Unofficial Comment Form

Project 2017-01 Modifications to BAL-003-1.1

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the **Project 2017-01 Modifications to BAL-003-1.1** project. The electronic form must be submitted by **8 p.m. Eastern, Friday, December 1, 2017**.

Documents and information about this project are available on the [Project 2017-01 Modifications to BAL-003-1.1](http://www.nerc.com/pa/Stand/Pages/Project201701ModificationstoBAL00311.aspx) page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

# Background

Two Standards Authorization Requests (SARs) were received for modifying BAL-003-1.1. The first SAR was submitted by the NERC RS and was posted for industry comment from June 19, 2017 through July 18, 2017. The second SAR was submitted by the NWPP FRSG. This SAR proposes a two phase approach to modifying the current standard, The Phase I portion of the SAR was addressed during the posting and comment period for the NERC RS SAR (June 19, 2017 through July 18, 2017). This comment period will only address the Phase II portion of this SAR. The Phase II portion of the SAR proposes to:

* Consider revising BAL-003-1.1 standard to reflect real-time measurement of frequency performance vs. a two year old allocation.
* Consider revising BAL-003-1.1 Standard to reflect the correct applicable entity that controls and provides frequency response.
* Consider revising BAL-003-1.1 Standard to reflect comparability among the applicable entities.
* Consider revising BAL-003-1.1 Standard to eliminate arbitrary allocation of responsibility.
* Consider revising BAL-003-1.1 Standard to eliminate the incorrect signals that have created unintended consequences.

Please provide your responses to the questions listed below along with any detailed comments.

## Questions

1. The SAR proposes to modify the current BAL-003-1.1 standard to reflect the correct applicable entity that controls and provides frequency response, to reflect comparability among the applicable entities, and to eliminate arbitrary allocation of responsibility. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. The SAR proposes to modify the current BAL-003-1.1 standard to allow for real-time measurement of frequency performance instead of a two year old allocation. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. The SAR proposes to modify the current BAL-003-1.1 standard to eliminate the incorrect signals to the market for arbitrary pricing and conditions. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. Based on the scope of the Phase II section of the SAR, do you have any other comments for drafting team consideration?

[ ]  Yes

[ ]  No

Comments: