Unofficial Survey Form

Project 2010-14.2.1 Phase 2 of Balancing Authority  
Reliability-based Controls: Inadvertent Interchange  
BAL-006

**DO NOT** use this form for submitting survey responses. Use the [electronic form](https://sbs.nerc.net/) to submit survey responses on Project 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls: Inadvertent Interchange (BAL-006). Responses must be submitted by **8 p.m. Eastern, Friday, September 25, 2015**.

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-20101421-Phase-2--Balancing-Authority-Reliabilitybased-Controls--BAL0051-and-BAL006.aspx). If you have questions, contact Senior Standards Developer, [Darrel Richardson](mailto:darrel.richardson@nerc.net) (via email), or at (609) 613-1848.

## Background Information

This Project 2010-14.2.1 Phase 2 Balancing Authority Reliability-based Controls standard drafting team (SDT) is soliciting comments from the industry concerning the disposition of BAL-006. The Independent Expert Review Report, Periodic Review Team, and (during the SAR comment phase) industry indicated that majority of currently-effective Reliability Standard BAL-006-2 as written is an energy accounting standard and not a Reliability Standard.

The Federal Energy Regulatory Commission (“Commission”) recommended the development of a metric to bind the magnitude of inadvertent accumulations, as those accumulations may be indicative of a Balancing Authority excessively leaning on the resources of others in its Interconnection. The SDT consensus was that an Inadvertent Interchange accumulation value alone cannot yield useful information concerning whether a Balancing Authority is operating reliably. The SDT has proposed revisions to BAL-005, and, the SDT believes that with these revisions and the other suite of BAL Standards, the Reliability Standards address reliable operation of Balancing Authorities.

Thus, with the evolution of the industry, technical advancements in measurements, and more visibility of the real-time operations, Inadvertent Interchange has little or no impact on reliability. However, large and long-held Inadvertent Interchange accumulations do impact commercial relationships, and their paybacks can create impacts to reliability if they are not conducted appropriate manner. This is discussed in a white paper being posted contemporaneously with this survey.

## Questions

1. Based on comments related to the SAR, the Independent Expert Review Report, and the Periodic Review Team’ recommendations, the industry agrees that BAL-006 is an energy accounting standard and not a Reliability Standard, however, it is unclear what the industry supports as a replacement. The SDT has developed a white paper for the industry to consider. Based on the concepts within the white paper, do you support maintaining Reliability Standard BAL-006?[[1]](#footnote-1)

      Modify and maintain BAL-006 as a Reliability Standard.

      Maintain BAL-006 (with no changes) as a Reliability Standard.

      Eliminate BAL-006 as a Reliability Standard.

Comments:

1. If you support maintaining BAL-006 as a Reliability Standard, are you in favor of the PRT recommendation as noted in the attached draft Reliability Standard BAL-006? If not, then what aspects of BAL-006 should be retained in a standard?

Yes:

No:

Comments:

1. If you support eliminating BAL-006 as a Reliability Standard, are you in favor of the SDT recommendation that these requirements be included in a commercial alternative arrangement, such as a NAESB standard or a process established by FERC? What aspects of BAL-006 should be retained in an alternative arrangement?

Yes:

No:

Comments:

1. If neither maintaining nor eliminating BAL-006 is preferred, please describe your suggestion for the disposition of this standard.

Comments:

1. If you have any other comments or reliability concerns, please provide them in the space below.

Comments:

1. When responding to this survey and providing comments, please keep in mind that draft proposed Reliability Standard BAL-006-3 has been posted under 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls, in connection with draft proposed Reliability Standards BAL-005-1 and FAC-001-3. Proposed Reliability Standard BAL-005-1, at Requirements R1 and R8, would include the obligations currently under Requirement R3 of Reliability Standard BAL-006-2. [↑](#footnote-ref-1)