

March 4, 2020

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

ATTN: Andrew Dodge, Director, Office of Electric Reliability

Re: Request for Additional Time to Respond to Data Request
North American Electric Reliability Corporation, Western Electricity Coordinating Council
Docket No. RM19-20-000

Dear Mr. Dodge:

The North American Electric Reliability Corporation (“NERC”) and Western Electricity Coordinating Council (“WECC”) hereby request an additional 45 days to respond to the data request issued in the above-referenced docket on February 18, 2020.¹

On September 6, 2019, NERC and WECC filed a joint petition with the Commission for approval of proposed regional Reliability Standard BAL-002-WECC-3 (Contingency Reserve), in which Requirement R2 of the currently effective standard is proposed to be retired.² In this petition, NERC and WECC stated that Requirement R2 is now redundant to the continent-wide frequency response standard and, based on the results of a one-year field test performed by WECC from May 1, 2017 to April 30, 2018, WECC determined that retirement of Requirement R2 would have no adverse impact on reliability in the Western Interconnection.

On February 18, 2020, the Commission, pursuant to authority delegated to the Director of the Office of Electric Reliability, issued a data request seeking additional information within 30 days. Specifically, the data request seeks:

¹ *Data Request in Response to Joint Petition Seeking Approval of Regional Reliability Standard BAL-002-WECC-3*, Docket No. RM19-20-000 (Feb. 18, 2020).

² *Petition of NERC and WECC for Approval of Proposed Regional Reliability Standard BAL-002-WECC-3*, Docket No. RM19-20-000 (Sep. 6, 2019).

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- The following data, from April 30, 2018 through September 30, 2019: (1) for any reportable Disturbance Control Standard (“DCS”) event, the date, time and required amount of Contingency Reserves at the time of the event, the actual amount of Operating Reserves – Spinning at the time of the event, and the actual DCS performance; and (2) for events involving a loss of 700 megawatts (“MW”) or greater, whether it is a reportable DCS event or not, the date and time of the event, the name of the resource(s), and the total MW loss.
- The amount of spinning reserve above or below 50 percent during non-event times on an hourly basis from May 1, 2017 through September 30, 2019.
- Supporting data for NERC frequency response metric (M-4) as it pertains to the Western Interconnection from May 1, 2017 through September 30, 2019.

NERC and WECC respectfully request that the Commission grant NERC and WECC an additional 45 days to submit the requested information. WECC and NERC believe they have the ability to obtain all or most of the requested data; however, the process of collecting the data will take additional time beyond the 30 days originally provided for response.

As NERC and WECC noted in their September 6 joint petition, WECC, with NERC approval, provided a compliance waiver for Requirement R2 to responsible entities in order to conduct the one-year field test.³ After it was determined that Requirement R2 should be retired, the compliance waiver was extended to allow for the completion of the regulatory approval process.

Following the conclusion of the field test, WECC did not continue to collect the information that it collected during the field test. WECC, therefore, must obtain this data from the entities that possess it. In some cases, as the responsible entities had been granted a compliance waiver, the Reserve Sharing Group will need to request the amount of Operating Reserve – Spinning being carried from some Balancing Authorities, which could take additional time. An unrelated transition in Reserve Sharing Groups in the Interconnection after the conclusion of the field test could also cause a delay in certain data being provided to WECC.

Under the circumstances, NERC and WECC submit that a 45-day extension of time is appropriate and reasonable and respectfully request that the Commission grant the request. If granted, NERC and WECC would file a response to the data request by no later than Monday, May 4, 2020.

³ *Id.* at 13.

Respectfully submitted,

/s/ Lauren A. Perotti

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 4th day of March, 2020.

/s/ Lauren A. Perotti

Lauren A. Perotti

*Counsel for North American Electric
Reliability Corporation*