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Organization (0 Responses)
Group Name (5 Responses)
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Group
Salt River Project
Chris Chavez
Yes
No
No
No
Yes
Group
PacifiCorp
Sandra Shaffer
Yes
No
No
No
Yes
PacifiCorp is concerned with treatment of after-the-fact corrections of Primary Inadvertent Interchange and the potential for after-the-fact violations. For example, if a meter error is discovered and the meter has accumulated inadvertent for a long period of time, when the correction is made to fix all past values for that meter, it could put accumulated inadvertent into the violation range. Currently, entities are required to make this correction as soon as possible. Would entities now be required to make the after-the-fact corrections slowly, in order to not push accumulated inadvertent values beyond acceptable levels? Or will entities now be required to make the correction at the beginning of the month in order to have enough time to return the accumulated inadvertent to acceptable levels prior to the end of the month?
Group
NorthWestern Energy

John Canavan
Yes
No
Group
Bonneville Power Administration
Chris Higgins
Yes
No
No
No
Yes
Group
Constellation Energy
Nicholas L. Hall
Yes
No
No
No
Yes
The proposed regional reliability standard meets these criteria, yet still poses several concerns, as follow: R1: The notion of a monthly limit on Accumulated Primary Inadvertent Interchange creates a potentially troublesome burden on Balancing Authorities, in that under this approach, significant system events occurring at the end of a month can have an undue impact on the performance metric. A Balancing Authority may be implementing ATEC and all other applicable control mechanisms appropriately throughout the month and still experience Primary Inadvertent balances that approach the defined limit for monthly performance. In such an instance, a significant system event occurring on the last day, or even the last hour, of the month could force a Balancing Authority out of compliance with this requirement. Given that the intent of this requirement is to ensure that Balancing Authorities' Primary Inadvertent balances are limited on an ongoing basis, there are other metrics that would similarly provide limitations, while better recognizing that the maintenance of appropriate Inadvertent Balances is a continual effort. It is preferable to utilize a metric that avoids overemphasizing the impact of a significant and unanticipated system event merely because it occurs late in a given month. Much as CPS1 is measured on a rolling 12 month basis, recognizing that impacts to system frequency play out over longer time frames and can counteract each other on that

larger scale, a rolling 12 month obligation would make sense for the management of Inadvertent balances. As with CPS1, a monthly calculation can be performed as a check-measure, with each monthly inadvertent value averaged into a rolling 12 month limitation. This still holds entities to comply with an Inadvertent balance limit of 150% of previous year's peak, but acknowledges that inadvertent is an ongoing concern, rather than an isolated monthly concern. This alternate approach also helps in protecting Balancing Authorities from the undue impact of a last minute event. R8: The exclusion of methods of Inadvertent management other than ATEC places an unreasonable limitation on the ability of a Balancing Authority to maintain compliance with R1. As R1 creates new obligations for entities, WECC should be open to new methodologies for compliance, especially those which are already acceptably used in other interconnections. While the prevention of stranding Secondary Inadvertent Interchange is a valid concern, the standard should not specifically prohibit the development of methodologies by which alternate Inadvertent management processes can be employed without stranding Secondary Inadvertent Interchange. As shown by historical practices, there are occasions where Balancing Authorities have had a need to enable bilateral mechanisms to manage these balances, so a prohibition is not appropriate. The drafting team should revise R8 to allow for alternative methodologies for compliance.

Additional Comment NorthWestern Energy:

R1. Following the conclusion of each month each Balancing Authority shall verify that the absolute value of its Accumulated Primary Inadvertent Interchange (PIIaccum) for both the On-Peak period and the Off-Peak period are each individually less than or equal to: 1.1. For load-serving Balancing Authorities, 150% of the previous calendar year's integrated hourly Peak Demand. This requirement would tie entities' hands if they acquired a large accumulation of primary inadvertent. Our requirement would be 150% of the previous calendar year's integrated hourly peak demand, looking at a conservative year the peak demand could be estimated at 1650 MW. 150% of 1650 equals 2475 MW. Under this new standard we would be required to keep our primary inadvertent accumulation under 2475 MW at the conclusion of each month. This should not be an issue on a normal operating basis but if an error was found in the primary inadvertent calculation and we corrected the error from the time of its occurrence to the current hour we could end up with a large accumulation. We would have to pay back or reduce the accumulated primary inadvertent to below 2475 MW before the month's end. R2. Each Balancing Authority shall, upon discovery of an error in the calculation of PIIhourly, recalculate within 90 days, the value of PIIhourly and adjust the PIIaccum from the time of the error. [Violation Risk] In this requirement we do not like the 90 day limit. WE understand the intent to have BAs correct the error in a reasonable time frame but undue circumstances could prevent a re-calculation from happening as fast as we would like and the 90 day limit opens the door for a possible compliance violation. R3. Each Balancing Authority shall keep its Automatic Time Error Correction (ATEC) in service, with an allowable exception period of less than or equal to an accumulated 24 hours per calendar quarter for ATEC to be out of service. [Violation Risk Factor: Medium] [Time Horizon: Same-day Operations] In this requirement we do not like only being able to have ATEC out of service for up to 24 hours per calendar quarter. This requirement is in the current BAL-004-WECC-1 standard and we almost ran into issues when we had to take a generator offline. The 24 hours per calendar quarter seems like a very small time frame given certain system conditions or events.