

Implementation Plan

Standards Authorization Request (SAR)

The original SAR is located [here](#).¹ Documentation templates have been updated for final filing.

Approvals Required

- WECC Board of Directors June 2019 (Pending)
- NERC Board of Trustees Pending
- FERC Pending

Effective Date

The WECC-0115 project asserts that BAL-002-WECC-2a, Contingency Reserve, Requirement R2 became redundant to BAL-003-1.1, Frequency Response and Frequency Bias Setting, Requirement R1 effective April 1, 2016. Because that date has passed, retirement of BAL-002-

¹ <https://www.wecc.org/Reliability/WECC-0115%20BAL-002-WECC-2%20Contingency%20Reserve%20SAR%20to%20Retire%20Requirement%20R2.pdf>

WECC-2a, Contingency Reserve, Requirement R2 can be effective immediately on receipt of regulatory approval.

Justification of Effective Date

The reliability-related substance of WECC-0115 BAL-002-WECC-2a Contingency Reserve, Requirement R2 is contained in BAL-003-1.1 Frequency Response and Frequency Bias, Requirement R1. (See DT White Paper and Response to Comments for Posting 2.²)

Because the reliability task is addressed in BAL-003-1.1 Requirement R1, BAL-002-WECC-2a Requirement R2 is redundant and can be retired.

Impact on Other Standards

As to other existing and proposed standards, the drafting team (DT) notes that some confusion may arise as to how the retirement of WECC-0115 BAL-002-WECC-2a, Requirement R2 may interplay with the existing BAL-002-1, Disturbance Control Performance standard. BAL-002-1, Requirement R2.3 requires the applicable entity (the Regional Reliability Organization *or* the Reserve Sharing group) to “specify its Contingency Reserve policies, including...(R2.3) ...the permissible mix of Operating Reserve – Spinning and Operating Reserve –Supplemental that may be included in Contingency Reserve.” Arguably, BAL-002-WECC-2a Requirement R2 meets this requirement.

The DT disagrees that retention of BAL-002-WECC-2a Requirement R2 is the only means of compliance with BAL-002-1. At a high level, since BAL-002-1 has no Measure for the associated Requirement R2, how compliance might be met is unclear. Further, since the only Measure provided requires that the Balancing Authority *or* the Reserve Sharing group “shall calculate and report compliance with the Disturbance Control Standard,” there is a disconnect between the required performance (have a policy) and the required Measure (perform a calculation).

² <https://www.wecc.org/Reliability/WECC-0115%20Posting%201%20BAL-002-WECC-2%20Retire%20R2%20-%20Response%20to%20Comments%2010-22%20through%2012-8-2015.docx>
<https://www.wecc.org/Reliability/WECC-0115%20Posting%202%20BAL-002-WECC-2%20Request%20to%20Retire%20R2%20-%20From%20Tech%20Editor.docx>



Consideration of Early Compliance

The DT sees no concerns with early compliance.

Action Plan

On June 18, 2019, the WECC Standards Committee (WSC) will review the project for approval followed by WECC Board of Directors (BOD) disposition during the June 2019 BOD meeting.

The full project is available for review on the WECC website at the WECC-0115 homepage.

