

Proposed Balancing Authority Certification Standards — Comments

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 Manager of Standards, Mark Ladrow at 609-452-8060 or at mark.ladrow@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

1. Do you agree with the modifications made to the Balancing authority Certification — Certification standard in removing the administrative process from the standard?

General Comment: Industry comments received provided consensus that supports the removal of the process from the standard.

Commenter	Yes	No	Comment	Response
TOTAL:	22	2		
Terry L. Blackwell – South Carolina Public Service Authority		X	The proposed ORG Standards appear to define processes by which organizations are certified along with associated requirements that duplicate or restate requirements included in other NERC Standards. In addition, the proposed standards also appear to be a potential forum to establish new requirements not already included in other NERC Standards. SCPSA believes that the overall process of certifying organizations should not be developed through the NERC standards process; rather, organization certification processes and procedures should be developed and maintained, with industry input, by NERC and the regions along with other processes and procedures that are currently maintained outside of the standards process.	The industry supported the development of the SAR and Standards for certification using the NERC Standards Process Manual.
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts	X			

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun				
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC	X			
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT	X		The Compliance and Certification Committee (a NERC stakeholder group) thanks the standard drafting team for removing the certification process from the standard. The Organization Certification Working Group (a group reporting to the CCC) has taken the process language that was removed from the standard, drafted a more detailed process, and is working on a transition plan and training documents for entities that wish to register and certify. The CCC expects to post these process documents publicly for comment and will coordinate the posting with the drafting team. The CCC will have the flexibility to improve the certification process to benefit the industry.	
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X		ATC approves of moving the administrative process to the CCC as long as they follow an ANSI approved process.	We are anticipating that the procedures will be posted to obtain public comment. Administrative processes should not be standards.
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X		Manitoba Hydro supports removing any administrative process from the standard. The standard should focus on what is required not how to do or administer it.	
Transmission Access Policy Study	X			

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Group (please see list of members at end of this document)				
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell - MAIN				
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X		
Midwest Reliability Organization	X		The MRO supports removing any administrative process from	

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Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom			the standard. The standard should focus on what is required not how to administer it.	
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2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-009-1 — Balancing Authority Certification — Certification

General Comment: Based on the industry comments received, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements identified for ORG-009. The drafting team has made minor modifications based on comments received.

Commenter	Yes	No	Comment	Response
TOTAL:	16	8		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Standard ORG-009-1 appears to be more of a procedure than a standard. We suggest that it be eliminated and replaced with a NERC administrative procedure. If this is not a practical change, then perhaps a better way to develop these certification standards is to reference the various standards that truly apply and not list each specific task that is required. Having a list may lead to the standards being changed at different times and the two getting out of synch with each other. General – This whole Standard seems to be a process document rather than something warranting requirements. In particular: R1 is a requirement requiring the adherence to other requirements. This seems redundant. If the requirements of ORG-010 through ORG-018 are not met then certification could be removed/denied on that basis alone. R2 – Why is this a standard requirement? If an entity does not adhere to administrative requirements for application it gets	When the drafting team removed the procedure from the standard, the industry supported the action taken. The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. The industry also supported maintaining the remaining elements of ORG-009-1. The drafting team is continuing to modify the standard based on the comments received from the industry to obtain final consensus on the standard and its content. R1 – Defines the standards on which certification awarding will be based. R2 – To ensure that certification is administered in a consistent manner.

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			denied. Standards such as R4 and R6 should explicitly state which entity they apply to. M1 – What is there to “meet” on R1? Is it not the expectation that an applicable entity “meet” all of its requirements? This measure is a waste of ink. M2 – Why is documentation for inspection of R2 a necessary measurable requirement?	R4 and R6 - The responsible entities are identified. M2 – To ensure that certification is administered in a consistent manner.
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC		X	Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Balancing Authority. " The following comment applies to all the BA Certification Standards. In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Balancing Authority". This is clearer and more consistent with the standards process format and language. The added words from the previous draft, are unnecessary, confusing and inherently implied. In "Additional Compliance Information" suggest adding "1.4.1 Once an entity is certified, it becomes subject to the relevant compliance elements of the NERC Reliability Standards." This will provide a clearer transition of compliance expectations and responsibilities.	The current wording in the standard in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures. This standard is intended for certification and does not extend beyond that.
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT		X	The CCC is pleased with the addition of the delegation of tasks language in the standard. The CCC is concerned about Requirements 6 and 7 and Measures 3 and 4. Requirement 6 requires the regions to perform the certification. Measure 4 requires the regional reliability organization to administer the certification process. Requirement 7 calls for a site visit to complete the certification process. Requirements like these, to manage the certification of entities and the details of the certification process, will likely be part of the delegation agreement that NERC will have with each of the regions. Measure 3 is a measure that will result in failure to be certified. Therefore, the requirements may not be enforceable using Measure 3. Requirement 7 states a process requirement for the NERC organization certification process that also may not	The standard has been modified to address industry concern. R7 has been deleted since it is an element of R6 and M3 has been changed due to this modification. Requirements R6 was included based on industry input during previous posting periods and the workshops held by the OCTF. It was made clear that the industry wanted to ensure that certification was implemented consistently throughout the industry and that it did not vary from region to region. This was the method that was selected by the drafting team to try and ensure the consistency desired by the industry. The drafting team will seek NERC counsel input on these requirements.

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			be enforceable. The CCC requests that the drafting team consult with NERC counsel regarding the appropriateness of including these provisions as part of the standards as opposed to being part of a delegation agreement with the regional reliability organizations.	
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP		X	As written the standard is not specific on whether the certification process is a one-time event or must be repeated on a periodic basis. Readiness audits should be sufficient to maintain certification and therefore repeated certification is not required. Results of previous audits should be factored into the certification process as much as possible.	The intent is that this will be a one-time certification. The industry during the SAR process did not support periodic re-certification. The CCC is developing procedures to address the initial certification and all re-certification issues. This document is expected to be posted for industry review in the fall.
Robert Coish – Manitoba Hydro		X	<p>The MRO strongly suggests that there needs to be a longer transition period in order to accommodate the certification of all Balancing Authorities within the region. Even existing Control Area may have to re-certify if there are new requirements for them to meet. We also request that the SDT or the Compliance Certification Committee clarify when re-certification is required, for example is it every year or only when the standard is revised.</p> <p>As well, the MRO suggests that the set of necessary requirements for certification is bound to change as the development of standards is an ongoing process, and would recommend that the words: and related NERC Reliability Standards, be added to requirement R5 of ORG-009-1.</p> <p>Also as general comments: the MRO is concerned that the Certification Standards not impose requirements for certification which exceed requirements for compliance. There is a risk of this, for example, if the wording of a requirement in a Certification standard is different from a corresponding requirement in another Reliability Standard. And that the Certification standards be written, as far as possible, so that changes in other Reliability Standards do not require that the Certification Standards to be frequently revised.</p>	<p>The drafting team will include the implementation plan for the standards in the next posting.</p> <p>The issues related to re-certification are under the authority of the CCC.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p>
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO	X			

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Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP				
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell - MAIN		X	R7 – I think back up facilities should be included as part of the on-site visit.	R7 has been removed from the standard since it is expected that it will be part of the NERC Certification Process for Balancing Authorities.
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	<p>R2 states the entity seeking certification shall adhere to the requirements of the "NERC Certification Process for Balancing Authorities". Please add that Certification Process to this Standard since that Process is part of the Certification Process.</p> <p>R3 contains the statement "The entity, to which a task is delegated, shall be subject to review." Please be more specific about the terms and conditions of this "review" requirement. "Review" by whom? Or what? Will this entity also be required to adhere to the unspecified "NERC Certification Process for Balancing Authorities"?</p> <p>M3 is a Requirement for the RRO. It is not a Measure. Please move M3 to the Requirements section and add a Measure that measures the RRO performance for administering the BA Certification Standard.</p> <p>Please add a statement in R7 indicating "who" will be conducting the "on-site" review which we expect is part of the Certification Process above.</p> <p>In R7 concerning the "on-site" visit, please replace the "Balancing Authority's control center facilities" with "control</p>	<p>R2 - Based on industry comments, the process was removed and supported by the industry consensus. The CCC is developing procedures to address the initial certification and all re-certification issues. This process would be an administrative process and should not be a part of the standard.</p> <p>R3 – Wording has been added to the standard to clarify that this review will be performed in accordance with the NERC Certification Process for Balancing Authorities.</p> <p>M3 – The standard has been modified to address industry concern. R7 has been deleted since it is an element of R6. The drafting team does not see any benefit to revising the wording regarding the balancing authority function.</p> <p>The Balancing Integrated Operational Plan has been posted and vetted as a new definition through the standards process to obtain industry input. The drafting team does not see justification for removing the plan or its reference from the standards.</p>

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			<p>center facilities of the entity seeking Balancing Authority Certification."</p> <p>In Sections A and B.R.1, please replace "balancing function" with "balancing functions as specified in the Standards."</p> <p>Please delete the definition, all references in all location of this Certification Standard, and then delete any requirements contained therein to BALANCING INTEGRATED OPERATIONAL PLAN. The definition of this term appears in ORG-009-1, ORG-010-1, ORG-011-1, ORG-012-1, ORG-016-1, and ORG-018-1, and its use should be deleted from ORG-012-1 R2 and R3, ORG-016-1 R1.1, and ORG-018-1 R2.1, R2.3, R2.13, and R2.13.2, and others as needed. The development of this BIOP is a new requirement most parts of which are already included in the Standards, includes the participation by more operational entities than the BA and RC, and should be vetted through the NERC Standard development process.</p>	
<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>		<p>X</p>	<p>The MRO strongly suggests that there needs to be a longer transition period in order to accommodate the certification of all Balancing Authorities within the region. Even existing Control Area may have to re-certify if there are new requirements for them to meet. We also request that the SDT or the Compliance Certification Committee clarify when re-certification is required, for example is it every year or only when the standard is revised.</p> <p>As well, the MRO suggests that the set of necessary requirements for certification is bound to change as the development of standards is an ongoing process, and would recommend that the words: and related NERC Reliability Standards, be added to requirement R5 of ORG-009-1.</p> <p>Also as general comments: the MRO is concerned that the Certification Standards not impose requirements for certification which exceed requirements for compliance. There is a risk of this, for example, if the wording of a requirement in a Certification standard is different from a corresponding requirement in another Reliability Standard. And that the Certification standards be written, as far as possible, so that changes in other Reliability Standards do not require that the Certification Standards to be frequently revised.</p>	<p>The drafting team will include the implementation plan for the standards in the next posting.</p> <p>The issues related to re-certification are under the authority of the CCC.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p>

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3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-010-1 — Balancing Authority Certification— Agreements?

General Comment: Industry consensus was not obtained from the comments received in this posting. The standard has been modified to address the concern identified and the drafting team will seek affirmation of these modifications in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	14	10		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council		X	Item R2.3 – Balancing Integrated Operational Plans are a key to success. More specificity in the definition of this item could add clarity in the certification process. It is recommended that a White Paper or Guideline be produced to provide an example of what is expected.	Earlier versions of the IOP had more detail and the industry comments directed the drafting team to be less specific in the elements of the plan. The BIOP was posted with the standards for review.
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X		With regards to R1.1, it is proposed to include the reactive control requirements. This needs to be noted that its rather confusing that Reactive and Voltage control is a Transmission Operator responsibility under VAR-001 but under TOP-001-R8 both the Balancing Authority and Transmission Operator have a responsibility to restore real and reactive power balance. A consistency needs to assured with other existing standards.	Control of reactive devices is the role of the Transmission Operator and does not need to be included in the BA agreements. If there are inconsistencies in the current version 0 standards, SARs should be submitted to correct them, but that is beyond the scope of this drafting team.
Kathleen M. Goodman – ISO NE	X		With regards to R1.1, it is proposed to include the reactive control requirements. This needs to be noted that its rather confusing that Reactive and Voltage control is a Transmission Operator responsibility under VAR-001 but under TOP-001-R8 both the Balancing Authority and Transmission Operator have a responsibility to restore real and reactive power balance. A consistency needs to assured with other existing standards.	Control of reactive devices is the role of the Transmission Operator and does not need to be included in the BA agreements. If there are inconsistencies in the current version 0 standards, SARs should be submitted to correct them, but that is beyond the scope of this drafting team.
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Definitions and R2.4 – The certification standard should not be used to define and create a new concept such as the Balancing Integrated Operational Plan (BIOP). If it exists elsewhere it is not clear and should be referenced. Certification should refer to such a concept that is required by one of the other Standards and/or the Functional model not originates the concept. As used in this standard, the scope of the requirements of the plan is not clear. For example to what resolution are the resource, interchange, and demand to be defined in the plan. Similarly, for what period is the plan supposed to cover - next hour, next day, etc? When is it	Earlier versions of the IOP had more detail and the industry comments directed the drafting team to be less specific in the elements of the plan. The BIOP was posted with the standards for review. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.

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			<p>supposed to be issued and what magnitude changes are enough to trigger a revision and re-communication of the plan. General - The requirements of ORG-010-1 are simply restatements of existing NERC Standard requirements. As such, they introduce the potential for the NERC Standards to get out of synchronization and provide contradictory information. It would be much better for the Organizational Certification Standards to reference the requirements of existing NERC Standards and state that the organization requesting certification should provide documentation proving that they have agreements in place to meet the requirements of the referenced standards.</p>	<p>The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p>
P. D. Henderson – IESO Ontario	X		<p>With regards to R1.1, it is proposed to include the reactive control requirements. This needs to be noted that its rather confusing that Reactive and Voltage control is a Transmission Operator responsibility under VAR-001 but under TOP-001-R8 both the Balancing Authority and Transmission Operator have a responsibility to restore real and reactive power balance. A consistency needs to assured with other existing standards.</p>	<p>Control of reactive devices is the role of the Transmission Operator and does not need to be included in the BA agreements. If there are inconsistencies in the current version 0 standards, SARs should be submitted to correct them, but that is beyond the scope of this drafting team.</p>
Roger Champagne – Hydro-Quebec TransEnergie	X		<p>With regards to R1.1, it is proposed to include the reactive control requirements. This needs to be noted that its rather confusing that Reactive and Voltage control is a Transmission Operator responsibility under VAR-001 but under TOP-001-R8 both the Balancing Authority and Transmission Operator have a responsibility to restore real and reactive power balance. A consistency needs to assured with other existing standards.</p>	<p>Control of reactive devices is the role of the Transmission Operator and does not need to be included in the BA agreements. If there are inconsistencies in the current version 0 standards, SARs should be submitted to correct them, but that is beyond the scope of this drafting team.</p>
Howard Rulf – WE Energies		X	<p>Include Distribution Providers to the group that the balancing authority can have agreements with if the balancing authority can interact directly with the distribution p[rovider to shed load.</p>	<p>The standard wording has been modified to reflect your concern.</p>
Eric Sendkowicz - FRCC		X	<p>The meaning of "balanced interchange schedules" is unclear in R1.1.4. Unless "balanced" adds some particular meaning which can be defined, suggest restating R1.1.4. to "Adhering to interchange schedules." R1.1.4 and R2.6 both refer to "interchange schedules". The term is capitalized in R2.6, but not in R1.1.4. Is there a distinction intended? If so, please clarify. Otherwise, make the terminology consistent.</p>	<p>The implementation of interchange schedules is intended to be balanced. The edits that you identified have been made.</p>
<p>NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP</p>				
<p>Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission</p>				

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<p>Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT</p>				
<p>Peter Burke (on behalf of ATC's Jason Shaver) - ATC</p>		X	<p>R1.1 The SDT failed to require an agreement between the BA and the Distribution Provider. Several entities, i.e. the Load Serving Entity, Distribution Provider, or Transmission Operator, have the capability of shedding load and the Transmission Operator should be the last resort for shedding load. A Transmission Operator, to shed load, may have to open multiple transmission lines to shed a small amount of load. The reason for this is that Transmission Operators do not have control over distribution breakers.</p>	<p>The standard has been modified to add the Distribution Provider.</p>
<p>Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP</p>	X			
<p>Robert Coish – Manitoba Hydro</p>		X	<p>Manitoba Hydro questions the need for Requirement 1.1.2, Reducing Voltage. The intent seems to be related to providing mitigation for a resource-demand imbalance, and in general R1.1.1 should cover this. The Agreements should only be concerned about the ability of the Balancing Authority to direct Load Serving Entities and Transmission Operator's to reduce load to meet an imbalance. As always, the standard should state what is required not how to do it. We would also suggest that the language in R1.1.1 be changed to: Reducing Load To Mitigate a Resource Demand Imbalance, to make it more general and leave it up to the Load Serving Entities and Transmission Operator to determine how to do it. As well, we question philosophically whether Balancing Authorities should really have the authority to direct the Transmission Operator to reduce voltage when their technical scope and responsibility in this area is rather limited.</p>	<p>The standard has been modified to address your concern.</p>
<p>Transmission Access Policy Study Group (please see list of members at end of this document)</p>		X	<p>The Balancing Authority should be required to have an executed NERC Operating Reliability Data Confidentiality Agreement in place. TAPS recommends the following modification to the current draft of the NERC Operating Reliability Data Confidentiality Agreement. Section 4.3 says that operating reliability data eight days or older is exempt</p>	<p>The industry did not support the requirement for the BA to sign the confidentiality agreement. Revising the NERC Operating Reliability Data Confidentiality Agreement is beyond the scope of the Standard Drafting Team.</p>

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			from access and disclosure restrictions and forecast operating reliability data is exempt beginning eight days after the forecast has passed. Does this mean that an entity that receives this data from others can share it with its merchant function, but that other merchants will not have access to the same data? This could create a competitive advantage even though the data is somewhat out of date. What it means is that the balancing authorities and transmission operators that receive the data from a number of other entities apparently can share it with their merchant functions after the fact, which could result in an unfair advantage in electricity markets. The data provided by others should not be shared at any time with the merchant function unless publicly available. Section 12.0 says that disputes will be settled in accordance with the dispute resolution procedures of the party's regional council and NERC. This is confusing, since the procedures may be different in a region than at NERC. If this agreement is to be standard throughout NERC, disputes should be resolved through NERC dispute resolution procedures in order to achieve consistency of interpretation	
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee		X	R1.1.4 - The meaning of "balanced interchange schedules" is unclear. Unless "balanced" adds some particular meaning which can be defined, suggest restating R1.1.4. to "Adhering to interchange schedules." R1.1.4 and R2.6 both refer to "interchange schedules". The term is capitalized in R2.6, but not in R1.1.4. Is there a distinction intended? If so, please clarify. Otherwise, make the terminology consistent.	The implementation of interchange schedules is intended to be balanced. The edits that you identified have been made.
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X		We recommend that R1.1 should include Distribution Operator. We believe that NERC should draft a type of pro-forma agreement that would cover the minimum acceptable requirements with appropriate wording such as --unless stated in other agreements-- or include the minimum requirements in this document. Should R2.2 and R2.8 be combined and	The Distribution Provider has been added to the entities in R1.1. Since the intent of the standards is to be less prescriptive and allow entities to satisfy the standards in a multitude of ways. The definition of agreements supports this latitude. Although R2.2 and R2.8 appear redundant, they are intended

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			specifically identify pseudo-ties as being included in the metered boundaries?	to address two different elements. R2.2 requires the identification of the metered boundaries and R2.8 requires that arrangements be made for obtaining the metered data.
Gary H. Campbell - MAIN	X			
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X		We recommend that R1.1 should include distribution operator. We believe that NERC should draft a type of pro-forma agreement that would cover the minimum acceptable requirements with appropriate wording such as “unless stated in other agreements” or include the minimum requirements in this document. Should R2.2 and R2.8 be combined and specifically identify pseudo-ties as being included in the metered boundaries?	The Distribution Provider has been added to the entities in R1.1. Since the intent of the standards is to be less prescriptive and allow entities to satisfy the standards in a multitude of ways. The definition of agreements supports this latitude. Although R2.2 and R2.8 appear redundant, they are intended to address two different elements. R2.2 requires the identification of the metered boundaries and R2.8 requires that arrangements be made for obtaining the metered data. Metered boundaries is intended to include pseudo-ties..
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	R1 do not specify with whom the agreements must be made. Please add the following to the first sentence of R1 and R2: " .. shall have agreements (add - "with each of the following entities") that define the .. ". Please delete R1.1 through R1.3, and R2.1 through R2.11, since they specify the details of the agreements between the BAs and the other entities. In addition, add the following statement to the last sentence of R1 and R2 - " .. Transmission Owners (delete the rest of the sentence) (add - "such that all entities meet the NERC Reliability Standards.")". If it is decided to not delete the above requirements then please add a specific reference to each of the above requirements that identifies each specific NERC Standard and Requirement that requires the information detailed in that requirement. Requirement IRO-001 R8 contains the statement: "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements." If it is decided to not delete the above Requirements then please add this quoted statement in IRO-001- R8 to all the appropriate entities included in R1.1 through R1.3, and R2.1 through R2.11, including the last part of the	The intent of the standards is to be less prescriptive and allow entities to satisfy the standards in a multitude of ways and not dictate a specific entity to provide or perform some element of the operation. The industry has supported the elements that are included in this standard. The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. In general, NERC standards are not intended to cause any entity to violate safety, equipment, regulatory or statutory requirements. There is nothing in the standard to prevent this statement from being included in the agreements.

Proposed Balancing Authority Certification Standards — Comments

<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>		<p>X</p>	<p>statement " .. unless such directives would violate safety ... ". The MRO questions the need for Requirement 1.1.2, Reducing Voltage. The intent seems to be related to providing mitigation for a resource-demand imbalance, and in general R1.1.1 should cover this. The Agreements should only be concerned about the ability of the Balancing Authority to direct Load Serving Entities and Transmission Operator's to reduce load to meet an imbalance. As always, the standard should state what is required not how to do it. We would also suggest that the language in R1.1.1 be changed to: Reducing Load To Mitigate a Resource Demand Imbalance, to make it more general and leave it up to the Load Serving Entities and Transmission Operator to determine how to do it. As well, we question philosophically whether Balancing Authorities should really have the authority to direct the Transmission Operator to reduce voltage when their technical scope and responsibility in this area is rather limited.</p>	<p>The standard has been modified to address your concern.</p>
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Proposed Balancing Authority Certification Standards — Comments

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-011-1 — Balancing Authority Certification — Personnel?

General Comment: Industry consensus was not obtained from the comments received in this posting. The standard has been modified to address the concern identified and the drafting team will seek affirmation of these modifications in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	15	10		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council		X	<p>Item R1.1 List of tasks – item 5 – “Directs Generator Operators to implement redispatch for congestion management.” We recommend NERC drop the phrase “as directed by the Reliability Coordinator.” In WECC, the BA and the TO must collaborate to mitigate congestion on the transmission grid. If they do not fulfill this commitment in a timely manner, then the Reliability Coordinator will issue a directive to the BA to correct the problem. The primary responsibility belongs to the BA. This is probably a WECC Regional Difference.</p> <p>Item R1.1 List of tasks – item 9 – Recommend changing to “Provides real-time system data and verbal information to the Reliability Coordinator”.</p> <p>D. Compliance Item 1.3 Data Retention – Recommend changing “None” to “Retain training records for each individual for a 3 year period.”</p>	<p>We will make the changes to remove “as directed by the Reliability Coordinator”.</p> <p>The standard has been modified.</p> <p>This standard is only used for initial certification. Only the records necessary for initial certification are required. Continued retention of training records is addressed in other standards.</p>
Ray Morella – FirstEnergy Corp	X		<p>Requirement R1.1. states that the Tasks considered real-time Balancing Authority responsibilities include: Directs resources (Generator Operators and Load-Serving Entities) to take action to ensure balance in real time. Directs Transmission Operator to reduce voltage or shed load if needed to ensure balance within its Balancing Authority Area. Complies with reliability requirements specified by Reliability Coordinator. Informs the Reliability Coordinator and Interchange Authorities of Interchange Schedule interruptions due to generation or load interruptions within its Balancing Authority Area. Directs Generator Operators to implement redispatch for congestion management as directed by the Reliability Coordinator. Notifies the Reliability Coordinator of the implementation of its own emergency procedures. Coordinates the implementation of controllable loads with Load Serving Entities. Implements emergency procedures as directed by the Reliability Coordinator.</p>	<p>The Functional Model served as a reasonable framework for their initial development. Because this standard is for certification of Personnel all of the real-time functions for the Balancing Authority do not apply.</p>

Proposed Balancing Authority Certification Standards — Comments

			<p>Provides real-time verbal system information to the Reliability Coordinator.</p> <p>These tasks should be the same as the Real Time Balancing Authority Tasks listed in the Functional Model in effect at the time this standard is effective.</p> <p>R2 states that the BA will provide training on procedures etc. This requirement should state The Transmission Operator shall provide its operating personnel with training that addresses the maintenance of the certification credential applicable to the Balancing Authority function and all of the procedures, processes, and tools associated with performing the Transmission Operator responsibilities identified in Requirement R1.</p>	<p>This standard is used for initial certification of a Balancing Authority. Maintenance of Personnel certification is addressed in another standard.</p>
<p>CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.</p>	X			
<p>Kathleen M. Goodman – ISO NE</p>	X			
<p>Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>		X	<p>Same general comment as for Question No. 3 above.</p>	<p>Earlier versions of the IOP had more detail and the industry comments directed the drafting team to be less specific in the elements of the plan. The BIOP was posted with the standards for review.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p>
<p>P. D. Henderson – IESO Ontario</p>	X			
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	X		<p>Please clarify if all personnel to which some tasks may be delegated during Loss of Control Center Functionality must also be NERC certified</p>	<p>This standard is used for initial certification of a Balancing Authority. Requirements for Personnel certification during real-time operating emergencies is addressed in another</p>

Proposed Balancing Authority Certification Standards — Comments

				standard (PER-003-0 Measure 1.2).
Howard Rulf – WE Energies		X	Define controllable loads. What if load management is used for economic (not reliability) reasons. Clarify that a non-certified person may be performing load management for economic reasons.	Controllable loads will be removed from the standard.
Eric Sendkowicz - FRCC		X		
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP		X	The NERC PS feels that the training requirement R2 is insufficient with respect to being able to measure the organizations' ability to successfully meet the requirement. The tasks listed in requirement R1 may be sufficient to identify a Balancing Authority Organization, but the task list is not comprehensive enough to constitute the definition of a quality training program. Requirement R2.1 is also insufficient with respect to the retention of records. Retention of this limited amount of data would prove only that some form of "training" took place but would not provide enough information to determine if the organization had any structured program or assurance of quality and participant achievement. The PS recommends language be inserted into the standard requiring adherence to the present PER-003 and it's planned successor which is being drafted by the PS. Having training requirements within multiple standards has the potential to cause confusion within the industry for both the organization and the compliance and readiness audit staff.	The standard has been modified to address your concern regarding the inclusion of a training program.
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC		X	R1.1 Directs Transmission Operator to reduce voltage or shed load if needed to ensure balance within its Balancing Authority Area. The SDT failed to make a similar requirement for the Distribution Provider.	The standard has been modified to address your concern.
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar	X			

Proposed Balancing Authority Certification Standards — Comments

Stan Mason – SPA Robert Rhodes - SPP				
Robert Coish – Manitoba Hydro		X	As per our previous comment for ORG-010-1 the MRO strongly suggests that the SDT remove the reference of reducing voltage from R1.1. The Transmission Operator should be the entity to determine how it will reduce load not the Balancing Authority.	The standard has been modified to address your concern.
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN		X	R1.1 – Should Distribution Providers be included in this listing of responsibilities?	The standard has been modified to address your concern and made to be less prescriptive.
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis		X	Requirement R1 places a greater requirement on the BA than the existing Standards. Therefore, Requirement R1 for this Personnel Standard should be replaced by: "The Balancing	The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes

Proposed Balancing Authority Certification Standards — Comments

<p>Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini</p>			<p>Authority shall demonstrate how it meets Standard PER-003 R1."</p> <p>Please delete R1.1. It is an incomplete list of the Balancing Authority Real-Time activities taken from the Functional Model "Balancing Authority - Relationships with other Responsible Entities". R1.1 is not a list of the BA tasks that are performed by NERC-certified BA personnel.</p> <p>If R1.1 is kept then please provide a definition of "verbal system information" that the BA provides to the RC.</p>	<p>that may be made to the referenced standard.</p> <p>The tasks identified in the list have been supported by the industry through the standard development process and are only intended to identify tasks performed by personnel.</p> <p>"Verbal" has been removed from the standard.</p>
<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>		<p>X</p>	<p>As per our previous comment for ORG-010-1, the MRO strongly suggests that the SDT remove the reference of reducing voltage from R1.1. The transmission operator should be the entity to determine how it will reduce load, not the balancing authority.</p>	<p>The standard has been modified to address your concern.</p>

Proposed Balancing Authority Certification Standards — Comments

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-012-1 — Balancing Authority Certification — Balancing?

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-012-1 — Balancing Authority Certification — Balancing. The drafting team has made minor modifications to address comments received.

Commenter	Yes	No	Comment	Response
TOTAL:	19	5		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council		X	<p>General comment; There is no requirement for the BA to meet NERC operating standards such as CPS, CPS2 and DCS. Even if these operating standards are replaced by other operating measures, there is no requirement to meet these standards; they are only required to monitor their efforts to balance the system. This doesn't seem right.</p> <p>Also, why is it necessary to "demonstrate" capability. Does it significantly add to reliability?? We do not believe that it does. We have never had this requirement before and, as far as we know, reliability has not suffered. Until now, it has been sufficient for the certification team and approval bodies to assure themselves that a candidate BA has knowledge of the requirements. And, knowing what is expected, the candidate will acquire the equipment and create the agreements to become compliant as a BA Responsible Entity.</p> <p>The word "demonstrate" creates problems for the candidate BA as well as the certification team. For the candidate, how does the candidate show its ability to do this until it is part of the network? No trials here. For the certification team, when is the demonstration sufficient?</p>	<p>Your concerns are addressed in ORG-009-1 Requirement R.4.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>The drafting team feels that in order to ensure that an entity seeking certification has the means to perform their required tasks, a demonstration of the tool in addition to having the knowledge is necessary. The industry supports this position.</p>
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission		X	The requirements of ORG-012-1 are too prescriptive. They	The industry has supported these requirements through the

Proposed Balancing Authority Certification Standards — Comments

<p>Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>			<p>provide detailed information on certain balancing functions to be performed as they exist now but any future additions to responsibility would require that this complete standard be modified. We suggest that this be modified to state the functional requirements for monitoring transmission system reliability as stated in existing NERC Standards and that the certification audit team be charged with determining if the candidate transmission operator has sufficient tools and monitoring points to accomplish the specified reliability functions. This solution also has the advantage of permitting technical improvements that might change the particular set of system parameters to be monitored while accomplishing the functional reliability requirements, perhaps with better results and at a reduced cost.</p>	<p>standard development process. The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p>
<p>P. D. Henderson – IESO Ontario</p>	<p>X</p>			
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	<p>X</p>			
<p>Howard Rulf – WE Energies</p>	<p>X</p>			
<p>Eric Sendkowicz - FRCC</p>		<p>X</p>	<p>Requirement R1 needs clarification (re-wording). Suggest using a list clarifying the expectations of R1. Requirement R2 stipulates requirements on developing a Balancing Integrated Operational Plan. This standard or another applicable standard should contain the "required" elements of this BIOP. A loose attachment is not acceptable if BAs will be required to develop the plans and their plan will be subject to approval prior to becoming "certified" as a BA. A standard requirement should be clear and enforceable and based on "measurable" criteria.</p>	<p>R1 has been modified to address your concern. Early in the process, the IOP elements were a part of the standard and the industry direction was to be less prescriptive and the elements were moved to a separate reference document. The drafting team has followed the consensus of the industry.</p>
<p>NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP</p>				
<p>Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT</p>				

Proposed Balancing Authority Certification Standards — Comments

Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammam – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X		However, we believe that the use of the words — metered boundaries — should be clearer to include pseudo-ties.	Metered boundaries is intended to include pseudo-ties.
Gary H. Campbell – MAIN		X	R2 – I don not understand the purpose of this requirement. It seems we are requiring a procedure or plan to have a plan when NERC already has templates being developed for these plans. I think the requirement should be that the BA has an approved plan etc.	This requirement is to ensure that the entity has a process in place for developing their BIOP on a daily basis and that they are prepared to develop it accordingly. This is not associated with the Reliability Plans currently being developed.
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner	X		However, we believe that the use of the words M metered boundaries M should be clearer to include psudo-ties.	Metered boundaries is intended to include pseudo-ties.

Proposed Balancing Authority Certification Standards — Comments

Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus				
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	We suggest all the Requirements in this standard be replaced with one Requirement that the BA have procedures, processes, or tools to meet all the NERC Reliability Standards.	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards. In actuality, they are measuring two different elements, preparedness versus performance.
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

Proposed Balancing Authority Certification Standards — Comments

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-013-1 — Balancing Authority Certification — Data Acquisition

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-013-1 — Balancing Authority Certification — Data Acquisition. The drafting team has made minor modifications to address comments received.

Committer	Yes	No	Comment	Response
TOTAL:	19	4		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	<p>general - We suggest that ORG-013-1 be modified to state the functional requirements for all data that is required, as stated in existing NERC Standards, and that the certification audit team be charged with determining if the candidate transmission operator has sufficient tools, training and procedures to accomplish the specified reliability functions. As in Question No. 5 above, this solution has the advantage of permitting technical improvements that might change the particular set of system tools or analytical procedures to be performed while accomplishing the functional reliability requirements, perhaps with better results and at a reduced cost.</p> <p>R2.8 – Is this Actual Interchange intended to be Net or Detailed per tie so that telemetry problems can be more easily identified?</p> <p>R3.3 – For what period of time are “Reliability analyses” supposed to be acquired from the Reliability Coordinator – most recent, next hour, next day, more, all of these?</p>	<p>(1) The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p> <p>(2) Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard’s development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>(3) R2.8 The standard has been modified to include this clarification.</p> <p>(4) R3.3 is intended to include any analyses that would impact the BA’s operational plan.</p>
P. D. Henderson – IESO Ontario	X			

Proposed Balancing Authority Certification Standards — Comments

Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC		X	R2. The requirement should be changed to: "The Balancing Authority shall have procedures, processes, and tools for acquiring or developing:". This recognizes that many BA's may actually be developing things like load forecasts themselves rather than acquiring from others. R3.4. Should be restated as "Load shedding directives".	The drafting team has modified the requirements based on your comments for R2 and R3.4
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO	X			

Proposed Balancing Authority Certification Standards — Comments

Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP				
Alan Gale – City of Tallahassee		X	R2. The requirement should be changed to: "The Balancing Authority shall have procedures, processes, and tools for acquiring or developing:". This recognizes that many BA's may actually be developing things like load forecasts themselves rather than acquiring from others. R3.4. Should be restated as "Load shedding directives".	The drafting team has modified the requirements based on your comments for R2 and R3.4
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X		However, R2.7 should also include capability to determine frequency bias even if not variable. What is included in R3.3?	The drafting team feels that frequency bias is not a real-time value. R3.3 is intended to include any analyses that would impact the BA's operational plan.
Gary H. Campbell – MAIN	X			
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X		However, R2.7 should also include capability to determine frequency bias even if not variable. What is included in R3.3?	The drafting team feels that frequency bias is not a real-time value. R3.3 is intended to include any analyses that would impact the BA's operational plan.
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery		X	The Standards detail the information required by the BA and its interaction with those in its BA Area and its RC. There is no need for this Certification Standard to provide any list, especially a partial list, of requirements. Therefore please replace all of Requirement R2 with "The BA shall have procedures, processes, and tools in place to accomplish the data transfers specified in R1." We suggest deleting R3 as it is repetitive of R2. If it is not deleted then please replace all of Requirement R3 with: "The BA shall have procedures, processes, and tools in place to	(1) The industry has supported including a list of data to be acquired. (2) R2 is for acquiring data while R3 is a requirement for obtaining information directly from the RC.

Proposed Balancing Authority Certification Standards — Comments

Narinder Saini			accomplish the data transfers with the RC as required." Also, please make changes to the Measures as needed to accommodate the changes suggested above.	
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

Proposed Balancing Authority Certification Standards — Comments

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-014-1 — Balancing Authority Certification — Frequency Control

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-014-1 — Balancing Authority Certification — Frequency Control.

Committer	Yes	No	Comment	Response
TOTAL:	21	2		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Ruffano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question 6 above.	The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard’s development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC	X			
NERC Personnel Subcommittee Earl F. Cass – NERC				

Proposed Balancing Authority Certification Standards — Comments

Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			

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Gary H. Campbell – MAIN	X			
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	We suggest all the Requirements in this standard be replaced with one Requirement that the BA have procedures, processes, or tools to meet all the NERC Reliability Standards.	Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

Proposed Balancing Authority Certification Standards — Comments

8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-015-1 — Balancing Authority Certification — Interchange Approval and Implementation?

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-015-1 — Balancing Authority Certification — Interchange Approval and Implementation.

Commenter	Yes	No	Comment	Response
TOTAL:	18	5		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question 6 above.	The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard’s development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC	X			
NERC Personnel Subcommittee Earl F. Cass – NERC				

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Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee		X	R.1 - What is the expectation of the tool that will determine if scheduled ramps can be met? This is a current problem based on frequency swings seen today on or near the start and end of the "on-peak" time periods. How will a BA certify it	The intent of Requirement R.1 was to ensure that the BA has the ability to determine its ramping capability. This could be done via a process, procedure or tool. The current problem is outside the scope of the standard development.

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			can meet the ramp for each day of a several day schedule? Shouldn't the problem be fixed before we expect any new BA's to fix it on their own?	
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy		X	The Alliant Energy as a member of the Control Area Working Group (CAWG) believes that the BA must have the capability in real-time operations to determine that it has adequate resources to meet the schedule ramp with each schedule change. It is feasible that the BA is committing itself in the approval process to ensuring that adequate resources will be available to meet the schedule ramp at both the start and stop of the interchange schedule, however it is not feasible to assume that a BA will have the capability to verify that it can ramp a schedule off multiple days in the future with any degree of certainty. For example, a BA could have a method to indicate that it has projected excess capacity of 1000 MW to meet the start and stop of a 300 MW transaction, however the capability is difficult to measure and monitor for compliance. The ultimate measure of whether the BA ensured its ramp capability is in its generation control performance. In addition, the BA should also have the capability to limit the magnitude of schedule curtailments during TLRs if ramping capability is limited.	The intent of Requirement R.1 was to ensure that the BA has the ability to determine its ramping capability. This could be done via a process, procedure or tool. The issue related to TLR situations is outside the scope of the standard development.
Gary H. Campbell – MAIN	X			
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus		X	R1 - This requirement should be specific to the interchange schedules for which the Balancing Authority has responsibility. The CAWG believes that the BA must have the capability in real-time operations to determine that it has adequate resources to meet the schedule ramp with each schedule change. It is feasible that the BA is committing itself in the approval process to ensuring that adequate resources will be available to meet the schedule ramp at both the start and stop of the interchange schedule, however it is not feasible to assume that a BA will have the capability to verify that it can ramp a schedule off multiple days in the future with any degree of certainty. For example, a BA could have a method to indicate that it has projected excess capacity of 1000 MW to meet the start and stop of a 300 MW transaction, however the capability is difficult to measure and monitor for compliance.	The intent of Requirement R.1 was to ensure that the BA has the ability to determine its ramping capability. This could be done via a process, procedure or tool. The issue related to TLR situations is outside the scope of the standard development.

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			The ultimate measure of whether the BA ensured its ramp capability is in its generation control performance. In addition, the BA should also have the capability to limit the magnitude of schedule curtailments during TLRs if ramping capability is limited.	
<p>Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini</p>		X	We suggest al the Requirements in this standard be replaced with one Requirement that the BA have procedures, processes, or tools to meet all the NERC Reliability Standards.	<p>Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p>
<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>	X			

Proposed Balancing Authority Certification Standards — Comments

9. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-016-1 — Balancing Authority Certification — Information Dissemination?

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-016-1 — Balancing Authority Certification — Information Dissemination. The drafting team has made modifications based on the comments.

Committer	Yes	No	Comment	Response
TOTAL:	19	3		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Ruffano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question 6 above.	The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard’s development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC				
NERC Personnel Subcommittee Earl F. Cass – NERC				

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Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP		X	There appears to be an inconsistency between Requirements in this standard and Requirement R2 in ORG-010-1. It appears there should additional requirements for the Balancing Authority to share data especially with adjacent Balancing Authorities and Transmission Operators.	The standard has been modified based on your comments.
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	X			
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			

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Gary H. Campbell - MAIN	X			
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	We suggest all the Requirements in this standard be replaced with one Requirement that the BA have procedures, processes, or tools to meet all the NERC Reliability Standards.	Providing a list within this standard provides the entity with a current list of information so that the entity does not have to go through numerous other NERC standards. Currency of the standard is assured because, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

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10. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-017-1 — Balancing Authority Certification — Emergency Operations?

General Comment: Based on the comments received, industry consensus supports the Introduction, Requirements, Measures, and Compliance elements identified for ORG-017-1 — Balancing Authority Certification — Emergency Operations. The drafting team has made modifications based on the comments.

Committer	Yes	No	Comment	Response
TOTAL:	18	5		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Ruffano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X		The word Agreement is not used anywhere in the text of this standard, this needs to be clarified that why is definition then included in this standard. If this definition is retained then we recommend that wording should be added to the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”	The definition of Agreements is not included in this standard.
Kathleen M. Goodman – ISO NE	X		The word Agreement is not used anywhere in the text of this standard, this needs to be clarified that why is definition then included in this standard. If this definition is retained then we recommend that wording should be added to the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”	The definition of Agreements is not included in this standard.
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question No. 6 above. M1 (this also applies to some degree to the other standards) – How is a BA expected to “demonstrate” it can use procedures, processes and tools to operate during emergency conditions? Is it suppose to actually use the tools to operate, should it provide results from table top simulations, etc.?	The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. The standard has been modified based on your comment.
P. D. Henderson – IESO Ontario	X			
Roger Champagne – Hydro-Quebec TransEnergie	X		The word Agreement is not used anywhere in the text of this standard, this needs to be clarified that why is definition then	The definition of Agreements is not included in this standard.

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			included in this standard. If this definition is retained then we recommend that wording should be added to the proposed statement/definition of Agreement i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean....."	
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC		X	R1.3 is too broad. Suggest rewording to something like: "Has experienced an actual or suspected act of sabotage affecting or potentially affecting critical infrastructure facilities and/or the BA's ability to operate"	The standard has been modified based on your comment.
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP	X			
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO	X			
ISO/RTO Council Standards Review Committee Anita Lee – AESO	X			

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Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP				
Alan Gale – City of Tallahassee		X	R1.3 is too broad. Suggest re-wording to something like: "Has experienced an actual or suspected act of sabotage affecting, or potentially affecting, critical infrastructure facilities and/or the BA's ability to carry out it's real time obligations."	The standard has been modified based on your comment.
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X		However the purpose should be clarified with the additional words — bulk electric system — Emergency. Clarification requested in the following: wording in R1.4 would indicate that ANY directive by the RC to maintain the reliability of the Interconnection is an Emergency, is this a correct interpretation?	The standard has been modified based on your comment. R1.4 applies during an Emergency.
Gary H. Campbell - MAIN		X	The measure should use the terminology “and use its tools” to insure all everything is checked out. As written, an auditor can interpret the measure as only one of the three elements must be in place.	The standard has been modified based on your comment.
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison Roman Carter	X			
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X		However the purpose should be clarified with the addition words --bulk electric system-- Emergency. Clarification is requested for the following: wording in R1.4 would indicate that ANY directive by the RC to maintain the reliability of the Interconnection is an Emergency, is this a correct interpretation?	The standard has been modified based on your comment. R1.4 applies during an emergency.
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett		X	We suggest deleting the last sentence of R1 and all items R1.1 through R1.5	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement. The industry has supported this list.

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Jim Case Bill Aycock Melinda Montgomery Narinder Saini				
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

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11. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for ORG-018-1 — Balancing Authority Certification — Loss of Control Center Functionality?

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard based on the comments received and will seek affirmation of these changes and industry consensus in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	7	16		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.		X	The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard. re: R1: The foot note statement related to SCADA (voice)is confusing. The footnote needs to be clarified and/or reworded.	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent.
Kathleen M. Goodman – ISO NE		X	The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard. re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent.
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question No. 6 above.	The Reliability Standards’ process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.
P. D. Henderson – IESO Ontario		X	(i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time	(i) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes

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			<p>an BA could be compliant even if it took 24 hours.</p> <p>(ii)- If the BA's primary facility becomes unavailable the BA's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the BA's physical plan for a back up control center.</p> <p>(iii)- The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. This requirement needs to be mapped into this proposed ver-1 standard.</p> <p>(iv)- re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.</p>	<p>associated with implementation of the plan are defined in other reliability standards and must be adhered to.</p> <p>(ii) The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate.</p> <p>(iii) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to.</p> <p>(iv) The footnote in the standard has been modified to clarify the intent.</p>
Roger Champagne – Hydro-Quebec TransEnergie		X	<p>The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard.</p> <p>re: R1: The foot note statement related to SCADA (voice)is confusing. The footnote needs to be clarified and/or reworded.</p>	<p>As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to.</p> <p>The footnote in the standard has been modified to clarify the intent.</p>
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC		X	<p>R2.16. - Same comment as for ORG-017-1, R1.3. Requirement R1, last bullet reads, "Loss of control center support functions, i.e. air conditioning, power, or water." should be deleted. This is beyond the scope of Reliability and over-prescriptive in terms of the certification process. As long as an entity remains "functional", which is captured under the rest of the certification standard, Reliability will be preserved.</p>	<p>R1.The last bullet is intended to address any support function of the control center that could cause the center to become inoperable. The industry has supported this condition through previous posting comments.</p>
<p>NERC Personnel Subcommittee</p> <p>Earl F. Cass – NERC</p> <p>Mike Wells – WECC</p> <p>Ray Gross – PJM</p> <p>Geoff Elmer – IESO</p> <p>John Taylor - SPP</p>				
<p>Compliance and Certification Committee</p> <p>Jerry Smith – Arizona Public Service Commission</p> <p>Martin Sidor – NERC</p> <p>Earl Cass – Western Area Power Admin.</p>				

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Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP		X	The requirement in R1 is not clear on whether the loss is for all functionality or restricted to the loss of primary systems only. It is assumed that the intent is for the loss of primary functionality only and redundant or backup systems could be used to meet this requirement.	The assumption that you are making is correct. The intent of this standard is that it applies to the single loss of the primary control center functionality as identified in the list in Requirement R1 and could be satisfied with redundant or backup systems. The footnote in the standard has been modified to clarify the intent.
Robert Coish – Manitoba Hydro		X	Manitoba Hydro suggests that the SDT review the coordination between this standard and EOP-008-0, and whether both are required.	The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standards. The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards. In actuality, they are measuring two different elements, preparedness versus performance.
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO		X	i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time an BA could be compliant even if it took 24 hours. (ii)- If the BA's primary facility becomes unavailable the BA's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the BA's physical plan for a back up control center. (iii)- The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard. (iv)- re: R1: The foot note statement related to SCADA (voice	(i) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. (ii) The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate. (iii) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to.

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		) is confusing. The footnote needs to be clarified and/or reworded.	(iv) The footnote in the standard has been modified to clarify the intent.
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP		X	i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time an BA could be compliant even if it took 24 hours. (ii)- If the BA's primary facility becomes unavailable the BA's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the BA's physical plan for a back up control center. (iii)- The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard. (iv)- re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.	(i) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. (ii) The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate. (iii) As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. (iv) The footnote in the standard has been modified to clarify the intent.
Alan Gale – City of Tallahassee		X	R2.1 - Delete last bullet. As long as the systems remain functional what is the concern. This requirement is too prescriptive and burdensome. R2.11 - Same as ORG-015-1. R2.13.1 and R2.13.2 should be deleted. The goal is to perform real time functions during the loss of the Primary Facility. The SC should already have the BIOP, and I doubt changes will be made to it while combating the loss of the primary facility.	R.2.1 - We believe that you mean the last bullet in R.1. The last bullet is intended to address any support function of the control center that could cause the center to become inoperable. The industry has supported this condition through previous posting comments. R2.11 The intent of Requirement R.2.11 was to ensure that the BA has the ability to determine its ramping capability. This could be done via a process, procedure or tool. The Drafting Team feels that the BIOP and updates to the BIOP are necessary for continued reliability operations.
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy		X	The BA should also be responsible for adhering to cyber security requirements	The standard has been modified based on your comment.
Gary H. Campbell - MAIN		X	R1 & C Measures – should use the terminology “and facilities” to ensure everything is checked out. As it is written, an auditor can interpret the requirement as only one of the three elements must be in place.	The intent of the wording is that the Entity could have one or all (procedures, processes, tools or facilities) to meet the requirement. Using “and” implies that all four are required.
Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crawley John McCoy	X			

Proposed Balancing Authority Certification Standards — Comments

Joel Dison				
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus		X	The BA should also be responsible for adhering to cyber security requirements.	The standard has been modified based on your comment.
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	Please delete all of the itemized list in R2. We prefer and suggest all the Requirements in this standard be replaced with one Requirement that the BA have procedures, processes, or tools to meet all the NERC Reliability Standards.	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement. The industry has supported this list.
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom		X	The MRO suggests that the SDT review the coordination between this standard and EOP-008-0; Plans for Loss of Control Center Functionality, and whether both are required.	The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standards. The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards. In actuality, they are measuring two different elements, preparedness versus performance.

Proposed Balancing Authority Certification Standards — Comments

12. Do you agree with deleting ORG-019-1 — Balancing Authority Certification — Reporting Requirements?

General Response: Industry consensus supported the removal of ORG-019 and the elements being incorporated into other certification standards.

Commenter	Yes	No	Comment	Response
TOTAL:	19	4		
Terry L. Blackwell – South Carolina Public Service Authority				
David Hawkins – Western Electricity Coordination Council				
Ray Morella – FirstEnergy Corp	X			
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.	X			
Kathleen M. Goodman – ISO NE	X			
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun	X			
P. D. Henderson – IESO Ontario		X	There is no ORG-019-1 Document.	
Roger Champagne – Hydro-Quebec TransEnergie	X			
Howard Rulf – WE Energies	X			
Eric Sendkowicz - FRCC	X			
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO				

Proposed Balancing Authority Certification Standards — Comments

John Taylor - SPP				
Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Peter Burke (on behalf of ATC's Jason Shaver) - ATC	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP		X	ORG-019-1 does not exist on the NERC website therefore we can not comment on it.	
Robert Coish – Manitoba Hydro	X			
Transmission Access Policy Study Group (please see list of members at end of this document)	X			
Michael C. Calimano – NY ISO		X	THERE IS NO ORG-019-1 DOCUMENT.	
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammam – NYISO Bruce Balmat – PJM Charles Young - SPP		X	There is no ORG-019-1 document.	
Alan Gale – City of Tallahassee	X			
John Horakh – MAAC	X			
Robert Williams – PacifiCorp	X			
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell - MAIN	X			
Southern company Generation Clifford Shepard	X			

Proposed Balancing Authority Certification Standards — Comments

Lucius Burris Roger Green Terry Crawley John McCoy Joel Dison				
MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus	X			
Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini	X			
Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom	X			

Proposed Balancing Authority Certification Standards — Comments

13. Please identify any elements that should be included in the standards that have not been identified.

Commenter	Comment	Response
Terry L. Blackwell – South Carolina Public Service Authority		
David Hawkins – Western Electricity Coordination Council		
Ray Morella – FirstEnergy Corp		
<p>CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.</p>	<p>1. With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”</p> <p>2. Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be simultaneously specified.</p> <p>3. It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified.</p> <p>4. We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any Functional Model updates and revisions.</p> <p>5. Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully certified. Moreover, these entities ((such as GOP, LSE, etc..) be clearly defined and certified before the implementation of this certification standard.</p> <p>Also, for this Standard and all the Certification Standards it is important to clarify that Certification will be done only to meet this standard and not the Functional Model. Any changes to the Functional Model must be reflected in this standard by revision through the Reliability Standards Process.</p>	<p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Certification standards are unique in that non-compliance results in not being granted certification.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development.</p>
Kathleen M. Goodman – ISO NE	<p>1. With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”</p> <p>2. Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be simultaneously specified.</p>	<p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Certification standards are unique in that non-compliance results in not being granted certification.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial</p>

Proposed Balancing Authority Certification Standards — Comments

	<p>3. It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified.</p> <p>4. We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any Functional Model updates and revisions.</p> <p>5. Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully certified. Moreover, these entities (such as GOP, LSE, etc..) must be clearly defined and certified before the implementation of this certification standard.</p> <p>Also, for this Standard and all the Certification Standards it is important to clarify that Certification will be done only to meet this standard and not the Functional Model. Any changes to the Functional Model must be reflected in this standard by revision through the Reliability Standards Process.</p>	<p>development.</p>
<p>Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>	<p>These standards apparently attempt to set up a "check list" for Balancing Authority certification. While that is certainly one approach to certification, it introduces duplication of requirements in the standards and sets up the potential for the NERC Standards to get out of synchronization and provide contradictory information. Another approach is for the Organizational Certification Standards to reference requirements of existing NERC Standards and require the organization requesting certification to provide proof that they can meet these requirements. This basically means that the certification requirements are not standards in and of themselves, but procedures that the certification audit team follows to ensure that the candidate transmission operator can demonstrate its ability to meet the NERC Reliability Standards. We believe that this is a better approach and request that the ORG standards be withdrawn as candidate NERC reliability standards and further developed as procedures, perhaps by the Compliance and Certification Committee. We simply feel that this does not have to be a stand-alone standard.</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>The industry has supported the development of these standards to address certification.</p>
<p>P. D. Henderson – IESO Ontario</p>	<p>1. We have a general concern with regard to the existing NERC Registration Process and the ultimate Certification Process. The concern regards the consistency, terminology or the various interpretations within the industry of what constitutes an RC. We believe that clarity shall be established prior to ultimate certification. Our understanding is that various issues are under consideration at the Functional Model Working Group and we would ask that guidelines be developed and included in the revised Functional Model and be included in the implementation plan for the BA Certification Standard.</p> <p>2. With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean a contract or other</p>	<p>These standards are not intended to set the parameters of who is a Balancing Authority. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements.</p> <p>The drafting team will include the implementation plan for the standards in the next posting.</p> <p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary. Certification standards are unique in that non-compliance results in not being granted certification. Since these standards are currently intended for initial certification</p>

Proposed Balancing Authority Certification Standards — Comments

	<p>document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.</p> <p>3. It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.</p> <p>4. Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified.</p>	<p>only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification. Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development.</p>
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	<p>1. With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean....."</p> <p>2. It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified.</p> <p>3. We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any Functional Model updates and revisions.</p> <p>4. Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully registered/certified.</p> <p>5. Also, for this Standard and all the Certification Standards it is important to clarify that Certification will be done only to meet this standard and not the Functional Model. Any changes to the Functional Model must be reflected in this standard by revision through the Reliability Standards Process.</p>	<p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Certification standards are unique in that non-compliance results in not being granted certification.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development.</p>
<p>Howard Rulf – WE Energies</p>		
<p>Eric Sendkowicz - FRCC</p>	<p>These standards contain multiple requirements addressing the Balancing Integrated Operational Plan. The proposed definition and attached file defining required elements are not sufficient to support the requirements of these certification standards. The required elements of a Balancing Integrated Operational Plan should be defined and contained within an "approved" standard if the validity of the requirements and measures of the certification standards is expected. The expectations should be clear (ORG-018 includes BIOP update requirements?? what is the periodicity of updates??)</p>	<p>Early in the process, the IOP elements were a part of the standard and the industry direction was to be less prescriptive and the elements were moved to a separate reference document. The drafting team has followed the consensus of the industry.</p> <p>The drafting team will include the implementation plan for the standards in the next posting.</p>

Proposed Balancing Authority Certification Standards — Comments

	<p>It is suggested that as these standards proceed through the development process, special attention and consideration be made with respect to the implementation plan. These standards significantly increase the required documentation of procedures and processes. They will in some cases, especially for smaller entities, require a significant amount of effort and resources. The implementation plan should allow sufficient time for development of standardized and effective documentation, processes, and procedures by entities as they proceed through the certification process.</p>	
<p>NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP</p>		
<p>Compliance and Certification Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT</p>		
<p>Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP</p>		
<p>Robert Coish – Manitoba Hydro</p>	<p>As a general comment here is a risk that the capability requirements stated specifically in the Balancing Authority Certification Standards will not agree with the capability requirements needed to comply with the full set of NERC Reliability requirements. The Certifications standards should be written to automatically accommodate any differences with existing standards in this regard or to automatically accommodate any new capability requirements that may arise during the ongoing standards development process. A solution to this might be to state that where differences exist between the Certification Standard and other Reliability Standards, the Requirements in the other standards will apply. This will put the Certification standards on</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a</p>

Proposed Balancing Authority Certification Standards — Comments

	firmer legal ground. Also, the Certification standards will only need to be updated periodically and not every time a related change are made to other standards.	review of existing standards to identify any implications to these standards.
Transmission Access Policy Study Group (please see list of members at end of this document)	See comments above concerning the NERC Operating Reliability Data Confidentiality Agreement.	The industry did not support the requirement for the BA to sign the confidentiality agreement. Revising the NERC Operating Reliability Data Confidentiality Agreement is beyond the scope of the Standard Drafting Team.
Michael C. Calimano – NY ISO		
ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP	Additional Comments: (i)- The ISO/RTO Council has a general concern with regard to the existing NERC Registration Process and the ultimate BA Certification Process. The concern regards the consistency, or lack thereof, of BA registrations already performed, and the various interpretations within the industry of what constitutes a BA. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the BA Certification Standard. (ii)- With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....” (iii)- It is expected that audits will be conducted for these standards. In that case we suggest that data retention period for any audit results be specified. (iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) be clearly defined and registered/certified before the implementation of this certification standard.	These standards are not intended to set the parameters of who is a Balancing Authority. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements. The drafting team will include the implementation plan for the standards in the next posting. We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary. Certification standards are unique in that non-compliance results in not being granted certification. Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification. Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development.
Alan Gale – City of Tallahassee		
John Horakh – MAAC		
Robert Williams – PacifiCorp		
Terry Gucciardo – Alliant Energy	The conditions for BA certification should acknowledge that if a BA is being added to a group operating under a NERC waiver, that it should be held to the conditions acknowledged in the waiver. A waiver is not a delegation of responsibility in all cases, it may reflect the transfer of responsibility to another entity also responsible for compliance.	Waivers are expected to handled in the same fashion as they are currently and will not be addressed in the Certification standards.
Gary H. Campbell - MAIN		

Proposed Balancing Authority Certification Standards — Comments

<p>Southern company Generation Clifford Shepard Lucius Burris Roger Green Terry Crowley John McCoy Joel Dison</p>	<p>In the "Description of Current Draft" section of this standard, the SDT mentions all references to the Interchange Authority (IA) have been removed from the certification standards.</p> <p>Maybe this is because the certification standards are based on Version 0 standards which are currently being used for compliance. The IA was not included in the Version 0 standards and, therefore, this SDT probably decided to not mention it here because it felt the IA no longer existed.</p> <p>This is not the case at all. The IA was not implemented in the Version 0 standards because the Version 0 SDT did not believe Industry could implement (immediately) the IA as it was interpreted by Industry in the Functional Model, thus postponing the implementation of the IA, but not abolishing the IA.</p> <p>Version 1 standards such as the Coordinate Interchange and the Cyber Security Standards are being developed with IA functions being performed by an IA entity. If Industry accepts and approves these Version 1 standards with the IA, then these certification standards being developed today (i.e. RC, BA, TOP) may need to reference agreements with the IA .</p> <p>Therefore, the Certification Standard Drafting team should consider drafting a certification standard for the IA or maybe Industry should agree that the IA does not need to be certified in order to perform its duties and responsibilities.</p>	<p>The certification standards for the IA is currently still part of the SDT scope. The development of those standards has been delayed until the final decision is made to its functionality. Once the IA functionality is defined, these certification standards will have to be modified to include them. Aspects of the IA function have been included in the BA function for the purpose of these standards. Any future inclusions of IA reference will occur through the standards development process.</p>
<p>MISO Control Area Working Group Doug Hils Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus</p>	<p>The conditions for BA certification should acknowledge that if a BA is being added to a group operating under a NERC waiver, that it should be held to the conditions acknowledged in the waiver. A waiver is not a delegation of responsibility in all cases, it may reflect the transfer of responsibility to another entity also responsible for compliance.</p>	<p>Waivers are expected to handled in the same fashion as they are currently and will not be addressed in the Certification standards.</p>
<p>Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini</p>	<p>In these standards, no process exists for the possibility of being de-certified after the initial certification. If this process exists separately from this set of standards, then these standards should point to that process. If it does not exist elsewhere, then these standards should be modified to allow for that possibility.</p> <p>Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the BA to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the BA, or providing the opportunity for new requirements to be imposed on the BA.</p> <p>Grammatically, more use of possessive nouns would be appreciated; some standard requirement sections contain wording that appears to place requirements on entities other than the BA.</p>	<p>ORG-009 does reference the certification procedures that are being developed by the CCC. These procedures are expected to be posted for comment before the certification standards go to ballot.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>Standard modifications have been made particularly in the agreements area (ORG-010) to clarify BA responsibilities.</p> <p>Under the current situation, the intent of this standard applies to</p>

Proposed Balancing Authority Certification Standards — Comments

	<p>Please add a provision for periodic on-site reviews of BAs to ensure they continue to meet Certification Standard requirements.</p> <p>Please add provisions for de-certification of BAs, for both self-decertification and de-certification for cause.</p>	<p>initial certification and does not establish an on-going certification requirement. The process for any type of periodic review for certification, in addition to de-certification, is under the responsibility of the CCC and should be addressed by the certification procedures that they are developing.</p>
<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>		

Proposed Balancing Authority Certification Standards — Comments

14. Please identify any regional differences that should be included in the standards.

Commenter	Comment	Response
Terry L. Blackwell – South Carolina Public Service Authority		
David Hawkins – Western Electricity Coordination Council		
Ray Morella – FirstEnergy Corp		
CP9, NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen M. Goodman – ISO NE Roger Champagne – TransEnergie HydroQuebec Khaqan Khan – The IESO Ontario Greg Campoli – NY ISO David Little – Nova Scotia Power Guy Zito – NE Power Coordinating Ccl Al Adamson – NY State Reliability Ccl.		
Kathleen M. Goodman – ISO NE		
Southern Company – Transmission Marc M. Butts Mike Oatts Raymond Vice Jim Griffith Doug McLuaghlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		
P. D. Henderson – IESO Ontario		
Roger Champagne – Hydro-Quebec TransEnergie		
Howard Rulf – WE Energies		
Eric Sendkowicz - FRCC		
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP		
Compliance and Certification		

Proposed Balancing Authority Certification Standards — Comments

<p>Committee Jerry Smith – Arizona Public Service Commission Martin Sidor – NERC Earl Cass – Western Area Power Admin. Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour - Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT</p>		
<p>Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Robert Rhodes - SPP</p>		
<p>Robert Coish – Manitoba Hydro</p>		
<p>Transmission Access Policy Study Group (please see list of members at end of this document)</p>		
<p>Michael C. Calimano – NY ISO</p>		
<p>ISO/RTO Council Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO-NE William Phillips – MISO Karl Tammar – NYISO Bruce Balmat – PJM Charles Young - SPP</p>		
<p>Alan Gale – City of Tallahassee</p>		
<p>John Horakh – MAAC</p>		
<p>Robert Williams – PacifiCorp</p>		
<p>Terry Gucciardo – Alliant Energy</p>		
<p>Gary H. Campbell - MAIN</p>		
<p>Southern company Generation Clifford Shepard Lucius Burris</p>		

Proposed Balancing Authority Certification Standards — Comments

<p>Roger Green Terry Crawley John McCoy Joel Dison</p>		
<p>MISO Control Area Working Group Doug Hills Tony Jankowski James Maenner Ray Morella William SeDoris CJ Ingersoll Karl Kohlrus</p>		
<p>Entergy Services Inc. Rick Riley Ed Davis Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini</p>		
<p>Midwest Reliability Organization Wayne Guttormson Terry Bilke Robert Coish Ken Goldsmith Todd Gosnell Alan Boesch Jim Maenner Darrick Moe Tom Mielnik Joe Knight Dennis Florom</p>		

Proposed Balancing Authority Certification Standards — Comments

TOP Members	Organization	Region*	Segment*
Gayle Mayo	Indiana Municipal Power Agency		4
Sharon Staz	Kennebunk Light & Power, ME	NPCC	4
Terry Bundy	Lincoln Electric System, NE	MRO	4
Gary Mathis	Madison Gas & Electric Company, WI	MAIN	4
Nilaksh Kothari	Manitowoc Public Utilities, WI	MAIN	4
Joe Pacovsky	Marshfield Electric & Wtr. Dept., WI	MAIN	4
Gary Zimmerman	Michigan Public Power Agency	ECAR	4
Jack Kegel	Minnesota Municipal Utilities Assoc.	MRO	4
Duncan Kincheloe	MO Jt. Muni. Elec. Util. Commission	SPP	4
Tom Heller	Missouri River Energy Services, SD	MRO	4
Libby Marshall	Municipal Electric Power Assoc. of KY	ECAR	4
David Benforado	Municipal Electric Utilities of WI	-----	
Geoffrey Wilson	Municipal Energy Agency of MS	SERC	4
William Leung	Municipal Energy Agency of NE	MRO	4
Chris Dibbern	NMPP Energy	MRO	4
Kenneth Craig	Navajo Tribal Util. Authority, AZ	WECC	4
Steve Kaminski	New Hampshire Elec. Coop., Inc.	NPCC	4
Bob Ellston	North Attleborough Electric, MA	NPCC	4
Patrick Hyland	Northeast Public Power Assoc.	NPCC	4
Jim Pope	Northern California Power Agency	WECC	4
Jolene Thompson	Ohio Municipal Electric Assoc.	ECAR	4
Harry Dawson	Oklahoma Muni. Power Authority	SPP	4
Mike Frazier	Piedmont Muni. Power Agency, SC	SERC	4
Jimmy Wever	Publ. Serv. Comm. Of Yazoo City, MS	SPP	4
Larry Koshire	Rochester Public Utilities, MN	MRO	4
Thomas Josie	Shrewsbury Elec. & Cable Oper., MA	NPCC	4
Raymond Hayward	So. Minnesota Muni. Power Agency	MRO	4
Joseph Blain	Taunton Muni. Lighting Plant, MA	NPCC	4
Ray Shockey	Town of Ipswich, MA	NPCC	4
William Gallagher	VT Public Power Supply Authority	NPCC	4
John Scirpoli	W. Boyston Muni. Ltg. Plant, MA	NPCC	4
Roy Thilly	Wisconsin Public Power Inc.	MAIN	4
Robert Claussen	Ala. Muni. Electric Authority	SERC	4
Marc Gerken	American Municipal Power - Ohio	ECAR	4
Duane Dahlquist	Blue Ridge Power Agency, VA	ECAR	4
Kenneth Stone	Braintree Elec. Lt. Dept., MA	NPCC	4
Barbara Grimes	Burlington Elec. Dept., VT	NPCC	4
Terry Huval	Lafayette Utilities System, LA	SPP	4
Charles Guerry	City of Newberry, SC	SERC	4
Bill Burks	City Util. of Springfield, MO	SPP	4
Robert Preist	Clarksdale / MS Delta Energy	SPP	4
Daniel Sack	Concord Muni. Light Plant, MA	NPCC	4
Maurice Scully	CT Muni. Elec. Energy Coop.	NPCC	4
Charlie Higley	Citizens Utility Board, WI	----	
Patrick McCullar	Delaware Muni. Elec. Coop. Inc	MAAC	4
Jesse Tilton III	NCMPA1 and NCEMPA	SERC	4
Roger Fontes	Florida Muni. Power Agency	FRCC	4
Tom Talsma	Geneva Electric Department, IL	MAIN	4
Wayne Snow	Georgetown Muni Lt. Dept., MA	NPCC	4
Leonard Mediavilla	Groton Elec. Lt. Dept., MA	NPCC	4
Michael York	Harrisonburg Elec. Comm., VA	SERC	4
Brain Bullock	Holden Muni. Lt. Dept., MA	NPCC	4
Ronald Earl	Illinois Muni. Electric Agency	MAIN	4
Raj Rao	Indiana Municipal Power Agency	ECAR	4
Anne Kimber	Iowa Assoc. of Muni. Utilities	MRO	4
Colin Hanson	Kansas Municipal Utilities	SPP	4