# 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. |
| **Deletion of Requirement R1**  During the Comment/Response meeting, the drafting team heard BPA’s concern that elimination of Requirement R1 could result in losing operational boundaries. The team concurs that even though the 150% has neither a current nor history technical justification, it does nonetheless establish an operational boundary the BA cannot exceed. Its deletion could result in BA’s operating far beyond the 150% threshold.  The DT also concluded that the language could be further refined to better align with actual operations. As such, the DT proposes the following for R1:  Posting 2, Proposed R1.  Each Balancing Authority shall operate its system such that, following the conclusion of each month, the average of each hour’s Accumulated Primary Inadvertent Interchange (PIIaccum) does not exceed 150% of the average load in those hours, as calculated by the Interchange Software. (Light load and heavy load are calculated separately.) : [Violation Risk Factor Medium:] [Time Horizon: Operations Assessment]   * 1. For generation-only Balancing Authorities:      1. The average of each hour’s (PIIaccum) shall not exceed 150% of the average generation in those hours.   The DT believes this approach encourages remediation earlier than the as approved metric.    See Question 2 for response regarding combination of R2 and 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. | |
| --- | --- | --- |
| 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.  Please see the response to Question 5 addressing Requirement R5. | | |

**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. |
| **Deletion of Requirement R7**  BPA proposes to reinstate Requirement R7 to ensure the Requirement aligns with and does not interfere with existing business practices. BPA suggests the following:  Each Balancing Authority shall ensure that its month-end adjustment is entered into WIT correctly in the Net Interchange - Actual Interchange (NIA).  The DT concluded that although deletion of the Requirement should have no impact on current practices, retaining the Requirement as a means to buttress existing practices could be accommodated.  However, BPA’s suggested language requires the BA to “correctly” input data. Use of the adverb invites ambiguity as the adverb can be subjective and could also serve as the crux of a bilateral contract dispute. What constitutes “correctly” in BPA’s scenario is based on an extrinsic agreement between two parties. As such, “correctly” was not included in the proposed reinstatement of R7. Rather, the DT proposes the following:  Posting 2, proposed R7:  R7. Each Balancing Authority shall input its month-end adjustment into the Interchange Software as part of its Actual Net Interchange.  M1. Each Balancing Authority will have evidence that it input 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. | |
| --- | --- | --- |
| 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. |
| **Deletion of Requirement R8**  OPTION 1: PARTIAL DELETION – MOVE THE “RATHER THAN” CLAUSE  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.  The DT recognizes the value of the predicate “rather than” but suggests the language is advisory rather than compulsory and would be best served if located in the Rationale section. As proposed in Posting 2, Requirement R8 would read as follows with the advisory clause relocated to the Rationale section providing for R8:  Posting 2, proposed R8:  Each Balancing Authority shall payback Inadvertent Interchange using ATEC.  The Rationale would be updated as follows:  To retain the advisory narrative, the Rationale section for Requirement R8 would be updated as follows:  Justification:  To ensure the integrity of ATEC, only ATEC is to be used for payback purposes. Although unilateral/bilateral payback arrangements were customary prior to ATEC, Requirement R8 mandates that ATEC is the only approved means to address ATEC.  Option 2: FULL DELETION BECAUSE ITS COVERED IN R3.  The DT concurs with BPA that ATEC should be the only recourse to address payback; however, as approved R8 is redundant to as approved R3 and as proposed RX and can therefore be deleted.  If ATEC is in service as required under R3, the adjustments are made automatically and there is no need to reiterate that ATEC has to be used as is the case in as approved R8. Even though R3 is only specific to times when ATEC is in service, once ATEC is placed back in service input of data values will automatically correct the imbalance thereby negating the need for additional Requirement language. This approach is further supported by the as proposed RX that requires the BA to use the Interchange Software – and by default not use unilateral/bilateral transactions.  Historically, this DT believes that previous DTs wanted to state an affirmative prohibition against using unilateral/bilateral contracts rather than solely using ATEC. However, because Requirements are not worded in the negative, the basic mandate to use ATEC (as approved R3) was restated in as approved R8 adding the “rather than” suffix to highlight the unilateral/bilateral concern. This is a less-than-optimal drafting approach that creates a redundant Requirement and may create a double jeopardy for the BA between R3 and R8.  As such, the DT holds to its position that R8 should be deleted.  To retain the prohibitive intent of R8, the as approved Rationale for R8 would be updated and relocated to R3 as follows:  **Premise:** ATEC includes automatic payback of Primary and Secondary Inadvertent Interchange. Use of extrinsic means to adjust ATEC, such as unilateral or bilateral agreements, disrupts the automatic nature of the ATEC function; thus, the ATEC process is the only allowable means to implement payback.  **Justification**: Adjustments implemented through extrinsic unilateral or bilateral agreements disturb the balance and distribution between Primary and Secondary Inadvertent Interchange throughout the Interconnection; thereby stranding Secondary Inadvertent Interchange.  **Goal**: To avoid stranding Secondary Inadvertent Interchange and to specifically annotate that extrinsic agreements are not to be used to implement payback. | | |

**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.  (Carried over from Question 2.)  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? |
| The drafting team appreciates BPA’s in-depth and timely participation in the Standards development process.  **Deletion of R5: Contract Concern**  BPA raises a contract concern that is present whether R5 is deleted or retained.  Because the content of the vendor’s software is predicated on the content of the contract associated with the software, the vendor could change the software whether or not R5 is kept or deleted. Software changes would be outside of the scope of this project and are best addressed directly with the vendor.  This will continue to be the case unless/until the software vendor is listed as an applicable entity as approved by NERC. Unless that occurs, Standards requirements cannot be imposed on non-applicable entities.    **Deletion of R5: Ability to Change Operating Modes**    *Not Addressed Elsewhere*  The DT concluded that the ability to change AGC modes is not addresses in other approved Standards. A “Ctrl-F” search was done of 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 similar operation requirement; thus, R5 is the only known Requirement addressing the ability to change operating modes.  *The Focus of the Requirement – Ability to Change Modes*  As approved, the crux of R5 is the *ability to change* AGC modes rather than ensuring a software field or changing the mode under specified conditions. (See BAL-004-WECC-X, Table of Compliance Elements, Severe VSL and Guideline and Technical Basis for Requirement R5.)  Though the DT believes this Requirement is improperly placed in this Standard (having nothing to do with ATEC), the DT proposes to reinstate R5 out of an abundance of operational caution. Further, noting that the parenthetic statements are dicta they have been deleted as superfluous.  The DT concurs that if the Requirement is needed for operations, it should migrate via a NERC Standard Authorization Request (SAR) to either a NERC Standard or the NERC Glossary of Terms Used in Reliability Standards. This approach is outside of the scope of this project.  Posting 2 proposed R5 would read as follows:  **R5.** Each Balancing Authority shall be able to change its Automatic Generation Control (AGC) operating mode to correspond to current operating conditions. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations]  **M5.** Each Balancing Authority will have evidence that its AGC is able to change operating modes to correspond to current operating conditions. | | |