

STD Comment Form for 2nd Posting of Balance Resources and Demand Standard

Note – This form is to comment on version 2 of the Balance Resources and Demand Standard.

The latest version of this Standard (BAL_RES_&_DEMND_05_02) is posted on the Standards web site at:

<http://www.nerc.com/~filez/standards/Balance-Resources-Demand.html>

E-mail this form between **June 2–July 2, 2004**, to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards – Gerry Cauley at 609-452-8060.

Background

The Balance Resources and Demand Standards Drafting Team (team) put together a document called “Introduction to the Balance Resources and Demand Standard” to explain the approach they took in using industry comments to develop the second draft of this standard. Several of the questions on this comment form ask for feedback on that rationale.

Your feedback is very important in guiding the team’s revisions to this draft standard. The SDT is not seeking feedback on the appropriateness of the compliance monitoring process or the levels of non-compliance on the requirements in this standard during this posting period. The next posting of this standard will include specific questions asking for guidance on the appropriateness of the compliance elements of the standard.

The SDT thanks you for your active participation in this process!

STD Comment Form for 2nd Posting of Balance Resources and Demand Standard

Requirement 301 — Balance Resources and Demand

Please read the explanation of the Frequency Profile on pages 4–5 of the “Introduction to the Balance Resources and Demand Standard” before answering this question.

1. Do you agree with the change to Requirement 301 to keep CPM-1 and eliminate any second CPM?

Agree with elimination of a second CPM

Disagree with elimination of CPM

Comments

The New York State Reliability Council (NYSRC) disagrees with the fundamental premise that the Balancing Standard is frequency only. Large net unscheduled flows into and out of control areas due to large ACE values can have an adverse reliability effect on the transmission systems of other control areas.

CPS 2 has been a far more relevant criterion than CPS 1 from an empirical point of view. While some have found it to be undesirable on a theoretical basis, we now have a large empirical compliance violation data base to determine which criterion is in fact more effective. There is a need to include empirical verification, as well as the theoretical.

Some analyses have indicated that the CPS 2 constraint would assist frequency performance more than 80% of the time. While these short studies are anecdotal and not conclusive, they are probably indicative of what CPS 2 is achieving, and it agrees with intuition. Further analysis is needed. This concept is used to good advantage in the NPCC alternative metrics.

2. Do you agree with Requirements in 301?

Yes

No

Comments

3. Do you agree with the Measures in 301?

Yes

No

Comments

Requirement 302 — Frequency and ACE

During the first posting of this standard, the SDT provided the industry with two versions of requirement 302, which requires the RA to direct its BAs to take actions to preserve interconnection frequency:

- One version of requirement 302 sanctioned the RA if the RA directed its BAs to act, but the actions taken didn't preserve interconnection frequency.
- The other version of requirement 302 sanctioned the RA only if the RA failed to take any actions in directing its BAs.

The first posting of the standard occurred before the August 14 Blackout, when most commenters indicated a preference for the version of the requirement that only penalized the RA that did not direct its BAs to take actions. The SDT did not feel that the industry would comment the same way post August 14, and defaulted to using the version of this requirement that holds the RA responsible for preventing

STD Comment Form for 2nd Posting of Balance Resources and Demand Standard

frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages from occurring. The SDT added some additional language to this requirement to clarify that if the RA's directives don't achieve the expected goal, then the RA must "...continue to direct actions to return interconnection frequency to within its Frequency Trigger Limits."

4. Do you agree with SDT that given August 14, the RA should be held accountable for achieving results, not just for taking some actions?

- Agree with holding the RA responsible for preserving interconnection frequency
 Disagree with holding the RA responsible for preserving interconnection frequency
 Comments Both parties need to have a certain level of accountability.

Do you agree with the Requirements in 302?

- Yes
 No
 Comments

Concern has been raised about the direction by the RA to multiple BAs within the Reliability Authority Area to take action to support interconnection frequency. It may be detrimental to the security of the Interconnection to have multiple BAs acting to correct frequency concurrently.

5. Do you agree with the Measures in 302?

- Yes
 No
 Comments

Reporting requirements need to be re-visited.

Requirement 303 — Actions to Return Frequency within FTL

6. Do you agree with the requirements in 303?

- Yes
 No
 Comments

Although we are quite cognizant of the ability to monitor compliance, audit, etc, the documentation requirements being written into the draft Standards need to be carefully considered. It appears as though the requirements for documentation are being focused on more than the effectiveness of the actual actions taken. This is completely contrary to the NERC Standards process.

7. Do you agree with the Measures in 303?

- Yes
 No
 Comments

See above comments. Within the New York Control Area, the RA and BA functions are performed by the same entity, i.e., the New York Independent System Operator (NYISO), and in some cases, the same individual within the NYISO. The NYSRC agrees that logs of actions taken are always of value, however, the extra information being sought in this Measure i and iii is of little or no value in this instance. Also, if there is sufficient proof that ACE and frequency deviations were minimized as much as practical in magnitude, then the BA and or RA are performing their functions appropriately in accordance with the standard.

The NYSRC also questions the T_v of 30 minutes and no mention made of immediately addressing the problem and taking the appropriate action.

STD Comment Form for 2nd Posting of Balance Resources and Demand Standard

Requirement 304 — Frequency Bias Settings

8. Do you agree with Requirements in 304?

- Yes
 No
 Comments

9. Do you agree with the Measures in 304?

- Yes
 No
 Comments Minimum technical standards for some degree of consistency and fairness are needed. What is a seasonally operating balancing authority, and, what about generation only BAs?

Requirement 305–6 — Setting Frequency and Balancing Authority ACE Limits

In the first posting of this standard, these procedures were stand-alone reference documents. The procedures will be subject to targeted research, and then field-tested. Several commenters indicated that the procedures should be embedded in the standard and they were moved to ensure that the procedures would be followed as intended.

10. Do you agree with Requirement 305?

- Yes
 No
 Comments

It is hard to evaluate a methodology when it is still a work in progress. Use of an average as in Section A 3 iv may not be correct. Note the Frequency Resource Subcommittee (FRS) white paper discusses significant differences in Interconnection frequency response as a function of time of day. A conservative or worst case value should be used.

These details are important and should be coordinated with any emerging FRS standard.

The NYSRC suggests that the drafting team ensure all the necessary attributes pertaining to this standard appear in the standard and not in any companion document.

It seems that this is quite different from the Abnormal Operations Metric (AOM) in the first posting in that the diversity of ACE is not discussed. What assumptions apply? What would be typical FTL limits, so a comfort level for resulting BAALs in representative scenarios can be evaluated?

The BAAL was revised so that it is frequency-dependent, rather than diversity-dependent, and can be used in real-time by both the RA and Balancing Authority. The BAAL is explained in the "Introduction to the Balance Resources and Demand Standard."

STD Comment Form for 2nd Posting of Balance Resources and Demand Standard

11. Do you agree with the change made to the BAAL calculation?

- Agree with change from diversity-dependent to frequency-dependent BAAL
 Disagree change to BAAL
 Comments

The NYSRC does recognize that, as being developed, the standard is in fact addressing the core reliability issue related to high or low frequency deviations.

BAAL could be developed for fixed limits that are not a function of prevailing frequency. Why not keep it simple for the operators? During the recovery from a loss of generation, their target will be moving around on them.

12. Do you agree with Requirement 306?

- Yes
 No
 Comments

We concerned about the ease of use of variable MW limits during disturbance recovery.

Other Issues

13. List any Regional Differences for this standard.

- No known Regional Differences
 Regional Difference:

Comment:

The NYSRC Reliability Rules are not inconsistent with or less stringent than the proposed NERC Standard, and the NYSRC has elected not to propose that NYSRC Reliability Rules be made part of this Reliability Standard.

It is the NYSRC's position that (1) NERC specifies minimum standards, (2) a Region may establish more stringent standards for its members separate from the NERC standards, and (3) it is unnecessary to include these more stringent standards within the framework of the NERC standards.

14. Provide any other comments on this standard.

- Comments

15. Reaching consensus is a difficult task. If you have any ideas on how the SDT can move the industry forward in reaching consensus on what constitutes an 'acceptable risk to the interconnection', please share your ideas with the SDT.

- Suggestions

16. The requirement for setting frequency limits requires the identification of the "...highest approved UFLS Relay setting for the interconnection." Do you have any ideas on how the Eastern interconnection could identify its highest approved UFLS Relay setting? Would it be OK to let the Standards Developer mediate this?

- Suggestions