

II. SUPPORT FOR WITHDRAWAL

On February 12, 2013, NERC filed for Commission approval a proposed interpretation of BAL-002-1. On May 16, 2013, the Commission issued a Notice of Proposed Rulemaking (“BAL Interpretation NOPR”)⁵ proposing to remand the proposed interpretation, stating that, “it changes a requirement of the Reliability Standard, thereby exceeding the permissible scope for interpretations.”⁶

Since the issuance of the BAL Interpretation NOPR, NERC developed Reliability Standard BAL-002-2 (*Disturbance Control Performance - Contingency Reserve for Recovery from a Balancing Contingency Event*) to supersede BAL-002-1. Reliability Standard BAL-002-2, which was adopted by the NERC Board of Trustees on November 5, 2015 and approved by the Commission on January 19, 2017,⁷ obviates the need for the proposed interpretation under pending Reliability Standard BAL-002-1a. Accordingly, NERC is requesting that the Commission approve withdrawal of the proposed interpretation.

⁵ *Electric Reliability Organization Interpretation of Specific Requirements of the Disturbance Control Performance Standard*, 143 FERC ¶ 61,138 (2013) (“BAL Interpretation NOPR”).

⁶ BAL Interpretation NOPR at P 1. The rulemaking on the BAL Interpretation NOPR is currently pending.

⁷ Order No. 835, *Disturbance Control Standard—Contingency Reserve for Recovery from a Balancing Contingency Event Reliability Standard*, 158 FERC ¶ 61,030, 82 Fed. Reg 8994 (2017) (to be codified at 18 C.F.R. pt. 40).

III. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission permit withdrawal of NERC's Petition filed in Docket No. RM13-6-000.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 2nd day of February 2017.

/s/ Courtney M. Baughan

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