

Consideration of Comments

Project Name: 2017-06 Modifications to BAL-002-2 | Standards Authorization Request
Comment Period Start Date: 6/20/2017
Comment Period End Date: 7/20/2017
Associated Ballots:

There were 21 sets of responses, including comments from approximately 72 different people from approximately 48 companies representing the 10 Industry Segments as shown in the table on the following pages.

Questions

1. The SDTs execution of this Standards Authorization Request (SAR) requires the SDT to address the FERC Order directives or alternatively propose modifications that address the Commission concerns in the FERC Order. This SAR will specifically address revising BAL-002-2 to require that BAs and RSGs: (1) notify the Reliability Coordinator that the BA or RSG cannot comply with the 15-minute ACE recovery period due to existence of the conditions as set forth in Requirement R1, Part 1.3.1; and (2) provide the Reliability Coordinator with an ACE recovery plan that includes a target recovery time. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.
2. Based on the scope of the SAR, do you have any other comments for drafting team consideration?

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Karl Kohlrus	Prairie Power, Inc.	1,3	SERC
					Mark Ringhausen	Old Dominion Electric Cooperative	3,4	SERC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC		Pawel Krupa	Seattle City Light	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
				Seattle City Light Ballot Body	Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurie Hammack	Seattle City Light	3	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida	6	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Power and Light Co.		
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Lonnie Lindekugel	Southwest Power Pool Inc.	2	SPP RE
					Mahmood Safi	Omaha Public Power District	5	SPP RE
PPL - Louisville Gas and Electric Co.	Shelby Wade	1,3,5,6	RF,SERC	PPL NERC Registered Affiliates	Charlie Freibert	LG&E and KU Energy, LLC	3	SERC
					Brenda Truhe	PPL Electric Utilities Corporation	1	RF
					Dan Wilson	LG&E and KU Energy, LLC	5	SERC
					Linn Oelker	LG&E and KU Energy, LLC	6	SERC

1. The SDTs execution of this Standards Authorization Request (SAR) requires the SDT to address the FERC Order directives or alternatively propose modifications that address the Commission concerns in the FERC Order. This SAR will specifically address revising BAL-002-2 to require that BAs and RSGs: (1) notify the Reliability Coordinator that the BA or RSG cannot comply with the 15-minute ACE recovery period due to existence of the conditions as set forth in Requirement R1, Part 1.3.1; and (2) provide the Reliability Coordinator with an ACE recovery plan that includes a target recovery time. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer No

Document Name

Comment

Currently there is no requirement for a Reserve Sharing Group to have a 24 hour, manned, operations center. This would be required if this proposal is implemented. Furthermore, it would also require the Reserve Sharing Group to have authority in some manner over the participating BAs to devise and implement a recovery plan. A proposed alternative could be that BAs that are a part of a RSG must notify their RC if they will not be able to recover their individual ACE in the recovery period as well as providing their recovery plan and target recovery time.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SAR DT understands and agrees with your concern. The SAR DT will recommend to the SDT to modify the language to provide clarity to Requirement R1 Part 1.3.1 with respect to the responsible entity communicating with the RC.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name	
Comment	
Please see response to Qestion #2.	
Likes 0	
Dislikes 0	
Response	
Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body	
Answer	No
Document Name	
Comment	
The City Light subje amtter expert feels that there should be no requirement that forces a Reserve Sharing Group to have a 24 hour a day operations center. An alternative would be for BA's that are part of an RSG and cause the RSG to be in a disturbance provide the Reliability Coordinator with an ACE recovery plan if they will not be able to recover their ACE in 15 minutes.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SAR DT understands and agrees with your concern. The SAR DT will recommend to the SDT to modify the language to provide clarity to Requirement R1 Part 1.3.1.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	No
Document Name	

Comment

The SPP Standards Review Group recommends that the drafting team provides clarity on what the FERC Order is requiring and the situation that has been identified in Requirement R1 Part 1.3.1 of the Standard. From our perspective, there may be some confusion on what goals that need to be accomplished for a Responsible Entity pertaining to this requirement. It's not clear on if a the event drives the situation in to 1.3.1 or b has the EEA Event already occurred and then the Responsible Entity needs to notify the RC about not meeting their recovery time as well as submitting a Recovery Plan. Also, we recommend that if the FERC Order addresses a then BAL-002-2 may be the appropriate document to conduct the proposed revisions. However, if the concerns are more applicable to b then the group would recommend making the appropriate revisions to the EOP-011-1 Standard.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SAR DT understands and agrees with your concern. The SAR DT will recommend to the SDT to modify the language to provide clarity to Requirement R1 Part 1.3.1.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer

No

Document Name

Comment

We caution the use of "15-minute ACE recovery period" in the SAR. We believe the SDT should have clear direction to instead leverage the previously NERC Glossary-defined term, "Contingency Event Recovery Period." This term is referenced frequently within the standard and aligns with the efforts of the previous Standard Drafting Team.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SAR DT agrees that defined terms should be used within the standard.

Dori Quam - NorthWestern Energy - 1 - WECC

Answer Yes

Document Name

Comment

In its comments to FERC’s Notice of Proposed Rulemaking (NOPR) in Docket No. RM16-7-000, Arizona Public Service Company (APS) outlined a proposal regarding notice to the RC when the extenuating conditions listed in Requirement R1.3.1 are met and the BA is unable to recover its ACE within the 15-minute recovery period. This proposal addressed FERC’s concerns with extension of the 15-minute ACE recovery period, but also allowed appropriate flexibility to BAs when extenuating circumstances are present. (Order No. 835, P 36.)

NorthWestern Energy agrees with the proposal that was outlined by APS in its comments to the FERC NOPR. (APS Comments, Accession No. 20160720-2146, Section II-A, pages 3–9.)

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT will consider this information when developing modifications to the standard.

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer Yes

Document Name

Comment

Likes 1 Tallahassee Electric (City of Tallahassee, FL), 1, Langston Scott

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Smith - Manitoba Hydro - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Based on the scope of the SAR, do you have any other comments for drafting team consideration?

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer No

Document Name

Comment

We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

Dori Quam - NorthWestern Energy - 1 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Smith - Manitoba Hydro - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	No
Document Name	

Comment

Likes 0

Dislikes 0

Response

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer

No

Document Name

Comment

Likes 1

Tallahassee Electric (City of Tallahassee, FL), 1, Langston Scott

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

The IRC Standards Review Committee (SRC) provides these comments: As one of the “alternative modifications” the SRC proposes the SDT consider converting the Standard to a communication guide (developed under the auspices of the NERC OC) that could be converted to a standard if such a need were identified by the RCs.

Likes	0
Dislikes	0
Response	
Thank you for your comment. The SAR DT is unsure as to the issue you are raising. However, if you are proposing a communication guide instead of this SAR, the SAR DT believes that there is still clarity necessary to resolve the ambiguity highlighted in Requirement R1 Part 1.3.1 and to address the FERC order. In addition, the SAR DT will recommend to the NERC OC to review the existing Operating Reserve Management Guideline to ensure the communication issues are considered.	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
The SPP Standards Review Group recommends that the drafting team evaluate the expansion of SAR that are associated with part 1.3.2 of the Standard. Our concern pertains to contingencies impacting frequency that is outside of the Responsible Entity's area that has a significant impact on the Responsible Entity meeting the 15 minute recovery.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The scope of this SAR is explicitly and exclusively addressing the FERC Order directives. However, if you believe additional modifications are necessary, you may submit a SAR that addresses your concerns.	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Duke Energy agrees that the SAR aligns with the directive from FERC, and also agrees with the scope of this project as written currently.	
Likes	0
Dislikes	0
Response	
Thank you for your affirmative response and clarifying comment.	
Scott Downey - Peak Reliability - 1	
Answer	Yes
Document Name	
Comment	
Peak appreciates the opportunity to provide comments on the BAL-002-2 SAR. Peak requests consideration be given to intended and/or unintended expectations resulting from the provision of the information to the Reliability Coordinator that may or may not be covered by additional NERC Reliability Standards.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SAR DT understands your concern and will recommend to the SDT that it consider potentially affected standards.	
Shelby Wade - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF, Group Name PPL NERC Registered Affiliates	
Answer	Yes
Document Name	
Comment	

“The objective of this SAR is to provide clear, unambiguous requirements to address the directives in the January 19, 2017 FERC Order regarding the recovery from a Balancing Contingency Event, or alternatively propose modifications that address the Commission concerns.”

Since BAL-002-2 is addressing recovery from a **Reportable** Balancing Contingency Event (as distinct from a separately defined [non-reportable] Balancing Contingency Event), and since the FERC Order requires NERC to develop modifications regarding such **Reportable** events, in order to avoid any ambiguity or confusion we recommend that the SAR Objective be revised to state:

“The objective of this SAR is to provide clear, unambiguous requirements to address the directives in the January 19, 2017 FERC Order regarding the recovery from a **Reportable** Balancing Contingency Event, or alternatively propose modifications that address the Commission concerns.”

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDTs are instructed to develop clear and unambiguous language in the standard and therefore, no modifications to the SAR are necessary.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Yes

Document Name

Comment

PacifiCorp is concerned that (1) the requirement to notify the reliability coordinator of the conditions set forth in Requirement R1, Part 1.3.1 preventing it from complying with the 15-minute ACE recovery period; and (2) to provide the reliability coordinator with its ACE recovery plan, including a target recovery time, will be distracting requirements as the balancing area operators are working towards recovery in the 15-minute period. Setting aside recovering from the event to provide notification to the reliability coordinator could

impede efforts towards the recovery itself. We fail to see the value in these additional requirements and wonder if is this more suitable for the Eastern Interconnection – Western Interconnection power pool agencies are not 7x24 shops.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SAR DT understands and agrees with your concern. The SAR DT will recommend to the SDT to modify the language to provide clarity to Requirement R1 Part 1.3.1 with respect to the responsible entity, the BA, communicating with the RC.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

In order to provide clear, unambiguous requirements to address the FERC directive, Texas RE recommends the standard drafting team (SDT) consider specifying a time-frame in which the notification and provision of a recovery plan is expected to occur. Developing a recovery plan and target recovery time may not be feasible within 15 minutes, so it may be more practical to require notification to the Reliability Coordinator (RC) within 15 minutes of the event, and provision of a recovery plan within an agreed upon time-frame.

Likes 0

Dislikes 0

Response

Thank you for your comment. The SDT will consider your comments while developing the language to address the directives from the FERC Order.

End of Report