

## Review of BAL-005-0.1b—Automatic Generation Control (Filing 2)

[http://www.nerc.com/files/BAL-005-0\\_1b.pdf](http://www.nerc.com/files/BAL-005-0_1b.pdf)

### VSLs for Requirement R14

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Notes
BAL-005-0.1b, R14	The Balancing Authority shall provide its operating personnel with sufficient instrumentation and data recording equipment to facilitate monitoring of control performance, generation response, and after-the-fact analysis of area performance. As a minimum, the Balancing Authority shall provide its operating personnel with real-time values	N/A	The responsible entity did not provide its operating personnel with real-time values for one of the following: ACE, Interconnection frequency or Net Actual Interchange.	The responsible entity did not provide its operating personnel with real-time values for two of the following: ACE, Interconnection frequency or Net Actual Interchange.	The responsible entity did not provide its operating personnel with real-time values for ACE, Interconnection frequency and Net Actual Interchange.  <u>OR</u>  <u>The responsible entity did not provide its operating personnel with sufficient instrumentation and data recording equipment to facilitate monitoring of</u>	FERC pointed out that the first portion of the requirement – providing personnel with equipment and instrumentation – was not addressed in the VSLs. This was deemed a Guideline 3 violation.  NERC staff agrees that an element was missing and has added it.

	for ACE, Interconnection frequency and Net Actual Interchange with each Adjacent Balancing Authority Area.				<u>control performance, generation response, and after-the-fact analysis of area performance.</u>	
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**Original Guideline Explanation for R14 VSLs in [December 1, 2010 VSL Filing 2](#):**

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs.

- *Guideline 1:* P. 858-859 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2:* The previously binary VSL was gradated; therefore, Guideline 2a is no longer applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as written, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3:* NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.