**Unofficial Comment Form**Regional Reliability Standard

BAL-004-WECC-4

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the proposed modifications to **Regional Reliability Standard**, **BAL-004-WECC-4** **(Automatic Time Error Correction)**. The electronic form must be submitted by **8 p.m. Eastern, Tuesday, May 28, 2024.**

Documents and information about this project are available on the [WECC’s Standards](https://nam04.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wecc.org%2FStandards%2Fpages%2Fwecc-0148.aspx&data=05%7C01%7CKimberlin.Harris%40nerc.net%7Ccc79c0734f7c457b713008db9200b758%7Ca2d34bfabd5b4dc39a2e098f99296771%7C0%7C0%7C638264304431998209%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ttggN5eh1L7NoZ8MM60mi9hbsxKAKPmNHOV73pvPRzk%3D&reserved=0)page. If you have questions, contact Reliability Standards Analyst, Kimberlin Harris (via email) or at (404) 446-9794.

**Background Information**

Proposed Regional Reliability Standard BAL- 004-WECC-4 – Automatic Time Error Correction modifies the current effective regional standard BAL-004-WECC-3 as follows:

1. Expanding the existing Background section
2. Creating a Standard-specific definition (Interchange Software)
3. Creating a requirement to use the Interchange Software
4. Addressing treatment of Balancing Authorities that do not have a full year of operating data
5. Consolidating and clarifying requirements
6. Updating the documents to NERC's newest templates
7. Adding a Standard-specific definition, applicable only to this RRS
8. Clarifying that when used, the term “ATEC” is as defined in the WECC Regional Definitions section of the NERC Glossary of Terms Used in Reliability Standards (Glossary)

The WECC Board of Directors approved the proposed regional standard on March 13, 2024.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Each regional difference (i.e., Regional Reliability Standard or Variance) shall be: (1) is more stringent than the continent-wide Reliability Standard, including a regional difference that addresses matters that the continent-wide reliability standard does not; or (2) necessitated by a physical difference in the bulk power system. Regional Reliability Standards and Variances shall provide for as much uniformity as possible with Reliability Standards across the interconnected bulk power system of the North American continent. Regional Reliability Standards and Variances, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC Reliability Standards and shall be enforced upon all applicable Bulk Power System owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a proposed Regional Reliability Standard or Variance, or the retirement of an existing standard or Variance, requires NERC to publicly notice and request comment. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Unfair or Closed Process –** The Regional Reliability Standard was not developed in a fair and open process that provided an opportunity for all interested parties to participate. Although a NERC-approved Regional Reliability Standards development procedure shall be presumed to be fair and open, objections could be raised regarding the implementation of the procedure.

**Adverse Reliability or Commercial Impact on Other Interconnections –** The Regional Reliability Standard would have a significant adverse impact on reliability or commerce in other interconnections.

**Deficient Standard –** The Regional Reliability Standard fails to provide a level of reliability of the Bulk Power System such that the Regional Reliability Standard would be likely to cause a serious and substantial threat to public health, safety, welfare, or national security.

**Adverse Impact on Competitive Markets within the Interconnection –** The Regional Reliability Standard would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

**Questions**

1. Do you agree that the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

[ ] Yes

[ ] No

Comments:

1. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

[ ] Yes

[ ]  No

Comments:

1. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

[ ] Yes

[ ] No

Comments:

1. Does the proposed Regional Reliability Standard meet at least one of the following criteria?
* The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
* The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
* The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

[ ]  Yes

[ ]  No

Comments: