

October 1, 2018

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**Re: Informational Filing Regarding BAL-001-2, Docket No. RM14-10-000  
(Errata to Include Attachment)**

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits this informational filing regarding Reliability Standard BAL-001-2 (Real Power Balancing Control Performance), as directed by the Federal Energy Regulatory Commission (“Commission”) in Order No. 810.<sup>1</sup> Reliability Standard BAL-001-2 is intended to ensure that Interconnection frequency is maintained within predefined frequency limits and improved upon the prior version of the standard by adding a frequency component to the measurement of a Balancing Authority (“BA”) Area Control Error (“ACE”) called the BA ACE Limit (“BAAL”).

In approving Reliability Standard BAL-001-2, the Commission directed NERC to submit an informational filing after implementation of the standard regarding potential impacts on System Operating Limit (“SOL”) and Interconnection Reliability Operating Limit (“IROL”) exceedances in the Western and Eastern Interconnections.<sup>2</sup> In particular, the Commission stated:

The Commission adopts the NOPR proposal regarding NERC’s submission of an informational filing. .... Further, we find that the informational filing should encompass both the Western and Eastern Interconnections, as there were concerns about possible increases of SOL/IROL exceedances in both Interconnections.

....Therefore, we direct NERC to make an informational filing 90 days after the end of the two-year period following implementation that includes an analysis of data (all relevant events or a representative sample) on whether experience with the Balancing Authority ACE Limit in the first two years after approval has seen ACE swings and

<sup>1</sup> *Real Power Balancing Control Performance Reliability Standard*, Order No. 810, 151 FERC ¶ 61,048, 80 Fed. Reg. 22,395 (2015) (“Order No. 810”).

<sup>2</sup> SOL is the value (such as MW, MVar, Amperes, Frequency or Volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. An IROL is a SOL that, if violated, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk power system.

unscheduled power flows or inadvertent interchange that could cause SOL/IROL exceedances. However, if it is evident that during this two-year period the issues discussed above are creating SOL/IROL exceedances NERC should provide that information to the Commission, together with appropriate recommendations for mitigation, as this information becomes available. Further, NERC should also make the underlying data available to Commission staff upon request.<sup>3</sup>

The attached report presents NERC's analysis regarding whether experience with the BAAL has resulted in ACE swings and unscheduled power flows or inadvertent interchange that could cause SOL/IROL exceedances. To complete this analysis, NERC evaluated trends in frequency trigger limit exceedances, unscheduled flow mitigation hours in the Western Interconnection, transmission loading relief procedures in the Eastern Interconnection, frequency performance, and inadvertent interchange. Based on this analysis, NERC concludes that the BAAL has not resulted in an increase in SOL/IROL exceedances.

NERC is not requesting any Commission action on the instant filing. NERC respectfully requests that the Commission accept this filing for informational purposes only.

Respectfully submitted,

/s/ Candice Castaneda  
Candice Castaneda

*Counsel for North American Electric Reliability  
Corporation*

cc: Official service list in Docket No. RM14-10-000

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<sup>3</sup> Order No. 810, PP 36-38. The Commission also directed NERC to revise the definition of Reporting ACE, which NERC filed and the Commission approved in 2016. *See, North Am. Elec. Reliability Corp.*, Docket No. RD16-7-000 (Letter Order June 23, 2016). This informational filing satisfies all outstanding directives in Order No. 810.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service lists compiled by the Secretary in the above-referenced proceedings.

Dated at Washington, D.C. this 1<sup>st</sup> day of October, 2018.

*/s/ Candice Castaneda*

Candice Castaneda  
*Counsel for North American  
Electric Reliability Corporation*