

RFC Reliability Standards Voting Process

Detailed Ballot Voting Results

08/31/2009 1:38 pm

BAL-502-RFC-2 Planning Resource Adequacy Analysis, Assessment and Documentation

Ballot Period: 1

Voting Period: **10/16/2008 thru 10/30/2008**

Passing %: **50.00**

Certified Date: **11/03/2008**

Certified Outcome: **PASSED**

Distribution Provider	Yes	No	Abstain	Total Eligible Votes	Ballot Outcome
	11	0	0	11	PASSED
Yes Voters					
Douglas GHohlbaugh					Ohio Edison Company
Edward PCox					Kingsport Power Company
Henry WStevens					Metropolitan Edison Company
Jeffery CHubbartt					Toledo Edison Company
Jeffrey CMueller					Public Service Electric and Gas Company
John DKruse					Commonwealth Edison
Ken Esber					Pennsylvania Electric Company
Mark AKoziel					Jersey Central Power & Light
Sam JCicccone					Cleveland Electric Illuminating Company
Vincent JCatania					PECO Energy Company
William CMitchell					Delmarva Power
Generator: Owner, Oper.	Yes	No	Abstain	Total Eligible Votes	Ballot Outcome
	10	0	0	11	PASSED
Yes Voters					
Annette MBannon					PPL - Lower Mount Bethel Energy, LLC
Ken Dresner					FE Generation Corporation
Kent JKujala					Detroit Edison
Mark AHeimbach					PPL Martins Creek, LLC
Michael FGildea					Constellation Energy
Richard KDouglass					Conectiv Energy
Robin ARitzman					FirstEnergy Nuclear Operating Company
Steven LGaarde					Consumers Energy
Thomas JBradish					Reliant Energy Seward, LLC
William RDuge					FirstEnergy Nuclear Generating Co.
LSE, PSE, End User	Yes	No	Abstain	Total Eligible Votes	Ballot Outcome
	8	1	1	11	PASSED
Yes Voters					
Bob CThomas					Illinois Municipal Electric Agency
David LFolk					Pennsylvania Power Company
James DHebson					PSEG Energy Resources & Trade LLC
James RNickel					Michigan Public Power Agency
Jim TSummers					ACE
Louis SSlade					Dominion Energy Marketing, Inc.
Mark Ringhausen					ODEC
Thomas Whyzinski					PPL EnergyPlus, LLC
No Voters					
Chris Norton					American Municipal Power - Ohio, Inc.
Abstentions					
Scott Berry					Indiana Municipal Power Agency

RC, PC, TP, RP, RTO, BA, Govt. Agency	Yes	No	Abstain	Total Eligible Votes	Ballot Outcome
	2	0	0	2	PASSED
Yes Voters					
Lawrence EHartley				First Energy Solutions Corp.	
Terry Bilke				MISO	
Transmission: Owner, Oper., Serv. Prov.	Yes	No	Abstain	Total Eligible Votes	Ballot Outcome
	9	2	0	11	PASSED
Yes Voters					
Damon WHolladay				Hoosier Energy	
Edward Bedder				Orange and Rockland	
Elizabeth Davis				PPL Electric Utilities Corporation	
Jason Shaver				American Transmission Co.	
Richard JKafka				Pepco	
Robert MMartinko				American Transmission Systems, Inc.	
Rodney LPhillips				Allegheny Power	
Ronald CSnead				Duke Energy	
Ronald KMcCrea				Appalachian Power	
No Voters					
Elizabeth AHowell				International Transmission Co.	
Robert JMattey				Ohio Valley Electric Corp.	

Voter Comments

Name: **Kent JKujala**

Organization: **Detroit Edison**

Voted **YES**

Comment

DTE supports BAL-502-RFC-2, as it stands however we do propose a revision for clarity to R1.1.1 as follows;

R1.1.1 The utilization of Direct Control Load Management or curtailment of Interruptible Demand will be included in the net internal demand calculation, and not contribute to the loss of Load probability calculation.

Response

Thank you for your response and suggested language. Your suggested language is consistent with the intent of R1.1.1. Since the draft standard has gone through the Category Ballot, no changes may be made to the standard prior to going in front of the RFC Board for action.

Name: **Terry Bilke**

Organization: **MISO**

Voted **YES**

Comment

While we are voting for this standard, we have several comments for consideration.

Necessity of Standard

With the approval of Module E of the Midwest ISO TEMT and a similar tariff requirement at PJM, as the ISOs are already required by FERC to perform a LOLE study.

Tariff Comparison

To quote from Module E: "The PRM analysis shall consider factors including, but not limited to: the Generator Forced Outage rates of Capacity Resources, Generator Planned Outages, expected performance of Load Modifying Resources, the LSE's forecasted Demand uncertainty, system operating reserve requirements, transmission congestion, external firm capacity sales and available transmission import capability." Thus, many of the requirements of the Standard are already mandated by the Midwest ISO's Tariff.

MRO Coordination

If this standard development is to continue, coordination with MRO to ensure compatible standards will be necessary as any conflicts could create compliance issues for the Midwest ISO.

R1.6

Documentation of this requirement could be difficult. We would like the drafting team to clarify how that documentation should look; either in the standard, or in an FAQ document.

R1.7

Documentation of the load included in the study could be accomplished but the certification that each end use customer was included in only one Resource Adequacy analysis seems excessive and could be beyond the control of the Planning Coordinator. Take, for example the concurrent efforts of ATC and MISO. In this instance some

Response

Since there are several Planning Coordinators within the RFC region, the SDT believes that one consistent regional standard is needed for reliability.

MRO and RFC are actively in coordination regarding these standards. Staff and members are on both drafting teams.

A FAQ has been added to the FAQ document regarding R1.6.

Version 3 of the standard (version out for Ballot) actually states: "Document that all Load in the Planning Coordinator area is accounted for in its Resource Adequacy analysis." The SDT believes R1.7 (as written) addresses your concern.

end use customers would be included in two Resource Adequacy Analyses and it would not create issues for end use customers. Each Planning Coordinator should only be responsible for ensuring that their load is included in an analysis while Reliability First could handle the coordination of studies within their footprint. The second half of this requirement should be omitted.

R2.1

Removal of the phrase "in the ten year period" would make this requirement clearer.

Violation Severity Levels

The removal of the Violation related to R1.6 may be appropriate as requirement R1.6 itself should be removed.

Under the Severity Levels for R2 the wording associated with R2.1 in the Moderate Column should read. "The Planning Coordinator failed to document its projected load and resource capability, for each area of transmission constrained sub-area identified in the Resource Adequacy analysis for one of the three years per R2.1."

Version 3 of the standard (version out for Ballot) actually states: "of the years in Year One through ten."

A FAQ has been added to the FAQ document regarding R1.6.

The SDT disagrees. If the Moderate VSL associated with R2.1 is modified as suggested, there would be a conflict with the High VSL for R2.1. If the Planning Coordinator failed to document the projected Load and resource for year 1, the entity would fall under both a Moderate and High VSL thus causing the conflict.

Name: **Chris Norton**

Voted **NO**

Organization: **American Municipal Power - Ohio, Inc.**

Comment

If this is to be a standard it should be a national standard and not a regional standard. This should start at NERC.

Response

RFC currently has an approved BAL-502-RFC-01 (Resource Adequacy) standard and the proposed BAL-502-RFC-02 is a revision to the current standard.

Additionally, there is no corresponding NERC standard which deals with a Resource Adequacy analysis. There has been a SAR at the NERC level which has been dormant for over three years. If NERC develops a continent wide Resource Adequacy analysis standard which is duplicative or more restrictive than the RFC standard, the RFC requirements may be removed.

Name: **Elizabeth AHowell**

Voted **NO**

Organization: **International Transmission Co.**

Comment

While the draft standard has a weak reference to the reliance of transmission to meet Resource Adequacy requirements, the standard fails to properly address the dependency on transmission to meet these requirements. The language used does not comport with that used in NERC standards. For example, the failure to reference "Generation Capacity Import Requirement (GCIR)" would be a severe oversight if missing from the RFC standard.

NERC Standard MOD-004-001, which is currently being re-balloted, has a framework, including terminology, to appropriately address GCIR (& hence CBM) in RFC standards. We suggest that the RFC standard be delayed until the re-balloting is completed and this RFC standard

Response

The SDT believes the standard is not in conflict with the draft MOD-004-01 standard. The dependency on transmission to meet these requirements may be dealt with in other reliability standards. This standard allows the flexibility to adopt any future transmission assessment frameworks.

Name: **Robert JMattey**

Organization: **Ohio Valley Electric Corp.**

Voted **NO**

Comment

This should be an LSE function as originally envisioned; no allowance for smaller loads.

Response

After examining the NERC Functional Model, the SDT believes the Planning Coordinator is the correct Applicable entity to carry out assessments and not the LSE. One of the relationships a Planning Coordinator has with a LSE is collecting Demand forecasts, and demand response program data from Load-Serving Entities. As such there should be no gaps in the analysis.

The LSE may still be responsible for the planning and reliability related to their load imposed by other standards or tariff requirements.