

Consideration of Comments

Project Name: 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls | BAL-006 Survey

Comment Period Start Date: 9/16/2015

Comment Period End Date: 9/25/2015

There were 14 responses, including comments from approximately 43 different people from approximately 33 different companies representing 6 of the 10 Industry Segments as shown on the following pages.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, [Howard Gugel](#) (via email) or at (404) 446-9693.

Summary Response

The NERC Standards Committee appointed eleven industry subject matter experts to serve on the BARC 2 periodic review team (BARC 2 PRT) in the fall of 2013. The BARC 2 PRT used background information on the standards and the questions set forth in the Periodic Review Template developed by NERC and approved by the Standards Committee, along with associated worksheets and reference documents, to determine whether BAL-006-2 should be: (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn. During the development of the recommendation, the PRT also considered stakeholder recommendations for candidate Paragraph 81 requirements from Phase 1 of Paragraph 81, and applied the Paragraph 81 criteria to all of the requirements. The team also considered the Independent Expert Review Panel recommendations on the standard.

After an extensive review, the BARC 2 PRT concluded that Reliability Standard BAL-006-2 was not a reliability standard, however, certain provision were necessary for the operations of the Interconnection.

The Balancing Authority Reliability-based Controls 2.1 Standard Drafting Team (BARC 2.1 SDT) reviewed the findings of the BARC 2 Primary Review Team. A survey was posted for comment September 16-25, 2015 to gain a better perspective as to any concerns the industry may have if BAL-006-2 was retired and replaced with a non-reliability process, such as a guideline or a business practice. The survey responses indicated support for retirement of BAL-006-2 as a NERC Reliability Standard. Upon further review the BARC 2.1 SDT determined that BAL-006-2 does not support the reliability of the BES. BAL-006-2 is an accounting business requirement and not a reliability standard. Therefore BAL-006-2 should be retired.

The BARC 2.1 SDT's recommendation for retirement of BAL-006-0 is contingent on simultaneous establishment of a NERC Operating Committee Guideline for the ongoing required accounting of inadvertent interchange. The BARC 2.1 SDT is coordinating the development of such a guideline with the NERC Operating Committee.

Questions

1. Based on comments related to the SAR, the Independent Expert Review Report, and the Periodic Review Team' recommendations, the industry agrees that BAL-006 is an energy accounting standard and not a Reliability Standard, however, it is unclear what the industry supports as a replacement. The SDT has developed a white paper for the industry to consider. Based on the concepts within the white paper, do you support maintaining Reliability Standard BAL-006?¹
2. If you support maintaining BAL-006 as a Reliability Standard, are you in favor of the PRT recommendation as noted in the attached draft Reliability Standard BAL-006? If not, then what aspects of BAL-006 should be retained in a standard?
3. If you support eliminating BAL-006 as a Reliability Standard, are you in favor of the SDT recommendation that these requirements be included in a commercial alternative arrangement, such as a NAESB standard or a process established by FERC? What aspects of BAL-006 should be retained in an alternative arrangement?
4. If neither maintaining nor eliminating BAL-006 is preferred, please describe your suggestion for the disposition of this standard.
5. If you have any other comments or reliability concerns, please provide them in the space below.

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users

¹ When responding to this survey and providing comments, please keep in mind that draft proposed Reliability Standard BAL-006-3 has been posted under 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls, in connection with draft proposed Reliability Standards BAL-005-1 and FAC-001-3. Proposed Reliability Standard BAL-005-1, at Requirements R1 and R8, would include the obligations currently under Requirement R3 of Reliability Standard BAL-006-2.

8 — Small Electricity End Users

9 — Federal, State, Provincial Regulatory or other Government Entities

10 — Regional Reliability Organizations, Regional Entities

1. Based on comments related to the SAR, the Independent Expert Review Report, and the Periodic Review Team' recommendations, the industry agrees that BAL-006 is an energy accounting standard and not a Reliability Standard, however, it is unclear what the industry supports as a replacement. The SDT has developed a white paper for the industry to consider. Based on the concepts within the white paper, do you support maintaining Reliability Standard BAL-006?[\[1\]](#)

[\[1\]](#) When responding to this survey and providing comments, please keep in mind that draft proposed Reliability Standard BAL-006-3 has been posted under 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls, in connection with draft proposed Reliability Standards BAL-005-1 and FAC-001-3. Proposed Reliability Standard BAL-005-1, at Requirements R1 and R8, would include the obligations currently under Requirement R3 of Reliability Standard BAL-006-2.

Laurel Brandt - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - MRO,RFC

Selected Answer: Maintain BAL-006 (with no changes) as a Reliability Standard.

Answer Comment: The current effective version of BAL-006 requires metering at all BAA interconnection points (R3). The proposed version of BAL-006 removes the requirement for metering. Although requirement for metering may be addressed in changes to other BAL or FAC Standards, until that occurs BAL-006 should remain as written.

Response:

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Jeri Freimuth - APS - Arizona Public Service Co. - 3 -

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Group Name: IRC-SRC

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISONE	NPCC	2
Ben Li	IESO	NPCC	2
Terry Bilke	MISO	RFC	2
Greg Campoli	NYISO	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: Our preference is to eliminate this standard with one caveat. We believe BAL-006 should be converted to a guide and placed in the NERC Operating Manual. The tasks done under this standard are useful housekeeping tasks that support validation of balancing data.

Response:

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: Southern agrees with the PRT that BAL-006 is an energy accounting standard and not a Reliability Standard.

Response:

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: **Duke Energy supports the elimination of BAL-006 as a Reliability Standard, based on the belief that the requirements, with the exception of certain provisions of R4 incorporated into the proposed BAL-005-1, are business in nature and are not needed to support the reliable operation of the Bulk Power System.**

Response:

Mark Holman - PJM Interconnection, L.L.C. - 2 -

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: While PJM agrees it is important to maintain requirements to calculate and account for Inadvertent Interchange, PJM suggest this be moved to a NAESB standard.

Response:

Wayne Van Liere - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC

Group Name: PPL NERC Registered Affiliates

Group Member Name	Entity	Region	Segments
Charlie Freibert	LG&E and KU Energy, LLC	SERC	3
Brenda Truhe	PPL Electric Utilities Corporation	RFC	1
Dan Wilson	LG&E and KU Energy, LLC	SERC	5
Linn Oelker	LG&E and KU Energy, LLC	SERC	6

Selected Answer: Modify and maintain BAL-006 as a Reliability Standard.

Answer Comment: In order to maintain enforcement capability, BAL-006 should remain a Reliability Standard.

Response:

Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

Group Name: FE RBB

Group Member Name	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5

Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: FE supports PJM comments on this issue.

While PJM agrees it is important to maintain requirements to calculate and account for Inadvertent Interchange, PJM suggest this be moved to a NAESB standard.

Response:

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Shawn Abrams - Santee Cooper - 1 -

Group Name: Santee Cooper

Group Member Name	Entity	Region	Segments
Shawn Abrams	Santee Cooper	SERC	1
James Poston	Santee Cooper	SERC	3
Michael Brown	Santee Cooper	SERC	6

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Adam Padgett - TECO - Tampa Electric Co. - 1,3,5,6 - FRCC

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Don Schmit - Nebraska Public Power District - 5 -

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6

Selected Answer: Eliminate BAL-006 as a Reliability Standard.

Answer Comment: We believe the SDT has provided adequate analysis on supporting rationale to eliminate BAL-006. Inadvertent Interchange is addressed

through other existing reliability and commercial requirements. However, we believe the SDT could have provided better documentation to support its conclusions by identifying how each requirement are addressed individually. We believe the SDT should develop a “mapping document” that accompanies its white paper to better substantiate its conclusions.

Response:

2. If you support maintaining BAL-006 as a Reliability Standard, are you in favor of the PRT recommendation as noted in the attached draft Reliability Standard BAL-006? If not, then what aspects of BAL-006 should be retained in a standard?

Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - MRO,RFC

Selected Answer: No

Answer Comment: Comments: The purpose listed in the draft of BAL-006 has not been changed from the previously approved standard and does not appear directly related to the drafted requirements.

The elimination of the currently effective BAL-006 R4 in the draft removes a requirement that no other standard addresses.

See also answer to question 1.

Response:

Jeri Freimuth - APS - Arizona Public Service Co. - 3 -

Answer Comment: NA as AZPS does not support retaining as a NERC standard.

Response:

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Selected Answer: No

Answer Comment: We suggest BAL-006 be retired.

Response:

Wayne Van Liere - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC

Group Name: PPL NERC Registered Affiliates

Group Member Name	Entity	Region	Segments
Charlie Freibert	LG&E and KU Energy, LLC	SERC	3
Brenda Truhe	PPL Electric Utilities Corporation	RFC	1
Dan Wilson	LG&E and KU Energy, LLC	SERC	5
Linn Oelker	LG&E and KU Energy, LLC	SERC	6

Selected Answer: Yes

Answer Comment:

To address FERC's recommendation for a metric to bind the magnitude of a BA's inadvertent accumulation, LG&E and KU suggest a multiplier of L10. For example, for a BA with an L10 of 100, a multiplier of 250 would permit an accumulation of up to 25,000 MWHs. The limit on the accumulation needs to reflect the relative size of the BA.

Response:

Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

Group Name: FE RBB

Group Member Name	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

Selected Answer: Yes

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: No

Answer Comment: BPA supports eliminating NERC BAL-006-2 as a reliability standard based on the NERC SDT (Standard Drafting Team) white paper provided for consideration. As the white paper suggests, the current requirements in NERC BAL-006-2 of a reliability nature should be addressed through the requirements of the proposed BAL-005-1.

Response:

Shawn Abrams - Santee Cooper - 1 -

Group Name: Santee Cooper

Group Member Name	Entity	Region	Segments
Shawn Abrams	Santee Cooper	SERC	1
James Poston	Santee Cooper	SERC	3
Michael Brown	Santee Cooper	SERC	6

Selected Answer: Yes

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
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Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6

Selected Answer: No

Answer Comment: We believe the SDT has provided adequate analysis on supporting reasons why BAL-006 should be eliminated. We also believe that Paragraph 81 criteria could be applied to eliminate the remaining requirements. Based on Paragraph 81 Criteria for Administrative and Reporting, we feel the SDT has provided sufficient technical basis to substantiate that these requirements do “not support reliability and is needlessly burdensome.” We also feel that in the instance when Adjacent BAs do not agree upon interchange quantities, the need to report such disputes to Regional Entities aligns with the definition of the Paragraph 81 Reporting Criterion. This specific criterion states that “these are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.”

Response:

3. If you support eliminating BAL-006 as a Reliability Standard, are you in favor of the SDT recommendation that these requirements be included in a commercial alternative arrangement, such as a NAESB standard or a process established by FERC? What aspects of BAL-006 should be retained in an alternative arrangement?

Laurel Brandt - Tennessee Valley Authority - 1,3,5,6 - SERC	
Selected Answer:	Yes
Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - MRO,RFC	
Selected Answer:	Yes
Answer Comment:	NERC could accomplish the data collection under rules of procedure as opposed to a reliability standard.
Response:	See answers to question 1 and 2 for elements of the current BAL-006 that would need to be addressed in reliability standards.
Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO	
Selected Answer:	Yes
Jeri Freimuth - APS - Arizona Public Service Co. - 3 -	

Selected Answer: Yes

Answer Comment: Reconciliation of inadvertent

Response:

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Group Name: IRC-SRC

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISONE	NPCC	2
Ben Li	IESO	NPCC	2
Terry Bilke	MISO	RFC	2
Greg Campoli	NYISO	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2

Selected Answer: No

Answer Comment: We do not support turning this over to NAESB or FERC. NAESB business practices ultimately become part of a transmission provider’s tariff. Not all transmission providers are Balancing Authorities. Additionally, not all Balancing Authorities are FERC jurisdictional. Rather than creating gaps and make the data unverifiable, our preference is that BAL-006 be converted to a guide or procedure and placed in the NERC Operating

Manual.

The guidelines or procedure could be drafted and maintained in the operating manual by taking the existing verbiage and replace “shall” with “will”, “needs to”, or “should”.

Response:

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Selected Answer: No

Answer Comment: Southern would prefer this be handled with agreements between the entities. However, if a standard is required, we suggest it be within NAESB and not a NERC Reliability Standard.

Response:

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**Group Name:** Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Yes

Answer Comment: Duke Energy recommends moving the responsibilities present in R1-R3, as well as R4.1 of BAL-006 to the NAESB standards. NAESB already handles certain aspects of Interchange, and Inadvertent accounting is considered to be a business practice or commercial in nature. We believe the requirements listed above fit that description. We have excluded R4 from moving to NAESB, as we believe it would be covered by the proposed BAL-005-1 upon approval.

Response:**Mark Holman - PJM Interconnection, L.L.C. - 2 -****Selected Answer:** Yes

Answer Comment:

PJM believes the requirements in BAL-006 should be moved to a NAESB standard. In order for Inadvertent Interchange to be calculated appropriately the standard should include requirements similar to what the PRT has suggested for BAL-006. However PJM also believes that Adjacent Balancing Authorities should operate to a Net Interchange Schedule as this is important to avoid many potential dispute resolutions.

Response:

Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

Group Name: FE RBB

Group Member Name	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

Selected Answer:

Yes

Answer Comment:

FE supports PJM comments on this issue.

PJM believes the requirements in BAL-006 should be moved to a NAESB

standard. In order for Inadvertent Interchange to be calculated appropriately the standard should include requirements similar to what the PRT has suggested for BAL-006. However PJM also believes that Adjacent Balancing Authorities should operate to a Net Interchange Schedule as this is important to avoid many potential dispute resolutions.

Response:

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: No

Shawn Abrams - Santee Cooper - 1 -

Group Name: Santee Cooper

Group Member Name	Entity	Region	Segments
Shawn Abrams	Santee Cooper	SERC	1
James Poston	Santee Cooper	SERC	3
Michael Brown	Santee Cooper	SERC	6

Selected Answer: Yes

Answer Comment: We support maintaining the current reporting requirements through the CERTS Inadvertent Interchange Reporting Application.

Response:

Adam Padgett - TECO - Tampa Electric Co. - 1,3,5,6 - FRCC

Selected Answer: Yes

Answer Comment: Refer it to NAESB and incorporate all of the BAL-006 requirements in a NAESB standard.

Response:

Don Schmit - Nebraska Public Power District - 5 -

Selected Answer: Yes

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1

Michael Brytowski

Great River Energy

MRO

1,3,5,6

Selected Answer:

Yes

Answer Comment:

We agree that commercial alternative arrangements, such as a NAESB Business Practices, are a better fit for Inadvertent Interchange.

Response:

4. If neither maintaining nor eliminating BAL-006 is preferred, please describe your suggestion for the disposition of this standard.

Jeri Freimuth - APS - Arizona Public Service Co. - 3 -

Answer Comment: Support transferring to NAESB

Response:

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Answer Comment: NA

Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

Group Name: FE RBB

Group Member Name	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

Answer Comment:

FE supports PJM comments on this issue.

This question is not applicable as PJM feels that Inadvertent Interchange requirements should be moved to a NAESB standard.

Response:

Shawn Abrams - Santee Cooper - 1 -

Group Name:

Santee Cooper

Group Member Name	Entity	Region	Segments
Shawn Abrams	Santee Cooper	SERC	1
James Poston	Santee Cooper	SERC	3
Michael Brown	Santee Cooper	SERC	6

Answer Comment:

n/a

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**Group Name:** ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6

Answer Comment: We suggest that the SDT eliminate BAL-006.**Response:**

5. If you have any other comments or reliability concerns, please provide them in the space below.

Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - MRO,RFC

Answer Comment:

Requirements in BAL-006 as proposed for deletion are of value in a Standard, see answers to Question 1 and 2.

Response:

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Group Name:

IRC-SRC

Group Member Name	Entity	Region	Segments
Christina Bigelow	ERCOT	TRE	2
Kathleen Goodman	ISONE	NPCC	2
Ben Li	IESO	NPCC	2
Terry Bilke	MISO	RFC	2
Greg Campoli	NYISO	NPCC	2
Mark Holman	PJM	RFC	2
Charles Yeung	SPP	SPP	2

Answer Comment:

If our suggestion is not supported, we would suggest balloting the posted standard and make the VRFs and VSLs reflect the fact that the requirements in this standard have little or no impact on reliability.

Response:

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Answer Comment: NA

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Answer Comment:

Duke Energy's support for the elimination of BAL-006 as a Reliability Standard, and the aforementioned requirements transition to the NAESB standards, predicated on the assumption that the Real-time reliability requirements of BAL-006 will be covered in one way (approval of proposed BAL-005-1) or another (incorporated into an existing BAL standard).

Given that the proposed BAL-005-1 will include a requirement covering the current BAL-006 R4, Duke Energy recommends that the BAL-005-1 implementation plan factor in the possible hand over of BAL-006 responsibilities from NERC to NAESB so that there isn't the possibility of BAL-005-1 being effective at the same time that BAL-006 is still in place with a duplicate requirement.

Response:**Mark Holman - PJM Interconnection, L.L.C. - 2 -****Answer Comment:**

As part of Project 2010-14.2.1 Phase 2 it was suggested that BAL-006-2 Requirement R3 be moved into BAL-005-3. While PJM agrees it is important to calculate MWh values for Inadvertent Interchange, PJM suggests this be moved to a NAESB standard.

Response:**Wayne Van Liere - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC**

Group Name: PPL NERC Registered Affiliates

Group Member Name	Entity	Region	Segments
Charlie Freibert	LG&E and KU Energy, LLC	SERC	3
Brenda Truhe	PPL Electric Utilities Corporation	RFC	1
Dan Wilson	LG&E and KU Energy, LLC	SERC	5
Linn Oelker	LG&E and KU Energy, LLC	SERC	6

Answer Comment:

LG&E and KU are not opposed to handling inadvertent via a NAESB standard or business practice; the concern is enforceability. A NAESB standard or business practice for inadvertent would lack enforcement "teeth." Thus LG&E and KU question whether a NAESB standard can as effectively achieve the desired result.

LG&E and KU are not in favor of financial or FERC established processes for settlement of accumulated inadvertent accounts.

Response:

Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

Group Name: FE RBB

Group Member Name	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4

Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

Answer Comment:

FE supports PJM comments on this issue.

As part of Project 2010-14.2.1 Phase 2 it was suggested that BAL-006-2 Requirement R3 be moved into BAL-005-3. While PJM agrees it is important to calculate MWh values for Inadvertent Interchange, PJM suggests this be moved to a NAESB standard.

Response:

Shawn Abrams - Santee Cooper - 1 -

Group Name: Santee Cooper

Group Member Name	Entity	Region	Segments
Shawn Abrams	Santee Cooper	SERC	1
James Poston	Santee Cooper	SERC	3
Michael Brown	Santee Cooper	SERC	6

Answer Comment:

n/a

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6

Answer Comment:

We question the practice of NERC posting this survey with the expectation of a nine-day, weekend included, turnaround for the possible elimination of a reliability standard. This survey was posted during a week with NERC Technical Committee meetings, which likely impacted the availability of many industry and NERC subject matter experts to provide comments. We hope this condensed commenting period was an oversight and a one-time occurrence.

Thank you for the opportunity to comment.

Response:

End of report