Unofficial Comment Form

Project 2017-01 Modifications to BAL-003-1.1

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit informal comments on the **Project 2017-01 Modifications to BAL-003-1.1** project. The electronic form must be submitted by **8 p.m. Eastern, Thursday, September 20, 2018**.

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project201701ModificationstoBAL00311.aspx). If you have questions, contact Standards Developer, Laura Anderson (via email) or at (404) 446-9671.

# Background

**Project 2017-01 Modifications to BAL-003-1.1**
The purpose of this project is to review the issues identified in Phase I of the SAR and make corresponding modifications to BAL-003-1.1, as necessary.

**Standard affected: BAL-003-1.1**

The supporting documents for BAL-003-1.1 were developed using engineering judgment on the data collection and process needed to determine the Interconnection Frequency Response Obligation (IFRO), as well as the processing of raw data to determine compliance. Now that the Reliability Standard is in place and the data is available for analyses, minor errors in assumptions, as well as process inefficiencies have been identified. It was anticipated that as Frequency Response improves, the approaches embedded in the Reliability Standard for annual samples may need to be modified. In addition to fixing the inconsistencies identified in the Frequency Response Annual Analysis Report (FRAA), the drafting team may separate the administrative and procedural items and reassign them to an alternative process, subject to Electric Reliability Organization (ERO) and North American Electric Reliability Corporation (NERC) Operating Committee approval.

This informal comment period is seeking inputs into the standard drafting team’s (SDT) proposed Phase I modifications to BAL-003-1.1:

* Replacing resource contingency criteria (RCC) by proposing a new methodology for determining the Resource Loss Protection Criteria (RLPC) that is consistent across all Interconnections, and is designed to maintain reliability for the respective Interconnections;
* An IFRO methodology that makes changes only when technically justified;
* Limiting the IFRO changes by no more than 10 percent annually and implementing percentage of change over the time period necessary to achieve the appropriate IFRO levels; and
* Move items not related to entity compliance from BAL-003-1.1, Attachment A to the *Procedure for ERO Support of Frequency Response and Frequency Bias Setting Standard* document.

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

## Questions

1. The SDT is proposing replacing RCC by proposing a new methodology for determining the RLPC that is consistent across all Interconnections, and is designed to maintain reliability for the respective Interconnections. This methodology is described in the *Resource Loss Protection Criteria* document. Is this methodology appropriate for determination of the event that each Interconnection is protecting against? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with using the two Most Severe Single Contingencies (MSSCs) in each Interconnection as the basis for an Interconnection’s IFRO? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. The standard drafting team is proposing an IFRO methodology that makes changes only when technically justified. This methodology should maintain a stable IFRO rather than implementing immaterial modifications. Do you agree with keeping IFROs stable over time, similar to CPS1, unless Interconnection Frequency Response significantly declines? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. The IFRO methodology proposed by the drafting team separates several variables from the annual modification of the IFRO, including the C to B ratio and delta frequency, and simplifies the calculation. These variables are being reviewed as part of the analysis process that will occur outside of the standard. Do you agree with the separation of the variables from the annual calculation? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. With the modification to the RLPC and IFRO methodologies, the Eastern Interconnection IFRO will experience an approximate 28 percent decrease, and Hydro Quebec will experience an approximate 17 percent increase. The standard drafting team recommends limiting the IFRO changes by no more than 10 percent annually and implementing percentage of change over the time period necessary to achieve the appropriate IFRO levels. Once the transition is complete, modifications to IFRO would not be limited. Do you agree with this staged implementation of the methodology?

[ ]  Yes

[ ]  No

Comments:

1. The drafting team is proposing to move items not related to entity compliance from BAL-003-1.1, Attachment A to the *Procedure for ERO Support of Frequency Response and Frequency Bias Setting Standard* document. The SAR recommended such changes to Attachment A. Do you agree that the changes to these documents address the SAR recommendations?

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the SDT to consider that you have not already provided on the Phase I modifications to BAL-003-1.1.

Comments: