

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted:	October 15, 2009
Date accepted:	November 30, 2009
Contact information for person requesting the interpretation:	
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Identify the standard that needs clarification:	
Standard Number (include version number):	TOP-002-2a
Standard Title:	Normal Operations Planning
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement:	
<p>R6. Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.</p>	
Clarification needed:	
<p>Requirement 6 is proposed to be eliminated in Project 2007-03 because it is redundant with BAL- 002-0, R4 and IRO-005-2, R9, but that will not be effective for more than two years. BAL-002-0 R4 requires the BA to meet the DRC within the DRP and IRO-005-2 R9 (IRO-005-3 R6) requires the Reliability Coordinator to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations. From this it would seem for this requirement that the responsibility of the BA is to meet CPS and DCS. Is the responsibility of a BA under Requirement 6 to plan to meet CPS and DCS under unscheduled changes in the system configuration and generation dispatch?</p>	
Identify the material impact associated with this interpretation:	
<p>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</p> <p>Not having the correct interpretation of this requirement could cause a BA only (BA that is not a TOP) to be found non-compliant.</p>	

Project 2009-29: Response to Request for an Interpretation of TOP-002-2a, Requirement R6, for Florida Municipal Power Pool

The following interpretation of TOP-002-2a — Normal Operations Planning, Requirement R6, for the Florida Municipal Power Pool was developed by the Real-time Operations Standard Drafting Team.

Requirement Number and Text of Requirement

R6. Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional and local reliability requirements.

Question

Is the responsibility of a BA under Requirement 6 to plan to meet CPS and DCS under unscheduled changes in the system configuration and generation dispatch?

Response

As stated in the NERC *Glossary of Terms used in Reliability Standards*, the Balancing Authority “integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.” To this end and in accordance with NERC Reliability Standards BAL-001-0.1a and BAL-002-0, Balancing Authorities are required to meet all control performance and disturbance recovery criteria for any system condition. Balancing Authorities are not responsible for the operation of the transmission system. The Transmission Operator is responsible for the real-time operating reliability of the transmission assets under its purview, and as such has the authority to issue reliability-related directives to entities within its Transmission Operator Area. Balancing Authorities are required to implement directives received from the Transmission Operator or the Reliability Coordinator regarding load, generation, and interchange for transmission concerns both predicted (e.g. through unit commitment) and actual (e.g. through re-dispatch, interchange modifications, or load shedding). If the actions of Balancing Authorities do not resolve the transmission issues, it is the responsibility of the Transmission Operators or Reliability Coordinators to direct alternative actions.