



Electric Reliability and Security for the West

Attachment A
Standard Authorization Request
WECC-0147
BAL-004-WECC-4 ATEC

Overview

This Standard Authorization Request (SAR) was received November 23, 2021, input into the WECC software system on November 23, 2021, and deemed complete on November 23, 2021. The WECC Standards Committee (WSC) vetted this SAR on December 7, 2021.

This SAR is converted and edited from its original “.aspx.” format into “.docx.” The original can be provided on request. If you have questions regarding this SAR, please contact [W. Shannon Black](#) at (503) 307-5782.

Introduction

Provide a brief overview of what you wish to accomplish.

This is a request to modify BAL-004-WECC-3, Automatic Time Error Correction (ATEC). (The resultant numbering will be BAL-004-WECC-4.) During the course of this modification, the assigned drafting team will also be asked to review the entire document thereby meeting the five-year review requirement of the WECC Reliability Standards Development Procedures.¹

Requester Information

Provide your contact information and your alternate's contact information:

Primary contact

- First name: W. Shannon
- Last name: Black
- Email: sblack@wecc.org
- Phone: (503) 307-5782
- Organization name: Western Electricity Coordinating Council (WECC)

Alternate

- First name: Steven
- Last name: Rueckert

¹ Per the WECC Reliability Standards Development Procedures, Maintenance of RRSs and CRTs: “The WSC shall ensure that each (Regional Reliability Standard (RRS)) is reviewed at least once every five years from the effective date of the most recent version of the document under review. If the review identifies needed changes, the WSC shall cause a remedial SAR to be filed. If the review does not identify needed changes, no further action is required.”

- Email: srueckert@wecc.org
- Phone: (801) 883-6878
- Organization name: Western Electricity Coordinating Council (WECC)

Type of Request

Specify the type of request: (Select one.)

This is a request to modify a WECC Regional Reliability Standard (RRS). This request also fulfils the mandated five-year review.

Create, Modify, Retire or Review a Document

Provide information for your request to create, modify, retire or review the document.

Pick from the dropdown provided in the online form.

Requested Action *(Select one.)*

- This is a request to modify a WECC Regional Reliability Standard (RRS). This request also fulfils the mandated five-year review.

Document Type *(Select one)*

- WECC Regional Reliability Standard (RRS)

Issue(s)

Specify what industry problem this request is trying to resolve.

Lack of Historic Data to Establish Compliance

BAL-004-WECC-3, Requirement R1 establishes limits on Accumulated Primary Inadvertent Interchange (PII_{ACCUM}). However, these limits are based on a value determined from the “previous calendar year.” While the creation of a new Balancing Authority (BA) or the shutdown of an existing Balancing Authority is rare, it has occurred and could occur again.

If that occurs and a BA does not have data from a previous calendar year, the subparts of the Requirements as written would establish a compliance limit of zero (0) MWh.

Maintaining a monthly PII_{ACCUM} Balance of zero as calculated by the Western Interchange Tool (WIT) is not operationally feasible. This can result in non-compliance with the Standard which cannot be mitigated until the end of the calendar year by allowing the limit for PII_{ACCUM} to increase as specified in Requirement R1, 1.1 or 1.2 of the Standard.



Five-year Review

This request meets the five-year review mandate of the Procedures.

Retirement and Structure

The assigned drafting team should consider whether BAL-004-WECC-3 should be retired in whole or in part and whether any portions of the Standard should be relocated/append to an existing NERC Standard as a WECC Regional Variance.² Further, because much of the WECC Regional Reliability Standard's (RRS) content stems from pre-2007 business practices, the Standard should be reviewed to determine which portions (if any) are business related as opposed to reliability related. With that determination made, any business-related content should be retired from the Standard and provided to the North American Energy Standards Board (NAESB) for disposition, subject to NERC/FERC disposition.

Of the Standard's eight Requirements, the stated "goal" of: 1) R1, R2, R4, and R6 is timely accounting, and 2) R2 and R6 is equity. (See Version 3, Guidelines and Technical Basis of the Standard)

In making a recommendation to keep or retire all or part of BAL-004-WECC-3, the assigned drafting team should weigh whether the primary impact of each Requirement adds reliability to the Interconnection or whether the Requirement's primary impact is commercial and/or accounting in nature. Where a Requirement is found to primarily target accounting, equity, or commercial activity, its retirement should be considered.

In making its recommendation, the drafting team should also consider whether the Standard's Requirements are properly located as a free-standing WECC Regional Reliability Standard or whether its Requirements should be appended to an existing NERC Standard as a Regional Variance. For example, if the review concludes that Requirements R1, R2, R4, and R6 should be retired, the remaining operational Requirements may better serve as a WECC Regional Variance.

Proposed Remedy(ies)

Specify how this request will address the issue you stated above.

Lack of Historic Data and Specific Language Concerns

The proposed remedial language is intended to address and establish a valid and reasonable PII_{ACCUM} limit where no data is available from the previous calendar year. The proposed remedial language addresses the

² Of note, the ATEC approach is not used anywhere else within NERC indicating it may not be essential to reliability. Further, NERC's parallel Standard, BAL-004-01 Time Error Correction, has been inactive since 2017.

start-up of a new BA, a BA footprint change, as well as the operational restart of a generation-only BA after being shut down for a period greater than one calendar year.

Existing Language

R1. Each Balancing Authority shall operate its system such that, following the conclusion of each month, the month-end absolute value of its On-Peak and Off-Peak, Accumulated Primary Inadvertent Interchange (PIIaccum), as calculated by the WECC Interchange Tool (WIT) or its successor electronic confirmation tool, are each individually less than or equal to:

1.1 For load-serving Balancing Authorities, 150% of the previous calendar year's integrated hourly Peak Demand,

1.2 For generation-only Balancing Authorities, 150% of the previous calendar year's integrated hourly peak generation.

Proposed Remedial Language (R1)

1.1 For load-serving Balancing Authorities, the greater of 150% of the previous calendar year's integrated hourly Peak Demand or 100% of the integrated hourly Peak Demand during the current calendar year.

1.2 For generation-only Balancing Authorities, the greater of 150% of the previous calendar year's integrated hourly peak generation or the total nameplate capability of the generation within the Balancing Authority.

Applicable Entities

Each function will be reviewed if affected. A dropdown will be provided. Check all applicable blocks.

"4. Applicability

4.1. Functional Entities

4.1.1 Balancing Authorities that operate synchronously in the Western Interconnection."

Detailed Description

Use this block to elaborate on anything that might have been missed above or to provide greater granularity.

This request will review and update the entire document, as needed.

This SAR takes no position on the retirement, structure, forum, or placement of the document. It only calls for the drafting team to review those issues as part of the five-year review.

Affected Reliability Principles

Which of the following reliability principles is MOST affected by this request? (Select one.)



Check the appropriate block that is provided on the online form. You need to select one of the NERC Reliability Principles that apply.

For example:

- **Reliability Principle 1** — Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

Document Information

Specify the document title, document number, and affected section regarding the request.

See above.

Reference Uploads

Please reference or upload any affected standards, regional business practices, criteria, policies, white papers, technical reports, or other relevant documents. If this request is based on a conflict of law, please include a copy of—or accessible reference to—the specific law or regulatory mandate in conflict.

Provide Additional Comments (if needed).

NA