

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jim Cyrulewski	
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Telephone:	248-374-7130	
E-mail:	jcyrulewski@itctransco.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
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1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
 No
 Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

For some reason the Comment Section for Question 2 would not allow comments. Regarding applicability, the Reliability Authority should be included since the entity monitors ACE. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes
 No

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The title of the standard would better read as "Area Control Error Calculation, Implementation and Reporting Comments"

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
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- No
- Comments

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- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Note: This response is with respect to question 2 since there is no field to enter a comment under Q2:

Absent details of the changes, we are unable to understand why the standard also applies to resource planner. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes

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No

BAL-005 has recently been posted for comments, along with BAL-001 to -003 and BAL-007 to -011. While the proposed changes to the posted version appear to be minor, having experienced the difficulties with keeping track of changes to IRO-006 when several versions were posted at about the same time, we strongly recommend that any standard development work be put on hold, or posting of the revised version be withheld, until after the version that's being commented on is balloted and approved. Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Maurice Casadaban	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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- Yes
- No
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2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

In item 2 of the "Brief Description" section the SAR proposes to "Clarify language". The SAR should explain this more by stating what language will be clarified and, in general terms, describing how it will be clarified. No changes (or clarifications) should be made that would expand the scope of existing requirements. The SAR should be modified to make this point clear. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

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- Yes

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No

The standard has no Measures and is missing other items in the Compliance Section. The SAR should include developing measures and the other areas of the standard that are missing. Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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- Yes
- No
- Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

More explanation of the reliability need is required to determine appropriateness of scope. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

SRC would like to understand how NERC and NAESB will proceed with these complementary standards going forward. Is the intent that each organization will retain standards with identical requirements? Or will each organization have distinct requirements those for reliability and those for business in their respective document? The SRC does not believe these requirements are readily distinguishable between reliability and business. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

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Yes

No

Comment for Question No.1 and No.2 . No comment boxes were provided on this form for those questions, comments are provided here:

Question 1: SRC does not find enough explanation for the reliability-related need in the explanation for the proposed SAR. All standards proposals should provide more substantive reasons as to why a new reliability standard (or change to a standard) is important to reliability. The requestor should explain what reliability issue is addressed with the use of this standard.

Question 2: More explanation of the reliability need is required to determine applicability.

Question 6: NERC should hold a high level of expectations in the language put into SARs. The purpose statements should be specific in identifying root causes to problems and justify that these problems if left unaddressed are risks to interconnected grid reliability.

Also regarding the practice of posting revisions to standards simultaneously. The posting of BAL 007-011 includes some related changes to BAL-005 that could cause industry confusion. It is difficult to review and vote on a standard knowing there are other changes that are being proposed that could affect the first posting. Also, some people may inadvertently mix up different proposals and overlook the need to comment and vote on a posted revision. We ask that the NERC SAC review this concern. Comments

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- Yes
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- Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
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Comments

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The Standard should be clear on how these new requirements are to be added to the Standard. Need greater detail on the additional requirements (dynamic schedules, pseudo-ties etc.) Comments

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3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

A concern exists with the proposed treatment of pseudo-ties which do not have equal acceptability as dynamic schedules for supplemental regulation. Comments

6. Do you have any other comments on the proposed SAR?

- Yes
- No

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Revision to the purpose statement seems to not be an improvement from the existing one.

The following comments were consensus comments developed by NPCC Working Groups and Task Forces;

In R2.4, replace "its ties and schedules" with "the ties and schedules of the receiving Balancing Authority". Do we wish to say Balancing Area instead?

NPCC participating members have indicated that it is improper to restrict supplemental regulation service to dynamic scheduling. For example, the NPCC ACE Diversity Interchange (ADI) project uses pseudo-ties successfully. In such an arrangement, the signed expected value of supplemental service received is 0 for an hour, however, it can and will differ and is not particularly predictable. Please change this here and in all other places to give pseudo-ties equal status with dynamic schedules for supplemental regulation. It is inconsistent to allow pseudo-ties for moving load and generation, which can have fairly predictable values and should be e-tagged for use in IDC. The NPCC ADI project, using pseudo-ties, was reviewed and approved by the NERC Resources Subcommittee prior to its implementation, its results have been shared with the NERC Resources Subcommittee, has been problem-free, and has served as useful input into the MISO ADI project and the prospective WECC ADI project. Prohibiting pseudo-ties for supplemental regulation is without technical basis, overly prescriptive, and would incur needless conversion costs.

In R3.2.4, NIs is used in 2 places with 2 definitions, and it should be clarified if loads and generation in these equations are all positive values (or not).

In R3.2.5, NIa is used in 2 places with 2 definitions, and it should be clarified if loads and generation in these equations are all positive values (or not). Also, the use of pseudo-ties should be added to allow for supplemental regulation.

R2.3.6 needs to be revamped, merely stating that $ACE = 0$ for overlap regulation.

Does the "may" in R3.3.3 need to be changed to "shall"?

How does one enforce or validate the 99.95% reliability criterion of R3.5?

Measure M1's wording is very tedious.

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Name:	Mike Pfeister	
Organization:	Salt River Project	
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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- Yes
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 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

The focus should be to utilize the reliability-based elements from NAESB Standards where applicable. Reliability requirements should supercede any conflicts with efforts to harmonize with NAESB Standards. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

Comments

6. Do you have any other comments on the proposed SAR?

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(Complete this page for comments from one organization or individual.)		
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please read the BAL-005-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
- No
- Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes
- No

Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:** **Do** enter text only, with no formatting or styles added.
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Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

- DO NOT:** **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen Goodman
Organization:	ISO New England
Telephone:	(413) 535-4111
E-mail:	kgoodman@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 – Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 – Electricity Brokers, Aggregators, and Marketers
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Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

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Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
 No
 Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

A concern exists with the proposed treatment of pseudo-ties which do not have equal acceptability as dynamic schedules for supplemental regulation. Comments

6. Do you have any other comments on the proposed SAR?

- Yes
 No

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Revision to the purpose statement seems to not be an improvement from the existing one.

In R2.4, replace "its ties and schedules" with "the ties and schedules of the receiving Balancing Authority." Do we wish to say Balancing Area instead?

It is improper to restrict supplemental regulation service to dynamic scheduling. For example, the NPCC ACE Diversity Interchange (ADI) project uses pseudo-ties successfully. In such an arrangement, the signed expected value of supplemental service received is 0 for an hour, however, it can and will differ and is not particularly predictable. Please change this here and in all other places to give pseudo-ties equal status with dynamic schedules for supplemental regulation. It is inconsistent to allow pseudo-ties for moving load and generation, which can have fairly predictable values and should be e-tagged for use in IDC. The NPCC ADI project, using pseudo-ties, was reviewed and approved by the NERC Resources Subcommittee prior to its implementation, its results have been shared with the NERC Resources Subcommittee, has been problem-free, and has served as useful input into the MISO ADI project and the prospective WECC ADI project. Prohibiting pseudo-ties for supplemental regulation is without technical basis, overly prescriptive, and would incur needless conversion costs.

In R3.2.4, NIs is used in 2 places with 2 definitions, and it should be clarified if loads and generation in these equations are all positive values (or not).

In R3.2.5, NIa is used in 2 places with 2 definitions, and it should be clarified if loads and generation in these equations are all positive values (or not). Also, the use of pseudo-ties should be added to allow for supplemental regulation.

R2.3.6 needs to be revamped, merely stating that $ACE = 0$ for overlap regulation.

Does the "may" in R3.3.3 need to be changed to "shall"?

How does one enforce or validate the 99.95% reliability criterion of R3.5?

Measure M1's wording is very tedious.

Comments

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Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
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Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

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- Yes
 No
 Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

The scope of this SAR is to duplicate a NAESB Business Practice. There is no need for redundant NERC and NAESB requirements. FERC enforces the standards and Business Practices of NERC and NAESB respectively.

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

PJM would like to know why there is even a need for NERC to work with NAESB on this item. Is there an error in the NAESB Business Practice? Why must the Industry be mandated by FERC to include this BP in our tariffs and then have FERC again enforce the definition through a mandatory reliability standard? How does this improve reliability. Every BP 'affects' reliability. By the Requestor's definition, every NAESB BP should be copied into a NERC standard! How is reliability changed in any way by this SAR?

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comment for Question No.1 and No.2 . No comment boxes were provided on this form for those questions, comments are provided here:

Question 1: PJM does not find enough explanation for the reliability-related need in the explanation for the proposed SAR. All proposals for standards should provide substantive reasons as to why a new reliability standard (or change to a standard) is important to reliability. The requestor should explain what reliability issue is addressed with the use of this standard.

Question 2: The concepts of Overlap and Supplemental regulation are just variations of a process for control. The current CPS standard mandates that every BA control to a given level. The INT standards cover the issue of agreement on quantity and timing of schedules. If a BA wants to buy or sell regulation, that activity is done by a bilateral Agreement. NERC holds the BAs responsible for control performance. It is therefore the two BAs responsibility to explain to NERC how any agreement that they enter into allows the involved BAs to comply with the NERC standard. Overlap and Supplemental are just two such bilateral agreements. NERC should not have to write into a standard rules for every bilateral agreement that is drafted. But every bilateral agreement that is used to comply with a NERC mandate must be justified by the signers of the agreement. The issue of applicability should be addressed in the agreement. As the SAR now stands, it is not clear why LSEs, Resource Planners, TOs and GOs are all subject to this SAR.

Question 6: NERC should hold a high level of expectations in the language put into SARs. The purpose statements should be specific in identifying root causes to problems and justify that these problems if left unaddressed are risks to interconnected grid reliability.

Also regarding the practice of posting revisions to standards simultaneously. The posting of BAL 007-011 includes some related changes to BAL-005 that could cause industry confusion. It is difficult to review and vote on a standard knowing there are other changes that are being proposed that could affect the first posting. Also, some people may inadvertently mix up different proposals and overlook the need to comment and vote on a posted revision. We ask that the NERC SAC review this concern. Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Michael Calimano
Organization:	New York Independent System Operator
Telephone:	518-356-6129
E-mail:	mcalimano@nyiso.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 – Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 – Transmission-dependent Utilities
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Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please read the BAL-005-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
 No
 Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

The NYISO would like to understand how NERC and NAESB will proceed with these complementary standards going forward. Is the intent that each organization will retain standards with identical requirements? Or will each organization have distinct requirements those for reliability and those for business in their respective document? Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

No

The NYISO has also worked closely with NPCC and the IRC, and supports their additional concerns.

Also regarding the practice of posting revisions to standards simultaneously. The posting of BAL 007-011 includes some related changes to BAL-005 that could cause industry confusion. It is difficult to review and vote on a standard knowing there are other changes that are being proposed that could affect the first posting. Also, some people may inadvertently mix up different proposals and overlook the need to comment and vote on a posted revision. We ask that the NERC SAC review this concern.

Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please read the BAL-005-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
- No
- Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes
- No

Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Raymond Vojdani	
Organization:	WACM	
Telephone:	970-461-7379	
E-mail:	avojdani@wapa.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
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- Yes
- No
- Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes
- No

Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	David Hawkins	
Organization:	California ISO	
Telephone:	916-351-4465	
E-mail:	dhawkins@caiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
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 Comments

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- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

The variety of components to be added to the ACE Equation demands that we have standard definition and standard implementation by all control areas/ Balancing authorities to ensure reliable operation of the interconnection. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

ACE Equation would appear to be a NERC standard and it doesn't appear to be a business practice. NERC should have the lead on this standard and NAESB is collaborate as they feel necessary Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

The WECC automatic time error correction term is a regional difference Comments

6. Do you have any other comments on the proposed SAR?

- Yes

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

No

A standard is definitely needed and a guideline is also needed for educational purposes so everyone will fully understand all the components in the new ACE equation. Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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2. Do you agree with the applicability of the proposed SAR?

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- No
- Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
- No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
- No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
- No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes
- No

Comments

Comment Form for Initial Posting of BAL-005-1, Area Control Error Equation Implementation, Appendix B

Please use this form to submit comments on the of BAL-005-1, Area Control Error Equation Implementation Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-005-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:**
- Do enter text only, with no formatting or styles added.
 - Do use punctuation and capitalization as needed (except quotations).
 - Do use more than one form if responses do not fit in the spaces provided.
 - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
 - Do not use numbering or bullets in any data field.
 - Do not use quotation marks in any data field.
 - Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities

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Group Comments (Complete this page if comments are from a group.)			
Group Name:	Midwest Reliability Organization		
Lead Contact:	Jim Maenner		
Contact Organization:	Wisconsin Public Service Corp		
Contact Segment:	2		
Contact Telephone:	920/617-4119		
Contact E-mail:	jmaenner@wpsr.com		
Additional Member Name	Additional Member Organization	Region*	Segment*
Robert Coish	MHEB	MRO	2
Alan Boesch	NPPD	MRO	2
Dennis Florum	LES	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XCEL	MRO	2
Dave Rudolph	BEPC	MRO	2
Tom Mielnik	MEC	MRO	2
Dick Pursley	GRE	MRO	2
Ken Goldsmith	ALT	MRO	2
Terry Bilke	MISO	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 additional MRO member	Companies not named above		

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

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Please read the BAL-005-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

- Yes
 No
 Comments

2. Do you agree with the applicability of the proposed SAR?

- Yes
 No
 Comments

3. Do you agree with the scope of the proposed SAR?

- Yes
 No

Bullet No. 2 "Clarify language" is too vague. MRO members would like more information about the language that needs clarification. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

- Yes
 No

No stakeholder participation should be blocked or limited in the standard process. The MRO would like to see all requirements contained in one standard versus splitting between multiple standards. Having more than one standard maintained by different organizations is bound to cause confusion and process problems as things change. We would expect NAESB to cooperate in this effort as well. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

- Yes
 No

Comments

6. Do you have any other comments on the proposed SAR?

- Yes

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No

If there is a coordinated effort between NERC and NAESB on this standard, it would be helpful if this information would be posted on the NERC standards page associated with this SAR with a link to the NAESB page. Comments