

Summary Consideration: Most commenters suggested that this change does not rise to the level required of an Urgent Action. The Standards Authorization Committee determined that this action did deserve to move ahead in time for SPP to implement its Energy Imbalance Services Market, which was originally scheduled to be implemented on May 1, 2006. To hold back a change that has been granted to other entities would seem to provide an adverse impact on SPP. The Reliability Standards Process Manual does state that an, *“Urgent action may be appropriate when a delay in implementing a proposed standard or revision can materially impact reliability of the bulk electric systems.”* The manual does **not** limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system. The Reliability Standards Process Manual states, *“Recognizing that bulk electric system reliability and electricity markets are inseparable and mutually interdependent, all reliability standards shall be consistent with the market interface principles. Consideration of the market interface principles is intended to ensure that reliability standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.”*

Shortly before balloting began on this standard, SPP announced a delay in the implementation of its Energy Imbalance Market. The Standards Authorization Committee acknowledged this delay, but felt that it was unlikely that the change to BAL-006 could go through the entire standards development process by the revised start up date and directed staff to proceed with the ballot as planned.

The drafting team did not make any changes to this standard as a result of the comments submitted with the first ballot. One commenter indicated that the standard’s effective date should include a sentence to indicate that this Urgent Action will be in effect for one year or until it is replaced by a permanent standard, whichever occurs first. This errata will be posted and the standard will be corrected when presented to the NERC Board for approval and adoption.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments on First Ballot of Urgent Action Revision to BAL-006

Company	Balloter	Vote	Comments
Great River Energy GRE	Gordon Pietsch	No	While I have no problem with SPP's request for a Regional Difference, I believe NERC needs to follow the NERC Reliability Standards Process Manual and therefore the standard needs to include an explicit termination date one year or less per the requirement stated under the "Urgent Action" section in the NERC Reliability Standards Process Manual. I am assuming that a permanent request for a regional difference will follow this request for urgent action similar to the process used with the Cyber Security standard.

Response: Please see the summary consideration of comments. The standards process manual does **not** limit the use of Urgent Actions to only those that actions that materially impact reliability.

You are correct about the need to add an expiration date. We will make this modification to the standard as errata.

There is another SAR underway for a wider scope of changes to BAL-006. This SAR has been approved by the SAC for an initial posting, but hasn't been posted because of higher priority items.

Nebraska Public Power District NPPD	Alan Boesch	No	As identified in the NERC Reliability Standards Process Manual an "Urgent action may be appropriate when a delay in implementing a proposed standard or revision can materially impact reliability of the bulk electric systems. The SAC must use its judgment carefully to ensure an urgent action is truly necessary and not simply an expedient way to change or implement a standard." The change to this standard does not fit the definition of an Urgent Action Standard and should have not been approved for use by the SAC.
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Response: Please see the summary consideration of comments. The standards process manual does **not** limit the use of Urgent Actions to only those that actions that materially impact reliability

SaskPower SPC	Wayne Guttormson	No	SaskPower fundamentally agrees with the language stated in the URGENT ACTION: SPP Regional Difference - BAL-006 standard, but disagrees with the need for this standard to be categorized as URGENT ACTION. There is an urgent need by the SPP Market for this standard, there IS NOT an urgent need based on the "Reliability of the Bulk Electric System" for this standard and thus should not be classified as URGENT ACTION.
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Response: Please see the summary consideration of comments. The standards process manual does **not** limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.

Consideration of Comments on First Ballot of Urgent Action Revision to BAL-006

Company	Balloter	Vote	Comments
Midwest Reliability Organization	William J. Head	No	<p>First, the MRO fundamentally agrees with the language stated in the URGENT ACTION: SPP Regional Difference - BAL-006 standard. However, the MRO strongly disagrees with the need for this standard to be categorized as URGENT ACTION, especially in light of the scheduled startup date of the SPP Market being moved from May 1, 2006 to October 1, 2006. While the MRO agrees that there is an urgent need by the SPP Market for this standard, there IS NOT an urgent need based on the "Reliability of the Bulk Electric System" for this standard and thus should not be classified as URGENT ACTION. As stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual, An "Urgent action may be appropriate when a delay in implementing a proposed standard or revision can materially impact reliability of the bulk electric system." Also stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual is "The SAR must include a justification for urgent action." The MRO firmly believes that the URGENT ACTION: SPP Regional Difference - BAL-006 standard provided NO justification for urgent action and poses no significant impact to the reliability of the bulk electric system. The MRO recommends a NO vote on the URGENT ACTION: SPP Regional Difference - BAL-006 standard, and that all future changes to the BAL-006 standard proceed in a way that is consistent with the NERC Standards Process Manual.</p>

Response: Please see the summary consideration of comments. The standards process manual does **not** limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.

Great River Energy GRE	Sam Kokkinen	No	<p>We support the SPP Regional Difference request, however the Standard should indicate explicitly that a termination date one year or less should be stated as required under the "Urgent Action" section in the NERC Reliability Standards Process Manual.</p>
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Response: You are correct. We will make this modification to the standard as errata.

Consideration of Comments on First Ballot of Urgent Action Revision to BAL-006

Company	Balloter	Vote	Comments
Lincoln Electric System LES	Bruce E Merrill	No	<p>First, LES agrees with the language stated in the URGENT ACTION: SPP Regional Difference - BAL-006 standard. However, LES strongly disagrees with the need for this standard to be categorized as URGENT ACTION, especially in light of the scheduled startup date of the SPP Market being moved from May 1, 2006 to October 1, 2006. While LES agrees that there is an urgent need by the SPP Market for this standard, there IS NOT an urgent need based on the "Reliability of the Bulk Electric System" for this standard and thus should not be classified as URGENT ACTION. As stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual, An "Urgent action may be appropriate when a delay in implementing a proposed standard or revision can materially impact reliability of the bulk electric system." Also stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual is "The SAR must include a justification for urgent action." LES firmly believes that the URGENT ACTION: SPP Regional Difference - BAL-006 standard provided NO justification for urgent action and poses no significant impact to the reliability of the bulk electric system. All future changes to the BAL-006 standard should proceed in a way that is consistent with the NERC Standards Process Manual.</p>

Response: Please see the summary consideration of comments. The standards process manual does **not** limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.

There is another SAR underway for a wider scope of changes to BAL-006. This SAR has been approved by the SAC for an initial posting, but hasn't been posted because of higher priority items.

MidAmerican Energy Company MEC	Thomas C. Mielnik	No	<p>The SPP Market is not scheduled to begin until October 1, 2006. There is plenty of time to process the SPP Regional Difference under the normal rules. There is no need for this to be an urgent action standard.</p>
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Response: Please see the summary consideration of comments. The SPP market delay had just been announced when this was ready to go to ballot. The SAC determined that it would be less confusing to allow this to proceed to ballot. There is another SAR for a wider scope of changes to BAL-006, and it is unlikely that it will go through the entire standards development process before October 1, 2006.

Consideration of Comments on First Ballot of Urgent Action Revision to BAL-006

Company	Balloter	Vote	Comments
Lincoln Electric System LES	Dennis Florom	No	<p>Fundamentally agree with the language stated in the URGENT ACTION: SPP Regional Difference - BAL-006 standard. However, the strongly disagree with the need for this standard to be categorized as URGENT ACTION, especially in light of the scheduled startup date of the SPP Market being moved from May 1, 2006 to October 1, 2006. While the we agree that there is an urgent need by the SPP Market for this standard, there IS NOT an urgent need based on the "Reliability of the Bulk Electric System" for this standard and thus should not be classified as URGENT ACTION. As stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual, An "Urgent action may be appropriate when a delay in implementing a proposed standard or revision can materially impact reliability of the bulk electric system." Also stated in the "Urgent Action" Section of the NERC Reliability Standards Process Manual is "The SAR must include a justification for urgent action." We firmly believe that the URGENT ACTION: SPP Regional Difference - BAL-006 standard provided NO justification for urgent action and poses no significant impact to the reliability of the bulk electric system. Recommend that all future changes to the BAL-006 standard proceed in a way that is consistent with the NERC Standards Process Manual.</p>
<p>Response: Please see the summary consideration of comments. The standards process manual does not limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.</p> <p>The SPP market delay had just been announced when this was ready to go to ballot. The SAC determined that it would be less confusing to allow this to proceed to ballot. There is another SAR for a wider scope of changes to BAL-006, and it is unlikely that it will go through the entire standards development process before October 1, 2006.</p>			
Split Rock Energy LLC SRE	Donna Stephenson	No	<p>SRE agrees with the objective of the modified language, however agrees with MRO that it is not clear why this change is categorized as "urgent action," especially with the recent FERC order delaying the market start to (at the earliest) Oct. 1, 2006.</p>
<p>Response: Please see the summary consideration of comments. The standards process manual does not limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.</p> <p>The SPP market delay had just been announced when this was ready to go to ballot. The SAC determined that it would be less confusing to allow this to proceed to ballot. There is another SAR for a wider scope of changes to BAL-006, and it is unlikely that it will go through the entire standards development process before October 1, 2006.</p>			

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Company	Balloter	Vote	Comments
Western Area Power Administraton UGP Marketing UGPM	John Stonebarger	No	We do not feel this meets the criteria for Urgent Action.
<p>Response: Please see the summary consideration of comments. The standards process manual does not limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.</p>			
IESO	Don Tench	Yes	The IESO suggests that the SDT incorporate this regional difference into the standard body generalizing the requirement for any BA that settles inadvertent through financial means. Thereby eliminating the need to revise the standard each time a BA adopts financial settlement of inadvertent.
<p>Response: There is another SAR for a wider scope of changes to BAL-006 that, if supported by the industry, should eliminate the need for these regional differences.</p>			
City of Tallahassee TAL	Alan Gale	Yes	While I vote for this change to the standard, I do desire to caution against becoming too liberal with the urgent action process. This change appears to be for economic reasons instead of reliability reasons.
<p>Response: Please see the summary consideration of comments. The standards process manual does not limit the use of Urgent Actions to only those that actions that are urgent based on the reliability of the bulk electric system.</p>			