**Unofficial Comment Form**

Project 2009-19 – Interpretation of BAL-002-0 for NWPP

Please **DO NOT** use this form to submit comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=39bae72a878644e79f8d2cbe9ec535ba) located at the link below to submit comments on the Interpretation of BAL-002-0 (R4, R5, and Section D 1.4) for the Northwest Power Pool Reserve Sharing Group. The electronic comment form must be completed by 8 p.m. ET **September 4, 2012.**

<http://www.nerc.com/filez/standards/Project2009-19_Interpretation_BAL-002-0_NWPP.html>

If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

### **Background Information**

This posting is soliciting formal comment.

This Request for Interpretation (RFI) was submitted by the Northwest Power Pool Reserve Sharing Group (NWPP) to provide clarity in three specific areas of BAL-002-0 Disturbance Control Performance. The specific areas NWPP is requesting clarification on are; 1) although a Disturbance that exceeds the most severe single Contingency must be reported by the Balancing Authority or Reserve Sharing Group (as applicable), is the Disturbance excluded from compliance evaluation for the applicable Balancing Authority or Reserve Sharing Group; 2) with respect to either simultaneous Contingencies or non-simultaneous multiple Contingencies affecting a Reserve Sharing Group, the exclusion from compliance evaluation for Disturbances exceeding the most severe single Contingency applies both when (a) all Contingencies occur within a single Balancing Authority member of the Reserve Sharing Group and (b) different Balancing Authorities within the Reserve Sharing Group experience separate Contingencies that occur simultaneously, or non-simultaneously but before the end of the Disturbance Recovery Period following the first Reportable Disturbance; and 3) the meaning of the phrase “excluded from compliance evaluation” as used in Section 1.4 (“Additional Compliance Information”) of Part D of BAL-002-0 and for purposes of the preceding statements is that, with respect to Disturbances that exceed the most severe single Contingency for a Balancing Authority or Reserve Sharing Group (as applicable), a violation of BAL-002-0 does not occur even if ACE is not recovered within the Disturbance Recovery Period (15 minutes unless adjusted pursuant to BAL-002-0, R4.2).

NWPP notes that without further clarity this standard potentially has significant financial and operational impacts on all Balancing Authorities and Reserve Sharing Groups. If the standard is interpreted to require that ACE be returned to zero even for a Disturbance that exceeds the most severe single Contingency, a Balancing Authority could be required to take drastic operational actions, even when other measures of system reliability (voltage stability, normal frequency, operation within system operating limits, etc.) indicate otherwise.

The original interpretation failed to achieve a two-thirds approval from the industry. The original Interpretation Drafting Team (IDT) did not believe that an interpretation could be developed that would provide sufficient clarity on the requestors points of interest without the using the “Additional Compliance Information” elements within the standard. Initially, the IDT believed that the “Additional Compliance Information” section could not be used to interpret the requirements of a standard. The Standards Committee (SC) agreed and the interpretation was tabled. The NERC BOT later ruled that the “Additional Compliance Information” elements should be recognized as part of the standard and that they could be utilized to provide guidance on the meaning of the requirements. The SC re-activated the project in May 2012. The IDT has reviewed the NWPP request and developed this interpretation pursuant to the NERC Guidelines for Interpretation Drafting Teams, which is available at:

<http://www.nerc.com/files/Guidelines_for_Interpretation_Drafting_Teams_Approved_April_2011.pdf>)

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

Please review the request for an interpretation, the associated standard, and the draft interpretation and then answer the following questions.

1. Do you agree with **Response 1** of this interpretation? If not, what, specifically, do you disagree with? Please provide specific suggestions or proposals for any alternative language.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with **Response 2** of this interpretation? If not, what, specifically, do you disagree with? Please provide specific suggestions or proposals for any alternative language.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with **Response 3** of this interpretation? If not, what, specifically, do you disagree with? Please provide specific suggestions or proposals for any alternative language.

[ ]  Yes

[ ]  No

Comments: