# Posting 1

## Posting

This project was posted for comment from August 22 through September 21, 2022.

WECC distributed notice for the posting on August 10, 2022. The drafting team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized electronic template.

One comment was received on the project.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0147](https://www.wecc.org/Standards/pages/wecc-0147.aspx) project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

## TEXT

## Minority View

TEXT

There was no minority view.

## Proposed Effective Date

The proposed effective date is the first day of the second quarter following regulatory approval.

## Justification

TEXT

Entities may be using planning criteria other than the specified defaults. Setting the effective date as the first day of the second quarter should allow sufficient time to implement default criteria.

**Impact on Other Documents**

None.

## Action Plan

TEXT

On October 6, 2022, the [WECC-0147](https://www.wecc.org/Standards/pages/wecc-0147.aspx) BAL-004-WECC-4, Automatic Time Error Correction (ATEC) Drafting Team (DT) agreed to…

forward the project to the WECC Standards Committee (WSC) with a request for ballot. Because the next duly noticed WSC meeting is not scheduled until December 2022, staff will request that the WSC consider approving the request by taking an Action Without a Meeting per the WSC Charter. If approved, staff will open a Ballot Pool followed by a ballot.

Targeted events are as follows:

* Forwarded to the WSC September 15, 2022
* WSC Action Without a Meeting September 29, 2022
* Ballot Pool Opened October 6, 2022
* Ballot Pool Closed October 20, 2022
* Standards Briefing October 26, 2022
* Ballot Opened October 27, 2022
* Ballot Closed November 10, 2022
* WECC Board of Directors (if approved) March 7, 2023
* Effective Date July 1, 2023

No further DT meetings are contemplated.

## Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](mailto:sblack@wecc.org), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.

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| Commenter | Organization |
| Andria Jessup | Bonneville Power Administration (BPA) |

**Index to Questions, Comments, and Responses**

Posting One only covers Sections A-C of BAL-004-WECC-4.  Other sections will be covered in subsequent postings.

The DT is suggesting deletion of various Requirements. Although a cursory justification is offered below, this posting seeks both guidance and technical support as to whether various Requirements should be deleted vs. modified. For Posting 1, the drafting team is:

1. Requirement R1:
   1. Suggesting deletion of as-approved Requirement R1. As proposed, R1 remedies the timing concerns raised in the Standard Authorization Request (SAR). Do you agree R1 should be deleted? If you agree Requirement R1 should be deleted, please provide technical justification for that position.
2. Requirement R2:
   1. Suggesting combining as-approved Requirement R2 and as-approved Requirement R6. Do you agree that as-proposed R2 accurately consolidates as-approved R2 and as-approved R6? If not, please explain your answer.
3. Requirement R7:
   1. Suggesting deletion of as-approved Requirement R7. The DT asserts that the content of as-approved R7 is addressed in the balance of the as-proposed Requirements. Do you agree that all aspects of as-approved R7 are included in the balance of the as-proposed Standard? If you agree Requirement R7 should be deleted, please provide technical justification for that position.
4. Requirement R8:
   1. Suggesting deletion of as-approved Requirement R8. The DT asserts that where an entity complies with the balance of the proposed Standard, ATEC payback is automatic. As such, as-approved R8 is redundant. Further, as-approved R8 prohibits commercial activities that should fall outside of the purview of a Reliability Standard. Do you agree as-approved Requirement R8 can be deleted because it is redundant? If you agree Requirement R8 should be deleted, please provide technical justification for that position.
5. All Other:
   1. The DT invites comment on all other aspects of Sections A through C. Other sections will be addressed in subsequent postings.

**Question 1**

1. **The drafting team is suggesting deletion of as-approved Requirement R1. As proposed, R1 remedies the timing concerns raised in the Standard Authorization Request (SAR). Do you agree R1 should be deleted? If you agree Requirement R1 should be deleted, please provide technical justification for that position.**

| Summary Consideration: | See summary in the preamble. | |
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| Commenter/Comment | | Response |
| BPA | | No, R1 should not be deleted.  BPA suggests keeping the Version 4 proposed language but change the language to have the BA that exceeds 150% change their Lmax = L10. This will actually give a change in operations. This is not a new idea and is mentioned in the Requirement R1 Rationale section of the current BAL-004-WECC-3 standard:  Setting Lmax equal to L10.until the PIIaccum is below the limit in Requirement R1.  The proposed language also accounts for new BA's that have no history.  BPA agrees with the drafting team as to combining as-approved Requirement R2 and as-approved Requirement R6.  BPA agrees that as-proposed R2 accurately consolidates as-approved R2 and as-approved R6. |
| Should Requirement R1 be deleted? BPA suggests it should not.  BPA suggesting keeping the version -4 proposed language but change the language to have the BA that exceeds 150% change their Lmax = L10. This will actually give a change in operations. This is not a new idea and is mentioned in the R1 Rationale section of the current BAL-004-WECC-3 standard:  Setting Lmax equal to L10.until the PIIaccum is below the limit in Requirement R1.  The proposed language also accounts for new BA's that have no history.  BY Hydro says via email: R1: I support the argument that if ATEC is in service, primary inadvertent cannot accumulate without bound. I also maintain that Primary inadvertent accumulation, and the associated time error, has no reliability impact. Failure to support the return of frequency to schedule, on the other hand, has impact but that is the domain of BAL-001 R1. BAL-004 R1 should be deleted.  The drafting team appreciates BPA’s comment and concurrence on the proposed combination of as-approved Requirement R2 and as-approved Requirement R6. The team further appreciates BPA’s comment and concurrent that as-proposed R2 accurately consolidates as-approved R2 and as-approved R6. | | |

**Question 2**

**The drafting team is suggesting combining as-approved Requirement R2 and as-approved Requirement R6. Do you agree that as-proposed R2 accurately consolidates as-approved R2 and as-approved R6? If not, please explain your answer.**

| Summary Consideration: | See summary in the preamble. | |
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| Commenter/Comment | | Response |
| BPA | | Yes. However, BPA has concern that if R5 is deleted, a software vendor could simplify their product by not having these different operating modes (Flat Frequency, Flat Tie Line, Tie Line Bias, Tie Line Bias plus Time Error Control) included in AGC functionality.  Is this the only place requiring this functionality? Is this an issue? Where do the operating modes belong? |
| **Consolidation of R2 and R6**  The drafting team appreciates BPA’s comment and concurrence that as-proposed R2 accurately consolidates as-approved R2 and as-approved R6.  **Deletion of R5: Contract Concern**  However, BPA has concern that if R5 is deleted, a software vendor could simplify their product by not having these different operating modes (Flat Frequency, Flat Tie Line, Tie Line Bias, Tie Line Bias plus Time Error Control) included in AGC functionality.  BY HYDRO says via email: R5: I can imagine a vendor removing CNI and CF from AGC but I can’t easily imagine a BA accepting same. But point taken, and I offer that, in case glossary entries are inadequate, then BAL-005 would be the place to add this requirement. Yes BAL-005 is concerned with Reporting ACE but it is a Reliability Standard and if, for example, you are islanded and cannot calculate a Constant Frequency ACE then your reliability is at risk. //////////  BPA raises a contract concern that is present whether R5 is deleted or retained.  The content of the vendor’s software is predicated on the content of the contract associated with the software. Private contracts are outside of the scope of this project and, unless specifically agreed upon within the contract, changes to the software’s functionality are not likely mandated to align with Reliability Standards.  Restated at the hypothetical extreme, unless the vendor’s contract specifies that it must retain all functionality reflected in the Reliability Standards, the vendor could terminate all of its product’s functionality – regardless of what is stated in the Reliability Standards.    **Deletion of R5: Mode Change Ability**  Is this the only place requiring this functionality? Is this an issue? Where do the operating modes belong? DO WE NEED TO RETAIN THAT mandated ABILITY?  As approved, the crux of R5 appears to be more about ensuring the ability to change AGC modes than having a software field that corresponds to the change. (See BAL-004-WECC-X, Table of Compliance Elements, Severe VSL and Guideline and Technical Basis for Requirement R5.) A “Ctrl-F” search was done for all Reliability Standards searching for “AGC”, “Automatic Generator,” and “Automatic Generation Control.” Although AGC is referenced in MOD-027 and CIP-002, neither reference is a requirement for operation. | | |

**Question 3**

**The drafting team is suggesting deletion of as-approved Requirement R7. The DT asserts that the content of as-approved R7 is addressed in the balance of the as-proposed Requirements. Do you agree that all aspects of as-approved R7 are included in the balance of the as-proposed Standard? If you agree Requirement R7 should be deleted, please provide technical justification for that position.**

| Summary Consideration: | See summary in the preamble. | |
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| Commenter/Comment | | Response |
| BPA | | No. This is the only requirement regarding month-end adjustments. BPA proposes the following: 'The BA shall ensure that their month end adjustment was entered into WIT correctly in the NIA.'  The issue is some BA's do monthly meter adjustments, which is fine. However, the BA needs to ensure that a change was entered into ON/OFF Peak correctly and it needs to be added as 100% Primary. For BPA and BCH as an example, there was an agreement that approximately 33% be OFF and 66% be ON Peak. |
| The drafting team proposed to delete Requirement R7. BPA does not concur that the substance of the Requirement is covered elsewhere within the Standard.  This is the only requirement regarding month-end adjustments. BPA proposes the following: 'The BA shall ensure that their month end adjustment was entered into WIT correctly in the NIA. (AKA: Actual Net Interchange).  The issue is some BA's do monthly meter adjustments, which is fine. However, the BA needs to ensure that a change was entered into ON/OFF Peak correctly and it needs to be added as 100% Primary. For BPA and BCH as an example, there was an agreement that approximately 33% be OFF and 66% be ON Peak.  BYHYDRO offered in email: R7: In talking with our staff I’m told that month-end meter adjustments are reported separately for HLH and LLH. And they are folded into the month-end HLH and LLH inadvertent adjustments in the current Interchange Software. Perhaps the premise of this requirement (that meter adjustments are reported as net for the month and not for HLH and LLH) is obsolete and no longer relevant?  ALTERNATIVE REPLACEMENT?  “Each Balancing Authority shall enter its month-end adjustment into the Interchange Software as part of its Actual Net Interchange.” | | |

**Question 4**

**The drafting team is suggesting deletion of as-approved Requirement R8. The DT asserts that where an entity complies with the balance of the proposed Standard, ATEC payback is automatic. As such, as-approved R8 is redundant. Further, as-approved R8 prohibits commercial activities that should fall outside of the purview of a Reliability Standard. Do you agree as-approved Requirement R8 can be deleted because it is redundant? If you agree Requirement R8 should be deleted, please provide technical justification for that position.**

| Summary Consideration: | See summary in the preamble. | |
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| Commenter/Comment | | Response |
| BPA | | No. BPA believes it is critical that this requirement stays intact. The key to R8 is disallowing any inadvertent paybacks outside of ATEC. If BA's start making bilateral exchanges, then ATEC becomes broken and not functioning.  If one BA has a positive accumulation and another BA has a negative accumulation, they can agree to 'exchange' the error off the books to ATEC, then the error will never be paid back to the interconnection.  The DT invites comment on all other aspects of Sections A through C. Other sections will be addressed in subsequent postings.    Created at 9/20/2022 11:37 AM by Andrea Jessup  Last modified at 9/20/2022 11:37 AM by Andrea Jessup |
| The drafting team is suggesting deletion of as-approved Requirement R8. BPA does not agree.  The drafting team appreciates BPA’s concern; however, as stated above regarding contract terms, a Reliability Standard cannot in and of itself prohibit an applicable entity from entering into a contract outside of the Standards.  On the one hand, the contract-related language may be moot; but, its predicate continues to be informative. On the other hand, the use of the term “rather” implies that a contractual exchange may be available and actually preferred by others. This permissive language adds ambiguity to the mandate: “shall…use…ATEC.”  OPTION 1: JUST LEAVE IT ALONE.  OPTION 2: KEEP THE INTENT BUT MOVE THE PIECES TO THE RIGHT PLACES.  The drafting team believes the “rather than” clause can be deleted and the mandate to use ATEC will be just as firm without raising the specter of contractual prohibition. As such, the proposed R8 would read as follows:  “Each Balancing Authority shall payback Inadvertent Interchange using ATEC.” As a result, if an entity entered into a payback transaction not “using ATEC” the entity would not be meeting the letter of the Requirement.  To retain the informative narrative, the Justification section for Requirement R8 would be updated as follows:  “Justification: Additional unilateral and bilateral exchanges disturb the balance and distribution between Primary Inadvertent Interchange and Secondary Inadvertent Interchange throughout the *Western* Interconnection; thereby stranding Secondary Inadvertent Interchange.  To ensure the integrity of ATEC, only ATEC is to be used for payback purposes. Although unilateral/bilateral payback arrangements were allowed per-ATEC, Requirement R8 mandates that ATEC is the only approved means to payback.“  Option 3:  BC HYDRO offered via email: R8: I agree that PII is not to be paid back outside ATEC. Wasn’t it summer of 2009 that everyone’s PII balances got zeroed and the whole thing restarted? There were some BA’s not doing ATEC at all and others that weren’t calculating it correctly and it became an irreversible mess. Perhaps R8 can be folded into R3, since R3 already states that ATEC must be in service. For example:  Each Balancing Authority shall pay back (maintain? exchange?) its PII using only its ATEC, and shall keep its ATEC in service with an allowable exception period of less than or equal to an accumulated 24 hours per calendar quarter for ATEC to be out of service.  This period is separate from any period during which the Interchange Software was unavailable | | |

**Question 5**

**The drafting team invites comment on all other aspects of Sections A through C. Other sections will be addressed in subsequent postings.**

| Summary Consideration: | See summary in the preamble. | |
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| Commenter/Comment | | Response |
| BPA | | No further comments. |
| The drafting team greatly appreciates BPA’s in-depth and timely participation in the Standards development process. | | |