

**Individual or group. (62 Responses)**

**Name (37 Responses)**

**Organization (37 Responses)**

**Group Name (25 Responses)**

**Lead Contact (25 Responses)**

**Contact Organization (25 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (19 Responses)**

**Comments (62 Responses)**

**Question 1 (34 Responses)**

**Question 1 Comments (43 Responses)**

**Question 2 (33 Responses)**

**Question 2 Comments (43 Responses)**

**Question 3 (29 Responses)**

**Question 3 Comments (43 Responses)**

**Question 4 (30 Responses)**

**Question 4 Comments (43 Responses)**

**Question 5 (28 Responses)**

**Question 5 Comments (43 Responses)**

**Question 6 (17 Responses)**

**Question 6 Comments (43 Responses)**

Individual
Tom Siegrist
EnerVision, Inc.
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
No
Refer to the response to Question 5 below.
No
Refer to the response to Question 5 below.
No
Refer to the response to Question 5 below.
No
Refer to the response to Question 5 below.

No
The inclusion of the definition for Reserve Sharing Group Reporting ACE is unnecessary and should be removed. Referring to BAL-002-2, the definition does not need to appear in both BAL-002-2 and BAL-013-1. There will be unintended reliability problems by implementing the Standard as is. It is understood that there is a FERC Directive to make DCS applicable to unexpected loss of load, there has been no highlighted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are typically caused by coincident transmission contingencies. "Knee jerk" adjustments to generation in order to bring the ACE to zero may well lead to further transmission issues. We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE. We would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms, but similar to events greater than MSSC, they should not factor into the compliance evaluation.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Arizona Public Service Company
Yes
Individual
Rich Hydzik
Avista
Yes
No
What need for this standard has been identified? Is there a history of large load losses creating reliability issues in an interconnection? How does a BA, or responsible entity, even lose 500 MW of load for a single contingency event? This type of event almost presupposes cascading outages, which are beyond the normal operations planning type of outage.
No
Yes
Yes
Yes
Individual
Sam Rugel
Tucson Electric Power
Yes

No
We are not in support of this standard. Responsible BA's currently perform this task without the need for a new standard.
No
the current standard states a time horizon of "Real Time Operations".
Yes
Yes
Individual
Nazra Gladu
Manitoba Hydro
Yes
No comment.
Yes
No comment. Please note that this question corresponds to question 5 on the comment form sent to stakeholders by NERC.
Yes
Please note that this question corresponds to question 6 on the comment form sent to stakeholders by NERC. (1) Section D, Compliance, 1.1 – the paraphrased definition of 'Compliance Enforcement Authority' from the Rules of Procedure is not the standard language for this section. Is there a reason that the standard CEA language is not being used? (2) Large Loss of Load Event and R1 - the word 'clock' has been removed from 'clock-minutes'. Standard BAL-001-2 uses the words 'clock-minutes'. For consistency between these two standards, "clock" should be retained or removed in both standards. (3) Large Loss of Load Event –the definition is missing a timeframe. Please clarify that the MSSC happens 'within a rolling one minute interval' OF WHAT occurrence? (4) Large Loss of Load Event – there is no definition within the standard or Glossary as to what 'EMS scan rate data' is. (5) 1. (Proposed) Effective Date in both the Standard and Implementation Plan - remove the " " following the word 'Trustees' because it is not defined this way in the Glossary of Terms. (6) R1 –the newly added language at the end of R1 which states "resulting from ....500 MW" is repeated in the definition of 'Large Loss of Load Event' and therefore seems unnecessarily repeated here. (7) VRF/VSL - capitalize 'bulk electric system' in both the High Risk Requirement and Medium Risk Requirement sections. Moreover, the words 'of the event' should be added to the end of each of the VSLs for clarity.
Yes
No comment. Please note that this question corresponds to question 3 of the original comment form sent to stakeholders by NERC.
Yes
No comment. Please note that this question Does not appear on the original comment form sent to stakeholders by NERC.
No comment. Please note that this question Does not appear on the original comment form sent to stakeholders by NERC.
Group
Salt River Project
Bob Steiger
Elec Reliability Compliance
No
No

Yes
No
Yes
In Order 693, FERC requested that a standard be developed for recovery from a large loss of load. This standard essentially mirrors BAL-002-2 in that both require returning ACE to zero or pre-disturbance levels within 15-minutes of loss of substantial generation or load. The difference is that recovery from loss of load is easily accomplished by backing generation, as opposed to loss of generation which requires preparation for and execution of relatively costly and difficult activities. Therefore this standard does not address a system reliability problem and only increases a Balancing Authority's data archiving and record keeping burden.
No
Individual
Rich Salgo
NV Energy
No
Standard BAL-002 contains a definition for Pre-Reportable Contingency Event ACE Value. I suggest similar wording in the Definitions section for BAL-013-1. The R1 text has run on sentences and improper punctuation. The Definitions section includes one for Large Loss of Load Event. Yet, R1 repeats the Large Loss of Load Event verbiage. Either eliminate the definition or eliminate the extra wording in R1. It is unnecessary to repeat "Responsible Entity" five times. The entire context of R1 is a performance requirement for the "Responsible Entity". I suggest: R1. The Responsible Entity shall correct its ACE, following each Large Loss of Load Event, within 15 minutes: • If the ACE just prior to the event is less than or equal to zero, return ACE to zero. • If the ACE just prior to the event is positive return ACE to the Pre-Event [define this term] value.
Yes
Yes
Yes
No
I disagree with the premise of this particular Standard and believe it is contrary and conflicting with the BAAL provisions elsewhere in the BAL family. In particular, I see no reason to compel a BA to correct its ACE to zero or pre-disturbance following the loss of a load, and especially if the positive ACE deviation happens to be assisting Interconnection frequency. Further, the threshold of action is set in relation to one's MSSC, and MSSC can at times be a very small value (for instance, off-peak).
Group
MRO NERC Standards Review Forum
Russel Mountjoy-Secretary
MRO
No
While the requirement is clear, we believe there will be unintended reliability problems by implementing the standard as is. While we understand there is a FERC directive to make DCS applicable to unexpected loss of load, there has been no noted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are

typically caused coincident transmission contingencies. Knee-jerk adjustments to generation in order to zero ACE may well lead to further transmission issues.

Yes

No

We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE. The proposed R1 needs to be reworked based on comments.

We understand that the drafting team is putting forth this standard in response to the FERC Directive in Order 693. However, the NSRF has concerns related to the potential unintended consequences that are likely under this standard. As stated in our comments on the proposed BAL-002 standard, ACE is not a primary measure of reliability. The proposed BAAL process in the proposed BAL-001-2 standard is a much better measure of reliability than a single entity's ACE. With this statement, the NSRF believes that the proposed BAL-001-2 standard addresses the FERC language in Order 693, specifically the language in Paragraph 352 below: "Consistent with this goal, the Commission believes that this Reliability Standard should be inclusive of all events, i.e., loss of supply, loss of load or significant scheduling problems, which can cause frequency disturbances and should address how balancing authorities should respond." Note that the proposed BAAL in the concurrently posted BAL-001-2 addresses this type of reliability event that causes a frequency disturbance. If a Balancing Authority experiences a loss of load, which causes a significant change in ACE and a change in frequency, the ACE for that BA will go outside of its BAAL. The BAL-001-2 standard then "instructs" the BA to get back within the BAAL within 30 minutes. We emphasize that this methodology is sufficient and much less likely to cause a more severe reliability event when compared to the proposed requirement in this standard. Under the proposed standard, a Balancing Authority must move back to a balanced position that is not an indication of reliability. If interconnection frequency is near scheduled and there is not an overloaded transmission line, there is no reliability issue. However, just as under the proposed and existing BAL-002, ACE is used for determination of compliance. This has led Reliability Coordinators to issue directives to entities based solely on their compliance with the standard, not due to a reliability issue. Since the standard only looks at ACE, it will result in the unintended consequence of curtailing loads for no reliability reason. As structured, it is likely that the RC would feel obligated to issue directives to trip generation if the ACE has not returned to pre-event levels, regardless of frequency or transmission loading. In a worst case scenario, tripping the generation will cause significant delays in restoring the loads and/or a frequency dip to below scheduled frequency, causing a secondary event never should have occurred. For these reasons, we believe that the drafting team and NERC should recognize the fact that the proposed BAAL is a much better means to address the much less likely event of loss of load rather than this well intentioned but misguided standard.

If this standard does advance, we would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms. However, similar to events > MSSC, they should not factor into the compliance evaluation.

Individual

David Jendras

Ameren

Agree

SERC OC Standards Review Group: Comments on NERC Project 2010-14.1 Phase 1 of BAL-013-1

Individual

Joe Tarantino

SMUD

No

This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.

No
This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.
No
This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.
This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.
No
Individual
Jim Cyrulewski
JDRJC Associates LLC
Agree
Midwest ISO
Group
SPP Standards Review Group
Robert Rhodes
Southwest Power Pool
No
We still have concerns that this standard will not appreciably impact BES reliability. However, we understand the drafting team's dilemma in responding to FERC's directive. But let's look at it this way. Requiring a 15-minute recovery period as stated in R1 puts BAL-013 on the same plateau as BAL-002. We do not feel that is equitable. Proposing to lengthen the recovery period to 30 minutes may be a more reasonable approach. However, when doing this, recovery for a large loss of load event then becomes no different than any other ACE deviation which would be adequately covered by BAL-001-2 R2. Therefore, we wouldn't need BAL-013 at all. If the standard survives, we would suggest rewording the requirement to remove the redundancy which is created by the definition of Large Loss of Load Event and the rest of the requirement. The revised requirement would read: 'The Responsible Entity shall correct its ACE following each Large Loss of Load Event within 15 minutes of the event as follows:'
No
Again, we do not feel that the risk to the reliability of the BES associated with a large loss of load event is equivalent to that associated with BAL-002. The VRFs for BAL-002 are Medium. Therefore, the VRFs for BAL-013 should be Low.
Yes
Yes
No
As we've stated in the past, we simply do not feel there is a significant reliability risk to the BES associated with large loss of load events and therefore cannot support this standard.
Yes
Comments on the Background Document Introduction We suggest the following for the beginning of

the first sentence that it would read: 'Since loss of large load occurs and can impact Balancing Authorities throughout an interconnection,...' Background & Rationale by Requirement R1 Follow our suggestion for rewording R1 in Question 1 above: 'The Responsible Entity shall correct its ACE following each Large Loss of Load Event within 15 minutes of the event as follows:' Background & Rationale Delete 'initial' in the 3rd paragraph. The 15-minute recovery period was not founded in initial NERC policy. It was a 10-minute recovery period then.

Individual

Anthony Jablonski

ReliabilityFirst

No

VSL for Requirement R1 - Based on the FERC VSL Guideline 3 that VSL assignments should be consistent with the corresponding requirement, ReliabilityFirst recommends restructuring the VSLs to be consistent with the language in the requirement, as follows (this is an example of a Lower VSL), "The Responsible Entity corrected its ACE following each Large Loss of Load, but recovered in more than 15 minutes but less than or equal to 25 minutes."

Yes

ReliabilityFirst offers the following suggestion for consideration: Requirement R1 - ReliabilityFirst recommends combining Requirement R1 and the definition of Large Loss of Load Event (and associated Measures, VRFs, VSL/s etc.) into the BAL-002-2 draft standard (this is in support of a number of comments submitted via the previous comment period). These two standards are dealing with very similar content regarding balancing resources and demand to Balancing Authority's Area Control Error (ACE) within the defined limits (either following a Reportable Balancing Contingency Event or following a Large Loss of Load Event). ReliabilityFirst believes very similar requirements (dealing with very similar reliability needs) should be combined together in similar standards. ReliabilityFirst believes combining the two standards will make it much cleaner for all entities involved. For Applicable entities, all relevant requirements dealing with the Balancing Authority's Area Control Error (ACE) will all be in the same standard, thus making it more concise, clearer, and easier to follow. The Balancing Authority will only need to look at one standard instead of two. For both Registered Entities and Regional Entities, it will be more efficient from a compliance monitoring and enforcement perspective due to the similar nature of the content of the requirements. We realize that several commenters had submitted similar concerns in the previous round of comments and we agree with them that this is a better solution. ReliabilityFirst believes that FERC will accept this combining of the standards as long as the reasons for including them together are clearly explained.

Individual

Greg Travis

Idaho Power Company

Yes

Yes

No

I'm not sure I agree with the need for this standard. While Loss of Large Load could theoretically impact reliability, I can not remember a instance when a load loss created a practical problem in real-

time operations. Generally, it seems a loss of load is an easier contingency to mitigate.
Group
PacifiCorp
Ryan Millard
PacifiCorp
No
PacifiCorp does not support the underlying objective of this standard as loss of load does not pose a reliability impact that would require a Balancing Authority or a Reserve Sharing Group to coordinate any action. In the event of a large loss of load, Balancing Authorities will automatically reduce other generators through their Automatic Generation Control (AGC) to balance resources, rendering coordination with other entities redundant.
No
No
No
No
None, as PacifiCorp believes this standard is not necessary.
No
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
Yes
While we can support this standard, the inclusion of the definition for Reserve Sharing Group Reporting ACE is unnecessary (notwithstanding our comments on BAL-002-2 that this defined term may not be needed). The definition does not need to appear in both BAL-002-2 and BAL-013-1.
Individual
Mauricio Guardado
Los Angeles Department of Water and Power
Agree
Salt River Project
Individual
Howard F. Illian
Energy Mark, Inc.
Yes

Yes
Individual
Jack Stamper
Clark Public Utilities
Agree
Salt River Project
Group
SERC OC Standards Review Group
Stuart Goza
Tennessee Valley Authority
No
<p>Load is not typically aggregated at the BA level but at the DP &amp; LSE level thus the BA does not normally have visibility of the magnitude of load lost in real-time, which is the time horizon applied to the requirements. We disagree with the definition of Large Loss of Load Event for many of the same reasons that we disagreed with the BAL-002-2 definition of a Reportable Balancing Contingency Event. The SDT has not provided technical justification for the MW event thresholds. We disagree with the attempt to link criteria contained in two separate standards, BAL-002-2 and BAL-013-1 that can be approved and revised independent of the other. The SDT has not addressed the ACE recovery in the event of subsequent losses of load during the ACE Recovery Period as was done in proposed BAL-002-2. While the standard requires the BA to correct its ACE for a large loss of load event, it provides no guidance in how to do so. Is the BA required to take actions to trip off generation to recover ACE even if the large loss of load, which is normally unknown in real-time, does not cause a significant frequency deviation that could adversely affect reliability? Would it be sufficient for the RE to recover ACE to the lesser of zero/pre-event value or the dynamic BAAL limit for the real time interconnection frequency? E.g. when interconnection frequency is below 60 Hz, why should a BA be required to continue reducing generation to correct ACE to its pre-event value if it is within the BAAL high limit? As long as the BA's ACE is returned to within the BAAL high limit, there is no negative reliability impact. There should be coordination of the recovery required under BAL-013 with performance under the BAL-001(BAAL) standard. We suggest that a successful response by the RE would return ACE to the greater of 0 or its real time BAAL high limit (if its Pre-Reportable Contingency Event ACE was negative or equal to zero) and similarly – ACE returned to the higher of its Pre-Reportable Contingency ACE Value or BAAL high limit (if its Pre-Reportable Contingency Event ACE was positive). If the interconnection frequency is low – why require a BA to reduce generation more than is necessary to meet its BAAL limit? If interconnection frequency is high, the BAAL high limit as well as the zero or pre-contingent ACE rule would still apply.</p>
No
It is hard to agree with a VRF if you do not agree with the requirement
Yes
No
It is hard to agree with the VSLs if you do not agree with the requirement.

No
We understand the Commission directive in Order 693 to take into account the loss of load in the definition of a significant (frequency) event. Substantial load loss tends to occur over longer time periods such as multiple hours unless it is related to a widespread blackout, which generally includes the loss of significant generation. Generator over-speed relays operate in much shorter time frames, typically sub-second time frames. As a consequence, large loss of load typically does not create reliability concerns, in of itself.
No
We question the reliability need for this standard in light of the proposed BAAL requirement which deals with high frequency as well as low frequency. In addition NERC has developed tools to alert BAs and RCs when frequency is abnormal for short durations. This has proved effective in minimizing the duration of off-normal frequency. These comments were also supported by Ron Carlsen with Southern Company. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review Group only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.
Group
seattle city light
paul haase
seattle city light
Yes
No
The requirement does not address a real system reliability problem or BES risk and, if adopted, should have the lowest possible VRF.
Yes
This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.
This Standard is unnecessary. It essentially mirrors BAL-002-2, except it applies to loss of load instead of loss of generation. This is significant, in that recovery from loss of load is easily accomplished within few minutes by backing generation, as opposed to loss of generation which requires preparation for and execution of relatively costly and difficult activities. Therefore this standard does not address a system reliability problem and only increases a Balancing Authority's data archiving and record keeping burden.
Individual
Kenneth A Goldsmith
Alliant Energy
Agree
MRO NSRF
Group
PJM Interconnection, LLC
Stephanie Monzon
PJM Interconnection, LLC
No
Load is not typically aggregated at the BA level but at the DP & LSE level thus the BA does not normally have visibility of the magnitude of load lost in real-time, which is the time horizon applied to the requirements. PJM disagrees with the definition of Large Loss of Load Event for many of the same

reasons that PJM disagreed with the BAL-002-2 definition of a Reportable Balancing Contingency Event. The SDT has not provided technical justification for the MW event thresholds. PJM disagrees with the attempt to link criteria contained in two separate standards, BAL-002-2 and BAL-013-1 that can be approved and revised independent of the other. The SDT has not addressed the ACE recovery in the event of subsequent losses of load during the ACE Recovery Period as was done in proposed BAL-002-2. While the standard requires the BA to correct its ACE for a large loss of load event, it provides no guidance in how to do so. Is the BA required to take actions to trip off generation to recover ACE even if the large loss of load, which is normally unknown in real-time, does not cause a significant frequency deviation that could adversely affect reliability?

No

No

No

No

PJM understands the Commission directive in Order 693 to take into account the loss of load in the definition of a significant (frequency) event. We believe, however, that a BA's performance specific to recovering from significant frequency deviations resulting from the sudden loss of large load is adequately addressed in the proposed BAL-001 Requirement 2 which will implement the BAAL criteria.

We question the reliability need for this standard in light of the proposed BAAL requirement which deals with high frequency as well as low frequency. In addition, NERC has developed tools to alert BAs and RCs when frequency is abnormal for short durations. This has proved effective in minimizing the duration of off-normal frequency.

Individual

Andrew Gallo

City of Austin dba Austin Energy

Agree

ERCOT

Individual

Angela P Gaines

Portland General Electric Company

This standard corrects a reliability problem that does not exist. Loss of a large load doesn't impose any significant reliability concern to the electric system. Unlike loss of a generator for which the BAs or the RSGs need to have sufficient Operating Reserve to recover from the loss and restore frequency to pre-disturbance levels, loss of load does not pose any reliability impact. The BA experiencing the loss will reduce generation to maintain balance with load. The entire remedial action for correcting loss of a large load by a BA's AGC or by the BA's operator intervention takes a short amount of time and there is no reliability concern to the electric system or to the Interconnection. In addition, the proposed standard creates a burden to the BAs for tracking, gathering, and archiving information to comply with the requirement of the standard. The reporting burden is significant while not addressing a reliability concern.

Individual

Kathleen Goodman

ISO New England Inc.

No
No
No
No
The inclusion of the definition for Reserve Sharing Group Reporting ACE is unnecessary and should be removed. Referring to BAL-002-2, the definition does not need to appear in both BAL-002-2 and BAL-013-1. There will be unintended reliability problems by implementing the Standard as is. It is understood that there is a FERC Directive to make DCS applicable to unexpected loss of load, there has been no highlighted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are typically caused by coincident transmission contingencies. "Knee jerk" adjustments to generation in order to bring the ACE to zero may well lead to further transmission issues. We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE. We would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms, but similar to events greater than MSSC, they should not factor into the compliance evaluation.
Group
Duke Energy
Greg Rowland
Duke Energy
No
While we understand that the purpose is intended to address the FERC directive, the directive was based upon what FERC saw as a shortcoming in the existing NERC Standards without consideration of other standards under development. Duke Energy believes that the Balancing Authority ACE Limit ("BAAL") proposed under BAL-001-2 addresses the FERC directive in a more straight-forward and reliable manner than proposed in this draft Standard, which we believe eliminates the need for BAL-013-1. The research document, "Directed Research to Validate Balance Resources and Demand Standard's Procedures and Define Frequency-Related Limits" by Priority-based Control Engineering, posted on the drafting team's Field Trial webpage, provides analysis of the frequency limits being developed for the BAAL at that time. In the report for the Eastern Interconnection, PCE suggested that the high FTL used in the BAAL equation could be set at 60.170 Hz based upon a 1,000 MW load loss; however, statistical justification for use of any value would have to be researched further. PCE concluded that in order to maintain an epsilon1 of 18 mHz in the Eastern Interconnection, it would be beneficial to limit the FTL setting to about 3 or 4 times epsilon1 away from Scheduled Frequency. As the proposed BAAL under BAL-001-2 is using the most conservative of the suggested settings in the PCE report, 3 times epsilon1 away from Scheduled Frequency, Duke Energy would conclude that the BAAL will sufficiently address any event (loss of load, curtailment of a sale transaction, etc.) causing a BA's positive ACE to exceed its BAAL, with recovery required over an appropriate duration to allow the BA to fully assess its situation and the options available. BAL-013 has the following shortcomings: a) BAL-013 requires a BA to return to a pre-disturbance ACE no matter if the response is detrimental to the Interconnection frequency – conflicting with the purpose of BAL-001; b) loss of load is typical of events where much more may be happening within a BA's footprint where the BA should take some time to assess its options rather than be forced to make a knee-jerk reaction to an event just to meet a 15-minute compliance obligation - often the load may be restored in a manner where the BA will want its resources appropriately loaded to meet the demand; c) similar to the frequency performance seen under BAL-002, implementation of BAL-013 will result in over-response, swinging frequency at times far lower than Scheduled Frequency and putting the Interconnection at risk – and for periods longer in duration than the initial period above Scheduled Frequency; d) BAL-013 will require recovery irrespective of the impact such recovery may have on transmission loading or other facts needing consideration - BAAL will allow the BA up to 30 minutes to assess its situation and take action without

risk to reliability based upon the targeted research; e) BAL-013 is applicable to a BA for specific events - BAAL will capture any combination of circumstances causing a BA to exceed its BAAL, which is designed to consider the impact of the positive ACE on Interconnection frequency and be applicable to all BAs contributing to the high frequency event beyond their BAAL, not just the BA with a defined event, f) BAL-013 only requires recovery back to the pre-disturbance ACE, without a measure of performance thereafter - BAAL rules over the BA's performance anytime the BA's ACE is beyond its BAAL. Duke Energy concludes that there has not been a demonstrated reliability need for a Standard demanding the immediate response dictated by the draft BAL-013; such required response could be detrimental to the reliability of the Interconnection. Based upon the research described and the frequency performance realized under the Field Trial, Duke Energy believes that the BAAL under BAL-001-2 is more than sufficient to meet the reliability needs of the Interconnection while also addressing the FERC directive for a Standard covering the loss of load.

No

See response to question #1.

Yes

In addition to our comments above, Duke Energy points out that Reserve Sharing Groups established to address the loss of generation, should not automatically have the compliance obligation for response to loss of load events. If this standard moves forward, which Duke Energy does not support, appropriate provisions should be made to not obligate existing RSGs to performance under BAL-013, rather allow creation of RSGs specific to addressing BAL-013 aside from RSGs created to address BAL-002.

Individual

John Seelke

Public Service Enterprise Group

Agree

PJM Interconnection

Group

MEAG Power

Scott Miller

MEAG Power

Agree

SMUD

Individual

Karin Schweitzer

LOWER COLORADO RIVER AUTHORITY

Agree

LCRA Transmission Services Corporation

Individual

Martyn Turner

LCRA Transmission Services Corporation

Yes

No

Yes
This standard appears to duplicate portions of the BAL-001-2 & BAL-002-2 Standards. Please ensure that it would not be possible to have a contingency event that violates each of these proposed standards, otherwise they are redundant. If this Standard is deemed necessary, it should be incorporated within BAL-002-2 to minimize the chance for double-jeopardy situations.
This Standard is unnecessary. It essentially mirrors BAL-002-2, except it applies to loss of load instead of loss of generation. This is significant, in that recovery from loss of load is easily accomplished within few minutes by backing generation, as opposed to loss of generation which requires preparation for and execution of relatively costly and difficult activities. Therefore this standard does not address a system reliability problem and only increases a Balancing Authority's data archiving and record keeping burden.
Individual
Don Jones
Texas Reliability Entity
No
While the language in the requirement is clear, we believe that implementation of this standard may create unintended reliability problems. Knee-jerk reactions to recover from a large positive ACE change could lead to transmission issues such as power swings. Recovery from a large positive ACE change is also highly dependent on generator ramp rates to ramp-down quickly. The BAL-001-2 proposed R2 language (for a BAAL-high event) already provides sufficient criteria for recovery from a large loss of load event.
Yes
Yes
No
See comments above related to the R1 requirement.
1) The SDT may want to consider revising the definition of Large Loss of Load Event to incorporate additional criteria, e.g. sudden loss of export due to a transmission forced outage that causes an unexpected positive change in ACE. The proposed definition as currently written only applies to loss of Load. 2) Should the definition of Large Loss of Load Event have a reference to Responsible Entity versus only BA in the first part of sentence? How is "Large Loss of Load Event" interpreted when a Reserve Sharing Group is involved? Also, the Applicability section in the Implementation Plan is different than the Standard. 3) As stated above, we feel the BAL-001-2 proposed R2 language (for a BAAL-high event) already provides sufficient criteria for recovery from a large loss of load event, and this proposed standard is superfluous and unnecessary.
Individual
Keith Morisette
Tacoma Power
No
Tacoma Power believes that R1 has inconsistencies. It refers to a Responsible Entity but the definition of Large Loss of Load Event only refers to a Balancing Authority. Therefore, R1 cannot refer to a Reserve Sharing Group. Tacoma Power is a member of a Reserve Sharing Group and would comply with R1 through a Reserve Sharing Group and the definition of Large Loss of Load Event needs to be re-written to include Reserve Sharing Groups. Further, R1 refers to the MSSC of the Balancing Authority. However, a Balancing Authority that is actively part of a Reserve Sharing Group, does not have a MSSC. So R1 does not make sense as written.
Yes

Yes
Yes
Tacoma Power does not support R1 and the Large Loss of Load Event definition. Please refer to the comments in item #1 above.
Tacoma Power does not agree with the need for this standard BAL-013, about the loss of load. A loss of load event already has economic incentives for the generation to be adjusted downward to match the new load requirements as soon as possible. Even if the generation remains high, other generation in the interconnection is allowed to under-generate through the CPS1 standard in BAL-001. Thank you for the opportunity to comment on this proposed standard.
Individual
Oliver Burke
Entergy Services, Inc. (Transmission)
Agree
SERC OC Standards Review Group
Individual
Brian Murphy
NextEra Energy
Yes
Excessive or rapid adjustments made to generation in order comply with this requirement may lead to transmission issues.
Individual
Robert Blohm
Keen Resources Ltd.
Yes
No
Group
Iberdrola USA
John Allen
Rochester Gas & Electric

Agree
NPCC
Group
PPL NERC Registered Affiliates
Brent Ingebrigtsen
LG&E and KU Services
No
The PPL NERC Registered Affiliates appreciate the work of the Standard Drafting Team, and while we believe the standard is unnecessary, we do have some feedback and suggestions for improvement of the standard should the standard move forward. First, deletion of RSG from R1 is a positive change. Second, we suggest requiring the Responsible Entity to correct ACE to the lesser of zero/pre-event value or the BA's BAAL limit for the real time interconnect frequency. For example, when interconnect frequency is below 60 Hz, a BA should not be required to correct ACE to its pre-event value by reducing generation. As long as the BA's ACE is returned to within the BAAL limit, there is no negative reliability impact. Third, R1 raises the performance bar higher than the BAAL standard (BAL-001-2). It is unclear what the technical basis is for requiring a BA experiencing a large reduction in load to correct ACE to tight limits within 15 minutes rather than the 30 minutes allowed outside the dynamic BAAL limits as allowed by BAL-001-2. Fourth, if there were no other alternative, it is unclear whether a Responsible Entity would be expected to trip generation in order to comply. Tripping of generation to meet the transient nature of R1 would likely be detrimental to reliability.
No
In the Eastern Interconnection, it is unclear whether the frequency rise associated with a relatively small loss of total load (500MW on a 300,000+MW interconnect or .16%) is actually a risk to reliability. If the same parameters in R1 must be applicable to all interconnects, the VRF should be indicative of the reliability risk presented to each interconnect. For the parameters proposed here, the VRF should be LOW for the Eastern Interconnection, while a MEDIUM VRF may be appropriate for other interconnects. An alternative would be to set an Interconnection-specific loss-of-load threshold that would be more indicative of a MEDIUM VRF for each Interconnection (e.g. Eastern Interconnection threshold at 1000 – 2000MW).
No
The PPL NERC Registered Affiliates appreciate the work of the Standard Drafting Team, and while we believe the standard is unnecessary, we do have some feedback and suggestions for improvement of the standard should the standard move forward. At a minimum, this Standard should be consistent with the BAAL (BAL-001-2) standard (see response to Q1). The VRF and/or parameters used in standard needs to reflect the potential reliability impact on the specific Interconnection. One size does NOT fit all in this case.
Yes
: It is presumed that this question 6 pertains to BAL-013-1 and not BAL-001-2. The PPL NERC Registered Affiliates believe that in many respects, the proposed BAL-013-1 is the mirror image of BAL-002-2, but it should not be. Assuming the proposed BAL-001-2 is approved and implemented and should this BAL-013-1 move forward, the requirements of BAL-013-1 should be coordinated with the requirements of BAL-001-2 as it relates to dynamic BAAL limits. It is not clear of the reliability need supporting the logic that BAL-013-1 mirror BAL-002-2 nor is it clear that loss of load has nearly the same impact on BES reliability as that of loss of resources. During a large weather related event (hurricane, ice storm etc.) there may be large loss of load (i.e. loss of load is expected) but the specific where and when of the load loss is unknown. It is unclear whether an entity would be expected to meet R1 for multiple, sequential large loss-of-load events due to expected weather events. BAL-002 addresses multiple, sequential loss-of-resource events and limits an entity's compliance exposure to MSSC. There should be something similar to limit an entity's compliance exposure for multiple, sequential large loss-of-load events.
Individual

Steven Wallace
Seminole Electric Cooperative
No
It would seem that the intent of the requirement is response to a lost load event which is GREATER THAN, OR EQUAL TO the lesser of the MSSC, or 500 MW. As stated, it appears only a load loss EQUAL to the lesser of the MSSC or 500 MW would trigger response / reporting.
No
We are not convinced that mandating compliance with this standard is not more DETRIMENTAL than conducive to reliability. BAL-001 R2 (BAAL limit compliance) should provide adequate incentive and performance assurance to address response to significant load loss events.
Yes
No
See response to Question 2
No
I believe that the intended purpose of this standard will be met adequately with the new BAL-001 Standard Requirements, and which Seminole supports. Given approval of the proposed BAL-001 requirements, BAL-013 is not needed and may even be detrimental to BES reliability.
No
Group
Western Area Power Administration
Lloyd Linke
Western Area Power Administration
No
Western does not agree that loss of load is a reliability issue and a VRF of medium is to high for a standard that doesn't deal with a reliability issue.
No
Western believes that recovering from the load loss is not a reliability issue and this standard is not needed. This standard increases the burden on BAs for tracking, gathering and archiving information to comply with the requirements of the standard. Western recommends looking for other possible options to meet FERC's concerns and directive for this standard.
Individual
Mary Downey proxy for Bill Hughes, Marvin Briggs, Paul Cummings & Nicholas Zettel
Reddint Electric Utility
Agree
SMUD & WECC
Group
MISO Standards Collaborators
Marie Knox
MISO
No
While the requirement is clear, we believe there will be unintended reliability problems by

implementing the standard as is. While we understand there is a FERC directive to make DCS applicable to unexpected loss of load, there has been no noted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are typically caused by coincident transmission contingencies. Knee-jerk adjustments to generation in order to zero ACE may well lead to further transmission issues. If the standard is approved, it should only be applicable to entities not operating to the Reliability Based Control (RBC) standard. RBC is an equally effective, if not superior way to address imbalance due to loss of load events.

Yes

Yes

No

We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE.

No

See our comments below on an alternative to BAL-012.

No

We would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms, but similar to events > MSSC, they should not factor into the compliance evaluation.

Group

Florida Municipal Power Agency

Frank Gaffney

Florida Municipal Power Agency

BAL-013, R1 I think is a typo, the requirement applies to a Large Loss of Load Event "equal" to the lesser of the largest loss of source contingency or 500 MW. The definition of Large Loss of Load Event uses the phrase "greater than or equal"; so, FMPA believes this to be an oversight in drafting the requirement and the requirement should have used the phrase "greater than or equal"

Group

Tampa Electric Company

Ronald L Donahey

Tampa Electric Company

Agree

Duke Energy

Individual

Christopher Wood

Platte River Power Authority

Agree

Public Service Company of Colorado (Xcel Energy)

Individual

Thad Ness

American Electric Power

No

AEP believes that the exception provided in BAL-002-2 ("Except when an Energy Emergency Alert

Level 2 or Level 3 is in effect”) should also be provided in BAL-013-1.
Yes
Yes
Yes
AEP is supportive of the efforts being made by the drafting team to improve these standards, but believe the changes being proposed thus far this project, including those made for BAL-013-1, introduce unnecessary complexity that does not contribute to the reliability objective.
Group
Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela R. Hunter
Southern Company Operations Compliance
Yes
Load is not typically aggregated at the BA level but at the DP & LSE level thus the BA does not normally have visibility of the magnitude of load lost in real-time, which is the time horizon applied to the requirements. We disagree with the definition of Large Loss of Load Event for many of the same reasons that we disagreed with the BAL-002-2 definition of a Reportable Balancing Contingency Event. The SDT has not provided technical justification for the MW event thresholds. We disagree with the attempt to link criteria contained in two separate standards, BAL-002-2 and BAL-013-1 that can be approved and revised independent of the other. The SDT has not addressed the ACE recovery in the event of subsequent losses of load during the ACE Recovery Period as was done in proposed BAL-002-2. While the standard requires the BA to correct its ACE for a large loss of load event, it provides no guidance in how to do so. Is the BA required to take actions to trip off generation to recover ACE even if the large loss of load, which is normally unknown in real-time, does not cause a significant frequency deviation that could adversely affect reliability? Would it be sufficient for the RE to recover ACE to the lesser of zero/pre-event value or the dynamic BAAL limit for the real time interconnection frequency? E.g. when interconnection frequency is below 60 Hz, why should a BA be required to continue reducing generation to correct ACE to its pre-event value if it is within the BAAL high limit? As long as the BA's ACE is returned to within the BAAL high limit, there is no negative reliability impact. There should be coordination of the recovery required under BAL-013 with performance under the BAL-001(BAAL) standard. We suggest that a successful response by the RE would return ACE to the greater of 0 or its real time BAAL high limit (if its Pre-Reportable Contingency Event ACE was negative or equal to zero) and similarly – ACE returned to the higher of its Pre-Reportable Contingency ACE Value or BAAL high limit (if its Pre-Reportable Contingency Event ACE was positive). If the interconnection frequency is low – why require a BA to reduce generation more than is necessary to meet its BAAL limit? If interconnection frequency is high, the BAAL high limit as well as the zero or pre-contingent ACE rule would still apply. (SERC OC)
No
The loss of load more closely fits into the definition of VRF Low. The loss of load is not expected to adversely affect the state or capability of the BES. Typically there are no automatic protective systems that will remove BES equipment from service due to an increase in frequency like there are for decreasing frequency.
Yes
Yes
No

We understand the Commission directive in Order 693 to take into account the loss of load in the definition of a significant (frequency) event. Substantial load loss tends to occur over longer time periods such as multiple hours unless it is related to a wide-spread blackout in which includes the loss of significant generation. Generator over speed relays operate in much shorter time frames, typically sub second time frames. As a consequence, large loss of load typically does not create reliability concerns in and of itself.

Yes

We question the reliability need for this standard in light of the proposed BAAL requirement which deals with high frequency as well as low frequency. In addition, NERC has developed tools to alert BAs and RCs when frequency is abnormal for short durations. This has proved effective in minimizing the duration of off-normal frequency.

Individual

Spencer Tacke

Modesto Irrigation District

A technical justification for using 500 MW needs to be provided.

Individual

Thomas Washburn

FMPP

Agree

FMPA

Individual

Thomas Hanzlik

SCE&G

Agree

SCE&G is in agreement with the SERC OC Standard Review group's comments

Group

ACES Standards Collaborators

Jason Marshall

ACES

No

(1) How would non-conforming load be treated? Would a BA with a couple of large arc furnaces that shut off at the same time be considered experiencing a large loss of load event? They should not and this should be considered a regulation/CPS1 issue. The drafting team needs to consider the unintended consequences of R1 as currently written.

No

We disagree that this requirement is even needed to support reliability. Given our view, we cannot support even a Low VRF.

Yes

No

Because no technical justification is provided for the threshold values selected for the VSLs, they appear to be arbitrary. For instance, there is no explanation for why failing to recover ACE within 25 minutes is the transition threshold from a Lower to Moderate VSL. Why not select 30 minutes or 50 minutes or any other number for that matter? Also, it does not make sense to focus solely on minutes

until ACE is recovered. If pre-disturbance ACE is zero and the ACE is returned to 1 MW within 10 minutes but does not return to zero for another 45 minutes, the BA recovered ACE for all intents and purposes but would be assessed a Severe VSL. This is not consistent with reliability and would be an example of heavy handed enforcement that actually detracts from reliability. Also, why is the calculation not on a quarterly average of all loss of large load events similar to the current DCS standard? If the requirement must remain, we recommend writing a VSL based on the percent recovery of ACE and to base it on a quarterly average of events.

We cannot support this standard. There has been insufficient technical justification provided for it. It appears to simply be an attempt to write a DCS equivalent type of standard for load. When industry loses large loads, it is typically due to extreme weather events. The industry has a long history of managing these types of events well. No examples of loss of large load events have been provided where a BA did not manage the reliability impacts of the event well. Furthermore, this requirement is redundant with proposed BAL-001-2 R2. The BAAL limits already limit the exposure to large positive ACE values and do it on a more effective basis by adjusting the BAAL high limit downward as frequency increases. BAAL is superior and an equally effective and efficient alternative that should be presented to the Commission as addressing the loss of large load directive. Without such examples and a technical justification, we can't support the standard.

(1) The drafting team has an opportunity to assist NERC in moving the Reliability Assurance Initiative along and showing some of the first fruits of such a product. One of the key white papers written for the initiative focuses on the data requirement necessary for the compliance and enforcement process. It has a stated goal of reducing the data retention burden on registered entities. The data retention required for the current version of BAL-002 (which this standard is modeled upon) exceeds what is necessary and this draft version perpetuates the problem. All BAs will likely be required to submit monthly data to their regional entities for this standard which will clearly show whether they are compliant or not. Then they will still be required to retain three years worth of data. Since the regional entities will already have the data and know whether they are compliant or not what reliability value does three years of data provide? None. If regional entities will require quarterly reporting, then no more than six months of data is necessary and we request that the standard should be changed. It will demonstrate a good faith effort on the part of NERC to move the RAI forward. (2) The data retention section is inconsistent with the NERC Rules of Procedure. Section 3.1.4.2 of Appendix 4C – Compliance Monitoring and Enforcement Program states that the compliance audit will cover the period from the day after the last compliance audit to the end date of the current compliance audit. Since a BA is on a three-year audit cycle, the period from the previous audit will be about 3 years. It could be a little more or a little less. However, the data retention section of "the current year, plus three previous calendar years" (which could be up to four years) actually could exceed this three year audit cycle period. Consider if a BA completed their last audit on November 15, 2010. Their audit cycle would require another audit in 2013. Let's assume this is schedule for December 15, 2013. This means the audit period is 3 years and 1 month. It also means per the Rules of Procedure that NERC cannot review any period prior to November 15, 2010 for compliance unless there is an outstanding investigation. Per the data retention section, on December 15, 2013, the date of the audit, the BA would have to retain data for all of 2013 as well as all of the data for 2010, 2011 and 2012. By the Rules of Procedure, the auditors could not review any data prior to November 15, 2010. Thus, the registered entity would be compelled to retain for 11.5 months for which NERC is not allowed to review it. How does this benefit reliability? The data retention period should be changed to retain data since the last audit. Changing the data retention period to be no longer than since the last audit would show a good faith effort in moving the RAI along.

Group

ERCOT

H. Steven Myers

ERCOT ISO

No

ERCOT ISO supports the intention of the standard BAL-013-1 R1 to restore ACE back to pre-disturbance ACE but not necessarily to zero or the pre-disturbance ACE. The ACE recovery goal should be pre-disturbance levels. Therefore, ERCOT suggest the SDT establish a  $(\epsilon * \text{Frequency Bias} * 10)$  band around the pre-disturbance ACE or zero ACE, and, if during recovery ACE is recovered

within this range, entities would be compliant. This structure of establishing a goal, but providing for a compliance "floor" based upon the proposed range, will achieve the desired reliability benefits while also providing a reasonable degree of flexibility for circumstances where recovery to the exact pre-disturbance level is difficult to achieve, and unnecessary to ensure reliability. ERCOT ISO is voting "yes", but has reservations as described above and requests that the SDT revise the standard accordingly.

Yes

Yes

No

Same comments as for Question 1.

No

Same comments as for Question 1.

Individual

John Bee on Behalf of Exelon and its Affiliates

exelon

Yes

While we agree that loss of load events warrant consideration in development of standards regarding ACE and balancing, we feel that a loss of load event is significantly different than a loss of resource event, and warrants slightly different considerations. For example, given that recovery from a loss of load event, depending upon magnitude of an Entity's MSSC, might require the rapid removal of a generation resource from the grid, the drafting team should consider inclusion of a statement clarifying that the recovery criteria holds, unless such actions required for recovery would pose a risk to human safety or equipment.

Individual

William O. Thompson

NIPSCO

Agree

MISO

Group

Tennessee Valley Authority

Dennis Chastain

Tennessee Valley Authority

Agree

SERC OC Standards Review Group

Individual

David Gordon

Massachusetts Municipal Wholesale Electric Company

Agree

Northeast Power Coordinating Council, Inc. (NPCC) ISO New England, Inc.

Group

Oklahoma Gas & Electric

Terri Pyle
Oklahoma Gas & Electric
Yes
No
Group
BC Hydro and Power Authority
Patricia Robertson
BC Hydro and Power Authority
No
This Standard attempts to address performance of Balancing Authorities (BA) or Reserve Sharing Group (RSG) in the event of loss of a large load. The requirements of this standard nearly mimic and mirror the requirements of BAL-002 which is for loss of a large generation resource. However, unlike the loss of a large generation resource for which the BAs or the RSGs need to have a sufficient and timely Operating Reserve to tap into to recover, the loss of a large load can simply be dealt with by using Automatic Generation Control or Remedial Action Schemes to reduce generation output. BAs can restore the load-resource balance very quickly without significant reliability impacts to the Interconnection. Therefore, BCHA doesn't see a need for this standard. The proposed standard creates a substantial burden to the BAs for tracking, gathering, and archiving information to comply with its requirements while provides no real benefits to system reliability.
Group
IRC-SRC
Terry Bilke
MISO
No
While the requirement is clear, we believe there will be unintended reliability problems by implementing the standard as is. While we understand there is a FERC directive to make DCS applicable to unexpected loss of load, there has been no noted case where slow ACE correction following a loss of load event has caused a problem. Sudden losses of large blocks of load are typically caused coincident transmission contingencies. Knee-jerk adjustments to generation in order to zero ACE may well lead to further transmission issues. If the standard is approved, it should only be applicable to entities not operating to the Reliability Based Control (RBC) standard. RBC is an equally effective, if not superior way to address imbalance due to loss of load events.
No

Yes
No
We should not implement a requirement that could jeopardize transmission security for the goal of having a zero ACE.
No
We would encourage the drafting team to add large (500MW) sudden loss of load events to the DCS forms, but similar to events > MSSC, they should not factor into the compliance evaluation.
Group
Bonneville Power Administration
Jamison Dye
Transmission Reliability Program
No
BPA believes this should be a low VRF because loss of a large load does not impose any significant reliability concern to the electric system and BAs in particular.
No
BPA believes this standard is not necessary as there has not been a demonstrated need that recovering from load loss is a reliability issue. The proposed standard creates a huge burden to the BAs for tracking, gathering and archiving information to comply with the requirements of the standard. BPA recommends reassessing with FERC the directive requiring this standard to determine possible options for addressing FERC's concerns.
Individual
Alice Ireland
Xcel Energy
No
No
Xcel Energy understands that the drafting team is putting forth this standard in response to the FERC Directive in Order 693. However, Xcel Energy has concerns related to the potential unintended consequences that are likely under this standard. As stated in our comments on the proposed BAL-002 standard, ACE is not a primary measure of reliability. The proposed BAAL process in the proposed BAL-001-2 standard is a much better measure of reliability than a single entity's ACE. With this statement, Xcel Energy believes that the proposed BAL-001-2 standard addresses the FERC language in Order 693, specifically the language in Paragraph 352 below: "Consistent with this goal, the Commission believes that this Reliability Standard should be inclusive of all events, i.e., loss of supply, loss of load or significant scheduling problems, which can cause frequency disturbances and should address how balancing authorities should respond." Xcel Energy notes that the proposed BAAL in the concurrently posted BAL-001-2 addresses this type of reliability event that causes a frequency disturbance. If a Balancing Authority experiences a loss of load, which causes a significant change in ACE and a change in frequency, the ACE for that BA will go outside of its BAAL. The BAL-001-2 standard then "instructs" the BA to get back within the BAAL within 30 minutes. Xcel Energy

emphasizes that this methodology is sufficient and much less likely to cause a more severe reliability event when compared to the proposed requirement in this standard. Under the proposed standard, a Balancing Authority must move back to a balanced position that is not an indication of reliability. If interconnection frequency is near scheduled and there is not an overloaded transmission line, there is no reliability issue. However, just as under the proposed and existing BAL-002, ACE is used for determination of compliance. This has led Reliability Coordinators to issue directives to entities based solely on their compliance with the standard, not due to a reliability issue. Since the standard only looks at ACE, it will result in the unintended consequence of curtailing loads for no reliability reason. As structured, it is likely that the RC would feel obligated to issue directives to trip generation if the ACE has not returned to pre-event levels, regardless of frequency or transmission loading. In a worst case scenario, tripping the generation will cause significant delays in restoring the loads and/or a frequency dip to below scheduled frequency, causing a secondary event never should have occurred. For these reasons, Xcel Energy cannot support the proposed standard and believes that the drafting team and NERC should recognize the fact that the proposed BAAL is a much better means to address the much less likely event of loss of load rather than this well intentioned but misguided standard.