

Template for Quality Review of a NERC Reliability Standard

Basic Information:

Project number: 2010-14.1

Project title: Balancing Authority

Standard number: BAL-001-1

Standard Title: Real Power Balancing Control Performance

Coordinator's name: Darrel Richardson

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Reviewer's Names:

Mark Cole

Christopher Scanlon

R. E. Verraneault, Jr.

General Comments:

- The Background Document was invaluable to the Quality Review team and will be very helpful.
 - Thank you – that was the intent.
- See the redlined standard for some suggested edits – unless specifically referenced in this document, the suggested edits were provided by one of the quality reviewers for the team's consideration, but the team should review the edits carefully to ensure that the suggested words match the team's intent.
 - The SDT reviewed the proposed modifications and accepted some of the modifications and further modified some of the other suggestions.
- Please refer to Attachment A of this document for the SDT response to the comments imbedded within the standard.

Purpose

Comments: The purpose statement contains a circular reference - see redline for suggested revision.

- This change has been made.

Requirements

R1:

- The rolling 12-month basis may not be clear enough for compliance purposes – should say, “rolling 12-month basis, calculated hourly, daily, or monthly? In other words, if you slip out of compliance because something really bad happens, and are out of compliance for several hours, how many violations does that constitute?”
 - The SDT has modified the proposed Requirement. The revised Requirement no longer refers to a “rolling” 12 months and also states that the BA will be evaluated on a monthly basis. The periodicity of the calculations is defined by the algorithm in Attachment 1.
- In Attachment 1, there are several instances where defined term are used – and words are used to define them that are different than the words in the Glossary. Need to use the words in the Glossary and then add additional explanation, not use different words.
 - With the exception of Scheduled Frequency the SDT is not using defined terms. The SDT modified the wording in Attachment 1 for Scheduled Frequency to match what is found in the NERC Glossary of Terms. In the other instances mentioned the SDT was defining a variable used in the calculation (i.e., Net Interchange Actual, not Net Actual Interchange – the defined term found in the NERC Glossary). The SDT believes that this method provides greater clarity in defining the variable rather than trying to modify an existing definition (which could create additional confusion).
- The last two paragraphs in Att 1 and Att 2 should be incorporated into to the body of the standard – consider moving to Applicability section in the standard. The reviewers recognize that they were previously in the Requirements section – and are not necessarily stand-alone Requirements – but they provide important information and should not be buried at the end of the attachments. They are really about applicability.
 - The suggested modification has been made and can be found in the Applicability Section 4.1.1 and 4.1.3.

R2:

- Attachment 2 - Actual Frequency is used throughout Attachment 2 not a Glossary defined term – if the team intends to use the definition in Attachment 1 that needs to be made clear in Attachment 2.
 - This has been corrected.
- The last two paragraphs in Att 1 and Att 2 should be incorporated into to the body of the standard – consider moving to Applicability section in the standard. The reviewers recognize that they were previously in the Requirements section – and are not necessarily stand-alone Requirements – but they provide important information and should not be buried at the end of the attachments. They are really about applicability.
 - The suggested modification has been made and can be found in the Applicability Section 4.1.2 and 4.1.3.

Measures

- The Measures do not provide much information. Exactly what documentation should an entity compile to demonstrate compliance? For example, would it be spreadsheets showing the calculations, logs showing the values collected for use in the calculations, reports produced from certain software, any of the above? In addition to date-stamped, would the evidence need time stamps for some of the data? More detail would be a help.
 - The SDT has modified the measures to provide additional clarity. The SDT has also modified the Data Retention Section to clarify the data that needs to be retained.

Compliance Monitoring and Assessment Processes

- Change Compliance Violation Investigation to “Compliance Investigation”
 - This has been corrected.
- Periodic Data Submittals do not seem to be required – this should either be struck or clarify in “Additional Compliance Information” what data is required to be submitted, at what intervals and to whom.
 - This has been corrected.

Time Horizons

- Time Horizons for both Requirements should be Real-time Operations. Although the calculations may use data from or be done in the Operations Assessment time horizon, the required performance takes place in the Real-Time Operations time horizon.
 - This has been changed.

Violation Severity Levels

- The question about the interval within the rolling twelve months at which compliance is measured (whether it is hourly, daily, monthly is pertinent to the number of violations and how the VSLs would be applied and needs to be clarified. See observation for Requirement R1.
 - Please refer to the SDT response to Requirement R1.
- The VRF/VSL justification references the GVSDT (wrong drafting team).
 - This has been corrected.

Implementation Plan

- Need to include in the list of impacted standards the standard being retired.
 - I am not sure I understand this comment. If this is referencing standards impacted by the modification to the definition for “Interconnection” this is already shown in Attachment 1 of the Implementation Plan (first bullet).
- Need to also include a list of standards impacted by the revision of the defined term Interconnection.
 - I am not sure I understand this comment. This is already attached to the Implementation Plan (Attachment 1).

- Need to include an explanation for why the 6-month period is needed for implementation. For example, “Entities will need time to update and test their software to perform the calculations.”
 - This has been done.

Attachment A

SDT Response to Comments Imbedded in the Proposed Standard

Comment lh1

The rolling 12-month basis may not be clear enough for compliance purposes – should say, “rolling 12-month basis, **calculated hourly**” (or daily, or monthly?) In other words, if you slip out of compliance because something really bad happens, and are out of compliance for several hours, how many violations does that constitute?

- The SDT has modified the proposed Requirement. The revised Requirement no longer refers to a “rolling” 12 months and also states that the BA will be evaluated on a monthly basis. The periodicity of the calculations is defined by the algorithm in Attachment 1.

Comment lh2

The measure doesn’t provide much guidance. In addition, consider whether the evidence may need to be time-stamped if the calculations are done more frequently than daily

- The SDT has modified the measures to provide additional clarity. The SDT has also modified the Data Retention Section to clarify the data that needs to be retained.

Comment R3

Are Periodic Data Submittals truly required? Plus no information is listed in the Additional Compliance Information section

- Periodic Data Submittals has been removed from the standard.

Comment lh4

The question about how you measure the rolling twelve months (whether it is hourly, daily, monthly is pertinent to the number of violations and how the VSLs would be applied and needs to be clarified.

- Please see our response to “Comment lh1”.

Comment R5

It would be nice if the subscript stated “rolling 12-month”.

- The proposed standard no longer references a “rolling” 12 month period.

Comment R6

This edit ties this paragraph to the first paragraph above.

- The proposed modification has been made to the Attachment.

Comment R7

The definition proposed for Reporting ACE states these net terms are summed, not subtracted – there is some confusion and possibly the definition needs to be clarified, or this equation should be changed – it is not clear. Different reviewers read different things in the definition.

- The SDT believes that your confusion may be because we as an industry do not include the mathematical summation sign (large sigma) in the proposed Reporting ACE equation or existing ACE equations. Bias is in fact negative and two negatives make a positive and, so, the problem you are describing magically disappears. “Summed” is unambiguous, and therefore correct, in this case. It’s just that you have to be aware that bias is negative.

Comment R8

Net Actual Interchange is a NERC defined glossary term. State the definition then address pseudo tie and DC tie considerations.

- The SDT is defining a variable used in the calculation (i.e., Net Interchange Actual, not Net Actual Interchange – the defined term found in the NERC Glossary). The SDT believes that this method provides greater clarity in defining the variable rather than trying to modify an existing definition (which could create additional confusion).

Comment R9

Net Schedule Interchange is a NERC defined glossary term. State the definition then address dynamic schedule and DC tie considerations.

- The SDT is defining a variable used in the calculation (i.e., Net Interchange Schedule, not Net Schedule Interchange – the defined term found in the NERC Glossary). The SDT believes that this method provides greater clarity in defining the variable rather than trying to modify an existing definition (which could create additional confusion).

Comment R10

Scheduled Frequency is a NERC defined glossary term. Should state the definition.

- The SDT has modified the Attachment to use the defined term.

Comment R11

It would be nice if the summation included the i-range notation for clarity. I would either add upper/lower bounds above the symbol –OR- provide a clarifying comment to the side of the equation. Also consider explaining bad data criteria. Consider doing the same for the other formulas contained in this section missing the notation where appropriate.

- When a formula has a lead-in paragraph explaining the summation period, it is not necessary to indicate such period in the formula especially when the period is a variable.
- How to handle bad data is discussed further down in the Attachment.

Comment llh12

Consider whether these paragraphs should be included in the standard as parts to Requirement R1.

- This has been added to the Applicability Section in 4.1.1 and 4.1.3.

Comment llh13

Actual Frequency is used throughout Attachment 2 not a Glossary defined term – if the team intends to use the definition in Attachment 1, that needs to be made clear in Attachment 2.

- The SDT has corrected this in Attachment 2.

Comment R14

The formulas do not contain Fs, so delete the reference

- The SDT has deleted this reference from Attachment 2.