and 6 digit inadvertent banks, and it is clear that the equations presented will not work.

Why is this SAR even being considered at this time when there are so many other items under development that have significant effect on Reliability. Comments

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

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**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Howard F. Illian	
Organization:	Energy Mark, Inc.	
Telephone:	847-913-5491	
E-mail:	Howard.Illian@energymark.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> <b>NA – Not Applicable</b>	<input checked="" type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	



**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

**Please read the BAL-004-1 SAR and draft standard and then respond to the following questions.**

**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

No. While the standard is being reviewed, the current method of performing manual time error corrections should be reviewed. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Automatic time error correction used on the Western Interconnection as compared to manual time error correction used on the Eastern Interconnection. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

We need to be especially careful to maintain compliance with the other standards already approved. Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	David Lemmons	
Organization:	Xcel Energy	
Telephone:	303-3086120	
E-mail:	david.lemmons@xemkt.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Current rules and requirements are sufficient at this time. There are other issues with higher priorities that should be addressed prior to expending additional limited resources on this issue. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Automatic Time Error Correction (ATEC) has not worked as promised in the WECC up to this point. Further study should be done before any additional ATEC standards be developed. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

No

Comments

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Please use this form to submit comments on the of BAL-004-1, Time Error Correction Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “BAL-004-1” in the subject line. If you have questions please contact Barbara Bogenrief at [barbara.bogenrief@nerc.net](mailto:barbara.bogenrief@nerc.net) or 609-452-8060.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Pfeister	
Organization:	Salt River Project	
Telephone:	602-236-3970	
E-mail:	mjpfeist@srpnet.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities



**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

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**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

This Standard should focus on the reliability aspects of time error correction and frequency control. The reliability portions that were made part of NAESB WEQ-006 when we switched from NERC Policy to Standards should be utilized where applicable yet harmonizing with NAESB BP's should not be the focus, whereas measurable Standards for reliability should be the focus. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

No

Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities



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**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Typo under PURPOSE Section: "Time Error Correction affects...". Typos under INDUSTRY NEED Section: Unbold "Provide". "Time Error Correction affects...".  
Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Raymond Vojdani	
Organization:	WACM	
Telephone:	970-461-7379	
E-mail:	avojdani@wapa.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Western Area Power Administration, Rocky Mountain Region (WACM) supports the proposed standard. This standard will provide an automatic means to the balancing

## **Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

authorities (BAs) to repay their inadvertent in a short period. When implemented correctly, this standard will prevent accumulation of a large inadvertent by any balancing authority and should improve the reliability of the Interconnection.

In addition, questions have been raised that some balancing authorities are taking advantage of their ability to carry a large sum of inadvertent. This standard will all but eliminate any perception of gaming by the BAs. In my opinion, the fact that a BA has to pay back its last hour inadvertent to the Interconnection within the next few hours will have an equalizing effect on the market place. Furthermore, implementation of this standard will address FERC's concerns about the disparity between the PSEs and LSEs, who are subject to energy imbalance, and the balancing authorities who are not subject to any close scrutiny in dealing with their inadvertent accounting.

Comments

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Organization:		
Telephone:		
E-mail:		
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

PJM does not believe that time error correction addresses any reliability related requirement. In fact PJM would note that Time Error Corrections actually are detrimental to reliability. It is a known fact that many of the low frequency events on the Eastern Interconnection are a direct result of TEC's.

PJM does recognize that if TECs are effected that it is important that all BAs participate.

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

The only entity that could be held accountable is the BA.

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

This SAR is not needed for reliability. Time Error (like Inadvertent Interchange) can be used to help quantify the offset in control but offsetting poor (inadvertent) control in one direct by mandating poor (intentional) control in the other direction is not a reliability issue.

It is also difficult to determine just what is exactly being proposed. Is the intent of this SAR to introduce Automatic Time Error corrections as a normal practice? And if so where is the justification?

In the need section, it states that automatic Time Error correction will pay back frequency deviations (i.e. pay back bad Inadvertent Interchange) in a relatively prompt manner (quickly!) These statements are commercial concerns and not reliability issues.

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Yes

No

This SAR is not needed for reliability. . Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Although the NERC Operating Committee recognized this as one of the standards that should be retracted from NAESB and reassigned to NERC, PJM does not find any reliability benefit to this standard. Time error correction like Inadvertent payback is indicators of performance. NERC has a performance standard. These two indicators are hourly versions of that performance. They can not and do not impact reliability. They can help a BA find errors but they do not impact reliability. They were sent to NAESB because they are commercial measures that should be handled by commercial / market solutions. In the mean time Time Error like Inadvertent Interchange could be corrected unilaterally by BAs with poor control performance but neither TE nor II correction should be a mandatory standard. Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Charles Yeung	
Organization:	Southwest Power Pool	
Telephone:	832-724-6142	
E-mail:	cyeung@spp.org	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities



**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

**Please read the BAL-004-1 SAR and draft standard and then respond to the following questions.**

**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

SRC does not find enough explanation for the reliability-related need in the explanation for the proposed SAR. All standards proposals should provide more substantive reasons as to why a new reliability standard (or change to a standard) is important to reliability. The requestor should explain what reliability issue is addressed with the use of Time Error Correction. For example, time error indicates that the frequency was off schedule. And it certainly shows that some BA is not operating close to zero ACE. But what is the root cause of the time error that this standard seeks to correct? If the problem causing time error is line loading then why not rely on the SOL/IROL standards to deal with that issue? Time Error Corrections themselves will not stop parallel flows. And in fact Time Error Corrections may instead exacerbate parallel flows. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

More explanation of the reliability need is required to determine applicability. Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

More explanation of the reliability need is required to determine the appropriateness of scope. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

More explanation of the reliability need is required to be able to assess the need for NAESB coordination. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

NERC should hold a high level of expectations in the language put into SARs. The purpose statements should be specific in identifying root causes to problems and justify that these problems if left unaddressed are risks to interconnected grid reliability. Comments

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Please use this form to submit comments on the of BAL-004-1, Time Error Correction Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “BAL-004-1” in the subject line. If you have questions please contact Barbara Bogenrief at [barbara.bogenrief@nerc.net](mailto:barbara.bogenrief@nerc.net) or 609-452-8060.

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(Complete this page for comments from one organization or individual.)		
Name:	Denver York	
Organization:	EKPC	
Telephone:	(859) 745-9277	
E-mail:	Denver.York@ekpc.coop	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

The scope of the SAR is not entirely clear. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

EKPC does not wish to change the current method by which time error correction is done in the Eastern Interconnect. Comments

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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

NPCC participating members believe that this should not be a reliability standard. Time error correction has become less important over the years with the advent of atomic clocks etc which don't rely on "zero crossings" frequency dependency. Time error correction does not promote reliability and improper implementation of it can potentially degrade reliability. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

While WECC has successfully implemented automatic time error via primary inadvertent payback, one should not conclude necessarily that the Eastern Interconnection puts the same priority on reducing time error correction and managing inadvertent. An Eastern Interconnection consensus on whether the costs associated with implementation are worth the perceived benefit needs to be further

## Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B

reviewed but at this time NPCC participating members strongly believe that this is a low priority item in the standards development area, if it should even remain a standard. See the detailed comments below Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

It is not clear why this standard would support Interconnection reliability. NPCC participating members believe that more emphasis and concentration should be focused on the other balancing standards that deal with under/overgeneration, unscheduled flows and balancing these flows.

The following comments were developed by NPCC Working Groups and Task Forces.

R1.4 calls for mandatory participation in automatic time error correction. WECC has successfully deployed automatic time error correction (ATEC). An informal discussion with WECC personnel indicates that the driving force for its implementation was two-fold: reduce the number of manual time error corrections, and, to bring some equity to the issue of inadvertent. The WECC implementation attempts to force control areas creating primary inadvertent to pay it back, or receive payment for it, relatively soon when energy costs are expected to be comparable. WECC has not formally computed implementation and ongoing costs related to ATEC. It is clear that ATEC is successful in achieving the goals at some cost. Before endorsing this effort, a consensus for the Eastern Interconnection needs to be reached by answering all of the following questions, and possibly additional follow-up questions. Why does the Eastern Interconnection wish to deploy ATEC? What is the expected implementation cost per control area? What will the ongoing costs be to each control area? What additional efforts will be required of NERC Staff to support this project? What would the implementation schedule look like? How many control areas must be ready to support it before it can begin? What data quality problems are there related to scheduling error? Does the existence of the scheduling agent function create any special difficulties for ATEC? Is ATEC coordinated with or at odds with the BAAL limits being proposed and tested during the field trial? If the consensus of the Eastern Interconnection is that the magnitudes of hourly inadvertent are a problem right now and ATEC is to help fix it, how can a Balancing Standard that will effectively widen the spectrum of ACE values, and seemingly inevitably create larger quantities of hourly inadvertent due to the prospective demise of CPS 2, be reconciled with the ATEC effort? Is there a fundamental contradiction here? Is this an instance of poor coordination among standards? If inadvertent is not so important that the BAAL limits are sufficient for reliability interests, why do it?

R1.6 calls for Balancing Authorities to synchronize their time errors. Do all control areas presently have their own time deviation meter? Do some Balancing Authorities merely integrate their frequency values sampled at EMS sampling speed for a time error estimate. There is no other place in the present or draft standards stating that a Balancing Authority must have a time deviation device. If a time deviation device is required, what is the purchase and ongoing cost related to it?

R3.6 has what is basically a control ACE formula. Have the issues of reporting ACE for CPS versus control ACE been addressed fully? Term "TOB" speaks of bilateral

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

inadvertent payback created prior to the implementation of the ATEC procedure. Currently, several areas have 5 and 6 digit inadvertent banks, and it is clear that the equations presented will not work.

Why is this SAR even being considered at this time when there are so many other items under development that have significant effect on Reliability.. Comments

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Organization:		
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E-mail:		
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	James H. Sorrels	
Organization:	AEP	
Telephone:	614-716-2370	
E-mail:	jhsorrels@aep.com	
NERC Region	Registered Ballot Body Segment	
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	David Hawkins	
Organization:	California ISO	
Telephone:	916-351-4465	
E-mail:	dhawkins@caiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

The reliability of the interconnection is directly affected by the control of frequency and operation of the system at off nominal frequency for time error correction.

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

We believe this is more of a reliability issue than it is a Business Practice. IT is fine to coordinate with NAESB but the over riding criteria has to be the reliability concerns

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

The characteristics of each Interconnection must be included in the design of this standard. In the Western Interconnection, the number of manual time error corrections needed is significantly reduced when the time error is allowed to vary within a plus/minus 5 second bandwidth. It is unreasonable to define periods that are off limits for time error correction for the Western Interconnection that are based on the Central Standard time constraints in the Eastern Interconnection. The

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

Western Interconnection has also implemented an automatic time error correction procedure based on hourly inadvertent energy payback and this process should be included as a regional difference in the new standard. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

We urge NERC to proceed with the development of this standard. Comments

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6159	
E-mail:	mcalimano@nyiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

The NYISO has not seen sufficient evidence that this SAR or the standard will address a reliability standard. The NYISO has worked closely with NPCC and IRC, and supports there concerns. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Additional evidence needs to be provided that this will address a reliability concern. Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

see above Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

see above Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

No

It is not clear why this standard would support Interconnection reliability. The NYISO believes that focus should remain on balancing standards that address specifically under/overgeneration, unscheduled flows and balancing flows.

The NYISO has also worked closely with NPCC and the IRC, and supports there concerns. Comments

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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

<b>Group Comments (Complete this page if comments are from a group.)</b>			
<b>Group Name:</b>	MRO Standards Committee		
<b>Lead Contact:</b>	Terry Bilke		
<b>Contact Organization:</b>	Midwest ISO		
<b>Contact Segment:</b>	2		
<b>Contact Telephone:</b>	317-249-5463		
<b>Contact E-mail:</b>	tbilke@midwestiso.org		
<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Robert Coish	MHEB	MRO	2
Alan Boesch	NPPD	MRO	2
Dennis Florom	LES	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPS	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	Xcel	MRO	2
Dave Rudolph	BEPC	MRO	2
Tom Mielnik	MEC	MRO	2
Dick Pursley	GRE	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 additional MRO member	Companies not named above	MRO	2

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

**Please read the BAL-004-1 SAR and draft standard and then respond to the following questions.**

**You do not need to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Time Error Correction is tertiary frequency control and has been one of the original NERC Standards. It would help if the drafting team provided additional details in the SAR or standard on the reliability implications of not having this standard.

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Item 7 in the Brief Description should be clarified that there should not be corrections for FAST TIME between 0400-1100 Central Prevailing Time. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

The NERC process is open so there is nothing precluding the drafting team working with NAESB. However, there should be only one standard for Time Error Correction. Having more than one standard maintained by different organizations is bound to cause confusion and process problems as things change. We would expect NAESB to cooperate in this effort as well. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

**Comment Form for Initial Posting of BAL-004-1, Time Error Correction, Appendix B**

The standard should allow the WECC to do their current automatic time error correction. HQ should identify its process if different. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

If there is a concern on the number of time corrections that occur and their impact on frequency, there are some simple things that could be done following prior NERC practices and those in Europe. BAs should be allowed to pay back inadvertent unilaterally via a frequency offset or schedule equivalent to 20 percent of bias if the payback helps drive time error toward zero. Current practices penalize CPS of those BAs that provide bias obligation when frequency remains high. The number of corrections can be reduced if the trigger window is increased to 20 seconds. The impact on frequency (and likely the number of corrections) can be reduced if manual corrections are implemented for a full clock day with a 0.01Hz offset. Comments