# Posting 4

## Posting

This project was posted for comment from June 21 through July 21, 2023.

WECC distributed notice for the posting on June 13, 2023. The WECC-0147 BAL-004-WECC-4, Automatic Time Error Correction (ATEC) Drafting Team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized WECC-provided web portal.

One comment was received.

## 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

## The drafting team appreciates WECC Compliance’s insights provided during the Posting 4 comment period. After open discussion between the drafting team and WECC’s Compliance representative during the July 27, 2023, drafting team meeting, concerns were assuaged, and the parties agreed no further changes to the Standard were necessary.

## Minority View

There was no minority view to consider.

## 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.

## Action Plan

On July 27, 2023, the WECC-0147 BAL-004-WECC-4, ATEC Drafting Team agreed that no further Substantive changes were required for this project. To ensure depth of consensus, the team agreed to finalize the documents and circulate them to the team for final review. After review, the team will vote on whether to forward the project to the WECC Standards Committee (WSC) with a request for ballot.

The vote will be taken via email, closing August 2, 2023, at 6:00 p.m. MT. If the vote is affirmative, the project will be placed on the August 9, 2023, WSC agenda with a request for ballot.

## 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 |
| W. Shannon Black on behalf of WECC Compliance | Western Electricity Coordinating Council (WECC) |

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

**Question**

1. **The drafting team invited comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| WECC Compliance | WECC Compliance is concerned that the enhanced edits may not have addressed the problem for which the Standard Authorization Request (SAR) was filed. The fact pattern from which the SAR arose occurred/occurs when a Registered "existing" Balancing Authority (BA) shut down for over a year. As a result, when it restarted it was subject to complying with a limit on Inadvertent of zero MW, which was not possible.  The proposed Requirement R2 would put them in the same situation.  The process identified in Requirement R2.1 is acceptable; but that is only identified for "new" BA's. It does not address an existing BA that was shut down for the previous calendar year.  WECC Compliance suggests R2.1 could be modified to include any existing BA that was out of service for the previous calendar year. Additionally, for the proposed language to work, an assumption must be made that the standard is NOT applicable to BA that is not operating. This would only apply to our Gen Only BA's because at that time they are not "operating synchronously" within the Western Interconnection. Because this is one possible interpretation, the language should be updated to avoid ambiguity.  If not corrected, proposed Requirement R4 would require continued calculation of Inadvertent and maintaining ATEC in service with no ability to pay back. |
| The drafting team appreciates WECC Compliance’s insights.  Where a Balancing Authority (BA) is not a BA for a year, then all of its resources (load and generation) are moved into one or more different BAs. Along with the shifting of those resources, primary inadvertent also shifts to other BAs.  When this BA decides to move its resources back into its own BA, it should be considered a new BA. When this occurs, the BA is covered under Requirement R2.1.  Even if not generating, a generation-only BA is still a BA and needs to continue to calculate its ACE and payback inadvertent via ATEC. Any generation-only BA is a fully operational BA and is held to all the same standards as all other BAs.  Where a BA ceases to generate for more than one year, Requirement 2.1 applies as opposed to the body of Requirement R2, once the BA resumes generation.  For additional information on specific fact patterns, the reader can refer to either of the following NERC Guidelines:  Reliability Guideline Inadvertent Interchange March 22, 2022, Chapter 2: Managing the Balancing Authorities’ Balance, Dissolution of Balancing Authorities. <https://www.nerc.com/comm/RSTC_Reliability_Guidelines/Reliability_Guideline_Inadvertent_Interchange.pdf>  (or)  Balancing Authority Area Footprint Change Tasks Reference Document, IV. Inadvertent Interchange, page 4. <https://www.nerc.com/comm/OC/ReferenceDocumentsDL/BAA_Footprint_Change_Reference_Document_March_2019.pdf> | | |