

CAN-0040 Comment Analysis Summary

BAL-003 R2 and R5 Frequency Bias Calculation

CAN-0040 provides guidance regarding the proper approach to determine Frequency Bias contribution of Area Control Error (ACE) and the proper absolute value designation for the resulting Frequency Bias Setting. The CAN was posted for industry comment on the NERC web site on November 2, 2011, and the comment period expired on November 23, 2011.

NERC received nine comments from registered entities and five comments from industry trade associations, which are identified below. The main themes of the comments consisted of the following four categories: errata, scope, effective date and evidence of compliance.

Errata

The recommendations included changing Greek letter beta (β) to the capital letter "B" in the ACE equation for the term Frequency Bias and in other areas of the CAN that used beta. For clarity, an additional paragraph was added to distinguish Frequency Bias (capital letter "B") and Frequency Response (Greek letter beta β). Another change was made to "Primary Frequency Response" by lowercasing "primary" because it is not a defined NERC glossary term. The final errata change NERC made was to replace the word "footprint" with the NERC term "Balancing Authority Area."

Scope

There were only a few recommended substantive changes to the CAN in regard to scope.

One commenter stated that CAN-0040 expands the requirement in the standard by using the language "BA will analyze" in the compliance application section. In response, the language was reworded to clarify that the BA "analyzes," so the language is descriptive of the BA's activities, not directive in tone. Further, the paragraph was moved to the background section to outline that this statement was not intended to expand upon R2.2.

Another commenter stated that the word "methodology" should be stricken from the CAN because there is no requirement to have a methodology. In response, the word "methodology" was removed.

Effective Date

Several commenters believe that NERC should incorporate a reasonable implementation period for all CANs. The effective date of CAN-0040, or the beginning date that compliance will be assessed according to this guidance, is the date it was posted as final on the NERC Web site, and is to be used by CEAs to assess compliance from the posting date forward, regardless of the start date of any non-compliance or Possible Violation.

Evidence

As mentioned above, the word “methodology” was removed from the CAN to clarify that CEAs should not verify a methodology.

Conclusion

The analysis spreadsheet for CAN-0040 and the industry comments received are posted on the NERC website to provide transparency into the consideration of the comments received on this topic. Feedback from all sources is highly important, and NERC staff thanks industry for the time and effort put into providing that feedback. If you would like further discussion on CAN-0040, please feel free to contact us at cancomments@nerc.net.

Registered Entities that submitted CAN Comments

ACES Power Marketing
American Electric Power (AEP)
Ameren Services
Bonneville Power Administration (BPA)
LG&E and KU Services Company
MidAmerican Energy Company
Midwest ISO
PSEG Services Corporation
Southern Company

Trade Associations that submitted CAN Comments

Edison Electric Institute (EEI)
ISO/RTO Council Standards Review Committee (IRC SRC)
Midwest Reliability Organization NERC Standards Review Forum (MRO NSRF)
National Rural Electric Cooperative Association (NRECA)
NPCC Entities (industry)