

Consideration of Comments on Initial Ballot of Interpretation of Requirement R17 in BAL-005-1 — Automatic Generation Control for Portland General Electric

Summary Consideration: The drafting team did not make any modifications to the interpretation based on stakeholder comments. Two of the commenters suggest that the interpretation appears to conflict with the previous interpretation. The previous interpretation addressed the same question, and should be retired at the same time the BOT adopts the new interpretation. NERC staff will submit a request to retire the interpretation of BAL-005-1 R17 that was adopted by the NERC BOT on May 2, 2007 when this new interpretation is adopted.

Voter	Entity	Segment	Vote	Comment
Wayne Guttormson	SaskPower	1	Abstain	Why it it necessary to list devices at the end of R17 that are for reference purposes only? If they do not have any mandatory calibration or accuracy requirements they should be removed from the standard.
Response: Making changes to the requirements cannot be accomplished with an interpretation.				
William Franklin	Entergy Services, Inc.	6	Affirmative	The interpretation still appears to conflict with the previous interpretation with respect to devices "within the control room" and "outside of the control room". This appears to be an issue with how the standards process deals with previous interpretations and if they should be superseded if another interpretation provides further clarification on the same issue.
Response: NERC staff will ask the NERC BOT to retire the May 2, 2007 interpretation when the BOT adopts the new interpretation.				
Jacque Smith	ReliabilityFirst Corporation	10	Negative	Comments from ReliabilityFirst Corporation regarding Interpretation of BAL-005-1, It appears as though the latest interpretation contradicts the earlier one with regard to adherence to minimum values for the measuring devices listed. If this is the intent, the latest interpretation should state that it over-rides any or all previous interpretations. It appears that some of the device accuracy information for the measuring devices listed in the table does not apply to this requirement. Superfluous information should be removed for clarity. The interpretation should state the purpose of the accuracy requirement. The latest interpretation is correct in that it limits the calibration and accuracy to the proper devices.
Response: NERC staff will ask the NERC BOT to retire the May 2, 2007 interpretation when the BOT adopts the new interpretation.				

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