

Draft 1 2018 BP&B Comments Sent via Email by Aaron Cavanaugh on Behalf of BPA

BPA thanks NERC for the opportunity to review the first draft of the 2018 Business Plan and Budget and offers the following comments on the five strategic goals:

Goal 1 - Risk-Responsive Reliability Standards

BPA supports the Stakeholder Engagement and Cost Effectiveness project and seeks more active engagement and expertise with Standard Drafting Teams. BPA encourages incorporation of additional industry feedback loops to address any reliability gaps. BPA commends additional communication and outreach efforts for newly approved Reliability Standards.

Goal 2 - Objective and Risk-informed Compliance Monitoring, Enforcement, and Organization Certification and Registration

BPA advocates a more robust and consistent registration and deregistration process that ensures issues identified by the Balancing Authority, Transmission Operator and the Planning Coordination are recognized. BPA supports the continued efforts with the inherent risk assessment and internal control evaluations.

Goal 3 - Identification and Mitigation of Significant Risks to Reliability

BPA agrees with NERC's efforts to invest in evaluating, addressing and mitigating risks to reliability. BPA strongly supports increased information sharing and industry engagement on reliability assessments, event analysis, cyber threats and awareness, and situational awareness. BPA supports NERC's efforts to improve system models by utilizing the PMU datasets.

Goal 4 - Identification and Assessment of Emerging Risks to Reliability

BPA will see direct impacts from DER. Having a better understanding of reliability and diverse resource mix will be valuable to our modeling efforts. BPA recommends that NERC assess coordination of distributed energy resources at the transmission and distribution interface and ability of distributed energy resources to provide grid services. We support and welcome more engagement in this area.

Goal 5 - Effective and Efficient ERO Enterprise Operations

BPA strongly supports NERC efforts to align resources with NERC's strategic goals. BPA encourages additional stakeholder engagement ensuring alignment with NERC's efforts to enhance reliability.

Please contact me if you have any questions or concerns.