Unofficial Comment Form

Project 2022-03 Energy Assurance with Energy-Constrained Resources

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on draft one of **BAL-007-1 – Energy Reliability Assessments** by **8 p.m. Eastern, Monday, March 11, 2024.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-03EnergyAssurancewithEnergy-ConstrainedResources.aspx). If you have questions, contact Standards Developer, Dominique Love (via email), or at 404-217-7578.

## Background Information

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

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

The proposed new Reliability Standard is based on the Operations SAR. The remaining SAR will be addressed at a later date.

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

## Summary of changes Overview

The Standard Drafting Team (SDT) proposes a new Reliability Standard BAL-007-1 and ERA Definition. The Reliability Standard BAL-007-1 outlines the process and performance for near-term and seasonal ERAs. For a detailed explanation of the requirements, please refer to the *BAL-007-1 Technical Rationale*.

In addition, the proposed definition is not balloted separately but is being balloted via the standard. As such, when voting on the standard, ballot body participants will also be voting on the proposed definition used in the standard.

## Questions

1. The SDT has proposed a new Energy Reliability Assessment (ERA) definition which is intended to support the near-term and seasonal time horizons. Is the definition clear and understandable? If not, please provide the basis that supports your answer.

[ ]  Yes

[ ]  No

Comments:

1. The SDT developed a process that defines how both near-term and seasonal ERAs will be performed and specifies the requirements for both ERAs together. Are the process and the required parameters clear and understandable? If not, please provide the basis that supports your answer or suggestions for revisions. Please specify if comments are related to the near-term ERA, seasonal ERA, or both.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes to require a set of scenarios to be developed which is needed in the performance of ERAs. Additionally, there is Attachment 1 that further supports the development of the set of scenarios. Are the scenarios specified in Requirement 2 the correct level or risk to consider in an ERA, and is the development of scenarios clear and understandable? If not, please provide the basis that supports your answer or suggestions for revisions. Please specify if comments are related to the near-term, seasonal ERA, or both.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes entities determine energy reserve margins which would provide clear criterions for whether or not the results of an ERA require Operating Plan(s) to mitigate potential energy deficiencies. Are energy reserve margins the right method to set that criterion and are the specific energy reserve margin specified in Requirement 8 the correct thresholds for both near-term and seasonal ERAs? Is this approach clear and understandable? If not, please provide the basis that supports your answer or suggestions for revision.

[ ]  Yes

[ ]  No

Comments:

1. Does the proposed new standard address the reliability gaps or risks identified in the SAR and differentiate itself from other standard requirements? In your response, please provide any information that supports your answer.

[ ]  Yes

[ ]  No

Comments:

1. Is the proposed standard practicable to:
	* 1. Be implementable?
		2. Is the proposed standard auditable?
		3. Able to comply with?

In your response, please provide any information that supports your answer.

[ ]  Yes

[ ]  No

Comments:

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

Comments: