In Reply Refer To:
North American Electric Reliability Corp.
Docket No. RM16-13-000

March 7, 2017

Mr. Shamai Elstein
North American Electric Reliability Corp.
1325 G Street, N.W.
Suite 600
Washington, D.C.  20005

Reference:  Data Request in Response to Petition Seeking Approval of Reliability Standards BAL-005-1 and FAC-001-3

Dear Mr. Elstein:

On April 20, 2016, you filed on behalf of the North American Electric Reliability Corporation (NERC) a petition with the Federal Energy Regulatory Commission (Commission) seeking approval of revised Reliability Standards BAL-005-1 (Balancing Authority Control) and FAC-001-3 (Facility Interconnection Requirements), and of the retirement of currently effective Reliability Standards BAL-005-0.2b, BAL-006-2, and FAC-001-2.

On September 22, 2016, the Commission issued a Notice of Proposed Rulemaking (NOPR) proposing to approve the new standards. However, the NOPR raised certain concerns about the effect of eliminating Requirement R15 from current standard BAL-005-0.2b, which requires balancing authorities to have and to periodically test backup power supplies at primary control centers and other critical locations to ensure continuous operation of Automatic Generation Control (AGC) and vital data recording equipment during loss of normal power supply. The NOPR sought additional justification for the retirement of Requirement R15 and set out a series of related questions, including questions about current practices with respect to the use of backup power at primary control centers and about the lack of a parallel requirement to Requirement R15 for reliability coordinators and transmission operators.

Five sets of comments were filed in response to the NOPR, including responses from NERC; EEI, APPA, and LPPC (Trade Associations); Bonneville Power Administration; Idaho Power Co.; and Jonathan Appelbaum (as an individual).
However, Commission staff is seeking additional information, through issuance of this data request, about the current practices of a representative sample of entities potentially affected by the revised Reliability Standards. Specifically, the Commission is seeking further information, from a sampling of entities registered with NERC as a balancing authority, a reliability coordinator, and/or a transmission operator, regarding the following:

1. Does the identified entity have backup power supplies at its primary control center(s), its backup control center(s) and other critical locations? Briefly describe what types of backup power supplies are in each location, how long these supplies will provide power, what level of service the backup power supplies support, and how the entity has determined what locations warrant backup power supplies and the performance requirements for those supplies.

2. For each location identified above, how often and when were backup power supplies tested, including testing of switchover (i.e., from primary power supply to backup power supply), during 2016? What are the procedures for testing, and how are the tests documented?

This letter is issued pursuant to the authority delegated to the Director of the Office of Electric Reliability under 18 C.F.R. § 375.303 (2016) and is interlocutory. This order is not subject to rehearing pursuant to 18 C.F.R. § 385.713. A response to this order must be filed within 30 days of the date of this letter. You are encouraged to e-file your responses with the Commission. Instructions for e-filing are provided on the Commission’s website at www.ferc.gov/docs-filing/efiling.asp. Otherwise, if you choose to file hard copies, send your response to:

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Irrespective of your filing method, please also provide a copy of your response to:

Syed Ahmad
Office of Electric Reliability
888 First Street, N.E.
Washington, D.C. 20426
Syed.Ahmad@ferc.gov
Any questions regarding this letter should be directed to Syed Ahmad at (202) 502-8718.

Sincerely,

Michael Bardee, Director
Office of Electric Reliability