

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">December 15, 2009</a>
Date accepted: <a href="#">December 21, 2009</a>
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<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">TOP-001-1</a>
Standard Title: <a href="#">Reliability Responsibilities and Authorities</a>
<b>Identify specifically what requirement needs clarification:</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p><a href="#">R8. During a system emergency, the Balancing Authority and Transmission Operator shall immediately take action to restore the Real and Reactive Power Balance. If the Balancing Authority or Transmission Operator is unable to restore Real and Reactive Power Balance it shall request emergency assistance from the Reliability Coordinator. If corrective action or emergency assistance is not adequate to mitigate the Real and Reactive Power Balance, then the Reliability Coordinator, Balancing Authority, and Transmission Operator shall implement firm load shedding.</a></p> <p><b>Clarification needed:</b></p> <p><a href="#">Balancing real power is not a function of a TOP and balancing reactive power is not a function of a BA. For Requirement R8 is the Balancing Authority responsibility to immediately take corrective action to restore Real Power Balance and is the TOP responsibility to immediately take corrective action to restore Reactive Power Balance?</a></p>
<b>Identify the material impact associated with this interpretation:</b>
<p><b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b></p> <p><a href="#">Not having the correct interpretation of this requirement could cause a TOP only (TOP that is not a BA) or BA only (BA that is not a TOP) to be found non-compliant.</a></p>

**Project 2009-31: Response to Request for an Interpretation of TOP-001-1, Requirement R8, for the Florida Municipal Power Pool**

The following interpretation of TOP-001-1 — Reliability Responsibilities and Authorities, Requirement R8, was developed by the Real-time Operations Standard Drafting Team.

**Requirement Number and Text of Requirement**

**R8.** During a system emergency, the Balancing Authority and Transmission Operator shall immediately take action to restore the Real and Reactive Power Balance. If the Balancing Authority or Transmission Operator is unable to restore Real and Reactive Power Balance it shall request emergency assistance from the Reliability Coordinator. If corrective action or emergency assistance is not adequate to mitigate the Real and Reactive Power Balance, then the Reliability Coordinator, Balancing Authority, and Transmission Operator shall implement firm load shedding.

**Question**

For Requirement R8 is the Balancing Authority responsibility to immediately take corrective action to restore Real Power Balance and is the TOP responsibility to immediately take corrective action to restore Reactive Power Balance?

**Response**

The answer to both questions is yes. According to the NERC *Glossary of Terms Used in Reliability Standards*, the Transmission Operator is responsible for the reliability of its "local" transmission system, and operates or directs the operations of the transmission facilities. Similarly, the Balancing Authority is responsible for maintaining load-interchange-generation balance, i.e., real power balance. In the context of this requirement, the Transmission Operator is the functional entity that balances reactive power. Reactive power balancing can be accomplished by issuing instructions to the Balancing Authority or Generator Operators to alter reactive power injection. Based on NERC Reliability Standard BAL-005-1b Requirement R6, the Transmission Operator has no requirement to compute an Area Control Error (ACE) signal or to balance real power. Based on NERC Reliability Standard VAR-001-1 Requirement R8, the Balancing Authority is not required to resolve reactive power balance issues. According to TOP-001-1 Requirement R3, the Balancing Authority is only required to comply with Transmission Operator or Reliability Coordinator instructions to change injections of reactive power.