

Balancing Authority Certification Standard – Posting 2 - Comments

Our goal is to give every comment serious consideration in this process. If you feel that your comment has been overlooked or there has been an error or omission in the process, please contact Gerry Cauley immediately at 609-452-8060 or at gerry.cauley@nerc.net. You may submit an appeal in accordance with the [Reliability Standards Appeals Process](#)

1. Comments received during the Balancing Authority Certification Standard posting period indicated that either clarification and/or additional details should be included in the definition of the Integrated Operational Plan. The Standard Drafting Team feels that the level of detail that was provided in the initial definition was imposing additional requirements. It is the Standard Drafting Team’s interpretation that definitions should not impose additional requirements. The Standard Drafting Team has modified the Integrated Operational Plan definition to be consistent with the format of defined terms. This high level perspective will accommodate the specific needs of your Reliability Authority. Do you agree with the revised definition of an Integrated Operational Plan?

Response Summary: Based on the comments received, industry consensus supports the modifications that have been made to the IOP. The drafting team has considered the comments received and will make modifications to the standard where appropriate.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC		X	The CAWG would suggest striking some text to read: Integrated Operational Plan (IOP): A plan incorporating the intended operation of resources, interchange, and demand expectations that is provided to the Reliability Authority for performing reliability analysis.

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<p>John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>In accordance with the Functional Model, the BA has the task of submitting an IOP to the Reliability Authority for reliability assessment.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		<p>The definition is fine. Definitions should not be interrupted as “requirements” but just as definitions of words or concepts within a requirement.</p> <p>If a non-enforceable Technical Reference Document is going to be developed to “support” a definition, the definition should guide or alert the reader to that document. The current revised definition does not do this.</p>

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<p>The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required to the Balancing Authorities within its Reliability Authority area.</p>			
<p>Edward C Stein FirstEnergy Solutions</p>	<p>X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>	<p>X</p>		
<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo</p>	<p>X</p>		<p>Overall I feel this is a good plan to execute if or when the situation calls for. Hopefully we will never come across these extreme measures, but if needed, this Integrated Operational Plan should assure our efficiency as a Balance Authority.</p>

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Imperial Irrigation District			
Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council	X	X	NPCC would like to take this opportunity to note that in some jurisdictions (e.g. Ontario) responsibility for Interconnection Boundary Metering is not assigned to the Transmission Owner. The standard should add the words "where applicable" in the appropriate locations throughout.
This comment is not applicable to the IOP, but will take the comment under consideration in the appropriate area.			
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies		X	Define what constitutes a Balancing Authority Area. Define what constitutes a Control Area. IOP Definition: The Balancing Authority may not be the one formulating the plan. Defined terms throughout the standard should be capitalized, such as Agreement, not agreement.

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The Version 0 glossary defines the Balancing Authority Area as:

The collection of generation, transmission, and loads within the metered boundaries of the Balancing Authority. The Balancing Authority maintains load-resource balance within this area.

Control Area is no longer a defined term.

In accordance with the Functional Model, the BA has the task of formulating and submitting an IOP to the Reliability Authority for reliability assessment.

<p>Joanne K. Borrell FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>John Horakh MAAC</p>		<p align="center">X</p>	<p>The concept is fine. Suggest the following wording changes be made for clarity:</p> <p>A plan formulated by the Balancing Authority incorporating demand expectations and the intended operation of resources and interchange to satisfy balancing requirements. The plan is provided to the Reliability Authority for performing reliability analysis.</p>

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<p>Although it was always intended to mean that the plan was balanced, it was not clearly stated and will be modified to say such based on your comments.</p>			
<p>Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>	<p>X</p>		
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith</p>	<p>X</p>		

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<p>Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck</p>			

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<p>Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Michael C Calimano NYISO</p>	X		
<p>P.D. Henderson IMO</p>	X		
<p>Peter Burke [on behalf of ATC’s Jason Shaver] American Transmission Company</p>	X		
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission</p>	X		None.

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of South Carolina David A. Wright Public Service Commission of South Carolina			
Raj Rana AEP	X		
Ray Morella FirstEnergy Corp	X		
Robert Snow Small Electric User		X	The standard needs to be clear and the original list of requirements are preferable to the present document.
Industry consensus supports the current format.			
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM	X		
Dan Boezio AEP Steve Hillman	X		

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WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP			
William J. Smith Allegheny Power	X		

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2. The details of the Integrated Operational Plan are now identified in the Integrated Operational Plan Technical Reference document and are intended to provide elements of the plan, but are not requirements of the standard. The specific detailed requirements for an Integrated Operational Plan will be dependent on the needs of your Reliability Authority. Do you agree with the elements identified in the Integrated Operational Plan technical reference document?

<p>Response Summary: The IOP is intended to be a plan that is formulated and submitted by the BA to the RA addressing the elements related to balancing. Although the RA will need additional information to perform its reliability assessment, many of these elements will be provided to the RA by other entities separate from the IOP that is submitted by the BA.</p>			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		We agree that all non-mandatory references be kept separate from the Reliability Standards.
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris	X		We agree with the elements presented however we are concerned that the second sentence above opens up an unlimited amount of information the BA would be responsible for providing at the discretion of the RA defining what it wants in the IOP. The data should be limited to only what the RA requires in regards to balancing function.

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<p>NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>We agree that the IOP submitted by the BA should be reflective of the Balancing function.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		<p>However, we suggest the title be changed to make it obvious this is the IOP of the Balancing Authority and not the IOP for the total BA or RA Area. For instance, the attached Technical Reference Document only addresses load, generation to meet that load, and interchange. The plan does not address the many other issues that need to be addressed for operational planning of the power system, e.g. VAR support and location, VAR reserves, transmission facility overloads, congestion, etc. Hopefully these and other issues are addressed in the RA-IOP.</p>
<p>According to the Functional Model, the IOP is formulated by the BA and submitted to the RA. Other elements that are necessary for the RA to monitor area reliability are received through other means (ex. Information on reactive support is supplied by the Transmission Operator).</p>			
<p>Ed Riley California ISO</p>		<p align="center">X</p>	<p>The contents of a Technical Reference Document are not part of a Requirement and not enforceable. The contents of the Technical Reference Document should be included in Requirement 1407. This would ensure that proper operational data are passed from the Balancing Authority to the Reliability Authority.</p>

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<p>Industry consensus supports the current format of the IOP. The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required of the Balancing Authorities within its Reliability Authority area.</p>			
<p>Edward C Stein FirstEnergy Solutions</p>	<p>X</p>		<p>The elements identified in the IOP technical reference document appear to be the minimum elements necessary for a proper IOP and should be part of the Standard. If one is to be measured and judged on providing the RA an IOP, the required minimum elements of the IOP needs to be clearly and precisely identified in the Standard. Any documents not in a Standard, such as a technical reference document or a RA document outlining its requirements of an IOP, can not and must not be used to determine a Standard’s violation or non-compliance. NERC can no longer be vague on standards and requirements used to determine non-compliance.</p>
<p>The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required of the Balancing Authorities within its Reliability Authority area.</p>			
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power</p>	<p>X</p>		<p>However, we suggest you change the term “duration” used in items 1 and 3 to Time Period. The RA will need certain information from the BA for a specified time period, not a duration.</p>

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Agency			
Your suggestions will be incorporated into the next version.			
Gary Nolan Salt River Project			
Gerardo Castillo Imperial Irrigation District	X		n/a
Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council	X		
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr		X	This should state that other entities may develop the IOP, such as Market Operators. It should mention methods of delegating tasks i.e. Market Operators.

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We Energies Howard Rulf We Energies			
<p>According to the Functional Model, the IOP is formulated by the BA and submitted to the RA. If the tasks are delegated, the BA still maintains the responsibility for its formulation and submission to the RA.</p>			
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC	X		
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP	X		We recognize that the details of the Integrated Operational Plan (“IOP”) identified in the IOP Technical Reference document provide elements of the plan applicable to the BA Functions. We presume that other requirements, such as transmission outage information, will be included as details of an IOP related to other appropriate Authorities (i.e. Transmission Operator’s IOP Technical Reference will detail transmission outage information).

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According to the Functional Model, the IOP is formulated by the BA and submitted to the RA. Other elements that are necessary for the RA to monitor area reliability are received through other means (ex. Information on reactive support is supplied by the Transmission Operator).

<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>	<p align="center">X</p>		
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<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		<p>We recognize that the details of the Integrated Operational Plan (“IOP”) identified in the IOP Technical Reference document provide elements of the plan applicable to the BA Functions. We presume that other requirements, such as transmission outage information, will be included as details of an IOP related to other appropriate Authorities (i.e. Transmission Operator’s IOP Technical Reference will detail transmission outage information).</p>
<p>According to the Functional Model, the IOP is formulated by the BA and submitted to the RA. Other elements that are necessary for the RA to monitor area reliability are received through other means (ex. Information on reactive support is supplied by the Transmission Operator).</p>			
<p>P.D. Henderson IMO</p>	<p align="center">X</p>		<p>We presume that other requirements, such as transmission outage information, will be included as details of an IOP related to other appropriate Authorities (i.e. Transmission Operator’s IOP Technical Reference will detail transmission outage information).</p>
<p>According to the Functional Model, the IOP is formulated by the BA and submitted to the RA. Other elements that are necessary for the RA to monitor area reliability are received through other means (ex. Information on reactive support is supplied by the Transmission Operator).</p>			
<p>Peter Burke [on behalf of</p>			

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<p>ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>	<p align="center">X</p>		<p>None.</p>
<p>Raj Rana AEP</p>	<p align="center">X</p>		
<p>Ray Morella FirstEnergy Corp</p>	<p align="center">X</p>		<p>We agree with the details of the IOP, but it must be made absolutely clear that these elements are not part of the requirements and will not be any measure or compliance. The requirements for IOP needs to be clear and precisely identified. NERC can no longer be vague on standards and requirements</p>

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The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required of the Balancing Authorities within its Reliability Authority area.			
Robert Snow Small Electric User		X	They are at best recommendations unless the Technical Reference is included in the standard.
The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required of the Balancing Authorities within its Reliability Authority area.			
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM	X		
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS	X		

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Robert Rhodes SPP			
William J. Smith Allegheny Power	X		

3. Standard 1401 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commenters during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary:

In response to the comments received, the Standard Drafting Team will modify this standard to remove the process and wishes to provide some background information to the industry in seeking affirmation of the modifications.

Comments regarding the inclusion of the certification process in the standard began during the SAR process. Early in the development phase, the SAR Drafting Team sought the guidance of NERC legal counsel vis-à-vis the certification process. The opinion expressed by NERC's legal counsel, at that time, was that since there was no other procedure in place for approval of the certification process, it should remain in the standard in order to maintain a consistent implementation. There was some concern expressed that although the process was in the standard, it did not necessarily fit the typical standard format. The Drafting Team was able to achieve industry consensus and produce the initial standard with the certification process included as part of the standard. A minority opinion opposed to the inclusion of the certification process in the standard continued to be expressed by some members of the Drafting Team, as well as, some from the industry.

Some time after the SAR was approved, and had proceeded to the Standard Drafting phase, the Certification & Compliance Committee (CCC) was formed. The responsibility for developing administrative procedures for NERC Certification Programs is part of the scope of this Standing Committee.

As a result of the continued comments regarding nesting the certification process being within the standard and the formation of the CCC, the Drafting Team again sought the input of NERC legal counsel. NERC's legal counsel recommendation was to remove the certification process from the standard and place it in the area of responsibility for the CCC. The Drafting Team anticipates that the CCC will refine the current process, seek industry input, incorporate the input obtained into the process, and then seek NERC Board of Trustees approval for adoption. By utilizing the preceding process, an administrative advantage is realized by allowing necessary adjustments to refine the certification process to be accomplished more expeditiously than if the certification process were part of the standard. This procedure is analogous the procedures that are being used for the Control Area Readiness Audits. Although the certification process would not be a standard, it is still anticipated that all certifications would be administered consistently throughout the industry. The Drafting Team has included this requirement in the modifications that have been made to the standard.

In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the

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<p>Transmission Operator function must be NERC Certified.</p> <p>As a result of the events described above, the Standard Drafting Team will make these modifications to the standard and seek industry affirmation and support for its actions.</p> <p>This will serve as a response for all of the comments for this question and the comments will be forwarded to the CCC for consideration.</p>			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		<p>[Requirement 2.(xiv), 2nd paragraph, last two sentences]</p> <p>Make it clear that certification is by individual Region. Suggest the following wording:</p> <p>All affected Regions shall provide their respective approval or disapproval of the certification. The Lead Compliance Monitor shall notify NERC of the certification decisions.</p>
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris		X	<p>We believe more information is needed.</p> <p>Should this document also address re-certification with some periodicity (5 years) where it would also address penalties for non-compliance?</p> <p>Balancing Authority Area criteria should be defined within the standards to include what would constitute the need for certification for boundary changes. Can a single BA operate two or more Balancing Authority Areas – there isn't any specific wording that would differentiate between certifying the BA versus certifying the area(s) operated by the BA. Is there a one-for-one relationship only?</p> <p>Regarding item (iv) under the BA Certification Process – what does it mean that the BA cannot do anything while on "hold"?</p>

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<p>NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>Ed Davis Entergy Services, Inc</p>	X		
<p>Ed Riley California ISO</p>	X		
<p>Edward C Stein FirstEnergy Solutions</p>	X		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric</p>		X	<p>We continue to believe that the certification process itself should not be a part of the standard. The certification process does need to be developed through some sort of industry process that allows for review and input. However, including it as part of a reliability standard makes it very difficult to make changes that may be needed over time. Wouldn't it make sense to charge the NERC Compliance and Certification Committee to oversee the certification process and develop an open process for procedures such as this? The CCC scope states these responsibilities : "Periodically review and update the NERC Organization Certification Program plan," and "Maintain the Organization Certification Procedures and Processes Manual." We would support removal of 1401 from this standard and charging the CCC with completion of the development of this certification process.</p>

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<p>Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			<p>In addition, we offer the following comments on 1401.</p> <p>In section 1401(a)(2)(ix), the first paragraph states that the applicant shall identify to the review team any task that has been delegated. How will these delegated tasks be verified? Will it require additional visits to the facilities of the entities performing the delegated tasks?</p> <p>In section 1401(a)(2)(x), the third bullet still uses the word “Inspect”. In our comments on the previous posting we indicated we thought the word was very broad, and really needed clarification. In your response to our comments, a good clarification to what Inspect meant was given, but the bullet was left the same in this posting. We would suggest the drafting team consider using the words in your response as it really does clarify the intent of the word.</p> <p>We reviewed your response to our comment on section 1401(a)(2)(xiv) and still believe that the review team should present the certification recommendation to the Regional Manager. The Regional Manager would then have the responsibility to forward it to the appropriate regional committee(s). This would fit all regions and would eliminate the review team from having to determine who the “appropriate” committees are.</p>
<p>Gary Nolan Salt River Project</p>			<p>Section vii stipulates that team members will be subjected to “Confidentiality Agreements”. Will the agreements be standardized and included as part of this Standard?</p> <p>Section xiii states “all members of the review team shall have an equal voice in the...recommendation”. Does the vote for recommendation have to be unanimous? If not, will the minority opinions be voiced to the Regional Committee?</p>
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p>n/a</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State</p>	<p align="center">X</p>		

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<p>Reliability Council Guy Zito Northeast Power Coordinating Council</p>			
<p>Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies</p>		<p align="center">X</p>	<p>We believe that it is an absolute must that the process for certification be developed as a standard. Consideration should be given to an ongoing recertification process that covers this entire standard with non compliance penalties.</p>
<p>Joanne K. Borrell FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>John Horakh MAAC</p>		<p align="center">X</p>	<p>Pages 3 and 4: To avoid referring to a following item, move the four entities listed in (vi) to (iii), remove the forward reference in (iii), and add a backward reference in (vi) to (iii). Page 5: At top, “an” should be “a”. Page 6: In (xiv), for Multiple NERC Regions, clarify if disapproval by one Region equals an overall disapproval. Page 7: There should be a De-certification Process that can be initiated by the Region or the Lead Compliance Monitor, not just the certified BA.</p>
<p>Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT</p>	<p align="center">X</p>		<p>Revise item (viii) under Requirement (2) to read: <i>“Representative from an Independent System Operator or Regional Transmission Organization, when applicable.”</i></p> <p>The last paragraph of item (viii) under Requirement (2) allows for an <i>“alternative ..to engage a completely independent review team.”</i> We recommend some definition of what is meant by</p>

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<p>Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>			<p>“independent and how this <i>“independent review team”</i> is differentiated from the Review Team defined in the standard.</p> <p>The scope and depth of the reveiws and inspections identified in item (viii) under Requirement (2) should be determined and agreed upon ahead of the on-site visit. The ISOs and RTOs support the development and application of a consistent approach and review plan for review teams to use on visits to facilities</p>
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe</p>	<p align="center">X</p>		

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<p>Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			<p>No. The administrative process used to certify BAs should not be tied to the standard. The CCC has as its charge the responsibility of designing and implementing compliance and certification processes. The experience of the Control Area Certifications has taught us that NERC is still improving its processes, and putting an administrative procedure into this standard will make implementing improved processes much more difficult. The process of “how” a BA is certified is not material to whether or not a BA meets the requirements to function as a BA.</p> <p>Standard 1401 should be removed from this standard altogether and become part of the Compliance Enforcement Program process and procedures. This certification standard should contain only those technical requirements that address what the BA needs to accomplish to become certified.</p>
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		<p>Revise item (viii) under Requirement (2) to read:</p> <p align="center"><i>“Representative from an Independent System Operator or Regional Transmission Organization, when applicable.”</i></p> <p>The last paragraph of item (viii) under Requirement (2) allows for an <i>“alternative ..to</i></p>

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			<p><i>engage a completely independent review team.” We recommend some definition of what is meant by “independent and how this “independent review team” is differentiated from the Review Team defined in the standard.</i></p> <p>The scope and depth of the reviews and inspections identified in item (viii) under Requirement (2) should be determined and agreed upon ahead of the on-site visit. The ISOs and RTOs support the development and application of a consistent approach and review plan for review teams to use on visits to facilities</p>
<p>P.D. Henderson</p> <p>IMO</p>	X		<p>1. With regards to item (viii), the formation of review team requires three individuals from the listed category of entities. It needs to be clarified whether the listed categories be already certified prior to the BA certification. Allowance for a transition period since these other entities are not yet certified is needed.</p> <p>2. With regards to item (xiv), what happens if some Regional Committee(s) approves the certification application and some of them don't for an Applicant who intends to operate in multiple NERC Regions. It needs to be clarified whether a disapproval from “one” Region shall result in denying of certification or is it applicable only when all regions disapprove.</p>
<p>Peter Burke [on behalf of ATC’s Jason Shaver]</p> <p>American Transmission Company</p>	X	X	<p>The modifications did help with clarifying the standard but additional modifications are needed.</p> <p>The term “Lead Compliance Monitor” is not used consistently throughout section 1401 (a)(2).</p> <p>For example, under (a)(2)(i), <u>Applicant Intending to Operate in a Single NERC Region</u>: “The Compliance Monitor for the Region in which the Applicant plans to operate shall conduct the formal review process and award certification” would be better worded as “The Lead Compliance Monitor, the Compliance Monitor for the Region in which the Applicant plans to operate, shall conduct the formal review process and award certification.</p> <p>The revised statement conforms better to the first sentence of requirement (a)(2) and coordinates better with a similar statement at the end of (a)(2)(i), which refers to the Lead Compliance Monitor as distinct from one or more Compliance Monitors.</p> <p>Similarly, the first sentence of (a)(2)(ii) would be revised to begin: “The Applicant and Lead Compliance Monitor shall agree to a timeline,…”</p>

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			<p>If the SDT chooses to not adopt these modifications then the SDT must, at a minimum, clarify the intent of phrases such as “Compliance Monitor or Lead Compliance Monitor.” Note that requirement (a)(2)(ii) uses the phrase “Regional or Lead Compliance Monitor” but the next requirement, (a)(2)(iii), uses the phrase “Compliance Monitor or Lead Compliance Monitor.” Further note that the latter phrase is resurrected for requirements (a)(2)(xv), (a)(2)(xvi), and (a)(2)(xvii) while the subsequent section reverts to the former phrase.</p> <p>In requirement (a)(2)(v), the second sentence, “Region” should be changed to “Region(s).”</p> <p>The third bullet point under requirement (a)(2)(vi) should be clarified to state whether “Generators” means Generator Owners or Generator Operators or both.</p> <p>The fourth bullet point under requirement (a)(2)(vi) suggests questionnaires will go to adjacent BAs that have been granted the BA certification. Has the SDT considered whether questionnaires should also go to entities that are applicants not yet certified? Understandably, entities that were denied a BA Certification would probably not get a questionnaire.</p> <p>The last sentence of requirement (a)(2)(viii) includes the standard’s only reference to “independent review team.” The implication is that this is a Review Team that is independent but in every other respect the same as “Review Team” as the term is used everywhere else in the standard. If that is true, it would be better to make that point explicit.</p> <p>Requirement (a)(2)(xi) would be better without the last sentence, “The Review Team shall verify that any follow-up work required had been completed by the Applicant prior to making a certification recommendation.” The purpose of this statement is valid but it may prevent a Review Team from issuing a recommendation within the nine months that the process allows. Requirement (a)(2)(xii), particularly the last bullet under the requirement, accomplishes what the SDT intends and does not prevent a recommendation from being issued.</p> <p>What is the meaning of the term “equal voice” in requirement (a)(2)(xiii)? Could this be interpreted to mean that recommendation for certification is determined by a vote of the Review Team members? Could a three-member team recommend certification with two members in favor and one opposed?</p>
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			<p>Requirement (a)(2)(xv) refers to a 180 day Pending Certification period and a 30 day Compliance Monitor response period without limiting the allowable start of these periods. Requirement (a)(2)(ii), however, states that the Balancing Authority Certification Process must be complete nine months after the region's request for certification. The question that is certain to arise is whether a 180 day Pending Certification period may commence nine months after application and whether the 30 period for Compliance Monitor response may commence at the end of the 180 day Pending Certification period. That question is not easily answered when considering both requirements (a)(2)(ii) and (a)(2)(xv).</p> <p>What is the difference between the requirement (a)(2)(xiv) notification to NERC and the requirement (a)(2)(xvi) notification to NERC staff?</p>
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>	<p align="center">X</p>		<p>None.</p>

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Raj Rana AEP	X		
Ray Morella FirstEnergy Corp	X		
Robert Snow Small Electric User	X		
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM	X		
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS	X		

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Robert Rhodes SPP			
William J. Smith Allegheny Power	X		

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4. Standard 1402 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary: Based on the comments received, the Standard Drafting Team will modify the agreement standard to provide more flexibility in who provides the information to the BA.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		We are not sure as to how practical it will be to put all of these agreements in place unless some sort of standardized agreement is developed.
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils		X	<p>More clarification is needed.</p> <p>5(ii) "Each Balancing Authority's commitment to model pseudo-ties that exist in another Balancing Area" Agreements don't exist today for this in most cases. What does 5ii mean?</p> <p>6(i) "The Transmission Operator's commitment to reduce voltage or shed load if needed to ensure balance in real time" To the extent that the BA has direct agreements with the Distribution Provider, can that apply in place of 6i? Agreements to reduce voltage or shed load with one or more of the following: LSEs, DO, TO..</p> <p>7(i) "The Transmission Owner's commitment to provide interconnection boundary metering" Metering might be at the distribution level. The provider of metering might be the BA and the TO makes the PT and CTs available. The agreement should allow for appropriate BA definition metering as agreed to with the BA.</p> <p>Regional Differences:</p>

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<p>Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			<p>MISO should be recognized in the Regional Differences to account for the tasks that they will perform under the NERC waivers which formally were transferred to the MISO in the BA Agreement. The MISO should be certified for the transferred tasks so that those tasks are not reviewed at the BA certifications, and so that MISO is audited once for the functions transferred, not every time a BA is audited.</p>
<p>5ii – Additional clarifications will be incorporated.</p> <p>6i – Even if there are agreements in place between the BA and other entities, the Transmission Operator has to be involved in the process for reliability.</p> <p>7i – The requirement to have agreements with the Transmission Owner will be removed.</p> <p>The BA is responsible for the tasks as required by the standards. A BA can delegate tasks to another entity but the BA is still responsible for those tasks.</p> <p>If there are Regional differences associated with the MISO organization as related to the certification standards, they should be identified specifically with the content of the difference along with the Regions that are involved for inclusion in the standard.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell</p>	<p align="center">X</p>	<p align="center">X</p>	<p>In your response to our comments on Version 1, for sections 1402(d) and 1402 (e), it was</p>

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<p>FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			<p>stated that “elements of the on-going compliance program are expected to continue and have not been addressed by this standard.” It was also stated that “There are no provisions for different levels of compliance for gaining certification. All requirements and measures must be met.” If this is true, and certification is not a compliance enforcement issue, then the format of this standard should be changed to remove the compliance references. (sections c,d,e and f) This standard implies that an entity is either certified or not based on meeting all requirements.</p>
<p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation.</p>			
<p>Gary Nolan Salt River Project</p>			<p>In section 2 v and repeatedly throughout all the standards, “area” is not capitalized when part of the defined terms “Balancing Area” and “Balancing Authority Area” – see new NERC Glossary.</p>
<p>Your comments have been considered and the modifications will be incorporated.</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p>n/a</p>
<p>Kathleen Goodman ISO-New England</p>	<p align="center">X</p>		

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<p>David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>			
<p>Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies</p>		<p align="center">X</p>	<p>There should be agreements between Balancing Authorities, Distribution Owners, Transmission Owners, and Generator Owners related to providing equipment for obtaining both real time and after the fact data as specified in the standard. Additional statements are needed for LSE’s to define the loads that are within the Balancing Authority Area, Generator Owners to define what generators are within the BA Area, and Transmission Owners to define what transmission assets are within the BA Area. There should be agreements that LSE’s facilitate load shed as directed by either the Balancing Authority or Transmission Operator. There should be an optional requirement that the BA may have agreements with Distribution Owners to shed load as needed to maintain balance. If there are agreements with all Distribution Owners, an agreement with Transmission Owners is not necessary.</p>
<p>Requirements are included in the standard that the Balancing Authority have agreements with those entities that are needed to support the balancing function. The drafting team will modify the standard to provide a less prescriptive means for satisfying the requirement.</p> <p>Even if there are agreements in place between the BA and other entities with regards to load shed, the Transmission Operator has to be involved in the process for reliability.</p>			

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Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC		X	Page 8: In (b) (3), replace “defined” with “specified by the Reliability Authority”. Page 9: In (6) (i), Replace “or” with “and/or”.
Modification will be made based on your comments			
ale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP	X		
Jim Howell Southern Company Services Mike Miller Southern Company Services		X	(b) (3) (vii) Notice of Interchange Schedule interruptions within its Balancing Area It is not clear whether this section is referring to schedule adjustments or actual energy flows (i.e., unit trips, etc.). Need to define what is actually meant by interchange schedule interruption. Note; this type of information should actually be forwarded by the Interchange Authority.

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<p>Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			
<p>Clarification to the term interruption will be made.</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens</p>			<p>The standard does not identify which items can and cannot be delegated to other entities. While delegation may be contained in the Functional Model, the FM is not a standard. If the drafting team does not want to allow delegation, this standard should explicitly state that no tasks can be delegated. Stating this avoids future problems with interpreting the intent of the standard.</p>

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<p>Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Modifications have been made to the standard to clearly state that tasks can be delegated.</p>			
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		
<p>P.D. Henderson IMO</p>	<p align="center">X</p>		<p>1. The requirement to have agreements in place with other entities specified in the Functional Model will need to allow for a transition period since these other entities are not yet certified.</p> <p>2. Measure 1(i) states that the LSE's must provide load forecasts for the region being served. This measure should only be required if applicable to the BA being reviewed. The reason for this is that many BA's are also providing the load forecast as one of the functions for its participants and does not require the LSE to provide a load forecast.</p>
<p>All of the entities that the BA will have agreements with will not necessarily have to attain certification. At the current time, the only entities that certification standards are being developed for are the RA, BA, TOP, and IA.</p> <p>Requirements are included in the standard that the Balancing Authority have agreements with those entities that are needed to support the balancing function. The drafting team will modify the standard to provide a less prescriptive means for satisfying the requirement.</p>			
<p>Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company</p>		<p align="center">X</p>	<p>The text of measure (7)(i) does not accurately represent what should be required. That text could be interpreted to mean the Transmission Owner is required to provide (equipment and data) for interconnection boundary metering. ATC suggests the following instead:</p> <p>The Transmission Owner's commitment to allow for installation and maintenance of</p>

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			<p>interconnection boundary metering equipment.</p> <p>The above revision satisfies the SDT's requirement while addressing ATC's concern.</p> <p>Lastly, if the SDT determines that certification requires interconnection boundary metering, then the SDT should add the following to the list of standard 1404 measures:</p> <p>The Applicant shall document every circuit that has interconnection boundary metering equipment and demonstrate real-time monitoring at each position.</p> <p>Without the changes proposed above, the Transmission Owner could become financially responsible to offer a service that is not truly a Transmission Owner's to provide.</p>
<p>Requirements are included in the standard that the Balancing Authority has agreements with those entities that are needed to support the balancing function. The drafting team will modify the standard to provide a less prescriptive means for satisfying the requirement.</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina</p> <p>Elizabeth B. Fleming Public Service Commission of South Carolina</p> <p>G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina</p> <p>John E.Howard Public Service Commission of South Carolina</p> <p>Randy Mitchell – Chairman Public Service Commission of South Carolina</p> <p>C. Robert Moseley Public Service Commission of South Carolina</p> <p>David A. Wright Public Service Commission</p>	<p align="center">X</p>		<p>None.</p>

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of South Carolina			
Raj Rana AEP	X		
Ray Morella FirstEnergy Corp	X		
Robert Snow Small Electric User	X		
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM		X	<p>Under (b) Measures (4) vii and iv, it is recommended that they be restated to say: "Notice of Interchange Schedule Interruptions (<u>e.g., due to generation or load interruptions</u>) within its Balancing Area".</p> <p>The Functional Model under Balancing Authority Relationships- Real Time has this additional language under requirement #16.</p>

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Clarification to the term interruption will be made.			
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP	X		
William J. Smith Allegheny Power	X		

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5. Standard 1403 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary:			
Based on the comments received, industry consensus supports the requirements in the standard. The Standard Drafting Team will make additional clarifications to items identified in the comments.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL		X	Market information data providers should not be required to be NERC-certified. Item iii states that (all) Providers of data to the RA must be certified. Market Operators supply information to their System Operators who are responsible for the data content; therefore it is the System Operators (not the data providers) that must be certified.
The requirement was not intended to imply that all providers of real-time data must be certified. The drafting team will modify the task list based on your comments.			
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris	X		<p>Yes, however associated with the BA requirements for coordination of interchange, there should be specific tasks assigned to that scheduling and coordination function for easy delegation to other entities.</p> <p>Many Control Areas today have split out the interchange coordination function on the “transmission side” as a specific area responsible for coordination with adjacent Control Areas and provision of Net Scheduled Interchange into the ACE guiding generation dispatch - in many cases provided by personnel on the “other side of the house” (marketing). Splitting the Interchange coordination function out of the BA can prompt easier migration to commercial entities being certified for performing this function independently for multiple BAs.</p>

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<p>NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The Functional Model has an entity called the Interchange Authority that performs the task that you have described. Operators that are responsible for balancing load and generation in real-time are the individuals that must obtain a NERC certification credential.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities</p>	<p align="center">X</p>	<p align="center">X</p>	<p>We believe the format of the standard should be changed removing the compliance references as indicated in our response to question 4.</p>

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<p>Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			
<p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation.</p>			
<p>Gary Nolan Salt River Project</p>			<p>In Section A, recommend adding and including the real-time responsibility of verifying actual interchange values with Adjacent Balancing Authorities.</p>
<p>The drafting team interprets your comment as an after-the-fact task that does not require a certified operator to perform. If you were referring to the interchange confirmation process, that function would be performed by the IA and not the BA as currently defined in the Functional Model.</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p align="center">n/a</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One</p>	<p align="center">X</p>		

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<p>Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>			
<p>Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies</p>		<p align="center">X</p>	<p>Current certification credentials need to include NERC Certified System Operators. Is the list of tasks requiring NERC Certified operators a sufficient one? There is a formatting error for (b) Measures.</p>

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The drafting team feels that the list does encompass the necessary tasks to define who must be certified. We will fix the formatting error.			
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC	X		
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP	X		
Jim Howell Southern Company Services Mike Miller Southern Company Services	X		

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<p>Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities</p>			<p>What happens if a person in the BA entity performs only one of the tasks in this list? Is that person required to have a BA System Operator Certification? This is a basic question that the compliance folks have been facing for several years. It is an ongoing philosophical question identified in compliance audits that needs to be answered.</p>

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<p>Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Yes, all the real-time tasks defined in Standard 1403 – Requirement 1 shall be performed by a certified operator.</p>			
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		
<p>P.D. Henderson IMO</p>	<p align="center">X</p>		<p>1. Requirement 1, second sentence: “There should be only a BA certification for this standard. The fact that the BA may also be an IA, TO, and/or RA should involve separate certifications rather than being grouped with the BA. 2. Measure (3) shall read: “The Applicant shall have a projected schedule for a <u>minimum</u> period of 13 weeks ...”</p>
<p>1. The standard will be modified to provide clarification. 2. The standard will be modified.</p>			
<p>Peter Burke [on behalf of ATC’s Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice</p>	<p align="center">X</p>		<p>None.</p>

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<p>Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			
<p>Raj Rana AEP</p>	<p align="center">X</p>		
<p>Ray Morella FirstEnergy Corp</p>	<p align="center">X</p>		
<p>Robert Snow Small Electric User</p>		<p align="center">X</p>	<p>The personnel must have situational awareness of what is happening in the power system either from information obtained from the RA or from their own data and security analysis.</p> <p>They need to have information about what would change the demand such as weather information, temperatures of sub areas, and a tool that identifies their expected load for variations in weather conditions. With the tools, they need to show they can use them to balance load and demand.</p> <p>They need to have information about inadvertent flows, and CBM requirements from adjacent regions/areas.</p>

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The elements that you identify are part of the basic information that the operator should have an awareness of in obtaining their NERC credential and do not need to be specifically identified in this standard.			
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM	X		
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP	X		
William J. Smith Allegheny Power	X		

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6. Standard 1405 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

<p>Response Summary: Comments received during the posting period did not support the modifications that were made to this standard. Therefore, the Standard Drafting team will remove measures 2 & 3 from the standard.</p>			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL		X	Drop Measures 2 & 3 Policy 1 does not have a standard for Governor performance (it does have a GUIDE). Version 0 should not impose a new requirement Policy 1 only requires the registered entity to have a Frequency Bias for its area; no mention is made of monitoring each generating resource’s response. The issue of a Frequency Response Requirement has already been commented upon (and rejected) during the SAR process.
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response			
Darrel W. Richardson Illinois Power Company	X		We are not sure as to how you would monitor and verify resource governor response.
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response			
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC	X		However for item B2: “The Applicant shall have a procedure or process for determining the minimum governor response requirements for all resources within its Balancing Authority area”, should it read “..requirements for EACH APPLICABLE resource with its..”?

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<p>John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>Based on your and other comments, the drafting team will remove the measures with regards to individual unit response.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>		<p align="center">X</p>	<p>Measure 2: The CAISO is unclear on what this measure is requesting. Is the measure intending that the frequency response and frequency bias outlined in Measure 1 be distributed to each generator in the BA area?</p> <p>Suggested language for Measure 2:</p> <p>“The applicant shall have a procedure or process for determining the mandatory bottom line frequency response requirements for resources that are physically capable to provide frequency response”.</p>

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			Measure 3: Change “resource governor response” to resource frequency response”.
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response			
Edward C Stein FirstEnergy Solutions		X	Although I agree that governor response is important to the reliability and that there should be a Standard requiring a certain governor response on all generators, it is my understanding that Version 0 Standards will not include any governor response requirements. If my understanding is correct then items 2 and 3 under b Measures should be eliminated. You can't be required to determine and monitor governor response for all resources if all resources do not have or are not required to have a governor.
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response.			
Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency		X	Do the measures (1-3) in section 1405(b) agree with the other “NERC standards” identified in 1405(a) requirements? If so, why do we need this particular standard? Won't it be redundant? If these measures are stand-alone, we would suggest removing the reference to other NERC standards that was added in this posting. The comment in questions 4 regarding compliance references applies to this standard as well.

Balancing Authority Certification Standard – Posting 2 - Comments

The drafting team will remove measures 2 & 3.			
Gary Nolan Salt River Project			
Gerardo Castillo Imperial Irrigation District	X		n/a
Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council	X		
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies		X	

Balancing Authority Certification Standard – Posting 2 - Comments

Howard Rulf We Energies			
Joanne K. Borrell FirstEnergy Solutions		X	Although I agree that governor response is important to the reliability and that there should be a Standard requiring a certain governor response on all generators, it is my understanding that Version 0 Standards will not include any governor response requirements. If my understanding is correct then items 2 and 3 under b Measures should be eliminated. You can't be required to determine and monitor governor response for all resources if all resources do not have or are not required to have a governor.
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response.			
John Horakh MAAC		X	Page 14: In (b) (2) and (b) (3), add "generation" before "resources", in (b) (3), delete "resource" before "governor". There is no Question for Standard 1404. Changes were minimal, I agree with the changes made.
The drafting team will remove measures 2 & 3			
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung		X	We recommend that Measures (2) and (3) be removed. The Requirements and measurements should be based on existing standards. At this time there are no standards related to measures (2) and (3).

Balancing Authority Certification Standard – Posting 2 - Comments

SPP			
Based on your and other comments, the drafting team will remove the measures with regards to individual unit response.			
Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services	X		
Robert Harbour (chair)			This comment also pertains to Standard 1404. Documented processes and procedures

Balancing Authority Certification Standard – Posting 2 - Comments

<p>Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			<p>are necessary, but we suggest adding the phrase “tested for effectiveness” or something similar to demonstrate that many of these processes and procedures have been tested assuring some degree of usefulness.</p> <p>Comment to Standard 1406. This comment refers to an overlap with the Functional Model. In this standard, the BA needs to have tools and processes for approving interchange transactions. In the Functional Model the RA is charged with performing this task. The scope of which transactions are approved or denied needs to be clarified here to eliminate overlap of responsibility and accountability, and thus confusion. The FM assigns this duty to the RA but without any parameters. Those parameters must be defined in this standard.</p>
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Balancing Authority Certification Standard – Posting 2 - Comments

<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit. The effectiveness of the processes and procedures will be considered in the review teams evaluation.</p>			
<p>Michael C Calimano NYISO</p>		<p>X</p>	<p>We recommend that Measures (2) and (3) be removed. The Requirements and measurements should be based on existing standards. At this time there are no standards related to measures (2) and (3).</p>
<p>The drafting team will remove measures 2 & 3.</p>			
<p>P.D. Henderson IMO</p>		<p>X</p>	<p>Two new measures have been added in this version that relates to monitoring and verifying resource minimum governor response for <u>all</u> resources within BA. Currently Policy 1 treats unit governor response as a guide. It needs to be recognized that not all units are capable of the same governor response and hence further discussion is needed in the industry before this is implemented.</p>
<p>The drafting team will remove measures 2 & 3.</p>			
<p>Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission</p>	<p>X</p>		<p>None.</p>

Balancing Authority Certification Standard – Posting 2 - Comments

<p>of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			
<p>Raj Rana AEP</p>	X		
<p>Ray Morella FirstEnergy Corp</p>		X	<p>Although I agree that governor response is important to reliability and a that there should be a Standard requiring a certain governor response on all generators, it is my understanding the Version 0 Standards will not include any governor response requirements. If my understanding is correct then items 2 and 3 under (b) Measures should be eliminated. You can't be required to determine and monitor governor response for all resources if all resources do not have governors.</p>
<p>The drafting team will remove measures 2 & 3.</p>			
<p>Robert Snow Small Electric User</p>	X		
<p>Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM</p>	X		

Balancing Authority Certification Standard – Posting 2 - Comments

Lloyd Barnes SCGEM			
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP	X		
William J. Smith Allegheny Power	X		

Balancing Authority Certification Standard – Posting 2 - Comments

7. Standard 1407 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary: Based on the industry comments received, industry consensus supports the modification that were made to Standard 1407. In addition, the drafting team will make minor modifications based on suggestions from the comments received.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils	X		However, MISO should be recognized in the Regional Differences to account for the tasks that they will perform under the NERC waivers which formally were transferred to the MISO in the BA Agreement. The MISO should be certified for the transferred tasks so that those tasks are not reviewed at the BA certifications, and so that MISO is audited once for the functions transferred, not every time a BA is audited.

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<p>Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The BA is responsible for the tasks as required by the standards. A BA can delegate tasks to another entity but the BA is still responsible for those tasks.</p> <p>If there are Regional differences associated with the MISO organization as related to the certification standards, they should be identified specifically with the content of the difference along with the Regions that are involved for inclusion in the standard.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>		<p align="center">X</p>	<p>The “Requirement” requires the BA to provide data to its RA “in accordance with the RA’s specifications”. Measures 1 and 2 require the BA to have a procedure or process to provide its RA with the initial and updates to the Integrated Operational Plan. We agree that the BA needs to provide operational data to the RA. But the requirement and the measures reference different ways of doing this. We believe the BA should provide the data requested by the RA and not be limited only to what is outlined in the “Integrated Operational Plan Technical Reference Document”. We also are concerned, as previously indicated in Question 2, that having the specific details of a requirement in a Technical Reference Document will create problems for compliance enforcement.</p>
<p>Industry consensus supports the current format of the IOP. The IOP reference document is intended to provide guidance, but not requirements. The Reliability Authority will define the specific elements required of the Balancing Authorities within its Reliability Authority area.</p>			
<p>Edward C Stein</p>	<p align="center">X</p>		

Balancing Authority Certification Standard – Posting 2 - Comments

FirstEnergy Solutions			
Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency		X	Same comment as in question 4 regarding format and removal of compliance references.

Balancing Authority Certification Standard – Posting 2 - Comments

<p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation.</p>			
<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	X		n/a
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>	X		
<p>Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies</p>	X		

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Kelley Knoerr We Energies Howard Rulf We Energies			
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC		X	Page 16: In (b) (3), add “required” before “real-time”. “SPECIFIED” or “AS Specified”
The standard will be modified based on your comments.			
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP	X		
Jim Howell		X	Under (b) Measures (1) - (4), it is recommended that the statement “The Applicant shall

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<p>Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			<p>have a procedure or process and demonstrate its tool(s) <u>has the functional capability to provide.....</u>” be reworded as underlined and highlighted in red.</p> <p>Under (a) Requirements (1), it should be restated to read: “The Applicant shall provide data to its Reliability Authority in accordance with the Reliability Authority’s <u>request for information.</u>”</p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit. The substance of both statements is the same.</p>			
<p>Robert Harbour (chair)</p>			<p>Documented processes and procedures are necessary, but we suggest adding the phrase “tested for effectiveness” or something similar to demonstrate that many of these</p>

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<p>Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			<p>processes and procedures have been tested assuring a degree of usefulness.</p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit. The effectiveness of the processes and procedures will be considered in the review teams evaluation.</p>			
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		
<p>P.D. Henderson IMO</p>	<p align="center">X</p>		
<p>Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission</p>	<p align="center">X</p>		<p>None.</p>

Balancing Authority Certification Standard – Posting 2 - Comments

<p>of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			
<p>Raj Rana AEP</p>	X		
<p>Ray Morella FirstEnergy Corp</p>	X		
<p>Robert Snow Small Electric User</p>	X		
<p>Roman Carter SCGEM Lucius Burris SCGEM</p>		X	<p>Under (b) Measures (1) - (4), it is recommended that the statement “The Applicant shall have a procedure or process and demonstrate its tool(s) <u>has the functional capability to provide.....</u>” be reworded as underlined and highlighted in red.</p> <p>Under (a) Requirements (1), it should be restated to read: “The Applicant shall provide</p>

Balancing Authority Certification Standard – Posting 2 - Comments

<p>Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM</p>			<p>data to its Reliability Authority in accordance with the Reliability Authority's <u>request for information.</u>"</p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit.</p> <p>The substance of both statements is the same.</p>			
<p>Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP</p>	<p align="center">X</p>		
<p>William J. Smith Allegheny Power</p>	<p align="center">X</p>		

Balancing Authority Certification Standard – Posting 2 - Comments

8. Standard 1408 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary: Based on the comments received, industry consensus supports the modifications that were made to Standard 1408. In addition, comments reflected a need for additional modifications to the standard to: define IOS, add a requirement for the BA to publish its data reporting requirements, and to add flexibility for providing specific data. The drafting team will further modify the standard to reflect these suggested changes and seek industry affirmation on the modifications.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris		X	More clarification is needed. Under item 2): (i) and (ii) should have "if applicable" at the end of the sentences. is (iv) only BA-related IOS and which ones are those? Where are the others picked up? Possibly the introduction should list what IOS are applicable to this standard. Under item 4): add "as applicable" for i and ii. Under item 5); "The Applicant shall demonstrate that it can follow its process or procedure and use its data acquisition system to collect information from each Transmission Owner(s) within its Balancing Authority Area" Should this be collection of data from Transmission Operators and Distribution Providers

Balancing Authority Certification Standard – Posting 2 - Comments

<p>NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			<p>rather than Transmission Owner?</p>
<p>a) The balancing Authority needs to be able to acquire generator plans and commitments and also the generator maintenance plans in order to develop an overall operational plan. By adding the phrase, “if applicable” it could be inferred that generators would have the option and may not develop a plan for operation nor a maintenance plan. The plans need to be provided so that section 1404 of this standard can be carried out. This section, 1408, only defines the data acquisition aspects of the standard.</p> <p>b) Item (iv) only relates to IOS services required by the BA. These services are regulation, load following, frequency response, and contingency reserve. The other IOS are picked up either by the RA or TOP. The drafting team will develop a definition for IOS and identify those elements applicable to the BA.</p> <p>c) The BA needs to have data acquisition processes and procedures to obtain Interchange schedule requests. and approved Interchange schedules information. Adding the phrase, “if applicable” is not appropriate.</p> <p>d) Based on the comments received, the Standard Drafting Team will modify the standard to provide more flexibility in who provides the information to the BA.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		

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<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>		<p align="center">X</p>	<p>We do not think the reference to “NERC standards” in 1408(a)(1) is necessary for the same kind of reasons we identified in our response to question 6. The measures here apply to the BA having the data it needs to perform the BA function, not to meet other NERC standards. Note -this also applies to standard 1410 which you do not have a question for.</p> <p>Same comment as in question 4 regarding format and removal of compliance references.</p>

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<p>The reformatting of this standard to maintain consistent presentation to the industry will address your concern.</p> <p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation.</p>			
<p>Gary Nolan Salt River Project</p>			<p>Section B (1), shouldn't LSE Actual load value be a requirement here as well?</p>
<p>The BA does not require actual load to perform its balancing function. The data required in B (1) permits the BA to know in advance what the load requirements will be. In real-time, the ACE equation only needs frequency error and tie line error. The drafting team agrees that having the actual load provides a check on the accuracy of the LSE's forecast, but it is not a requirement of the BA to perform its tasks.</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p>X</p>		<p>n/a</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>	<p>X</p>		
<p>Tony Jankowski We Energies Dale Zahn</p>	<p>X</p>		

Balancing Authority Certification Standard – Posting 2 - Comments

We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies			
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC	X		
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat	X		

Balancing Authority Certification Standard – Posting 2 - Comments

<p>PJM Charles Yeung SPP</p>			
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>		<p align="center">X</p>	<p>Need to define minimum technical requirements for “data acquisition”. The current minimum technical requirements for “data acquisition” is contained in NERC Operating Policy 1, section E.</p> <p>Section (b) (4) (i):</p> <p>This section should be reworded to state that the BA shall have the <u>functional capability</u> to process interchange requests and implement confirmed Interchange as supplied by the IA</p>

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<p>The data reporting requirements for the BA will be established by the BA in conjunction with the data reporting requirements that are established by its Reliability Authority. The standard will be modified to include a requirement that the BA shall have data reporting requirements for entity data submission.</p> <p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit.</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Michael C Calimano NYISO</p>	X		
<p>P.D. Henderson IMO</p>	X		<p>Measure 2(iii): Clarification is required in regard with the type of data to be collected, so that consistency between BA areas is achieved.</p>
<p>The data reporting requirements for the BA will be established by the BA in conjunction with the data reporting requirements that are established by its Reliability Authority. The standard will be modified to include a requirement that the BA shall establish and publish its data reporting requirements for entity data submission.</p>			

Balancing Authority Certification Standard – Posting 2 - Comments

Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company			
Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina	X		None.
Raj Rana AEP	X		Change “process” to “processes” in the second line of Compliance Monitoring Process (1).
Thank you, this change has been made			
Ray Morella FirstEnergy Corp	X		

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<p>Robert Snow Small Electric User</p>		<p align="center">X</p>	<p>The requirement must be to collect, store and perform analysis on the data not simplify to collect it. The reports identified in another section are not sufficient. For example, this data should be used to verify if the weather assumption used to normalize load forecasts is consistent with reality and the variation of load with weather conditions.</p>
<p>The elements of this standard are to collect the data. Other standards in this series of standard address utilization of the data by the BA.</p>			
<p>Roman Carter SCGEM Lucius Burriss SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM</p>		<p align="center">X</p>	<p>In (a) Requirements (1), it should be stated the data acquisition process meets a defined minimum technical requirement. Currently, the minimum data acquisition requirements is contained within Policy 1, Section E. Since Policy 1 is going away, the new Version 0 Standard addressing this should be substituted and included here.</p> <p>In (b) Measures (1) – (5), the phrase “has the functional capability” should be inserted into the current statement “The Applicant shall demonstrate that it can <u>has the functional capability to</u> follow its process.....”</p>
<p>The data reporting requirements for the BA will be established by the BA in conjunction with the data reporting requirements that are established by its Reliability Authority. The standard will be modified to include a requirement that the BA shall establish and publish its data reporting requirements for entity data submission.</p>			
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit.</p>			
<p>Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck</p>	<p align="center">X</p>		<p>Change “process” to “processes” in the second line of Compliance Monitoring Process (1).</p>

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OG&E John Mason MPS Robert Rhodes SPP			
Thank you, this change has been made.			
William J. Smith Allegheny Power	X		

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9. The elements of Standard 1409 Interconnected Operating Services Data Acquisition and Analysis section have been identified through the comments received as being redundant with elements in standards 1404 and 1408. Therefore the Standard Drafting Team has removed Standard 1409 as initially written to eliminate duplication. Do you agree with this removal of redundancy?

Response Summary:

Based on the comments received, industry consensus supports the deletion of Standard 1409. The drafting team will define IOS based on the comments received.

Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO		X	In reviewing the document we found multiple instances where “IOS” was referenced however it is not clear what IOS are being referred to. Perhaps this section can reflect required IOS as they apply to the Balancing Authority (Operating Reserves, Regulation and Frequency Response, Black Start??)

Balancing Authority Certification Standard – Posting 2 - Comments

<p>Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The drafting team will develop a definition for IOS and identify those elements applicable to the BA.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace</p>	<p align="center">X</p>		

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<p>Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			
<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p>I agree because anytime you have redundancy, I feel you don't keep the policy simple. This way it's simple for everybody.</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast</p>	<p align="center">X</p>		

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Power Coordinating Council			
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies	X		
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC	X		
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips	X		

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<p>MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>			
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services Bill Pope Gulf Power Company</p>	<p align="center">X</p>		

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J. T. Wood Southern Company Services Marc Butts Southern Company Services			
Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT			
Michael C Calimano NYISO	X		
P.D. Henderson IMO	X		
Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company	X		

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<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>	<p align="center">X</p>		<p>None.</p>
<p>Raj Rana AEP</p>	<p align="center">X</p>		
<p>Ray Morella FirstEnergy Corp</p>	<p align="center">X</p>		
<p>Robert Snow Small Electric User</p>		<p align="center">X</p>	<p>They were better defined in 1409.</p>
<p>The drafting team will develop a definition for IOS and identify those elements applicable to the BA.</p>			
<p>Roman Carter</p>	<p align="center">X</p>		

Balancing Authority Certification Standard – Posting 2 - Comments

SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM			
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP	X		
William J. Smith Allegheny Power	X		

Balancing Authority Certification Standard – Posting 2 - Comments

10. Standard 1411 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period. Do you agree with modifications that were made to clarify the issues identified?

Response Summary: Based on the comments received, industry consensus supports the modifications that were made to Standard 1411.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils Cinergy	X		Yes, however under Item b1ii , what IOS are covered here?

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<p>Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The drafting team will develop a definition for IOS and identify those elements applicable to the BA.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative</p>	<p align="center">X</p>		<p>However, same comment as in question 4 regarding format and removal of compliance references.</p>

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<p>Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			
<p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation</p>			
<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p align="center">n/a</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State</p>	<p align="center">X</p>		

Balancing Authority Certification Standard – Posting 2 - Comments

Reliability Council Guy Zito Northeast Power Coordinating Council			
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies	X		
Joanne K. Borrell FirstEnergy Solutions	X		
John Horakh MAAC	X		Since 1409 will be eliminated, I assume 1410 will become 1409, and 1411 will become 1410.
Under the old format that would be correct, but the standard will be corrected in the next draft.			
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO	X		

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<p>Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>			
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell</p>	<p align="center">X</p>		

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<p>Southern Company Services Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT</p>			<p>Documented processes and procedures are necessary, but we suggest adding the phrase “tested for effectiveness” or something similar to demonstrate that many of these processes and procedures have been tested assuring a degree of usefulness.</p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit. The effectiveness of the processes and procedures will be considered in the review teams evaluation.</p>			
<p>Michael C Calimano NYISO</p>	<p align="center">X</p>		

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<p>P.D. Henderson IMO</p>	<p align="center">X</p>		<p>The requirement to have procedures or processes in place with other entities specified in the Functional Model will need to allow for a transition period since these other entities are not yet certified.</p>
<p>All of the entities that the BA will have agreements with will not necessarily have to attain certification. At the current time, the only entities that certification standards are being developed for are the RA, BA, TOP, and IA.</p>			
<p>Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>	<p align="center">X</p>		<p>None.</p>

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Raj Rana AEP	X		
Ray Morella FirstEnergy Corp	X		
Robert Snow Small Electric User		X	Leave in the identification of who the BA should be communicating with and include the results of a n annual simulation as well as the documentation to identify if the BA is compliant. This should be about performance rather than just documentation.
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit. The effectiveness of the processes and procedures will be considered in the review teams evaluation. Ongoing testing for effectiveness of processes and procedures will be accomplished as part of the ongoing compliance process.</p>			
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM	X		
Dan Boezio AEP Steve Hillman WPEK	X		

Balancing Authority Certification Standard – Posting 2 - Comments

Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP			
William J. Smith Allegheny Power	X		

Balancing Authority Certification Standard – Posting 2 - Comments

11. Standard 1412 – The Standard Drafting Team recognizes the confusion and redundancy that existed in the measures. Based on the comments received, modifications have been made to this standard in an attempt to simplify, as well as clarify the intent. The drafting team seeks industry affirmation to the changes that have been made for clarification. Do you agree with modifications that were made to simplify and clarify the standard?

Response Summary: Based on the comments received, industry consensus supports the modification that were made to Standard 1412. The drafting team will make additional corrections based on the comments we received.			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL	X		
Darrel W. Richardson Illinois Power Company	X		
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO		X	This requirement has two parts to it: 1. The Applicant shall have procedures, processes, or facilities such that it can continue to maintain resource-demand balance in accordance with NERC standards for its Balancing Authority Area. All measures under B1 would apply. 2. The Applicant shall identify how it can continue to meet NERC standards under the following conditions: (i) Evacuation of control center building (ii) Loss of communications (iii) Loss of Energy/Generation Management System critical functionality (iv) Loss of critical Supervisory Control and Data Acquisition system data (v) Loss of control center support functions, i.e. air conditioning, power, water Capabilities listed here are over-reaching and should instead rely upon Standard 28

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<p>Doug Hils Cinergy Tony Jankowski WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			<p>Requirement 1. Measures under B1 don't all apply to this requirement.</p>
<p>Based on the comments received, industry consensus supports the current requirements and measures included in Standard 1412.</p>			
<p>Ed Davis Entergy Services, Inc</p>	<p align="center">X</p>		
<p>Ed Riley California ISO</p>	<p align="center">X</p>		
<p>Edward C Stein FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace</p>	<p align="center">X</p>		<p>However, same comment as in question 4 regarding format and removal of compliance references</p>

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<p>Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			
<p>The drafting team has inquired about a different format and has been instructed to use the same format to maintain a consistent presentation of standards to the industry. While the compliance in most standards are ongoing and evaluated on a periodic basis, the compliance in this case is a one-time evaluation and not a periodic re-evaluation</p>			
<p>Gary Nolan Salt River Project</p>			<p>Section (b), in the sentence “maintain resource-demand balance within its Balancing Area for the loss of control center functionality” recommend replacing the word "for" with "during".</p>
<p>Wording in the standard has been modified to reflect this suggestion.</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>	<p align="center">X</p>		<p>I agree with the modifications to simplify and clarify the standard in order to make it easier to comply under these extreme circumstances if the situation was ever to arise for anybody.</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US</p>	<p align="center">X</p>		

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<p>Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>			
<p>Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies</p>		<p align="center">X</p>	<p>(a) (1) (iv) names SCADA. It should instead be the system the BA uses to gather, present, and act on real-time data.</p>
<p>NERC glossary has the following definition for SCADA - A system of remote control and telemetry used to monitor and control the transmission system.</p>			
<p>Joanne K. Borrell FirstEnergy Solutions</p>	<p align="center">X</p>		
<p>John Horakh MAAC</p>		<p align="center">X</p>	<p>The concept is fine. Suggest the following wording changes on Pages 23 and 24 for consistency.</p> <p>(b) (x) – change “implement” to “implementing”.</p> <p>(xi) – add “Using” at the beginning</p> <p>(xviii) – add “Providing” at the beginning</p> <p>(xix) – add “Reporting” at the beginning</p> <p>(xx) – add “Complying” at the beginning</p>

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			(xxi) – add “Maintaining” at the beginning. Since 1409 will be eliminated, I assume 1412 will become 1411.
Wording in the standard has been modified to reflect this suggestion.			
Under the old format that would be correct, but the standard will be corrected in the next draft.			
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP	X		
Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden	X		

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<p>Southern Company Services Jim Griffith</p> <p>Southern Company Services Monroe Landrum</p> <p>Southern Company Services David Johnson</p> <p>Savannah Electric Steve Williamson</p> <p>Southern Company Services Perry Stowe</p> <p>Southern Company Services Jonathan Glidewell</p> <p>Southern Company Services Bill Pope</p> <p>Gulf Power Company J. T. Wood</p> <p>Southern Company Services Marc Butts</p> <p>Southern Company Services</p>			
<p>Robert Harbour (chair)</p> <p>Continental Cooperative Services</p> <p>Ajay Garg</p> <p>Hydro One</p> <p>Gerry Steffens</p> <p>Rochester Public Utilities</p> <p>Chuck Waits</p> <p>Michigan Electric Transmission Company LLC</p> <p>Ted Hobson</p>			<p>Yes. These modifications provide an easier-to-use yardstick for measuring compliance. They are all essential and should be kept.</p>

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JEA Pete Kuebeck Oklahoma Gas and Electric Larry Grimm ERCOT			
Michael C Calimano NYISO	X		
P.D. Henderson IMO	X		
Peter Burke [on behalf of ATC’s Jason Shaver] American Transmission Company			
Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O’Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina	X		None.

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<p>C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			
<p>Raj Rana AEP</p>	<p align="center">X</p>		<p>In the second line of Requirement (1) and in the second line of Measure (1) the term “resource-demand” is used. This same term is used in other places throughout the standard, for example in the last line of Standard 1408, Measure (1) and in the last line of Standard 1404, Compliance Monitoring Process (1), but in a different form “resources/demand”. Be consistent throughout the standard with the usage.</p>
<p>Wording in the standard has been modified to reflect this suggestion.</p>			
<p>Ray Morella FirstEnergy Corp</p>	<p align="center">X</p>		<p>To further clarify this area, this requirement should be divided into two requirements. Requirement 1 should be ‘The Applicant shall have procedures, processes, or facilities such that it can continue to maintain resource-demand balance in accordance with NERC standards for its Balancing Authority Area’. This should be followed by the appropriate measures that are currently listed (b1). Requirement 2 should be ‘The Applicant shall identify how it can continue to meet NERC standards under the following conditions’ followed by the five conditions. As the current requirement is, it is confusing on how you can maintain all the measures listed in b1 when you apply the five conditions. It is virtually impossible to meet all the measures under the five conditions listed. There may have to be different measures that apply to each condition.</p>
<p>Based on the comments received, industry consensus supports the current requirements and measures included in Standard 1412.</p>			
<p>Robert Snow Small Electric User</p>		<p align="center">X</p>	<p>The requirements should have either a time or performance dimension. There should not be a significant difference in the performance of the BA within a short time (30 minutes) after the occurrence of any of the emergency conditions.</p>
<p>This standard is intended for certification and is not intended to be used for on-going requirements.</p>			
<p>Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM</p>	<p align="center">X</p>		

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<p>Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM</p>			
<p>Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP</p>	<p align="center">X</p>		<p>In the second line of Requirement (1) and in the second line of Measure (1) the term “resource-demand” is used. This same term is used in other places throughout the standard, for example in the last line of Standard 1408, Measure (1) and in the last line of Standard 1404, Compliance Monitoring Process (1), but in a different form “resources/demand”. Be consistent throughout the standard with the usage.</p>
<p>Wording in the standard has been modified to reflect this suggestion.</p>			
<p>William J. Smith Allegheny Power</p>	<p align="center">X</p>		

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12. Are there any elements that should be included in the standards that have not been identified?

Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL			
Darrel W. Richardson Illinois Power Company			
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils Cinergy Tony Jankowski WE Lee Kittelson			<p>1) This document should present the specific IOS that apply to the certification.</p> <p>2) The BA Area should be further defined. Balancing Authority Area criteria should be defined within the standards to include what would constitute the need for certification for boundary changes. Can a single BA operate two or more Balancing Authority Areas – there isn't any specific wording that would differentiate between certifying the BA versus certifying the area(s) operated by the BA. Is there a one-for-one relationship only?</p> <p>3) This document should clarify the personnel certification requirements for Interchange management – for example, though Policy 3 states what actions Control Area personnel are responsible for today, some Control Areas have failed to staff this function with System Operators.</p> <p>4) Related to 3 above: Many Control Areas today have split out the interchange coordination function on the “transmission side” as a specific area responsible for coordination with adjacent Control Areas and provision of Net Scheduled Interchange into the ACE guiding generation dispatch - in many cases provided by personnel on the “other side of the house” (marketing). Splitting the Interchange coordination function out of the BA can prompt easier migration to commercial entities being certified for performing this function independently for multiple BAs.</p>

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<p>OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The drafting team will develop a definition for IOS and identify those elements applicable to the BA.</p> <p>The Version 0 glossary defines the Balancing Authority Area as: The collection of generation, transmission, and loads within the metered boundaries of the Balancing Authority. The Balancing Authority maintains load-resource balance within this area. An entity must be certified for each Balancing Authority Area that it will operate. An entity may operate multiple Balancing Authority Areas provided they receive the appropriate certifications.</p> <p>The BA certification standard does provide a list of real-time tasks that require a certified system operator.</p>			
<p>Ed Davis Entergy Services, Inc</p>			<p>We have three concerns regarding this Standard 1400, Version Two:</p> <ol style="list-style-type: none"> 1) Organization registrations to serve as the responsible entities for the Version 0 reliability standards will include a "Reliability Coordinator". Please modify this BA Certification Standard to include the RC and the interrelationships between the BA and RC. 2) Organization registrations to serve as the responsible entities for the Version 0 reliability standards will not include an "Interchange Authority". Please modify this BA Certification Standard to exclude the IA and the interrelationships between the BA and IA. <p>We strongly recommend that at this time the Balancing Authority Certification Process remain in Standard 1401 (a) (2) and not be moved to another document or process.</p>
<p>The standards have been modified to reflect your concern.</p> <p>The same statement can be made for the IA.</p> <p>Based on comments the Drafting Team has received, the administrative process has been removed from the standard and the CCC will develop this process for the industry. The Drafting Team believes the CCC should get industry input in the development of the process and approval by the BOT. In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the identified functions must be NERC Certified.</p>			

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<p>Ed Riley California ISO</p>			<p>As noted above, several times the Measures are not referring to the same things as the Requirements. The CAISO feels some more “clean-up” on the standard is necessary.</p>
<p>The conversion to the new format should resolve these differences.</p>			
<p>Edward C Stein FirstEnergy Solutions</p>			<p>Under 1404 Resource/Demand Balancing, an 11 under b Measures should be added. 11 The applicant shall have documentation that the tools necessary for balancing resources/demand meet the criteria outlined in other applicable NERC Standards such as metering accuracy and chart speed and scale.</p>
<p>The Drafting Team believes that any metering requirements must meet the NERC standards and it is not necessary to add the suggested wording.</p>			
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			<p>We have not identified any additional elements that should be included in this standard.</p>

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<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>			<p>Everything that I have covered on these standards so far have been sufficient to our needs. I don't have anything to comment on at this moment but if I should come across any issues that might be of help to you, I will be more than willing to share with everyone involved.</p>
<p>Thank you</p>			
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council</p>			<p>NPCC Specific Comments are as follows;</p> <p>1400, The definition of an adjacent Balancing Authority as being physically adjacent can have negative ramifications when there is dynamic scheduling with a non-adjacent Balancing Authority. It is suggested that electrical adjacency should be considered as an alternative. If a Balancing Authority is operating per specification in every other aspect, but a dynamic schedule with a distant Balancing Authority is not managed properly, the interconnection could end up with a significant energy mismatch as “off schedule” frequency.</p> <p>1401 (a) 2 vi, last bullet. See adjacency comment above.</p> <p>1401 (a) 2 viii It is suggested that one of the review team's members be either Regional or NERC. A team of a transmission Operator, Generator Operator, and Load Serving Entity may have too narrow a scope to provide a thorough review, for example.</p> <p>1401 (a) 2 viii The last sentence of the next to last paragraph states: "Review team members shall represent at least two of the remaining categories." The intent seems to be to have the "non-Lead" to supplement the Lead with diverse skill sets. The prior sentence implies a singular representative only from a "non-Lead" region. Clarification and more work seems to be needed here.</p> <p>1401 (a) 2 xiv One should assume that unanimous approval is needed, as implied by this document. However, an explicit statement could prevent contentious situations from arising, concerning whether it must be unanimous.</p> <p>1402 (a) 1 See adjacency comment above. Also in the second line, replace the word "its" by "the" and add at the end of the paragraph "with which it intends to operate". This will make that paragraph more consistent with the formulation in section (b) of the RS.</p>

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			<p>1402 b 2 iv Insert the phrase "as directed by the Applicant" after the word "redispatch". Also, in the first line of 1402 b, after Generator Operator add " with which it intends to operate".</p> <p>1402 b 5 ii See adjacency comment above.</p> <p>1405 b 2 and 3 The industry has a minimum frequency bias setting, which should be covered by (1). The industry does not yet have a minimum governor response requirement, nor is there an efficient standard method to verify per resource governor response. The cost of implementing either can be large.</p> <p>1411 b (1) i It is not clear what a "resource" requirement is. Does it mean sufficient contingency reserve? Does it mean enough units on line for stability purposes?</p>
<p>1400 - The Standard does not define adjacent Balancing Authority as being physically adjacent. The posting included a note that stated the criteria for adjacent BAs.</p>			<p>1401- Based on comments the Drafting Team has received, the administrative process in 1401 has been removed from the standard and the CCC will develop this process for the industry. The Drafting Team believes the CCC should get industry input in the development of the process and approval by the BOT. In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the function must be NERC Certified.</p> <p>1402 (a) 1 The Drafting Team will make these changes as suggested.</p> <p>1402 b 2 iv The phrase “as directed by the Applicant” is at the end of the sentence and covers redispatch. The requirement specifies it is with a generator operator it intends to operate with.</p> <p>1402 b 5 ii The Standard does not define adjacent Balancing Authority as being physically adjacent.</p> <p>1405 b 2 and 3 Measure 2&3 are being removed from the standard.</p> <p>1411 b (1) i Clarifications will be made.</p>
<p>Tony Jankowski</p>			<p>1410 (b) (2) requires procedures <u>and</u> processes <u>and</u> tools the way it is written, not procedures or processes and tools. In many instances in the standard singular and plural</p>

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<p>We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies</p>			<p>are mismatched in the phrase procedure(s), process(es) and tool(s).</p>
<p>The Drafting Team will modify to provide consistency.</p>			
<p>Joanne K. Borrell FirstEnergy Solutions</p>			
<p>John Horakh MAAC</p>			<p>See comment about De-certification in Question # 3.</p>
<p>De-Certification is an issue that will be addressed by the CCC.</p>			
<p>Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien ISO-NE Bill Phillips</p>			<p>Several of the Standards require agreements with entities, as defined by the Functional Model. We recognize that some of the Authority entities do not exist yet or may not exist as certified entities if this Standard is implemented independently. A transition period will allow for agreements to be finalized.</p>

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<p>MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>			
<p>The agreements must be in place for certification to be granted. Any transition issues will be addressed in the implementation plan.</p>			
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services</p>			<p>In section 1406, under (b) Measures: Measure needs to be reworded to include the <u>functional capability</u> to analyze compliance with all BA interchange requirements, including ramp rate.</p> <p>Any place that says “demonstrate its tools” should say “functional capability”. Excellent tools without adequate personnel or processes do not guarantee success (or that the function can actually be performed).</p> <p>Page 4: (iv) The Applicant shall register in the NERC Master Registry. Registration stays on ‘hold’ until certification is granted or denied.</p> <p>Is the Registry requirement that takes place in October 2004 the same as the Master Registry? Is the list of Entities registering in October a separate list of the Master Registry?</p> <p><u>The Applicant shall have a procedure or process in place for the Interchange approval process and demonstrate its tool(s) has the functional capability to determine that the resource ramp capability meets the projected interchange ramp.</u></p> <p><u>Mandatory decertification and accompanying alternative dispute resolution (ADR) process should be developed as a part of this Standard.</u></p> <p><u>**It is recommended that the Certification Process for the Balancing Authority remain in this Standard under 1401 (a) Requirement (2) as it currently exists rather than be pulled out of this Standard and included in some “undefined” Process. Since the Certification</u></p>

Balancing Authority Certification Standard – Posting 2 - Comments

<p>Bill Pope Gulf Power Company J. T. Wood Southern Company Services Marc Butts Southern Company Services</p>			<p><u>Standard Development Team is dedicated to finishing the Certification process, introducing a “mid-stream” change in the Certification process will only introduce confusion to the Industry and probably delay Certification.</u></p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit.</p> <p>Based on comments the Drafting Team has received, the administrative process in 1401 has been removed from the standard and the CCC will develop this process for the industry. The Drafting Team believes the CCC should get industry input in the development of the process and approval by the BOT. In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the function must be NERC Certified.</p> <p>Since the removal of the administrative process from the standard, elements related to the registration process are no longer part of the certification standard.</p> <p>Voluntary decertification is currently part of the draft administrative certification process that will be proposed to the industry to remove from the certification standards and be given to the Certification and Compliance Committee for development. The CCC has also assigned one of its work groups to develop an involuntary decertification process</p>			
<p>Robert Harbour (chair) Continental Cooperative Services Ajay Garg Hydro One Gerry Steffens Rochester Public Utilities Chuck Waits Michigan Electric Transmission Company LLC Ted Hobson JEA Pete Kuebeck</p>			

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<p>Oklahoma Gas and Electric Larry Grimm ERCOT</p>			
<p>Michael C Calimano NYISO</p>			<p>Several of the Standards require agreements with entities, as defined by the Functional Model. We recognize that some of the Authority entities do not exist yet or may not exist as certified entities if this Standard is implemented independently.</p> <p>Other issues:</p> <p>Please see the attached markup to the 2nd draft for additional minor comments and formatting, typing, and grammar issues.</p> <p>The NYISO fully endorses the comments and positions submitted by the ISO/RTO Council.</p>
<p>The agreements must be in place for certification to be granted. Any transition issues will be addressed in the implementation plan</p> <p>The drafting team is going to correct many grammar and formatting issues in the next version</p>			
<p>P.D. Henderson IMO</p>			
<p>Peter Burke [on behalf of ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina</p>			<p>No.</p>

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<p>John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			
<p>Raj Rana AEP</p>			<p>No</p>
<p>Ray Morella FirstEnergy Corp</p>			<p>Under 1404 Resource/Demand Balancing, an item (11) under (b) Measures should be added.</p> <p>(11) The applicant shall have documentation that the tools necessary for balancing resources/demand meet the criteria outlined in other applicable NERC Standards such as metering accuracy and chart speed and scale.</p>
<p>The Drafting Team believes that any metering requirements must meet the NERC standards and it is not necessary to add the suggested wording.</p>			
<p>Robert Snow Small Electric User</p>			<p>See comments above.</p>
<p>Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM</p>			<p>Under 1406 (b) Measures (1), the statement is ambiguous and needs rewording. A possible option would be:</p> <p><u>The Applicant shall have a procedure or process in place for the Interchange approval process and demonstrate its tool(s) has the functional capability to determine that the resource ramp capability meets the projected interchange ramp.</u></p> <p><u>Mandatory decertification and accompanying alternative dispute resolution (ADR) process</u></p>

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<p>Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM</p>			<p>should be developed as a part of this Standard.</p> <p><u>**It is recommended that the Certification Process for the Balancing Authority remain in this Standard under 1401 (a) Requirement (2) as it currently exists rather than be pulled out of this Standard and included in some “undefined” Process. Since the Certification Standard Development Team is dedicated to finishing the Certification process, introducing a “mid-stream” change in the Certification process will only introduce confusion to the Industry and probably delay Certification.</u></p> <p><u>SCGEM</u> does not advocate that any special governor or unit tests be conducted and or/required at this time.</p>
<p>The intent of certification is to ensure that the entity has the appropriate processes, procedures, and tools in place to perform the required functions. The standard identifies the need for a demonstration of tools during the on-site visit.</p> <p>Based on comments the Drafting Team has received, the administrative process in 1401 has been removed from the standard and the CCC will develop this process for the industry. The Drafting Team believes the CCC should get industry input in the development of the process and approval by the BOT. In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the function must be NERC Certified.</p> <p>Since the removal of the administrative process from the standard, elements related to the registration process are no longer part of the certification standard.</p> <p>Voluntary decertification is currently part of the draft administrative certification process that will be proposed to the industry to remove from the certification standards and be given to the Certification and Compliance Committee for development. The CCC has also assigned one of its work groups to develop an involuntary decertification process.</p> <p>Standard 1405 – Measures 2 & 3 have been removed.</p>			
<p>Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS</p>			<p>No</p>

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Robert Rhodes SPP			
William J. Smith Allegheny Power			Allegheny Power has not identified any additional elements that should be included n the standards.

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13. There were no Regional differences identified in the previous posting, are there any regional differences that should be identified for consideration in the standards?

General Comment:			
Commentor	Yes	No	Comment
Bruce M. Balmat MAAC Joseph D. Willson MAAC Mark Kuras MAAC Albert DiCaprio MAAC Mark Heimbach PPL			
Darrel W. Richardson Illinois Power Company			
Ray Morella First Energy Dave Acton Alliant Gerry Arnason Manitoba Hydro Dan Becher SIPC and HEC John Martinez First Energy Charlie Dunn MISO Bill SeDoris NIPSCO Doug Hils Cinergy Tony Jankowski			MISO should be recognized in the Regional Differences to account for the tasks that they will perform under the NERC waivers which formally were transferred to the MISO in the BA Agreement. The MISO should be certified for the transferred tasks so that those tasks are not reviewed at the BA certifications, and so that MISO is audited once for the functions transferred, not every time a BA is audited.

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<p>WE Lee Kittelson OTP Larry Monday LGEE Michael McMullen XcelEnergy Chuck Whitley MECS/METC Other CAWG members not listed</p>			
<p>The BA is responsible for the tasks as required by the standards. A BA can delegate tasks to another entity but the BA is still responsible for those tasks.</p> <p>If there are Regional differences associated with the MISO organization as related to the certification standards, they should be identified specifically with the content of the difference along with the Regions that are involved for inclusion in the standard.</p>			
<p>Ed Davis Entergy Services, Inc</p>			<p>No.</p>
<p>Ed Riley California ISO</p>			
<p>Edward C Stein FirstEnergy Solutions</p>			
<p>Linda Campbell FRCC Roger Westphal Gainesville Regional Utilities Alan Gale City of Tallahassee Steve Wallace</p>			<p>Because the approach to implementation of this standard is to be the responsibility of each Region and the “appropriate Regional Committees”, there could be many regional differences in the implementation of this certification standard. We suggested in our response to question 4 to reformat the standard and remove the regional differences section along with the compliance references. There are too many specifics that the Regions are responsible for developing that are not included in this standard. Another reason why the certification process needs to exist, but not be a reliability standard. Only the criteria that a BA must meet needs to be included as the reliability standard.</p>

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<p>Seminole Electric Cooperative Tom Washburn Orlando Utilities Commission Ted Hobson JEA Bob Remley Clay Electric Cooperative Eric Grant Progress Energy Florida Bob Williams Florida Municipal Power Agency</p>			
<p>All Regional differences must be included and approved with the standard. The regional differences and compliance references are both part of the standard format that is to be utilized to provide a consistent presentation to the industry.</p>			
<p>Gary Nolan Salt River Project</p>			
<p>Gerardo Castillo Imperial Irrigation District</p>			<p>As of today there are none to comment on, but I will keep an open mind with you guys on anything that might pertain to these standards.</p>
<p>Kathleen Goodman ISO-New England David Kiguel Hydro One Networks(Ontario) Roger Champagne TransEnergie (Quebec) Peter Lebro National Grid US Ralph Rufrano New York Power Authority</p>			<p>NPCC has none identified for this Standard.</p>

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Al Adamson New York State Reliability Council Guy Zito Northeast Power Coordinating Council			
Tony Jankowski We Energies Dale Zahn We Energies Rick Stegehuis We Energies Kathy Walkowski We Energies Kelley Knoerr We Energies Howard Rulf We Energies			
Joanne K. Borrell FirstEnergy Solutions			
John Horakh MAAC			No.
Dale McMaster AESO Ed Riley CAISO Sam Jones ERCOT Don Tench IMO Peter Brandien			

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<p>ISO-NE Bill Phillips MISO Karl Tammar NYISO Bruce Balmat PJM Charles Yeung SPP</p>			
<p>Jim Howell Southern Company Services Mike Miller Southern Company Services Raymond Vice Southern Company Services Dan Baisden Southern Company Services Jim Griffith Southern Company Services Monroe Landrum Southern Company Services David Johnson Savannah Electric Steve Williamson Southern Company Services Perry Stowe Southern Company Services Jonathan Glidewell Southern Company Services</p>			<p>No, but there are no assurances that the markets will develop consistently across all regions, thus it is very likely that regional differences will be required as these markets develop.</p>

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<p>Michael C Calimano NYISO</p>			
<p>P.D. Henderson IMO</p>			
<p>Peter Burke [on behalf of</p>			

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<p>ATC's Jason Shaver] American Transmission Company</p>			
<p>Mignon L. Clyburn Public Service Commission of South Carolina Elizabeth B. Fleming Public Service Commission of South Carolina G. O'Neal Hamilton – Vice Chairman Public Service Commission of South Carolina John E.Howard Public Service Commission of South Carolina Randy Mitchell – Chairman Public Service Commission of South Carolina C. Robert Moseley Public Service Commission of South Carolina David A. Wright Public Service Commission of South Carolina</p>			<p>No.</p>
<p>Raj Rana AEP</p>			<p>No</p>
<p>Ray Morella FirstEnergy Corp</p>			
<p>Robert Snow</p>			

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Small Electric User			
Roman Carter SCGEM Lucius Burris SCGEM Clifford Shepard SCGEM Tony Reed SCGEM Roger Green Southern Generation Joel Dison SCGEM Lloyd Barnes SCGEM			<u>No, but there are no assurances that the markets will develop consistently across all regions, thus it is very likely that regional differences will be required as these markets develop.</u>
Dan Boezio AEP Steve Hillman WPEK Pete Kuebeck OG&E John Mason MPS Robert Rhodes SPP			No
William J. Smith Allegheny Power			Allegheny Power is not aware of any Regional differences affecting these Standards.