

## Comments: Draft 3 Balancing Authority Certification Standards

1. ORG-009-1 — Do you agree with the removal of this requirement from the Balancing Authority Certification – Certification standard?

<b>General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.</b>				
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>	<b>Response</b>
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co	X		We understand the SAC is considering including a field test/readiness audit-type process between balloting of the standard and approval by the Board of Trustees. This would ensure the entity seeking certification would possess the tools, personnel, training, etc., necessary for adequately performing the function. We recommend including this process in the standard.	The field test would occur prior to the standards going to ballot.
Entergy Services Ed Davis		X	There does not seem to be a requirement that in order to be certified the BA must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.	The standard has been modified to address your comment.
Southeastern Power Administration Carter B Edge	X		We understand the SAC is considering including a field test/readiness audit-type process between balloting of the standard and approval by the Board of Trustees. This would ensure the entity seeking certification would possess the tools, personnel, training, etc., necessary for adequately performing the function. We recommend including this process in the standard.	The field test would occur prior to the standards going to ballot.
AESO Anita Lee	X		R4. tools for "adhering" to NERC reliability standards. Should it be for complying with NERC reliability standards requirements?	Adhering to the standards is complying with the requirements.
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power	X			

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Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council				
FirstEnergy Corp Ray Morella	X			
MAAC John Horakh	X			
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X		None	
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti	X			
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard	X		However, I understand the SAC is considering including a field test/readiness audit-type process between balloting of the standard and approval by the Board of Trustees. This would ensure the entity seeking certification would possess the tools, personnel, training, etc., necessary for adequately performing the function. Southern Generation recommends including this process in the standard.	The field test would occur prior to the standards going to ballot.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission	X			
Hydro-Quebec TransEnergie	X			

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Roger Champagne				
CenterPoint Energy John Jointe	X			
Manitoba Hydro Robert Coish	X			
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members	X			
ISO – NE Kathleen Goodman	X			
California ISO Lisa A Szot	X			

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

**General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.**

Commenter	Yes	No	Comment	Response
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		X	R1.3.1 – why is confirmation of actual interchange for after-the-fact -checkout- explicitly stated in the Standard and no after-the-fact checkout of scheduled interchange (including Dynamic Schedules) as well as before-the-fact checkout of scheduled interchange required? R1.3.2 – why is the coordination of pseudo-ties required and that of dynamic schedules not required? The coordination of -dynamic transfers- may be more appropriate. R2 – The list of data and information exchange responsibilities should be designated for the applicable entity and not left ambiguous as currently stated. For example, which entities are to provide input to the BIOP and which should receive it. To leave it like it is leaves compliance open for debate and make difficult to measure compliance. If it's important enough to list, it's important enough to set clear expectations. If this can't be done by the drafting team by referring to the -Relationship with Other Responsible Entities- section of the Functional Model or referring to a current Standard then the requirement should be dropped. This standard should not be defining new relationships only making sure tools and procedures exist to make those defined elsewhere function correctly.	1.3.1 – the standard has been modified to address your comment  1.3.2 - the standard has been modified to address your comment  2 – references to the appropriate standards have been added to the requirements
Entergy Services Ed Davis		X	R1.3.1 - Please add after-the-fact checkout of scheduled interchange (including Dynamic Schedules). R1.3.2 - Please add the requirement for coordination of dynamic schedules, and preferably change the requirement to the coordination of dynamic transfers.	1.3.1 – the standard has been modified to address your comment  1.3.2 - the standard has been modified to address your comment
Southeastern Power Administration Carter B Edge		X	As these standards have been refined, SEPA has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and	The standards have been modified to reference applicable Version 0 standards.  1.3.1 – the standard has been modified to address your comment

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			<p>potentially introduce synchronization issues between the Requirements across the different standards in which they occur.</p> <p>R1.3.1 – why is confirmation of actual interchange for after-the-fact -checkout- explicitly stated in the Standard and no after-the-fact checkout of scheduled interchange (including Dynamic Schedules) as well as before-the-fact checkout of scheduled interchange required?</p> <p>R1.3.2 – why is the coordination of pseudo-ties required and that of dynamic schedules not required? The coordination of -dynamic transfers- may be more appropriate.</p> <p>R2 – The list of data and information exchange responsibilities should be designated for the applicable entity and not left ambiguous as currently stated. For example, which entities are to provide input to the BIOP and which should receive it. To leave it like it is leaves compliance open for debate and makes it difficult to measure compliance. If it's important enough to list, it's important enough to set clear expectations. If this can't be done by the drafting team by referring to the -Relationship with Other Responsible Entities- section of the Functional Model or referring to a current Standard then the requirement should be dropped. This standard should not be defining new relationships only making sure tools and procedures exist to make those defined elsewhere function correctly.</p>	<p>1.3.2 - the standard has been modified to address your comment</p> <p>2 – references to the appropriate standards have been added to the requirements</p>
AESO Anita Lee	X		With regards to R1.1, it is proposed to include the reactive control requirements	Reactive control requirements are the responsibility of the TOP.
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council	X			
FirstEnergy Corp Ray Morella	X			
MAAC	X			

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John Horakh				
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X		None	
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti	X		With regards to R1.1, the IESO proposes that a reactive control requirements be included.	Reactive control requirements are the responsibility of the TOP.
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		X	Under Req. 1.3.1, there is a requirement that the adjacent BA commit to confirming actual interchange for after-the-hour "checkout". Why is after-the-hour scheduled interchange confirmation not required? Additionally, a before-the-fact checkout of scheduled should be included as well. Under Req. 1.3.2, why is the coordination of dynamic schedules not included? This could have as much or more of an impact with reliability. Under Requirement 2 the list of tasks should include the entity with whom these tasks are coordinated with.	1.3.1 – the standard has been modified to address your comment  1.3.2 - the standard has been modified to address your comment  2 – references to the appropriate standards have been added to the requirements
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission		X	The FRCC has a common comment for all three groups of certification standards (TOP, BA and RC Certification). As these standards have been refined, the FRCC has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements across the different standards in which they occur. In an effort to clarify the overall standards process, reduce documentation and focus the compliance process the FRCC suggests to replace these eight standards with a single certification standard which addresses the certification process only, as defined in the Standard Authorization Request (SAR) which initiated these standards. This single standard would only include the unique requirements of the certification process (as described in the SAR) and would address the specific Balancing Authority requirements by global or specific reference. This would eliminate redundancy, eliminate the need for additional synchronization controls and maintain the integrity of the current BA applicable Requirements. This would also help focus the compliance elements rather than weaken and dilute them. There is a Requirements database which currently exists, that sorts applicable requirements applicable to each entity. The end product of a single certification process only standard would be that BAs going through the certification process would come out of it with a focused and clearer understanding of the actual Reliability Standards and associated Requirements for which they will be required to comply with on a day-to-day basis.	The Standard has been modified to include references to version 0 standards.  The certification process was removed from the standard and supported by the industry. The CCC is currently responsible for the process.  Although the Version 0 Matrix of Requirements by Function spreadsheet may be a useful resource, not all of the requirements included in Version 0 standards will be included in the elements of certification.

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Hydro-Quebec TransEnergie Roger Champagne	X			
CenterPoint Energy John Jointe	X		If one entity has multiple reliability roles ( i.e. an RC is also the BA and /or TO) it's internal documentation must clearly define it's own authority & responsibilities in conjunction with the agreements with other entities. Each entity's responsibilities (including delegated responsibilities) must be clearly defined, especially concerning emergency operations, curtailments and load shedding.	
Manitoba Hydro Robert Coish	X			
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members	X			
ISO – NE Kathleen Goodman	X			
California ISO Lisa A Szot	X			

### Comments: Draft 3 Balancing Authority Certification Standards

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

**General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.**

Commenter	Yes	No	Comment	Response
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		X	R2 – This requirement states that training should exist to address all of the procedures identified in R1 yet the list in R1 is not all inclusive of the real-time responsibilities of a BA (i.e., R1 says the se responsibilities -include- those listed). For example, confirming interchange schedules meet ramping capabilities is not listed. Rather than listing the tasks -included- as real-time BA responsibilities (which will very likely result in some not being enumerated as is the case here), the following could be used for R1: The Balancing Authority shall have NERC-certified personnel to perform any of the real-time Balancing Authority responsibilities identified for a BA in existing, approved standards on a 24 hours a day, seven days a week basis. Personnel shall have a current certification credential applicable to the Balancing Authority function. If any of these real-time tasks are delegated, the personnel performing these tasks must also be certified.	The intent of the requirement was to clarify which personnel in an organization had to be certified based on the tasks that they performed.  The standard has been modified to address your comment.
Entergy Services Ed Davis		X	R2 - This requirement states that training should exist to address all the procedures identified in R1 but R1 is not an all inclusive list of the real-time requirements of the BA. Please change R1 to reference the requirements of the BA as specified in the Standards.	The standard has been modified to address your comment.
Southeastern Power Administration Carter B Edge		X	R2 – This requirement states that training should exist to address all of the procedures identified in R1 yet the list in R1 is not all inclusive of the real-time responsibilities of a BA (i.e., R1 says these responsibilities -include-” those listed). For example, confirming interchange schedules meet ramping capabilities is not listed	The standard has been modified to address your comment.
AESO Anita Lee	X			
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power		X	In R-1, one of the bullets refers to congestion management. NPCC participating members request clarification of what is meant by the use of congestion management in this context.	The intent is that when a TOP or RC requires generators to be re-dispatched, the BA would communicate the requests to the generators.

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Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council				
FirstEnergy Corp Ray Morella	X			
MAAC John Horakh	X			
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X		None	
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti		X	In R-1, one of the bullets refers to congestion management. We request clarification of what is meant by the use of congestion management in this context.	The intent is that when a TOP or RC requires generators to be re-dispatched, the BA would communicate the requests to the generators.
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		X	By referencing a training program in Req. 2 for personnel to be proficient in the required responsibilities contained in Requirement 1 means the certification standard will not contain all responsibilities assigned to the BA. For example, the BA is also responsible for confirming that the interchange schedule can meet the ramping requirements associated with the transaction. Therefore, it would be better to reference specific approved standards (such as the V-0 standards) which already contain a complete list of responsibilities rather than attempt to provide them here.	The standard has been modified to address your comment.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities		X	See comment to question number 2.	See response to question number 2.

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Bill Rouse – Orlando Utilities Commission				
Hydro-Quebec TransEnergie Roger Champagne		X	In R-1, one of the bullets refers to congestion management. We request that Drafting Team clarify what is meant by the use of congestion management in this context.	The intent is that when a TOP or RC requires generators to be re-dispatched, the BA would communicate the requests to the generators.
CenterPoint Energy John Jointe	X			
Manitoba Hydro Robert Coish	X		MH agrees with this standard however in R2.1: “The Balancing Authority shall have a training program that addresses the knowledge and competencies required for reliable system operations.” is vague and will be hard to measure.	The standard has been modified to address your comment.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florum – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members	X		MRO agrees with this standard however in R2.1: “The Balancing Authority shall have a training program that addresses the knowledge and competencies required for reliable system operations.” is vague and will be hard to measure.	The standard has been modified to address your comment.
ISO – NE Kathleen Goodman		X	In R-1, one of the bullets refers to congestion management. We request that Drafting Team clarify of what is meant by the use of congestion management in this context; some may consider this a Market Operations term and question its use in a Reliability.	The intent is that when a TOP or RC requires generators to be re-dispatched, the BA would communicate the requests to the generators.
California ISO Lisa A Szot		X	There is a reference in R-1 congestion management. The ISO request clarification of what is meant by the use of congestion management in this context.	The intent is that when a TOP or RC requires generators to be re-dispatched, the BA would communicate the requests to the generators.

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

**General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.**

Commenter	Yes	No	Comment	Response
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	Although the SDT made an effort to clarify that loss of only primary systems is the intent in R1, the footnotes are still not totally clear that this is the case. For example, Footnote 1 could be reworded to say "Loss of communications is meant to include only primary communications..."	The standard has been modified to reference Version 0 standard EOP-008. This should address your comment.
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		X	R2.9 and R2.12 – These requirements are redundant	The standard has been modified to reference Version 0 standard EOP-008. This should address your comment.
Entergy Services Ed Davis		X	R2.9 and R2.12 are redundant.	The standard has been modified to reference Version 0 standard EOP-008. This should address your comment.
Southeastern Power Administration Carter B Edge		X	2.9 and R2.12 – These requirements are redundant	The standard has been modified to reference Version 0 standard EOP-008. This should address your comment.
AESO Anita Lee	X			
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Ruffano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One			NPCC participating members wish to inquire why in the redline version R-2.18 was stricken and "Adhering to Cyber Security Protocols" was added. Also Please clarify the difference between R-2.18 and R-2.16.  A possible suggestion would be to include the stricken "old" R-2.18 as a new bullet under R-1 to say loss of the "Bulk Electric System."  Please clarify R-2.18, what is a cyber security protocol.	The standard has been modified to reference Version 0 standard EOP-008.  The term cyber security protocol has been removed, but was intended to reference the cyber security standards.

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Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council				
FirstEnergy Corp Ray Morella	X			
MAAC John Horakh	X			
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X		None	
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti	X			
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		X	Requirements 2.9 and 2.12 are somewhat redundant.	The standard has been modified to reference Version 0 standards EOP-008. This should address your comment.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission		X	See comment to question number 2.	See response to question number 2
Hydro-Quebec TransEnergie Roger Champagne		X	Please clarify why, in the redline version, R-2.18 was stricken and "Adhering to Cyber Security Protocols" was added. Also, please clarify the difference between R-2.18 and R-2.16. Please clarify what is meant by cyber security protocols in R-2.18. A possible suggestion would be to include the stricken "old" R-2.18 as a new bullet under R-1 to say loss of the "Bulk Electric System." if this is a condition that could affect Control Center Functionality.	The standard has been modified to reference Version 0 standard EOP-008.  The term cyber security protocol has been removed, but was intended to reference the cyber security standards.
CenterPoint Energy John Jointe	X			
Manitoba Hydro		X	In response to 3rd Posting comments on this standard, the SDT	The standard has been modified to reference Version 0

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Robert Coish			noted that, as compared to EOP-008-0, this standard is measuring "different elements, preparedness versus performance." The MH believes the SDT is incorrect in this response. EOP-008-0 is not actually measuring performance but is an example of a Reliability Standard that is actually measuring preparedness - i.e., preparedness to continue to operate during loss of Control Center Functionality. The MH check "No" above due to the following concern. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.6 and R2.7 - does having a plan in place that relies on sending people to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"?	standard EOP-008.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members		X	In response to 3rd Posting comments on this standard, the SDT noted that, as compared to EOP-008-0, this standard is measuring "different elements, preparedness versus performance." The MRO believes the SDT is incorrect in this response. EOP-008-0 is not actually measuring performance but is an example of a Reliability Standard that is actually measuring preparedness - i.e., preparedness to continue to operate during loss of Control Center Functionality. The MRO checked "No" above due to the following concern. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.6 and R2.7 - does having a plan in place that relies on sending people to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"?	The standard has been modified to reference Version 0 standard EOP-008. This should address your comments.
ISO – NE Kathleen Goodman		X	Why, in the redline version, R-2.18 was stricken and "Adhering to Cyber Security Protocols" was added. Also, please clarify the difference between R-2.18 and R-2.16 and define what 'Cyber Security Protocols' are. A possible suggestion would be to include the stricken "old" R-2.18 as a new bullet under R-1 to say loss of the "Bulk Electric System."	The standard has been modified to reference Version 0 standard EOP-008.  The term cyber security protocol has been removed, but was intended to reference the cyber security standards.
California ISO Lisa A Szot	X			

## Comments: Draft 3 Balancing Authority Certification Standards

5. Comments relating to ORG-012, ORG-013, ORG-014, ORG-015, ORG-016, ORG-017:

<b>General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.</b>		
<b>Commenter</b>	<b>Comment</b>	<b>Response</b>
<p>Operating Reliability Working Group  Mike Anderson – AEP  Bob Cochran – SPS  Mike Gammon – KCP&amp;L  Don Hargrove – OG&amp;E  Allen Klassen – Westar  Pete Kuebeck – OG&amp;E  Bill Nolte – SECI  Robert Rhodes - SPP</p>	<p>Bulk Electric System (BES) is used in ORG-017 but is not capitalized even though it is a defined term in the Standards Glossary.</p>	<p>The typo has been corrected – thank you</p>
<p>Southern Company Transmission  Marc Butts  Raymond Vice  Doug McLaughlin  Mike Oatts  Keith Calhoun  Jim Viikinsalo  Jim Griffith  Jim Busbin  Wade Pugh  Phil Winston – GA Power Co</p>	<p>ORG-012, the list of items in R1-R10 (which may be or may become incomplete) could be replaced by a general reference such as: The Balancing Authority should have procedures, tools, and personnel to perform the balancing responsibilities assigned to it in the current, approved BAL, INT, and other applicable standards.  ORG-13: R1- The term -reporting- implies in normal situations - disseminating- or -providing- rather than -acquisition- which is the focus of this standard. The use of reporting generates confusion between R1 and the focus of ORG-016. Replace -reporting- in R1 with -acquisition-.  ORG-15: R2 – This is a duplicate of ORG-012, R6. Consideration should be given to combining ORG-12, ORG-14, and ORG-15 into a single Standard. It is not clear why current separation is necessary or what benefits it provides – other than to cause confusion.  ORG-17: R1.4 – As worded this requirement does not necessarily constitute an emergency condition since reliability Coordinators can direct actions to BA's for conditions not an emergency. The wording needs to be specific to the focus of R1 – perhaps define what type - action- (e.g., emergency) is being directed. As worded a BA's response to all actions directed by an RC will need to have the stated procedures and processes available for inspection.  ORG 016-1 R1.3 states that the BA should inform the RC when interchange interruptions occur due to generation or load interruptions. The BA ought to tell the RC anytime it has an interchange interruption (loss of communications, etc.). This could lead to a loss of load, etc. that the RC should know about.  ORG 016-1 R2.1 This requirement just talks about schedule and actual interchange and does not address prescheduled implementation checkout. This was covered in R1.3.</p>	<p>ORG-12 – R1 to R13 defines the requirements to be satisfied for certification. These requirements have been modified to reference applicable Version 0 standards.  ORG-013 – the standard has been modified to address your comment  ORG-015 – ORG-012 has been modified to remove the redundancy. The industry has supported the standards as they have been organized.  ORG-017 – Bulk Electric System Emergency is identified in R1 and is intended to be implied in R1.1 to R1.5.  ORG-016 – 1.3 addresses the only situations where there would be an interchange interruption that would require the BA to disseminate the information.  Loss of communications is covered under ORG-018.  The SDT does not see any reason to modify the current wording since prescheduled checkout is implied in the current wording</p>
<p>Entergy Services  Ed Davis</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</p>	<p>The Standard has been modified to include references to version 0 standards.</p>

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<p>Southeastern Power Administration Carter B Edge</p>	<p>opportunity for new requirements to be imposed on the BA.</p> <p>ORG-011-1 and ORG-012-1 require development and communication of a BAs "Balancing Integrated Operational Plan" while the specific elements of such a plan are included as an attachment which is not part of any standard. This will make Measures and Compliance elements associated with this plan very difficult to define and audit against. Suggest incorporating the "plan" concept into an existing standard or removing the requirement for a plan from the certification standard.</p> <p>ORG-13: R1- The term -reporting- implies in normal situations - disseminating- or -providing- rather than -acquisition- which is the focus of this standard. The use of reporting generates confusion between R1 and the focus of ORG-016. Replace -reporting- in R1 with -acquisition-.</p> <p>ORG-15: R2 – This is a duplicate of ORG-012, R6. Consideration should be given to combining ORG-12, ORG-14, and ORG-15 into a single Standard. It is not clear why current separation is necessary or what benefits it provides – other than to cause confusion.</p> <p>ORG-17: R1.4 – As worded this requirement does not necessarily constitute an emergency condition since reliability Coordinators can direct actions to BA's for conditions not an emergency. The wording needs to be specific to the focus of R1 – perhaps define what type - action- (e.g., emergency) is being directed. As worded a BA's response to all actions directed by an RC will need to have the stated procedures and processes available for inspection.</p> <p>ORG 016-1 R1.3 states that the BA should inform the RC when interchange interruptions occur due to generation or load interruptions. The BA ought to tell the RC anytime it has an interchange interruption (loss of communications, etc.). This could lead to a loss of load, etc. that the RC should know about.</p> <p>ORG 016-1 R2.1 This requirement just talks about schedule and actual interchange and does not address prescheduled implementation checkout. This was covered in R1.3.</p>	<p>The BIOP has been removed from the standard.</p> <p>ORG-013 – the standard has been modified to address your comment</p> <p>ORG-015 – ORG-012 has been modified to remove the redundancy. The industry has supported the standards as they have been organized.</p> <p>ORG-017 – Bulk Electric System Emergency is identified in R1 and is intended to be implied in R1.1 to R1.5.</p> <p>ORG-016 – 1.3 addresses the only situations where there would be an interchange interruption that would require the BA to disseminate the information. Loss of communications is covered under ORG-018. The SDT does not see any reason to modify the current wording since prescheduled checkout is implied in the current wording</p>
<p>AESO Anita Lee</p>		
<p>CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks</p>		

**Comments: Draft 3 Balancing Authority Certification Standards**

Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council		
FirstEnergy Corp Ray Morella		
MAAC John Horakh	None	
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	None	
Cinergy Jeff Baker		
IESO – Ontario Ron Falsetti		
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard	In ORG-013, replace reporting in R1 with acquisition to better reflect the intent of the standard-Data Acquisition.	The standard has been modified to address your comment.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission	See comment to question number 2. Additionally, ORG-011-1 and ORG-012-1 require development and communication of a BAs "Balancing Integrated Operational Plan" while the specific elements of such a plan are included as an attachment which is not part of any standard. This will make Measures and Compliance elements associated with this plan very difficult to define and audit against. Suggest incorporating the "plan" concept into an existing standard or removing the requirement for a plan from the certification standard.	See response to question number 2. The BIOP has been removed from the standard.
Hydro-Quebec TransEnergie Roger Champagne		
CenterPoint Energy John Jointe		
Manitoba Hydro Robert Coish	None	
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric	None	

**Comments: Draft 3 Balancing Authority Certification Standards**

System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members		
ISO – NE Kathleen Goodman		
California ISO Lisa A Szot		

**Comments: Draft 3 Balancing Authority Certification Standards**

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

Commenter	Comment	Response
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		
Entergy Services Ed Davis		
Southeastern Power Administration Carter B Edge		
AESO Anita Lee		
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council		

**Comments: Draft 3 Balancing Authority Certification Standards**

Guy Zito – NE Power Coord Council		
FirstEnergy Corp Ray Morella		
MAAC John Horakh	None	
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe		
Cinergy Jeff Baker		
IESO – Ontario Ron Falsetti		
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission	See comment to question number 2.	See response to question number 2.
Hydro-Quebec TransEnergie Roger Champagne		
CenterPoint Energy John Jointe		
Manitoba Hydro Robert Coish	None	
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT	None	

**Comments: Draft 3 Balancing Authority Certification Standards**

Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members		
ISO – NE Kathleen Goodman		
California ISO Lisa A Szot		

## Comments: Draft 3 Balancing Authority Certification Standards

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

Commenter	Comment	Response
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co	We are not aware of any at this time, however, this does not mean a legitimate reason for a regional difference could not be discovered in the future	Thank you
Entergy Services Ed Davis		
Southeastern Power Administration Carter B Edge		
AESO Anita Lee		
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council		

**Comments: Draft 3 Balancing Authority Certification Standards**

Guy Zito – NE Power Coord Council		
FirstEnergy Corp Ray Morella		
MAAC John Horakh	None	
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	None that are not in place	
Cinergy Jeff Baker		
IESO – Ontario Ron Falsetti		
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard	Not aware of any at this time. However, this does not mean a legitimate reason for a regional difference could not be discovered in the future.	
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission	See comment to question number 2.	See response to question number 2
Hydro-Quebec TransEnergie Roger Champagne		
CenterPoint Energy John Jointe		
Manitoba Hydro Robert Coish	None	
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT	None	

**Comments: Draft 3 Balancing Authority Certification Standards**

Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members		
ISO – NE Kathleen Goodman		
California ISO Lisa A Szot		

## Comments: Draft 3 Balancing Authority Certification Standards

8. Do you agree with the proposed implementation plan for these standards?

Commenter	Yes	No	Comment	Response
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		X	Implementation Plan – ORG-010 requires agreements with all of the other entities listed in R1 and R2. The reading of the - Agreement- definition, as proposed, indicates that a physical document must be provided. In a large number of cases, the relationship between a BA and the identified entities has been one that has existed for years and has been defined by corporate and/or long-standing, historical relationships and is not currently written down as mutually executed documents. It is impractical to believe that such documentation can be negotiated and executed with all such entities by all BA's in the timeframe proposed in the Implementation plan.	The definition of agreement provides various means to satisfy the requirements for agreements, but they must all be documented. The implementation plan will provide a time period for preparation to comply.
Entergy Services Ed Davis	X			
Southeastern Power Administration Carter B Edge		X	Implementation Plan – ORG-010 requires agreements with all of the other entities listed in R1 and R2. The reading of the - Agreement- definition, as proposed, indicates that a physical document must be provided. In a large number of cases, the relationship between a BA and the identified entities has been one that has existed for years and has been defined by corporate and/or long-standing, historical relationships and is not currently written down as mutually executed documents. It is impractical to believe that such documentation can be negotiated and executed with all such entities by all BA's in the timeframe proposed in the Implementation plan.	The definition of agreement provides various means to satisfy the requirements for agreements, but they must all be documented. The implementation plan will provide a time period for preparation to comply.
AESO Anita Lee	X			
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie	X			

**Comments: Draft 3 Balancing Authority Certification Standards**

David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council				
FirstEnergy Corp Ray Morella	X			
MAAC John Horakh		X	The process looks OK, but the first sentence in Item # 7 (Control Area Certification for New Control Areas) should be reworded as follows for clarity. (1) Delete *after 4/1/2005* (2) After *continue*, add *using the existing control area certification process* (3) Delete *approved* and replace with *implemented, April 1, 2006.*	The implementation plan will be revised.
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X			
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti	X			
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		X	The relationship between a BA and the identified entities has been one that has existed for years and has been defined by corporate and/or long-standing, historical relationships and is not currently written down as mutually executed documents. It is impractical to believe that such documentation can be negotiated and executed with all such entities by all BA's in the timeframe proposed in the Implementation plan.	The definition of agreement provides various means to satisfy the requirements for agreements, but they must all be documented. The implementation plan will provide a time period for preparation to comply.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission		X	See comment to question number 2.	Same response to question number 2
Hydro-Quebec TransEnergie Roger Champagne	X			

**Comments: Draft 3 Balancing Authority Certification Standards**

CenterPoint Energy John Jointe	X			
Manitoba Hydro Robert Coish	X		The MH agrees that these standards, appropriately revised, could be implemented in April 2006. The MH is concerned that the certification procedures being prepared by the NERC Compliance and Certification Committee take into consideration the time that may be required for entities to put in place required agreements.	The implementation plan will provide a time period for preparation to comply.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members	X		The MRO agrees that these standards, appropriately revised, could be implemented in April 2006. The MRO is concerned that the certification procedures being prepared by the NERC Compliance and Certification Committee take into consideration the time that may be required for entities to put in place required agreements.	The implementation plan will provide a time period for preparation to comply.
ISO – NE Kathleen Goodman	X			
California ISO Lisa A Szot	X			

### Comments: Draft 3 Balancing Authority Certification Standards

9. The Drafting Team believes that the BA Certification standards are ready for ballot. Do you support this position?

**General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.**

Commenter	Yes	No	Comment	Response
<b>Total:</b>				
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	We could support submitting the standard for ballot provided the further clarifications on ORG-018-1, R1 in Question 4 above are adequately addressed.	The standard has been modified to address your concerns and has referenced EOP-008.
Southern Company Transmission Marc Butts Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston – GA Power Co		X	It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required. We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. As an example only, under ORG-011-1, requirement R1.1 might be restated to say -The Balancing Authority shall perform the tasks associated with the real-time responsibilities contained in Standard EOP-003, Requirement 3-. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards. In this regard, the BA certification team will not accidentally leave out an important component of the certification standards and, at the same time, will not violate the reliability operating standards. We believe it is still a mistake to include and introduce the concept of the Balancing Integrated Operational Plans (BIOP) in the BA Certification Standard (we had previously commented that this was the case in the last draft). This expectation is implied in the IRO-004, R4 where each BA (and TOP, TO, GO, etc.) in an RC Area shall provide information required for system studies such as critical facility status, load, generation, operating reserve	The standards have been modified to address your concerns regarding the referencing of other standards.  The BIOP has been removed from the standards.

**Comments: Draft 3 Balancing Authority Certification Standards**

			projections, and known Interchange Transactions. For the Operations Planning case, R4 states it should be done by 1200 CST. In addition TOP-005 indicates that a BA (and TOP) shall provide its RC with real-time information in the Attachment 1 of that standard. To include the concept of the BIOP in the BA certification is inappropriate. The BA Certification Standard as now written attempts to define a -how- information should be provide from a BA to its RC rather than make an assessment of whether the requirements already outlined in IRO-004 and TOP-005 can be accommodated by appropriate tools, personnel, etc on the part of the BA. If the BIOP is an appropriate concept for the standards, it should be part of and IRO or TOP standard and NOT part of the BA certification standard.	
Entergy Services Ed Davis		X		
Southeastern Power Administration Carter B Edge		X	<p>It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required.</p> <p>We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. As an example only, under ORG-011-1, requirement R1.1 might be restated to say -The Balancing Authority shall perform the tasks associated with the real-time responsibilities contained in Standard EOP-003, Requirement 3-. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards.</p> <p>In this regard, the BA certification team will not accidentally leave out an important component of the certification standards and, at the same time, will not violate the reliability operating standards.</p>	The standards have been modified to address your concerns regarding the referencing of other standards.
AESO Anita Lee		X	Once our above comments are incorporated then we would consider these ready for balloting.	The standards have been modified and the referencing of other standards should address your concerns.
CP9 Reliability Standards Working Group Guy Zito – Northeast Power Coordinating Council Ralph Rufrano – NY Power		X	See our comments above. Clarification in a few areas is required.	The standards have been modified and the referencing of other standards should address your concerns.

**Comments: Draft 3 Balancing Authority Certification Standards**

Authority Peter Lebro – National Grid US Roger Champagne – TransEnergie David Little – Nova Scotia Power Kahtleen Goodman – ISO NE Greg Campoli – NY ISO David Kiguel – Hydro One Networks Khaqan Khan – IESO Ontario Al Adamson – NY State Reliability Council Guy Zito – NE Power Coord Council				
FirstEnergy Corp Ray Morella	X			
MAAC John Horakh	X			
Tennessee Valley Authority Kathleen A. Davis Edd Forsythe	X		TVA is ready for implementation of this standard and either is, or can be in compliance with some data collection and new or modified contracts	
Cinergy Jeff Baker	X			
IESO – Ontario Ron Falsetti		X	Once our above comments are incorporated then we would consider these ready for balloting.	The standards have been modified and the referencing of other standards should address your concern.
Southern Company Generation Roman Carter Roger Green Terry Crawley Tom Higgins Wayne Moore Joel Dison Clifford Shepard		X	It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required. We understand that the BA Certification drafting team has received different guidance which does not allow "referencing" of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. As an example only, under ORG-011-1, requirement R1.1 might be restated to say "The Balancing Authority shall perform the tasks associated with the real-time responsibilities contained in Standard EOP-003, Requirement 3". In this regard, the BA certification team will not accidentally leave out an important component of the certification standards and, at the same time, will not violate the reliability operating standards.	The standards have been modified to address your concerns regarding the referencing of other standards.
FRCC Eric Senkowicz Linda Cambell Alan Gale – City of Tallahassee		X	See comment to question number 2.	Same response to question number 2

**Comments: Draft 3 Balancing Authority Certification Standards**

Steve Wallace – Seminole Electric Cooperative Ron Donahey – Tampa Electric Bob Remley – Clay Electric Cooperative Mark Bennett – Gainesville Regional Utilities Bill Rouse – Orlando Utilities Commission				
Hydro-Quebec TransEnergie Roger Champagne		X	See our comments above. Clarification in a few areas is required.	The standards have been modified to address your concerns regarding the referencing of other standards.
CenterPoint Energy John Jointe	X			
Manitoba Hydro Robert Coish		X	The MH is concerned that certification standards should not have requirements that exceed requirements which must be met after certification. The MRO suggests that the SDT consider adding language to the standard which says that the intent is that certification standards requirements should not exceed requirements which must be met after certification.	The standards have been modified and the referencing of other standards should address your concern.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Tod Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 additional MRO Members		X	The MRO is concerned that certification standards should not have requirements that exceed requirements which must be met after certification. The MRO suggests that the SDT consider adding language to the standard which says that the intent is that certification standards requirements should not exceed requirements which must be met after certification.	The standards have been modified and the referencing of other standards should address your concern.
ISO – NE Kathleen Goodman		X	See comments above. Clarification in a few areas is required.	The standards have been modified and the referencing of other standards should address your concern.
California ISO Lisa A Szot		X	Once our and other comments are incorporated then we would consider these ready for balloting.	The standards have been modified and the referencing of other standards should address your concern.