# 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

## Requirements are renumbered in Posting 2. When commenting on Posting 2, please be clear as to which Posting 2 Requirement the comments attach.

|  |  |
| --- | --- |
| Posting 1 | Posting 2 |
| RX | R1 – New Requirement |
| R1 | R2  |
| R2 | R3 |
| R3 | R4  |
| R4 | R6 |
| R4a | R7 – New Requirement |
| R5 | R5 |
| R6 – Content moved to Posting 2, R2. | See Posting 2, R2. Content from Posting 1, R2 and R6 is consolidated into Posting 2, R2.  |
| R7  | R8 |
| R8 – Proposed for Deletion because it is covered in Posting 1, R3 / Posting 2, R4. | See Posting 2, R4. |

* A.1. Title, footnote 1 was deleted. Its content is covered in Section 7, Standards Definitions.
* R2, emphasis shifted to the average of each hour’s Accumulated Primary Inadvertent Interchange.
* R5, deleted the parentheticals.
* R8, added a requirement to input month-end adjustments into the Interchange Software.
* The Rationale Section has not been fully addressed, but some changes were made for Posting 2. Numbering and text for this section are subject to change.
	+ Rationale R1, was added.
	+ Rationale R3, the instructional narrative from Posting 1 R8 was relocated to support Posting 2 R3.

## Minority View

* The Bonneville Power Administration (BPA) does not agree that as approved Requirement R8 should be deleted. The drafting team disagreed, moving forward with its recommendation to delete as approved Requirement R8. The team concluded that the content is covered in Posting 2, R1, R3, and portions of R4. These combined Posting 2 Requirements ensure ATEC is on and serving as the primary means of calculating ATEC. Further, the suffix of Posting 1 as approved R8 creates ambiguity and an artificial prohibition against entering into contracts.

# Implementation Plan and Effective Date

## Proposed Effective Date

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

## Justification

As proposed, many of the required tasks are already being performed in the same or similar manner as those currently approved. The new or modified tasks impose a minimal burden achievable in the time window between regulatory approval and the proposed Effective Date.

**Impact on Other Documents**

None.

## Action Plan

On December 1, 2022, the WECC-0147, BAL-004-WECC-4, Automatic Time Error Correction (ATEC) Drafting Team (DT) agreed to post Posting 2 for a 30-day comment period. Once the comment period opens, comments can be submitted by selecting the Submit and Review Comments accordion on the WECC-0147 homepage. Then, click Submit Responses to Posting 2.

The posting period will open December 12, 2022, and close January 11, 2023.

The DT will meet on January 19, January 26, and February 16, 2023, to address comments received.

Posting 2 covers only Sections A-C. The remaining portions of the document will be addressed as Requirements draw nearer to completion.

## Contacts and Appeals

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

|  |  |
| --- | --- |
| 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. |
| --- | --- |
| 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 (As approved R1 becomes proposed R2 in Posting 2)**During the Comment/Response meeting, the drafting team heard BPA’s concern that elimination of Posting 1, Requirement R1 could result in losing operational boundaries. The team concurs that even though the 150% has neither a current nor historic 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 agreed to keep the Requirement with further refinement. The following language is proposed to replace Posting 1 Requirement R1 as approved: (Posting 2, Proposed Requirement R2)“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]**2.1.** For generation-only Balancing Authorities:**2.1.1.** 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 as approved Posting 1 R2 and R6. |

**Question 2**

**The drafting team is suggesting combining as approved Requirements R2 and R6. Do you agree that as-proposed R2 accurately consolidates as approved R2 and 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 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. |
| --- | --- |
| 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).” Emphasis added. 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: “Each Balancing Authority shall input its month-end adjustment into the Interchange Software as part of its Actual Net Interchange.M. 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**The DT concurs with BPA that ATEC should be the only recourse to address payback.After considering BPA’s approach, the DT opted to delete Requirement R8 in its entirety because it is covered in as approved Requirement R3, and buttressed by proposed RX. The drafting team concluded that as approved, Requirement R8 performs two tasks: 1) creation of a mandate to use ATEC, and 2) prohibition against entering into any ATEC settlement contract extrinsic to the Standard. Since as approved Requirement R3 (renumbered R4 in Posting 2) requires the entity to “keep its [ATEC] in service” there is no need for a redundant requirement to payback “Inadvertent Interchange using ATEC” as required in R8. If ATEC is in service (R3) payback occurs whether specifically mandated in R8 or not. Further, the R8 suffix (“rather than bilateral and unilateral payback”) insinuates a prohibition against extrinsic contractual relations. This creates ambiguity and may overstep a Requirement’s intent to create affirmative reliability tasks as opposed to creating a prohibition to a given action. As such, the DT holds to its position that R8 should be deleted.To retain the original 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 acceptable means to implement payback within the Western Interconnection (WI).**Justification**: Adjustments implemented through extrinsic unilateral or bilateral agreements disturb the balance and distribution between Primary and Secondary Inadvertent Interchange throughout the WI; thereby stranding Secondary Inadvertent Interchange. Primary inadvertent is exchanged with the WI as a whole and cannot be exchanged between two or more BAs.**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. |
| --- | --- |
| Commenter/Comment | Response |
| BPA | No further comments. (The below comment is 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. Because the team could not find Version 3, R5 covered in any other Standards the team opted to keep the content out of an abundance of operational caution. However, because the parentheticals create ambiguity, they have been removed. At one extreme, the parentheticals could be viewed as advisory such as “for example.” At the opposite extreme, the language could be interpreted to require specific tasks that do not align with “correspond to current operating conditions.”As such, the parentheticals are removed. Posting 2, 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.Forms of acceptable evidence of compliance with Requirement R5 include but are not limited to any one of the following:* + - Screen shots from Energy Management System,
		- Demonstration using an off-line system.

While opting to retain R5, the DT makes the following observations: 1. BPA’s concern regarding third parties is present whether R5 is retained or deleted. 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 third parties. 1. Although the Requirement does not appear to be covered elsewhere, the Requirement is ill-placed in this Standard as it is not required to implement ATEC. A NERC SAR would be required to properly relocate the Requirement.
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