

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

BAL-002-WECC-1: Regional) **Docket No. RM09-15-000**
Reliability Standard for Resource)
Demand and Balancing)

**ADVICE OF THE
WESTERN INTERCONNECTION REGIONAL ADVISORY BODY
TO THE FEDERAL ENERGY REGULATORY COMMISSION REGARDING
THE WECC REGIONAL RELIABILITY STANDARD FOR RESOURCE AND
DEMAND BALANCING**

Pursuant to Section 215(j) of the Federal Power Act, the Western Interconnection Regional Advisory Body (WIRAB) submits the following advice to FERC regarding its March 18, 2010 Notice of Public Rulemaking (“Version One Regional Reliability Standard for Resource and Demand Balancing”), in which FERC proposes to remand BAL-002-WECC-1. After an extensive regional standards development process, WECC submitted BAL-002-WECC-1 to NERC on June 11, 2008 to improve on and replace WECC-BAL-002-0, one of eight regional reliability standards approved by FERC on June 8, 2007. In a March 18, 2010 Notice of Public Rulemaking (NOPR), FERC proposed to remand the revised regional standard BAL-002-WECC-1. On May 24, 2010, WECC submitted extensive comments in response to the NOPR. The WECC comments included attachments on the required amount of frequency-responsive reserves in the Western Interconnection and on the effects of an extension of the contingency reserve replacement period.

WIRAB agrees with WECC (in its May 24, 2010 comments) that its proposed regional standard significantly improves on the current regional standard (pgs. 4-5). The proposed standard extends contingency reserve requirements to renewable resources (the fastest growing generation source in the Western Interconnection), limits load shedding to meet contingency reserves, includes demand-side management that can be deployed within 10 minutes in interruptible load, and clarifies such ambiguous terms as “load responsibility.” Clarification of the ambiguous terms in the existing standard alone

makes a major improvement to reliability by making the reserve requirements clearer and easier to enforce. . The proposed standard is more stringent than the continent-wide standard. Its contingency reserve requirement is the *greater* of the most severe single contingency (the continent-wide requirement) *or* 3% of load plus 3% of net generation. (pgs. 6-10). WIRAB believes that WECC has adequately responded to and clarified issues raised by FERC in its March 18, 2010 NOPR. (pgs. 11-14) These issues include the rationale for the extension of the contingency reserve restoration period from 60 to 90 minutes after the end of the 15 minute disturbance recovery period. The proposal makes the contingency reserve restoration period identical to that in the continent-wide standard, and permits more systematic use of e-tag transactions during reserve restoration.

Section 215(d)(2) of the Federal Power Act states “The Commission shall give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard and *to the technical expertise of a regional entity organized on an Interconnection-wide basis with respect to a reliability standard to be applicable within that Interconnection*, but shall not defer with respect to the effect of a standard on competition” (emphasis added). WIRAB believes that FERC should give due deference to the efforts and technical expertise of WECC in developing and enforcing regional reliability standards. (pg. 15-16)

WIRAB is aware of FERC’s concern about frequency responsive reserves. Indeed, WECC has also conducted studies of this topic. However, WIRAB believes that further inquiry is necessary to move from studies to standards appropriate to each region. In the meantime, FERC should not deny the Western Interconnection of the reliability benefit of an improved Contingency Reserves standard. WIRAB recommends that FERC approve the proposed standard BAL-002-WECC-1 and continue its examination of frequency responsive reserves.

WIRAB Recommendation

WIRAB recommends that FERC approve the proposed standard BAL-002-WECC-1. FERC should continue its examination of frequency response reserves.