Unofficial Comment Form

Project 2022-03 Energy Assurance with Energy-Constrained Resources

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on draft two of **BAL-007-1 – Near-term Energy Reliability Assessments** and draft one of **BAL-008-1– Seasonal Energy Reliability Assessments** by **8 p.m. Eastern, Thursday, June 20, 2024.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-03EnergyAssurancewithEnergy-ConstrainedResources.aspx). If you have questions, contact Standards Developer, [Jordan Mallory](mailto:jordan.mallory@nerc.net) (via email).

## Background Information

Project 2022-03 currently has two assigned Standard Authorization Requests (SARs) that seek to enhance reliability by requiring entities to perform Energy Reliability Assessments (ERAs) to evaluate energy assurance and develop Corrective Action Plan(s), Operating Plan(s), or other mitigating actions to address identified risks to each respective time horizon:

* Operations/operational planning time horizon (Operations SAR)
* Planning time horizon (Planning SAR)

The proposed new Reliability Standards are based on the Operations SAR. The planning time horizon SAR will be addressed at a later date.

The Standards Committee (SC) accepted the revised SARs at its January 25, 2023, meeting. At the same meeting, the SC authorized drafting of the Reliability Standard(s) identified in the SARs. Since that time, the team has conducted several meetings, both remote and in-person, and posted a draft of a new standard for informal comment to solicit feedback and completed one initial comment and ballot period for BAL-007-1.

## Summary of changes Overview

Based on industry feedback, the standard drafting team (SDT) modified the ERA definition. In addition, determined that near-term ERAs and seasonal ERAs would be better suited in separate standards. The team kept near-term ERAs in BAL-007-1 and created a new BAL-008-1 to address seasonal ERAs. The purpose of this change was to make each requirement clearer about what applied to each standard and allow for two ERAs to be better distinguished. Please refer to the BAL-007-1 and BAL-008-1 Technical Rationale document for additional justification and information regarding requirements within the proposed standards.

As a reminder, the proposed definition is not balloted separately but is being balloted via the BAL-007-1 standard. As such, when voting on the standard, ballot body participants will also be voting on the proposed definition used in the standard.

## Questions

**BAL-007-1 Near-term ERAs**

1. The standards drafting team (SDT) modified the Energy Reliability Assessment (ERA) definition based on industry feedback. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification.

Yes

No

Comments:

1. Based on industry feedback, the SDT updated Requirement R1 to clarify what near-term ERAs mean and to allow flexibility for Balancing Authorities when developing their process. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT updated Requirements R2 through Requirement R8 based on industry feedback. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT proposes entities use forecasted Demand profiles for the time interval under study for the BAL-007 assessment. The SDT’s goal is to align measures for ERAs with those used for EOP-011. Actions taken as part of a BAL-007 Operating Plan should be targeted to minimize any Energy Emergency events. Do you agree with the updated proposed language in Requirement R8? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT updated Requirement R9 based on industry feedback. Do you agree with the updated proposed language in Requirement R9? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT updated the implementation plan to allow for 18 months for Requirements R1 through R3 and 24 months for Requirements R4 through Requirement R10 to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT believes that fuel data information needed to address BAL-007-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT proposes that the newly proposed BAL-007-1 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Provide any BAL-007-1 additional comments for the SDT to consider, if desired.

Comments:

**BAL-008-1 Seasonal ERAs**

1. The SDT drafted BA-008-1 Requirement R1 to clarify what seasonal ERAs mean and to allow flexibility for Balancing Authorities when developing their process. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT drafted BAL-008-1 Requirements R2 through R13 based on industry feedback regarding seasonal ERAs. Do you agree with the proposed requirements? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT drafted the BAL-008-1 implementation plan to allow for 18 months for Requirements R1 through R6 and 24 months for Requirements R7- R13 to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT believes that fuel data information needed to address BAL-008-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

1. The SDT proposes that the newly proposed BAL-008-1 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes

No

Comments:

1. Provide any BAL-008-1 additional comments for the SDT to consider, if desired.

Comments: