NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

Please use this form to submit comments on the revised SAR for Reliability Based Control standards. Comments must be submitted by **October 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability-based Control" in the subject line. If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Jeff Hackman	
Organization:	Ameren	
Telephone:	314-554-2839	
E-mail:	jhackman@ameren.com	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☒	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

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Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

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The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

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1. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: This has long been a disconnect in requirements although in practice, the industry has generally "done the right thing"

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☐ No

Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Thad K. Ness	
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E-mail:	tkness@aep.com	
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1. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: We already have sufficient Standards that, if enforced correctly or applicability is expanded, would have optimal results.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: We already have sufficient Standards that, if enforced correctly or applicability is expanded, would have optimal results.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

☐ No

Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☒ Yes

☐ No

Comments: While we do not see a significant reliability need to modify the Standards, if the SAR were to proceed there are some additional items to consider in the scope. For example, to address the SAR's stated purpose of "C" (To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions) there should be enforceable requirements/measures for Purchasing-Selling Entities and Generator Operators to schedule and to follow in real-time balancing. Lack of proper scheduling, based on generator/resource capability, and following by PSEs and Generators in real-time while meeting the balancing requirement on an hourly integrated basis can lead to unscheduled use of transmission service that is not evaluated during the reliability assessment window. This possible unscheduled use of transmission service for the purposes of hourly integrated balancing is not captured in the NERC IDC reliability tool and could also be causing unwarranted congestion on the Bulk Electric System. There needs to be enforceable requirements specifically stated for each reliability function involved. Most BAs have supporting reliability function subsets that have a direct impact on reliability; yet these are not addressed in the current BAL Standards and proposed SAR.

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Since Generator Operators and PSEs are also stated in the SAR as applicable reliability functions, why are there no specific references in the requirements or measures to be enforced for these entities? The BA is charged with the burden of complying with the intent of the Balancing Standards Requirements and Measures, but it has little direct control of the actions that a Generator Operator or PSE in real-time. Some of these concerns should also be addressed in other areas, such as the Interconnection Operating and Regulation Agreements, but the NERC Reliability Standard should provide some enforceability.

The BAL and INT Standards, already in place, provide the requirements and measurability to address the overall purpose and reliability intent of this SAR; yet they do not specifically address the other reliability functions that might compromise the BA's ability in meeting the requirements.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	James Murphy	
Organization:	Bonneville Power Administration	
Telephone:	360-418-2413	
E-mail:	jpmurphy@bpa.gov	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Without this as part of the standard, one of the primary reasons it failed in the last rounds of balloting would not be addressed. By allowing the ACE to drift as far as this standard allows, it is critical that the standard take into account the transmission loading it may cause.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: This SAR is for managing ACE. While it may cause transmission congestion it need not be concerned with transmission load relief procedures. The SAR should make sure to state how the standard will be drafted to insure ACE that is still within the BAAL upper and/or lower limits but causing transmission congestion issues is corrected in a timely manner.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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Please provide comments in support of your answer in the comment area.

☐ Yes

☒ No

Comments: BPA fails to see that this part of FERC Order 693 mandates a wholesale change in performance standards. RBC is primarily a set of standards that attempts to manage the short to medium term control. In order to meet the FERC Order, data retention requirements need to be added as need be, and minor modifications to current standards need to be undertaken. There is nothing in this order that dictates removal of CPS2 as a standard. There is also nothing in the order that dicates NERC needs to widen the control margins for all BAAs.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments: The only other issue BPA has with RBC is that it replaces CPS2 as a standard without any technical justification to prove that removal of CPS2 is necessary.

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Interconnected system operation is predicated on mutual assistance between Balancing Authorities (BA) during emergencies and disturbances while maintaining individual BA autonomy. Reliability standards and older operating policies and guidelines created to facilitate interconnected system operation were designed to maintain this individual BA self-sufficiency and independence. Even though the reliability standards, operating policies and guidelines may have been deficient on technical basis, they were accepted and supported because they were consistent in ensuring proper separation and allocation of expenditures among interconnected entities. Fairness and equity were maintained. The draft BAL-007 Standard which will be incorporated into this new SAR, violates these underlying principles of self-suficiency, fairness and equity. It would allow a BA to undergenerate and use energy from neighboring BA's to supply its load not only during disturbances but continously as long as its BAAL limit is not exceeded. Even though balloting comments may not have focused on this aspect, this could be what really is the underlying reason why the draft BRD standards BAL-007 through BAL-011 were not passed. It would be very difficult for a BA to vote for a standard that will allow another BA to exploit the costly energy it generates without being compensated for it.

Besides the standard being proposed could really be considered as a subset of law of the United States since it is created pursuant to section 215 of the Federal Power Act. As such, it should not ignore the requirement that the standard be fair and equitable similar

to other laws of the US. BAL-007 will not be fair and equitable since it will provide the largest opportunity for gaming the system and allow rogue entities to use a neighboring entity's energy without paying for it. Note that the FERC would only approve a proposed standard if the Commission determines that the proposal is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

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Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowland@dukeenergy.com	
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Sam Holeman	Duke Energy	SERC	1

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: We recognize that getting agreement on exactly what constitutes "excessive ACE" may be difficult, but we agree with the development of this requirement. Though there are standards in place today to address actions to be taken by the Transmission Operator to relieve SOL/IROL problems, we believe that a "cap" on ACE could be determined in a balancing standard that clearly defines "excessive ACE" and limits the duration of operating in that area, as such operation could cause or contribute to an SOL/IROL problem, or otherwise burden its interconnected neighbors, no matter if the BA is supporting Interconnection frequency. This standard should not attempt to address "loop flow" and other associated problems that could occur even when ACE is zero. This standard should address what the appropriate tradeoffs are between supporting the interconnection frequency, with perhaps less generation control at times and more at others, and not burdening the interconnected neighbors by unacceptable unbalanced operations.

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: We agree with the development of this requirement for Balancing Authorities to provide timely transmission congestion relief. The volume of transactions cut under TLR and expected time for relief need to be considered in the practical implementation of the standard.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order**

693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?

E) To address the directives of FERC Order 693:

- Add data retention requirements to all standards.
- Require a continent-wide contingency reserve policy.
- Modify BAL-003 – Frequency Response and Bias.
- Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: We believe that all the FERC directives should be addressed in a coordinated manner among all the Standards Drafting Teams. FERC directives, including those in Order No. 693, must be addressed by NERC. However, FERC noted that it did not mandate particular outcomes in Order 693, but expects the ERO to respond with equivalent, fully supported alternatives. This is consistent with FERC's statutory authority in Section 215 of the Federal Power Act which requires that FERC "...give due weight to the technical expertise of the Electric Reliability Organization with respect to the content of a proposed standard or modification to a reliability standard..."

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☒ Yes

☐ No

Comments: On Saturday, August 4, 2007, the Eastern Interconnection experienced multiple losses of generation resulting in the Interconnection frequency dropping below 59.86 Hz. Though the response of the grid on that day was sufficient to bring the Eastern Interconnection back above the low Frequency Abnormal Limit of 59.918 Hz, it emphasized the importance of the immediate, primary response provided by unit governors and other resources contributing to the Frequency Response. Duke Energy would expect that ensuring adequate resources for providing such "primary" response would fall under Frequency Response SAR, however we are concerned that the current standards do not ensure adequate "secondary" response being provided by Balancing Authorities correcting ACE when significant events drop the Interconnection frequency below the Frequency Abnormal Limit. As the Balancing Authority ACE Limit (BAAL) currently proposes a violation to occur when the BAAL is exceeded for more than 30 consecutive clock-minutes, we believe that the scope of this SAR must be broad enough to consider requiring more immediate response from the Balancing Authorities when frequency drops below the Frequency Abnormal Limit.

5. If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.

Comments: Three separate projects (Project 2007-5: Balancing Authority Controls, Project 2007-12: Frequency Response, and Project 2007-18: Reliability-based Control) are currently being implemented that are directly tied to frequency and Balancing Authority control. In order to ensure consistency and a logical conclusion, these three projects should develop a white paper that outlines the approach to be taken in respect to frequency response and control, and Balancing Authority action and performance. After development, the white paper should go through the Standards Process for industry review, comments and response. The three project teams should continue to work together until all projects have concluded.

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

Please use this form to submit comments on the revised SAR for Reliability Based Control standards. Comments must be submitted by **October 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Reliability-based Control" in the subject line. If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Howard F. Illian	
Organization:	Energy Mark, Inc.	
Telephone:	847-913-5491	
E-mail:	howard.illian@energymark.com	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☒ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
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	☐	7 — Large Electricity End Users
	☒	8 — Small Electricity End Users
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

The draft SAR Version 1 for this project was posted for a comment period from May 15 through June 13, 2007. Based on the comments received, the SAR Drafting Team made revisions to the SAR. These revisions were primarily made to the "Purpose" section of the SAR. Many comments indicated that the original "Purpose" section was not clear in communicating the scope. This section was revised to clarify the intent of the SAR.

The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

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   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

   ☐ Yes

   ☒ No

   Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

   Comments:

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☐	3 — Load-serving Entities
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Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

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The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

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E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
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The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments:

   We are of the opinion that ACE, high or low, would not itself contribute to an SOL/IROL violation. The concept being presented is not an ACE problem. It is a generation location and transmission loading problem. Therefore, this part of the scope should be deleted as the issues discussed are SOL/IROL issues and correction of those issues are contained in the requirements of TOP-008, Response to Transmission Limitations, and IRO-005, Reliability Coordination - Current Day Operations. If not deleted, then this SAR should include TOP-008, Response to Transmission Limitations, and IRO-005, Reliability Coordination - Current Day Operations, as part of this standard for revision during this standard development.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments:

   Existing TLR standards require curtailment of transactions after which the attaining BA must increase its own generation to meet its load, or be in violation of other balancing standards. If the attaining BA does not increase its generation during a TLR then there may be CPS1 and CPS2 violations. Violations of CPS1 and CPS2 will (should) be penalized through other reliability standards. Therefore, development of requirements in this standard should be deleted.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

   ☐ Yes

   ☒ No

   Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

   Comments:

   We are concerned that several aspects of this SAR infringe on business practices which should not be developed by NERC but should be sent to NAESB for development as business practices.

   The SAR Purpose Statement C, and the Brief Description section, contain a discussion of what appears to be on-peak and off-peak transaction concerns. Do the authors mean the times of transition from on-peak to off-peak and off-peak to on-peak transitions? Entergy believes any reliability standard should be adequate for all time periods, hour-to-hour as well as the transitions from on-peak to off-peak and back. If the System can not handle the on-peak to off-peak transition due to business practices then maybe the business practices need to change. We do not understand what or how the author would

write reliability standards requirements, other than existing requirements in other standards, based on this scope statement. Please explain in greater detail. However, at this time we think this part of the SAR should be deleted as it probably encroachs on NAESB business practice standards. We also suggest the author submits a request for correction of this problem to NAESB to develop block schedules that do not jeopardize reliability.

Also, the industry should identify and/or define the acceptable range of Interconnection frequency excursions of short duration. More to the point, this aspect of the SAR should be deleted from this SAR, investigated and developed by another group (maybe under the Operating Committee) and returned under a new SAR for development as a reliability standard based on the results of that investigation.

The section of the SAR - Corrective action not always supporting reliability, page SAR-3, - contains an open-ended statement for the SDT to "determine what other other bounds may be necessary":

> This standard would also determine what other bounds may be necessary to require proper action by the Balancing Authority when excessive ACE (as determined by this standard) is impacting transmission constraints; however the outcome must be a set of compliance elements that cannot conflict or require information that the Balancing Authority does not have access to.

We view this part of the SAR as an investigation and development process, not a standards development process. Therefore, we strongly suggest this whole Corrective section be deleted. An investigation and development should be undertaken by another group (maybe under the Operating Committee). Then, when the investigation and development are complete a new SAR can be submitted to develop new standard requirements based on that investigation.

We also suggest all investigation aspects be complete before any SAR is submitted for standards development, including all other aspects of this SAR that are investigations.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Sam Ciccone	
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
Doug Hohlbaugh	FirstEnergy Corp.	RFC	
Dave Folk	FirstEnergy Corp.	RFC	

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Background Information:

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

1. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Although First Energy agrees that there is a reliability-related reason to support developing this requirement, the purpose of this SAR and the Standard must be more definitive. We suggest revising this statement as follows: "To require the Balancing Authority to take corrective action when excessive Area Control Error contributes to an SOL or IROL condition."

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Although First Energy agrees that there is a reliability-related reason to support developing this requirement, the purpose of this SAR and the Standard must be more definitive. We suggest revising this statement as follows: "To establish timely congestion relief by requiring the Balancing Authority to employ corrective load/generation management within a defined timeframe when participating in transmission loading relief procedures."

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments:

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☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: The FERC Order to address the need for a continent wide contingency reserve policy (per Order 693 Par. 340) is applicable to modifications to BAL-002-0. However, another NERC Project (2007-05) also involves revisions needed for BAL-002. In an effort to efficiently coordinate changes to the BAL-002 standard, would it help to incorporate this Order into project 2007-05?

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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   3) Modify BAL-003 – Frequency Response and Bias.
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The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

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1. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: With the proposed elimination of CPS2 standard, HQT do not believe any reliability standard requirements exist for the proposed BAAL methodology's inability to sufficiently control adverse impacts on neighboring balancing authority areas with respect to large unscheduled flows until interface limits are exceeded .

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: The term congestion relief should be used carefully because it may have different implications depending on market structure. In some areas within NPCC such as New York, having congestion means fully utilizing the transmission system's capabilities

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: HQT do acknowledge the above FERC directives but would like to remind the drafting team and NERC of the international issues surrounding such directives and any conflicting opinions with those directives must be dealt with in an appropriate manner that recognizes jurisidictional concerns and respects Provincial Govermental law and markets.

In response to address the regulating reserve directives, we are not supportive of a prescribed MW value of a reserve requirement. We support the concept of a continent wide contingency reserve requirement.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Review EOP-002 applicability of changing R5?

For exactitude purpose, we should refer to «Québec Interconnection.» instead of «HQ Interconnection.» Part of the confusion might have come from our own comments, we apologized for that.

We consider that the response to our comment in the first comment period :

« For a single Balancing Area interconnection like Hydro-Québec Interconnection, BAAL-007-1 is not appropriate. Thus, Hydro-Québec TransÉnergie (HQT) should not be subjected to BAAL-007-1 requirements and so not be subject to compliance to that standards. BAAL-008 is the Standard that is more appropriate for HQT reliable operation.… The SAR drafting team should specify if an Interconnection -wide Regional variance to that effect is necessary and if so, it should be included in the further developpement of these Standards. If there is another means to take into account these concerns, the SAR drafting team should indicate how.»

did not fully address our concern.

HQT think that it is important to indicate as soon as possible in the process what venue should be taken about Standard BAL-007 not being implemented for Québec Interconnection.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT**	☐	1 — Transmission Owners
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B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

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   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: We agree that the BA needs to assist the RC and TOP in correcting SOL/IROL problems when such actions are deemed effective and as instructed by these entities, however, the BA has no direct responsibility for tie line flow performance.

   As such, the BA is only required to respond to the directions of TOPs and RCs, and the BA has no obligation to monitor tie flows. In addition, a BA does not and is not required to have transmission monitoring capability to identify if any tie lines are being overloaded or approaching/exceeding their operating limits. We therefore do not agree with the development of the proposed requirement.

   We understand that this proposal has been revised in response to industry comments on the previous SAR which opposed to the original wording on the purpose related to SOL and IROL, and that in the drafting team's view the commenters misinterpreted that the intent was in fact to require additional limits or alternative limits on ACE to help address SOL/IROL violations. We support the addition or alternative limits on ACE to limit parallel flows, but do not support corrective actions by the BA when excessive ACE may be contributing to or causing actions to be taken to correct a SOL/IROL problem. The way it is written leads readers to interpret that the requirements in the BAL standard are intended to correct SOL/IROL violations.

   The objective of this standard and the associated filed test is to ensure and demonstrate that new BAL requirements do not result in an increase in parallel flows. The requirements should focus on the BAAL limits to satisfy this condition, and not on SOL/IROL or tie line flow monitoring. Limiting parallel flow is a condition that needs to be demonstrated, not a requirement to be included in the standard.

   As we indicated in our previous comments, while it is a worthwhile exercise to conduct field tests to assess whether any proposed BAL requirements (on frequency, etc.) can result in increased parallel flows or aggravated transmission loading to address WECC's and NPCC's concerns, developing requirements to support eliminating SOL/IROL violations appear to be outside of the scope of any proposed BAL standards.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: Corrective load/generation management by the BA is initiated by adjusting tagging information through the instructions issued by the RC when TLR is implemented. There already exists a requirement in the IRO-006 standard that requires BAs to comply with applicable interchange scheduling standards during TLR. This requirement is not needed in the BAL standards.

   We had made similar comments in the last round of posting. The drafting team held the view that we and others might have misinterpreted the intent, but agreed to revise the wording to clarify the intent. Unfortunately, we feel that the revised purpose continues to convey this intent.

   The difference lies with the BA's action in supporting transmission loading relief; it is reactionary and as instructed. The wording in (D) that "…by requiring corrective load/generation management by the BA within a defined timeframe…" suggests that there will be requirements in the standard to prompt the BA to take corrective actions. Actions will definitely need to be taken, but the actions are instructed by the RC. All the BA does is to follow the interchange schedule change and the RC's instructions that may override the interchange schedule as necessary.

   Please also note that the latest verison of IRO-006 (version 4) which has gone through balloting with a majority support votes has, as directed by FERC, included language in it to indicate that the TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation due to the time required to implement the procedure. Given this wording and FERC's view, we expect the industry to become less reliant on using TLR to correct SOL/IROL violations. Hence, we do not see the need to develop stringent requirement to have the BA take immediate action on its own. When such actions are deemed necessary to correct transmission problems, they will be directed and instructed by the RC.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: EOP-002-2 (R5) should not be included in this SAR. The requirement is correct as written. The BA should only respond to RC's and TOP's instructions which include correction of SOL/IROL violations.

IRO-005-2 should be modified only to the extent that CPS, DCS and Reserves tasks are changed, but not for SOLs/IROLs.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Craig McLean	
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Telephone:	204 457 5517	
E-mail:	cmclean@hydro.mb.ca	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: There are already requirements in the standards that deal with one BA burdening others. There is also an obligation that BAs follow the direction of an RC, who has authority to direct the correction of ACE if it is causing congestion. If these can be improved upon, fine.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: A requirement can be added to ensure corrective load/generation management to assist in transmission loading relief procedures.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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   Please provide comments in support of your answer in the comment area.

☐ Yes

☒ No

Comments: We recommend this DT coordinate with the DT working on Frequency Resonse (Project 2007-12) to avoid dupliacation and confusion.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

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Comments: We support this SAR and could support an ultimate ACE cap if that is what is required to move forward.

Manitoba Hydro was part of the BAAL field test and was comfortable operating to BAL-007. Manitoba Hydro contributed to frequency regulation, minimized CPM2 violations and our inadvertent account was not negatively impacted. We are not aware of our ACE causing transmission congestion problems on our system or our neighbouring systems. Our RC was never put in the position to request us to reduce our ACE because it was negatively impacting the grid.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ron Gunderson	
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Telephone:	402-845-5252	
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: BA's with excessiver ACE may have a large impact on an SOL or IROL. Without a mechanism to require a BA to correct its ACE when it is impacting an IROL or SOL, will impact the reliability of the region. If a BA with curtailments does not meet the requirements with actual generation adjustments or other BA's that are contributing to the IROL/SOL violation are not required to adjust generation to correct their ACE when the ACE is impacting a constraint, it will be difficult if not impossible to control the loading on the constraint and bring the loading within the IROL/SOL.

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   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Transmission congestion relief is absolutely dependent upon generator movement. Changing scheduled interchange without the associated generation changes has absolutely no impact on congestion.

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Please provide comments in support of your answer in the comment area.

☐ Yes

☐ No

Comments:

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☐ Yes

☒ No

Comments:

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Comments:

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	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☒	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC Reliability Standards Committee, RSC

Lead Contact: Guy V. Zito

Contact Organization: Northeast Power Coordinating Council

Contact Segment: 10

Contact Telephone: 212-840-1070

Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Murale Gopinathan	Northeast Utilities	NPCC	1
Ed Thompson	Con Edison	NPCC	1
Randy MacDonald	New Brunswick System Operator	NPCC	2
Mike Ranalli	NGrid US	NPCC	1
Roger Champagne	HydroQuebec TransEnergie	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Brian Gooder	Ontario Power Generation	NPCC	5
David Kiguel	Hydro One Inc., Ontario	NPCC	1
Kathleen Goodman	ISO-New England	NPCC	2
Al Adamson	New York State Reliability Council	NPCC	10
Mike Schiavone	NGrid US	NPCC	1
Michael Gildea	Constellation Energy	NPCC	6
Donald Nelson	Commonwealth of MA. Dept of Public Utilities	NPCC	9
John Bonner	Entergy Nuclear	NPCC	5
Greg Campoli	New York ISO	NPCC	2
Guy V. Zito	Northeast Power Coordinating Council	NPCC	10

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B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: With the proposed elimination of CPS2 standard, NPCC participating members do not believe any reliability standard requirements exist for the proposed BAAL methodology's inability to sufficiently control adverse impacts on neighboring balancing authority areas with respect to large unscheduled flows until interface limits are exceeded." .

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☒ No

   Comments: The term congestion relief should be used carefully because it may have different implications depending on market structure. In some areas within NPCC such as New York, having congestion means fully utilizing the transmission system's capabilities

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: NPCC participating members do acknowledge the above FERC directives but would like to remind the drafting team and NERC of the international issues surrounding such directives and any conflicting opinions with those directives must be dealt with in an appropriate manner that recognizes jurisidictional concerns and respects Provincial Govermental law and markets.

In response to address the regulating reserve directives, we are not supportive of a prescribed MW value of a reserve requirement. We support the concept of a continent wide contingency reserve requirement.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Review EOP-002 applicability of changing R5?

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
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Group Comments (Complete this page if comments are from a group.)

Group Name: Public Service Commission of South Carolina

Lead Contact: Phil Riley

Contact Organization: Public Service Commission of South Carolina

Contact Segment: 9

Contact Telephone: 803-896-5154

Contact E-mail: philip.riley@psc.sc.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of SC	SERC	9
Elizabeth B. "Lib" Fleming	Public Service Commission of SC	SERC	9
G. O'Neal Hamilton	Public Service Commission of SC	SERC	9
John E. "Butch" Howard	Public Service Commission of SC	SERC	9
Randy Mitchell	Public Service Commission of SC	SERC	9
C. Robert "Bob" Moseley	Public Service Commission of SC	SERC	9
David A. Wright	Public Service Commission of SC	SERC	9

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The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

   ☐ Yes

   ☒ No

   Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

   Comments:

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Robert Blohm	
Organization:	Applied statistician	
Telephone:	2084854056	
E-mail:	rb112@columbia.edu	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT**	☐	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: But be careful here. Whenever this standard favors performance not favored by another standard the conflict must be resolved, but on a case by case basis, in other words when and only when the conflict occurs and not in a way that would preempt a conflict unless either standard is actually encouraging behavior that on a net basis tends to violate the other standard. Building in complete preemption is too much and is equivalent to using one standard to achieve the performance objectives of another standard. Developing a mechanism to resolve a conflict when it occurs may be enough; or designing a standard so that it does not encourage behavior that tends on a net basis to violate another standard may be enough; but creating a single global performance standard that would assure the entire set of performance objectives otherwise assured by separate standards would be the absurd extreme of using one standard to perform the objectives of another standard. In other words, there is a difference between a standard that encourages behavior that tends to violate another standard, and a standard that only occasions violations of the other standard from time to time as often as it actually prevents violations of the other standard from time to time. But either case can and should be corrected well short of making one standard do the job of the other standard.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: This is basically the same kind of issue as question 1 above. Here behaving to conform to the real-balancing-control standard could create congestion invoking transmission loading relief. Once again, be careful. To repeat, whenever this standard favors performance not favored by another standard the conflict must be resolved, but

on a case by case basis, or to eliminate a "tendency" to congest more than decongest, in other words when and only when the conflict occurs or is favored and not in a way that would preempt all conflict. This RBC standard cannot be designed to "preempt" congestion causation, but only to address a tendency to cause it more than prevent it, or to address it when it occurs. The RBC standard is itself not also a congestion relief standard.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

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   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Reserves and Response, while they overlap with this SAR, are more directly addressed by the other two related SARs for frequency response and balancing-authority-control which ultimately need to be coordinated with real-balancing-control (the subject of this SAR) so that they do not act at cross purposes. I understand the FERC directives as instruction to decide the "what" in the form of definitions of the reserve types, their measurement, and objectives and "how" to achieve them, rather than presuming at this point a specific answer to these questions.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

   ☒ Yes

   ☐ No

   Comments: Eliminating economic incentives for bad control behavior while keeping economic incentives for good control behavior through pro-reliability pricing. NERC originally addressed this issue in the Joint Inadvertent Interchange Taskforce Whitepaper but referred the issue to NAESB because it involved pricing. Technically-challenged NAESB punted/remanded this commercial/reliability interface issue back to NERC on the technical basis that any standard involving usage of the ACE measure should be developed by NERC. The RBCSAR should duly note association with this issue but note that it is best addressed directly, if at all, in the Balancing Authority Control Standard's treatment of Inadvertent Interchange.

5. If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.

Comments: Add the following sentence to the end of the paragraph that follows paragraph E:
"Also questions were raised about the adequacy of the technical research in support of the standard."
Reason:
The questioners included NPCC, Energy Mark and me, all of whom filed extensive specific comments, by far the most extensive of any comments submitted.
The paragraph purports to explain why the standard failed to pass the balloting. It so far gives only one explanation of several possible explanations, which could include an explanation of why the total voter turnout wasn't greater and more widely distributed beyond the over-concentration in a few companies for example. For example, I couldn't vote because the ballot body was inexplicably reconstituted twice within a year without individual notification of the members.
I missed out in what was an eliminatory management practice probably to reduce the required quota, not an inclusionary or expansive management practice which would have been to leave the old ballot body alone and not eliminate some live members along with dead members. I would have been half an entire membership sector that voted, giving each of our two votes more weight than any other.
There are many ways to slice/analyze a cake and interpret election results. Giving only one explanation looks too much like electoral strategizing to win when here the objective is not supposed to be political but technical. In other words, take the time to develop the best technical standard by being inclusive and addressing all the technical concerns and the votes will follow. "Build it (right) and they will come."
Don't Gerrymander (pun not intended) a standard in an attempt to manipulate, manage or massage a consensus. We're not hush-hush Karl Roves trying to finesse a political result: we're technicians, standards developers. According to the ERO mandate, NERC is all about being technicians, not political strategists.
The "continued work in this area" clause in the next (the last) paragraph takes care of the remedy to the clause I am proposing to add.

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Group Comments (Complete this page if comments are from a group.)

Group Name:	**SERC OC Standards Review Group (Project 2007-18)**
Lead Contact:	**Jim Griffith, Chair - SERC Operating Committee**
Contact Organization:	Southern Company Services, Inc.
Contact Segment:	1,3,5
Contact Telephone:	205-257-6892
Contact E-mail:	jsgriffi@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Sammy Roberts	Progress Energy Carolinas	SERC	1,3,5
Brett Koelsch	Progress Energy Carolinas	SERC	1.3.5
Randy Wilkerson	Progress Energy Carolinas	SERC	1,3,5
Troy Blalock	South Carolina Electric & Gas	SERC	1,3,5
Larry Akens	Tennessee Valley Authority	SERC	1,3,5,9
Bob Dalrymple	Tennessee Valley Authority	SERC	1,3,5,9
Timmy Lejeune	Louisiana Generating, LLC	SERC	1,3,4,5
Ryan Johnson	NRG	SERC	6
Tim Hattaway	Alabama Electric Cooperative, Inc.	SERC	1,3,4,5
Gary Davidson	East Kentucky Power Cooperative	SERC	1,3,5
Gene Delk	South Carolina Electric & Gas	SERC	1,3,5
Danny Dees	Municipal Electric Authority of GA	SERC	1,3,4,5
Raymond Vice	Southern Company Services, Inc.	SERC	1,3,5
Wayne Pourciau	Georgia System Operations Corp.	SERC	1,3,5
Carter Edge	SERC Reliability Corp.	SERC	10
Pat Huntley	SERC Reliability Corp.	SERC	10
John Troha	SERC Reliability Corp.	SERC	10

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   4) Require minimum Regulating Reserves for a Balancing Authority.

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The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

Comments: The Balancing Authority Controls SAR (Project 2007-05) states that it covers the "Continent-Wide" Reserve Policy required by FERC Order 693. NERC should ensure that the "Continent-Wide" Reserve Policy is covered by only one SAR.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments: We recommend that NERC ensure the Balancing Authority Controls SAR (Project 2007-05) and the Frequency Response Standard Drafting Team (Project 2007-12) and the Reliability-Based Control SAR (Project 2007-18) are closely coordinated to address FERC Order 693 directives without duplication.

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: SERC wants to ensure that short term frequency response, if not addressed by this SAR, is addressed by the frequency response drafting team.

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Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Southern Company

Lead Contact: J T Wood

Contact Organization: Southern Company Services

Contact Segment:

Contact Telephone: 205-257-6238

Contact E-mail: jtwood@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Raymond L. Vice	Southern Company Transmission	SERC	1

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

The draft SAR Version 1 for this project was posted for a comment period from May 15 through June 13, 2007. Based on the comments received, the SAR Drafting Team made revisions to the SAR. These revisions were primarily made to the "Purpose" section of the SAR. Many comments indicated that the original "Purpose" section was not clear in communicating the scope. This section was revised to clarify the intent of the SAR.

The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Language used is not clear and specific. We recommend that the wording be changed to : B) To require corrective action by a BA when its excessive ACE, as defined by this standard, is causing an SOL or IROL on the transmission network.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Language used is not clear and specific. We recommend that the wording be changed to : D) To require corrective load/generation control action by a BA(s) within a well defined timeframe when required to provide transmission load relief by TLR procedures.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: These directives from FERC order 693 do not appear to apply specifically to the RBC SAR, but also apply to all active NERC projects addressing the BAL standards (Frequency Response - Project 2007-13, Reliability Based Control - Project 2007-18 and Balancing Authority Controls - Project 2007-5). NERC should carefully coordinate these standards to ensure that the requirements of order 693 are addressed effectively without duplication of effort or over lapping requirements within the standards.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments:

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Operating Reliability Working Group	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☒ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☒	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Operating Reliability Working Group

Lead Contact: Robert Rhodes

Contact Organization: Southwest Power Pool

Contact Segment: 2

Contact Telephone: 501-614-3241

Contact E-mail: rrhodes@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
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Dan Boezio	AEP	SPP	1,3,5
Mike Gammon	KCPL	SPP	1,3,5
Don Hargrove	OKGE	SPP	1,3,5
Bill Grant	SPS	SPP	1,3,5
Pete Kuebeck	OKGE	SPP	1,3,5
Danny McDaniel	CLECO	SPP	1,3,5
Robert Rhodes	SPP	SPP	2
Jason Smith	SPP	SPP	2
Allen Klassen	Westar	SPP	1,3,5

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

The draft SAR Version 1 for this project was posted for a comment period from May 15 through June 13, 2007. Based on the comments received, the SAR Drafting Team made revisions to the SAR. These revisions were primarily made to the "Purpose" section of the SAR. Many comments indicated that the original "Purpose" section was not clear in communicating the scope. This section was revised to clarify the intent of the SAR.

The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
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The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

The proposed SAR calls for retention of the already-drafted BAL-007 through BAL-011 and continued work in that area, along with including in its scope the transmission-related concerns of the WECC and NPCC, the short-duration frequency excursions associated with Interchange Schedule ramping, the transmission loading relief associated with load/resource balance and after curtailment of Interchange Transactions, and the directives of FERC Order 693.

The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: However, as the SDT has indicated in the SAR (page SAR-2, under Corrective Action Not Always Supporting Reliability) this may be very difficult to accomplish given existing limitations on what information may be available to the Balancing Authority.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: A defined timeframe for the implementation of generation redispatch in response to identified NNL relief responsibility could be beneficial during implementation of the transmission loading relief process.

   Please keep in mind that the Balancing Authority is only a subset of those responsible for implementing transmission loading relief. For example, Generator Operators, Load Serving Entities and others also play a role in the effective implementation of transmission loading relief. Holding the Balancing Authority responsible for meeting these time contraints without also applying them to other entities is unduly restrictive and overly burdensome on the Balancing Authority.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order**

693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?

E) To address the directives of FERC Order 693:

- Add data retention requirements to all standards.
- Require a continent-wide contingency reserve policy.
- Modify BAL-003 – Frequency Response and Bias.
- Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: We are not aware of any additional directives from Order 693.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Concerning predefined frequency limits mentioned in Statement A of the Purpose, frequency itself may not be the appropriate parameter to establish as the criteria for determining proper control action. Although frequency is the driving force necessitating the establishment of the standard, frequency control is the outcome of the combined operation of all Balancing Authorities and other entities in an interconnection. While a Balancing Authority can cause a drop in frequency as the result of a loss of generation, that single Balancing Authority, depending upon its size, may not be able to individually recover frequency on the interconnection during excursions for which that Balancing Authority is not responsible.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Farzaneh Tafreshi	
Organization:	Texas Regional Entity	
Telephone:	512-225-7251	
E-mail:	ftafreshi@ercot.com	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☒ **ERCOT**	☐	1 — Transmission Owners
☐ **FRCC**	☒	2 — RTOs and ISOs
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	☒	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **ERCOT ISO**

Lead Contact: **Steve Myers**

Contact Organization: **Operations**

Contact Segment: **ISO**

Contact Telephone: 512-248-3077

Contact E-mail: smyers@ercot.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Steve Myers		ERCOT	ISO

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

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   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☐ No

   Comments:

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   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

Comments: The six Balancing (BAL) Reliability Standards (BAL-001 through BAL 006) address balancing resources and demand to maintain interconnection frequency within prescribed limits.
BAL-001 Real Power Balancing Control Performance; is to maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time. The proposed Reliability Standard applies to balancing authorities. In the NOPR, the Commission proposed to approve BAL-001-0 as mandatory and enforceable.

On November 21, 2002, NERC approved a regional difference for ERCOT by allowing it to be exempt from Requirement R2 in BAL-001-0 (ERCOT Waiver of CPS2), because: (1) ERCOT, as a single control area asynchronously connected to the Eastern interconnection, cannot create inadvertent flows or time errors in other control areas and (2) CPS2 may not be feasible under ERCOT's competitive balancing energy market. Since requesting the waiver from CPS2, ERCOT has adopted section 5 of the ERCOT protocols which identify the necessary frequency controls needed for reliable operation in ERCOT.
FERC approved the ERCOT regional difference as mandatory and enforceable and found that ERCOT's approach under section 5 of the ERCOT protocols to be more stringent practice than Requirement R2 in BAL-001-0.
However, as proposed in the NOPR, the Commission directed the ERO to file a modification of the ERCOT regional difference to include the requirements concerning frequency response contained in section 5 of the ERCOT protocols.
Order 693, also states, " As with other new regional differences, the Commission expects that the ERCOT regional difference will include Requirements, Measures and Levels of Non-Compliance sections".

Given the above summary, does the SAR DT find it necessary to expand the SAR scope to address the above FERC directive?

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☐ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Please refer to comment on Q.3. Given the existence of the "waiver" of CPS2 requirements for ERCOT, and the FERC Directive to the ERO to modify the standard, the ERCOT ISO suggests that the SAR should be modified to include language to resolve the FERC Directive with regard to the ERCOT waiver. ERCOT ISO believes that the directive could be addressed either by reference to the new Standard CPM requirements or by modification of the language of the existing BAL-001-0 language to indicate that CPS2 does not apply to an Interconnection within which there is a single

entity assigned the responsibility for frequency control, regardless of whether there is a single BA or multiple BAs.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Raymond R. Vojdani	
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☐	3 — Load-serving Entities
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information:

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A. To maintain Interconnection frequency within predefined frequency limits under all conditions (i.e., normal and abnormal), in order to manage frequency-related issues such as frequency oscillations, instability and unplanned tripping of load, generation or transmission that adversely impact the reliability of the Interconnection. (Work brought into this SAR from Draft BAL-007 though BAL-011)

B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

E. To address the directives of FERC Order 693:

   1) Add data retention requirements to all standards.
   2) Require a continent-wide contingency reserve policy.
   3) Modify BAL-003 – Frequency Response and Bias.
   4) Require minimum Regulating Reserves for a Balancing Authority.

The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

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The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

You do not have 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. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement B to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address this?**

   B) To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: The previous version of this standard was defeated not once but twice. It seems the BRD standard keeps rising from the ashes and gets repackaged every six months. Elimination of CPS2 and establishing BAAL is not going to enhnace reliablity no matter how many times it gets repainted and sent back.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: There are other standards which address this issue. To address the congestion related issues caused by having a loose control standard is abandon the standard rather than coming up with a remedy which could potentially conflict with other standards.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

   E) To address the directives of FERC Order 693:

   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☒ Yes

☐ No

Comments: These are good areas to work on. Addressing reserve related issues, regulating and contingency, are vital to system reliability. There are enough confusions surrounding these issues that cleaning it up would be a major accomplishement and it will go a long way in enhancing reliability.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☐ No

Comments:

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments:

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Comment Form for Project 2007-18 – Draft 2 of SAR for Reliability-based Control

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: WECC Performance Work Group

Lead Contact: **Perpetuo S. V. Tan**

Contact Organization: LADWP

Contact Segment: 1

Contact Telephone: (818) 771-6776

Contact E-mail: Perpetuo.Tan@ladwp.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Bart McManus	BPA	WECC	1
Don Badley	NWPP	WECC	10
Paul Morland	CSU	WECC	1, 3
John Tolo	TEP	WECC	1
David Hawkins	CAISO	WECC	2
Raymond Vodjani	WAPA	WECC	1
Steve Rueckert	WECC	WECC	10

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Background Information:

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The purpose of the proposed SAR is to develop requirements to achieve the following objectives:

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B. To support corrective action by the BA when excessive Area Control Error (as determined by this standard) may be contributing to or causing action to be taken to correct an SOL/IROL problem.

C. To prevent Interconnection frequency excursions of short-duration attributed to the ramping of Interchange Transactions.

D. To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

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The NERC Operating Committee endorsed the adoption of the proposed Balance Resources and Demand Standards BAL-007 through BAL-011; however, the proposed standards did not pass when balloted in April 2007. The proposed standards were supported unanimously by all entities that participated in the field test of the draft standards, including Reliability Coordinators and Balancing Authorities; however, comments primarily provided by WECC and NPCC Members indicated that transmission-related problems due to imbalanced operations should also be considered in the standards development.

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The Reliability-based Control SAR Drafting Team would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "Reliability-based Control" by **October 9, 2007**.

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments: Without this as part of the standard, one of the primary reasons it failed in the last rounds of balloting would not be addressed.

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☒ No

   Comments: This SAR is for managing ACE. While it may cause transmission congestion it need not be concerned with transmission load relief procedures. The SAR should make sure to state how the standard will be drafted to insure ACE that is still within the BAAL upper and/or lower limits but causing transmission congestion issues is corrected in a timely manner.

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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   - Add data retention requirements to all standards.
   - Require a continent-wide contingency reserve policy.
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   - Require minimum Regulating Reserves for a Balancing Authority.

Please provide comments in support of your answer in the comment area.

☐ Yes

☒ No

Comments: PWG fails to see that this part of FERC Order 693 mandates a wholesale change in performance standards. RBC is primarily a set of standards that attempts to manage the short to medium term control. In order to meet the FERC Order, data retention requirements need to be added as need be, and minor modifications to current standards need to be undertaken. There is nothing in this order that dictates removal of CPS2 as a standard. There is also nothing in the order that dicates NERC needs to widen the control margins for all BAAs.

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

☐ Yes

☒ No

Comments: The only other issue PWG has with RBC is that it replaces CPS2 as a standard without any technical justification to prove that the removal of CPS2 is necessary.

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

Comments: Interconnected system operation is predicated on mutual assistance between Balancing Authorities (BA) during emergencies and disturbances while maintaining individual BA autonomy. Reliability standards and older operating policies and guidelines created to facilitate interconnected system operation were designed to maintain this individual BA self-sufficiency and independence. Even though the reliability standards, operating policies and guidelines may have been deficient on technical basis, they were accepted and supported because they were consistent in ensuring proper separation and allocation of expenditures among interconnected entities. Fairness and equity were maintained. The draft BAL-007 Standard which will be incorporated into this new SAR, violates these underlying principles of self-suficiency, fairness and equity. It would allow a BA to undergenerate and use energy from neighboring BA's to supply its load not only during disturbances but continously as long as its BAAL limit is not exceeded. Even though balloting comments may not have focused on this aspect, this could be what really is the underlying reason why the draft BRD standards BAL-007 through BAL-011 were not passed. It would be very difficult for a BA to vote for a standard that will allow another BA to exploit the costly energy it generates without being compensated for it.

Besides the standard being proposed could really be considered as a subset of law of the United States since it is created pursuant to section 215 of the Federal Power Act. As such, it should not ignore the requirement that the standard be fair and equitable similar

to other laws of the US. BAL-007 will not fair and equitable since it will provide the largest opportunity for gaming the system and allow rogue entities to use a neighboring entity's energy without paying for it. Note that the FERC would only approve a proposed standard if the Commission determines that the proposal is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name: WECC Reliability Coordination Comments Work Grouop

Lead Contact: Nancy Bellows

Contact Organization: WACM

Contact Segment: 10

Contact Telephone: 970-461-7246

Contact E-mail: bellows@wapa.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Terry Baker	PRPA	WECC	10
Paul Bleuss	CMRC	WECC	10
Tom Botello	SCE	WECC	10
Mike Gentry	SRP	WECC	10
Greg Tillitson	CMRC	WECC	10

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   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

2. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement D to read as shown below. Do you think that there is a reliability-related reason to support developing a requirement to address the following?**

   D) To support timely transmission congestion relief by requiring corrective load/generation management by the Balancing Authority(ies) within a defined timeframe when participating in transmission loading relief procedures.

   Please provide comments in support of your answer in the comment area.

   ☒ Yes

   ☐ No

   Comments:

3. **Based on stakeholder comments, the drafting team modified the SAR's Purpose Statement E as shown below to identify the specific FERC directives from Order 693 that will be addressed as part of this project. Do you agree that the drafting team has identified all relevant directives?**

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   - Require a continent-wide contingency reserve policy.
   - Modify BAL-003 – Frequency Response and Bias.
   - Require minimum Regulating Reserves for a Balancing Authority.

   Please provide comments in support of your answer in the comment area.

   ☐ Yes

   ☐ No

   Comments:

4. **Questions 1 through 3 addressed the modifications made to the SAR Purpose to clarify the scope of the SAR. Are you aware of any other reliability concerns associated with load-resource balancing that this SAR should consider that are not addressed by another SAR, Standard under Development, or approved Standard? Please provide comments in support of your answer in the comment area.**

   ☐ Yes

   ☐ No

   Comments: The WECC RCCWG notes that on page SAR-07 references to the Eastern Interconnection TLR practices. TLR is not a process followed by the Western Interconnection.

5. **If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.**

   Comments: The WECC RCCWG applauds the SAR drafting team suggestion of working with WECC regarding parameters and transmission concerns.