BPA appreciates the opportunity to comment on the Recommendation, ‘**2021 WEQ Annual Plan Item 2.a’** - Consistent with FERC Order No. 676-I, reconsider the reservation of WEQ-006 Manual Time Error Correction (TEC) and determine if the standards should be retained or revised‘.

BPA approved the Recommendation based on the exemption of the WECC region, found in the introduction section of WEQ-006. While BPA understands there is a desire for some eastern interconnection entities to retain WEQ-006 to interpret and address questions relating to TEC requirements specific to their region, BPA favors retirement of WEQ-006 in its entirety.

As explained in the following documents, NERC BAL-004-0 reliability standard and the NAESB WEQ-006 Business Practice Standard both cover Manual TEC. NERC’s proposal for the retirement of NERC BAL-004-0 was conditioned upon the concurrent retirement of NAESB WEQ-006 BPS to ensure clarity and to avoid inadvertent, uncoordinated, manual TEC.

The following documents are included as a reference as background and support for this opinion:

* NERC’s white paper, ‘Time Error Correction and Reliability White - Recommendation of the Balancing Authority Reliability-based Controls 2.2 Standard Drafting Team to Retire BAL-004-0 – Time Error Correction’.
  + [Microsoft Word - BAL-004-0 White Paper - Clean - 2015 09 23 (nerc.com)](https://www.nerc.com/pa/Stand/Project%2020101422%20Phase%202%20of%20BARC%20%20BAL004%20DL/BAL-004-0_White_Paper_Clean_09242015.pdf)
  + This document provides background of the Manual Time Error process and research explaining the evidence supporting retiring NERC-BAL-004-0 and NAESB WEQ-006.
* NERC’s petition to retire NERC BAL-004-0 and the reference to NAESB WEQ-006.
  + PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR RETIREMENT OF RELIABILITY STANDARD BAL-004-0
  + [BAL-004 Petition for Retirement\_.pdf (nerc.com)](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/BAL-004%20Petition%20for%20Retirement_.pdf)
  + This document contains the above referenced white paper, in addition to the reference that the NAESB WEQ-006 Business Practice Standard retirement should occur concurrently with the retirement of NERC BAL-004-0.
* FERC Docket No. RD17-1-000 Approving the retirement of NERC BAL-004-0:
  + [Delegated Order approving retirement for Reliability Standard BAL-004-0.pdf (nerc.com)](https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Delegated%20Order%20approving%20retirement%20for%20Reliability%20Standard%20BAL-004-0.pdf)
  + This document contains FERC approval of the retirement of NERC BAL-004-0.
* NERC Time Monitoring Reference Document, Version 5
  + [Reference Documents (nerc.com)](https://www.nerc.com/comm/OC/Pages/Reference-Documents.aspx)
  + This document explains the role of the Interconnection Time Monitor regarding implementation of manual Time Error Corrections, if needed.
  + The industry still has the ability to perform MTEC’s, but can initiate this through interconnection specific processes and do not need to rely on reliability standards to do so.
  + It requires identification of each interconnection Time Monitor.
  + Many of the steps covered by the standards in the WEQ-006 BPS are included in this document.
  + Each interconnection is to have a procedure for initiating Manual Time Error Correction.
  + The Western Interconnection Time Monitor (RC West) has a procedure that explains the process. The details in this document contain the critical items that were contained in the NERC BAL-004-0 and WEQ-006 documents.
    - [Time Error Correction (caiso.com)](https://www.caiso.com/Documents/RC0220.pdf)

If it is decided to retain WEQ-006, BPA would support this decision with the requirement that the language remain in place exempting interconnections that have time error correction processes and systems in place to be exempt from the WEQ-006.

* As part of the process to identify elements in v3.1 in conflict with the Western Interchange time error and inadvertent interchange management processes, WECC replied to NAESB regarding the required changes to WEQ-006, v 3.1

<https://www.naesb.org/pdf4/weq_bps082020w2.docx>

* Until FERC approves the revision to WEQ-006, BPA and other western entities believe there is a gap between v 3.1 and v 3.3.
* All Western Interconnection BAs adhere to the FERC approved BAL-004-0 WECC Automatic Time Error Correction (ATEC) standard.