

Comment Report

Project Name: 2017-01 Modifications to BAL-003-1.1 SAR
Comment Period Start Date: 6/19/2017
Comment Period End Date: 7/18/2017
Associated Ballots:

There were 17 sets of responses, including comments from approximately 68 different people from approximately 50 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. The SAR discusses revising BAL-003-1.1 standard concerning the ratio of Point C to Value B to correct the inconsistency in the ratio identified in the FRAA report. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.**
- 2. The SAR discusses revising the BAL-003-1.1 standard concerning modifying the Resource Contingency Protection Criteria (RCPC) to help ensure sufficient primary frequency response is maintained. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.**
- 3. The SAR proposes to review and modify as necessary Attachment A of the standard to remove administrative tasks and provide additional clarity. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.**
- 4. The SAR proposes to modify the FRS Forms to allow for collection and submission of performance data for Frequency Response Sharing Groups. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.**
- 5. Based on the scope of the SAR, do you have any other comments for drafting team consideration?**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Karl Kohlrus	Prairie Power, Inc.	1,3	SERC
					Mark Ringhausen	Old Dominion Electric Cooperative	3,4	SERC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Electric Reliability Council of Texas, Inc.	Elizabeth Axson	2		IRC Standards Review Committee	Elizabeth Axson	ERCOT	2	Texas RE
					Ben Li	IESO	2	NPCC
					Mark Holman	PJM	2	RF
					Greg Campoli	NYISO	2	NPCC
					Terry Bilke	Midcontinent ISO, Inc.	2	MRO
					Ali Miremadi	California ISO	2	WECC
					Matthew Goldberg	ISO NE	2	NPCC
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	SPP RE
Southern Company - Southern Company	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern	6	SERC

Services, Inc.						Company Generation and Energy Marketing		
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
Laura Mcleod	NB Power	1	NPCC					

					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Scott Aclin	Southwest Power Pool Inc.	2	SPP RE
					Margaret Adams	Southwest Power Pool Inc.	2	SPP RE
					Daniel Baker	Southwest Power Pool Inc.	2	SPP RE

1. The SAR discusses revising BAL-003-1.1 standard concerning the ratio of Point C to Value B to correct the inconsistency in the ratio identified in the FRAA report. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern agrees with correcting the inconsistency.

Likes 0

Dislikes 0

Response

Joshua Eason - ISO New England, Inc. - 2 - NPCC

Answer Yes

Document Name

Comment

Table 1 in Attachment A is good demonstration of how IFRO is calculated, but some statistically determined data in the table may appear out-of-date for years when frequency response is improving. Ideally, the parameters used to calculate the current IFRO should be updated to accurately reflect the general trend in most recent years. If the goal is to shape Attachment 1 in such way that it will be modified as little as possible in the future, one feasible way is to let Table 1 just serve as a typical example of calculating IFRO while recording the latest parameters in a separate document, similar to how it is done for FRAA. With respect to the ratio of C-to-B ("CBR" or CB Ratio), it's necessary to update this key syntax according to the overall trend of recent system performance change, but it doesn't have to exactly line up with the ratio from the latest FRAA. The reason for this is that the ratio from each year's measurement may individually contain unexpected random factors that could eventually introduce an abrupt change to IFRO. Taking the performance of multiple recent years into consideration in determining the ratio can effectively smooth such impact. Additionally, ISO-NE believes that using the CBR: (1) does not accurately reflect that governor response has little to do with arresting frequency in the Eastern Interconnection, and (2) that the use of the current CBR provides a perverse incentive in that it essentially penalizes improved governor response.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

As a member of the NWPP Frequency Response Sharing Group, Idaho Power agrees with the proposed revision.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2, Group Name IRC Standards Review Committee

Answer

Yes

Document Name

Comment

The IRC SRC has no comment.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

The SPP Standards Review Group recommends that the drafting team develop some proposed language that will provide more details or give a better understanding in reference to the component (CBR - which is the statistically determined ratio of the Point C to Value B) mentioned in Attachment A. Also, we recommend that the drafting team mention a reference document that contains the IFRO calculation for informational purposes.

Likes 0

Dislikes 0

Response

Dori Quam - NorthWestern Energy - 1 - WECC

Answer

Yes

Document Name

Comment

See comments in response to Question No. 5.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. The SAR discusses revising the BAL-003-1.1 standard concerning modifying the Resource Contingency Protection Criteria (RCPC) to help ensure sufficient primary frequency response is maintained. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer No

Document Name

Comment

The SAR only identifies that changes to the BAL ~~Eastern~~ standard an Interconnection Resource Contingency Protection Criteria (RCPC). In the 2016 Frequency Response Annual Analysis Report, NERC identifies that the RCPC of all Interconnections should be revised to help ensure sufficient primary frequency response is maintained. We believe this should be clarified in the purpose and objectives of the SAR.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

The SPP Standards Review Group recommends that the drafting team develop some proposed language that will provide more details or give a better understanding in reference to the component (RCPC) in Attachment A and how the RCC component is associated as well. Also, we recommend that the drafting team provides clarity on how they intend to address the potential changes of the RCC component and what impacts it will have on the industry.

Likes 0

Dislikes 0

Response

Dori Quam - NorthWestern Energy - 1 - WECC

Answer Yes

Document Name

Comment

NorthWestern Energy supports modifying the RCPC for each Interconnection to ensure sufficient primary frequency response is maintained. However,

rather than the Resources Subcommittee recommending how events are selected for each Interconnection, the appropriate group in each Interconnection should determine the criteria for its own Interconnection. In addition, see comments in response to Question No. 5.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2, Group Name IRC Standards Review Committee

Answer

Yes

Document Name

Comment

The IRC SRC has no comment. SPP does not join this response.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

As a member of the NWPP Frequency Response Sharing Group, Idaho Power agrees with the proposed revision.

Likes 0

Dislikes 0

Response

Joshua Eason - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

After the proposed revision is made, the same RCC that is currently used in the Eastern Interconnection should continue to be used after August 3, 2017. Strictly following the current RCPC without any change would impose a substantial change in the RCC after August 3, 2017 which would

drastically impact the IFRO of the Eastern Interconnection. Such sudden change in the IFRO is not desirable, particularly when primary frequency response continues to consistently improve. If the latest system condition implies a scenario where the current RCC used in the Eastern Interconnection appears to no longer be valid, then the new criteria used to establish the RCC must be one that results in minimal impact to IFRO.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

Southern agrees with the proposed change and method of change.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

3. The SAR proposes to review and modify as necessary Attachment A of the standard to remove administrative tasks and provide additional clarity. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Texas RE is concerned process and timeline specifications in a supplemental document would not be enforceable. Texas RE strongly encourages the SDT to closely evaluate which steps are being moved to ensure they are purely administrative and not reliability tasks that are essential for the reliable operation of the Bulk Electric System (BES).

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

The SPP Standard Review Group recommends that the drafting team develop some proposed language explaining why they recommend the removal of any supporting procedural and process steps from the Attachment A in the standard and transferring this information to a Reliability Guideline. Additionally, we recommend that the proposed language clearly states that once the information is removed from the standard and placed into a guideline, this information can no longer be considered to have compliance/audit implications.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer No

Document Name

Comment

The authors of the SAR failed to uniformly incorporate the relocation of the standard's Attachment A to a NERC Operating Committee-approved Reference Document or Reliability Guideline. The relocation of Attachment A should be identified upfront in the purpose and objectives of the SAR. We believe Attachment A should be relocated, as its contents identify calculated values that should be periodically reevaluated outside the Standards

Development Process.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

Southern agrees this allows flexibility to correct the process in the future.

Likes 0

Dislikes 0

Response

Joshua Eason - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

In Attachment A, the Frequency Response Measure section can be made more concise by including only the necessary information such as the basic description of the measurement methodology, the definition of timeframes associated with A, B, and C values, and the typical data sources for measurement. Other details could be removed from the current version of Attachment A to be incorporated to the instruction portion of Forms 1 and 2 or a separate document such as the user manual for Forms 1 and 2 where more detailed instructions and “what if” examples could be added. Preferably, the section on the Timeline for Balancing Authority Frequency Response and Frequency Bias Setting Activities should be retained and remain in Attachment A, because the timelines are important to keep in mind and there’s no better place for them.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

As a member of the NWPP Frequency Response Sharing Group, Idaho Power agrees with the proposed revision.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2, Group Name IRC Standards Review Committee

Answer Yes

Document Name

Comment

The IRC SRC has no comment. SPP does not join this response.

Likes 0

Dislikes 0

Response

Dori Quam - NorthWestern Energy - 1 - WECC

Answer Yes

Document Name

Comment

NorthWestern agrees with revising Attachment A; however, NorthWestern believes any Reference Documents or Reliability Guidelines developed should be Interconnection specific — i.e., *Consider transferring supporting procedural and process steps from Attachment A into an ERO and NERC Operating Committee approved **Interconnection-Specific** Reference Document or Reliability Guideline.*

In addition, see comments in response to Question No. 5.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

4. The SAR proposes to modify the FRS Forms to allow for collection and submission of performance data for Frequency Response Sharing Groups. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

Dori Quam - NorthWestern Energy - 1 - WECC

Answer Yes

Document Name

Comment

See comments in response to Question No. 5.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2, Group Name IRC Standards Review Committee

Answer Yes

Document Name

Comment

The IRC SRC has no comment.

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

As a member of the NWPP Frequency Response Sharing Group, Idaho Power agrees with the proposed revision.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern agrees the RS needs the ability to ensure that RSG's are performing.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joshua Eason - ISO New England, Inc. - 2 - NPCC

Answer

Document Name

Comment

ISO-NE believes that each FRSG should be treated as one whole entity (*i.e.* as though it were an intact BA that neglects internal connections) in collection and submission of performance data. This will allow the FRSG to be judged for compliance as a single collective, which is the presumed intent of a Frequency Response Sharing Group.

Likes 0

Dislikes 0

Response

5. Based on the scope of the SAR, do you have any other comments for drafting team consideration?

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

No other comments at this time.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2, Group Name IRC Standards Review Committee

Answer No

Document Name

Comment

The IRC SRC has no comment.

Likes 0

Dislikes 0

Response

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua Eason - ISO New England, Inc. - 2 - NPCC	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name	
Comment	
BPA participated with 18 other Balancing Authorities to draft another SAR and technical support document for BAL-003, through the coordination of the Frequency Response Sharing Group (FRSG). If the FRSG SAR is approved, BPA requests that the two SARs are combined.	
Likes 1	NorthWestern Energy, 1, Quam Dori
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Duke Energy agrees with the scope of the SAR, and agrees with the modifications as currently proposed.	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Texas RE requests a link to the 2016 FRAA report be made available on the project page.	
Likes 0	
Dislikes 0	
Response	
Kasey Bohannon - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

AZPS appreciates and agrees that the language in Appendix A would greatly benefit from a thorough review and revision to make the information easier to understand. For example, we note that there is no description of where the Starting Frequency (FStart) for each Interconnection is derived. The current language claims that “detailed descriptions of the calculations used in Table 1...are defined in the *Procedure for ERO Support of Frequency Response and Frequency Bias Setting Standard*.” But in actuality, they are not. Additionally, the last sentence of first paragraph of Attachment A (A maximum delta frequency (MDF) is calculated by adjusting a starting frequency) implies that the starting frequency is being adjusted where it is the delta frequency which is being adjusted.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer

Yes

Document Name

Comment

(1) We caution that the scope identified within the SAR is too broad and appears to have no definite deadlines. The rush to address inconsistencies in the ratio of Point C to Value B, RCPC, and frequency nadir point limitations, as identified within the 2016 Frequency Response Annual Analysis Report, does not align with a similar deadline to introduce Attachment A and FRS Form enhancements. The latter clarifications could delay the standard development process unnecessarily. We believe the SAR should remove references to identify and incorporate all process modifications, and instead identify only enhancements to Attachment A and FRS Forms that are supportive of the 2016 Frequency Response Annual Analysis Report.

(2) We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

Dori Quam - NorthWestern Energy - 1 - WECC

Answer

Yes

Document Name

Comment

NorthWestern Energy participated with 18 other Balancing Authorities to draft a SAR and technical support document for BAL-003, through the coordination of the Northwest Power Pool (NWPP) Frequency Response Sharing Group (FRSG). If the FRSG SAR is approved, NorthWestern Energy requests that the two SARs be combined. If the FRSG SAR is not approved, each Interconnection should be allowed to develop its own Frequency Response and Frequency Bias Setting Standard.

Likes 0

Dislikes 0

Response