

Consideration of Comments

Project 2010-14.2 Periodic Review of BAL Standards

The Project 2010-14.2 Drafting Team thanks all commenters who submitted comments on the Standards Authorization Request (SAR). These standards were posted for a 30-day public comment period from July 16, 2014 through August 14, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 19 sets of comments, including comments from approximately 95 different people from approximately 75 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

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 Director of Standards, Howard Gugel, at 404-446-9693 or by e-mail. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

- 1. Do you have any specific questions or comments relating to the scope of the proposed standard action or any component of the SAR outside of the pro forma standard? 9**
- 2. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here17**
- 3. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements20**
- 4. If you have any other comments on this SAR that you haven't already mentioned, please provide them here23**

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, 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, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment																																																											
				1	2	3	4	5	6	7	8	9	10																																																		
1.	Group	Guy Zito	Northeast Power Coordinating Council										X																																																		
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Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
10. Mark Kenny	Northeast Utilities	NPCC	1																	
11. Helen Lainis	Independent Electricity System Operator	NPCC	2																	
12. Alan MacNaughton	New Brunswick Power Corporation	NPCC	9																	
13. Bruce Metruck	New York Power Authority	NPCC	6																	
14. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																	
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
16. Robert Pellegrini	The United Illuminating Company	NPCC	1																	
17. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																	
18. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																	
19. Brian Robinson	Utility Services	NPCC	8																	
20. Ayesha Sabouba	Hydro One Networks Inc.	NPCC	1																	
21. Brian Shanahan	National Grid	NPCC	1																	
22. Wayne Sipperly	New York Power Authority	NPCC	5																	
23. Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1																	
2.	Group	Joe DePoorter	MRO NERC Standards Review Forum		X	X	X	X	X											
	Additional Member	Additional Organization	Region	Segment Selection																
1.	Amy Casuccelli	Xcel Energy	MRO	1, 3, 5, 6																
2.	Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5																
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6																
4.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																
5.	Kayliegh Wilkersonq	Lincoln Electric System	MRO	1, 3, 5, 6																
6.	Jodi Jensen	Western Area Power Administration	MRO	1, 6																
7.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																
8.	Ken Goldsmith	Alliant Energy	MRO	4																
9.	Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5, 6																
10.	Marie Knox	MISO	MRO	2																
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6																
12.	Randi Nyholm	Minnesota Power	MRO	1, 5																
13.	Scott Nickels	Rochester Public Utilities	MRO	4																
14.	Terry Harbour	MidAmerican Energy	MRO	1, 3, 5, 6																
15.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6																
16.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5																

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
3.	Group	Marcus Pelt	Southern Company: Southern Company Services, Inc; Alabama Power Company, Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing			X		X	X				
N/A													
4.	Group	Robert Rhodes	SPP Standards Review Group		X								
		Additional Member	Additional Organization	Region	Segment Selection								
1.	Allan George	Sunflower Electric Power Corporation	SPP	1									
2.	Louis Guidry	Cleco Power	SPP	1, 3, 5, 6									
3.	Phil Hart	Associated Electric Cooperative	SERC	1, 3, 5, 6									
4.	Stephanie Johnson	Westar Energy	SPP	1, 3, 5, 6									
5.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6									
6.	Allen Klassen	Westar Energy	SPP	1, 3, 5, 6									
7.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6									
8.	Shannon Mickens	Southwest Power Pool	SPP	2									
9.	James Nail	City of Independence, MO	SPP	3, 5									
10.	Carl Stelly	Southwest Power Pool	SPP	2									
11.	Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4									
5.	Group	Erika Doot	Bureau of Reclamation					X					
		Additional Member	Additional Organization	Region	Segment Selection								
1.	Richard Jackson	Power Resources Office	WECC	5									
2.	George Girgis	Technical Services Center	WECC	1, 5									
6.	Group	Michael Lowman	Duke Energy			X		X	X				
		Additional Member	Additional Organization	Region	Segment Selection								
1.	Doug Hils			1									
2.	Lee Schuster			3									
3.	Dale Goodwine			5									
4.	Greg Cecil			6									

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
7.	Group	Terry Bilke	ISO Standards Review Committee		X								
Additional Member		Additional Organization	Region	Segment Selection									
1.	Charles Yeung	SPP	SPP	2									
2.	Greg Campoli	NYISO	NPCC	2									
3.	Ben Li	IESO	NPCC	2									
4.	Kathleen Goodman	ISO-NE	NPCC	2									
5.	Cheryl Moseley	ERCOT	ERCOT	2									
6.	Cathy Wesley	PJM	RFC	2									
8.	Group	Kathleen Black	DTE Electric Co.			X	X	X					
Additional Member		Additional Organization	Region	Segment Selection									
1.	Kent Kujala	NERC Compliance	RFC	3									
2.	Daniel Herring	NERC Training & Standards Development	RFC	4									
3.	Mark Stefaniak	Generation Optimization	RFC	5									
4.	Barbara Hollan	DO/SOC											
9.	Group	Jamison Dye	Bonneville Power Administration			X		X	X				
Additional Member		Additional Organization	Region	Segment Selection									
1.	Sheryl Welch	Public Utilities Specialist	WECC	1									
2.	Wes Hutchison	Commercial System Management	WECC	1									
3.	Gordon Markley	Electrical Engineer	WECC	1									
10.	Group	Ben Engelby	ACES Standards Collaborators						X				
Additional Member		Additional Organization	Region	Segment Selection									
1.	John Shaver	Arizona Electric Power Cooperative/Southwest Transmission Cooperative, Inc.	WECC	1, 4, 5									
2.	Bill Hutchison	Southern Illinois Power Cooperative	SERC	1, 5									
3.	Michael Brytowski	Great River Energy	MRO	1, 3, 5, 6									
4.	Steve McElhaney	South Mississippi Electric Power Association	SERC	1, 2, 3									
5.	Ellen Watkins	Sunflower Electric Power Corporation	SPP	1, 2, 3									
6.	Lucia Beal	Southern Maryland Electric Cooperative, Inc.	RFC	3									
7.	Scott Brame	North Carolina Electric Membership Corporation	SERC	3, 4, 5									
8.	Ginger Mercier	Prairie Power, Inc.	SERC	1, 2, 3									

Group/Individual		Commenter	Organization	Registered Ballot Body Segment											
				1	2	3	4	5	6	7	8	9	10		
9.	Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3, 4											
10.	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1											
11.	Group	Phil Hart	Associated Electric Cooperative, Inc. - JRO00088			X		X	X						
		Additional Member	Additional Organization	Region	Segment Selection										
		1. Central Electric Power Cooperative		SERC	1, 3										
		2. KAMO Electric Cooperative		SERC	1, 3										
		3. M & A Electric Power Cooperative		SERC	1, 3										
		4. Northeast Missouri Electric Power Cooperative		SERC	1, 3										
		5. N.W. Electric Power Cooperative, Inc.		SERC	1, 3										
		6. Sho-Me Power Electric Cooperative		SERC	1, 3										
12.	Individual	Thomas Foltz	American Electric Power			X		X	X						
13.	Individual	Greg Travis	Idaho Power												
14.	Individual	Leonard Kula	Independent Electricity System Operator		X										
15.	Individual	Eric Scott	Ameren			X		X	X						
16.	Individual	Karin Schweitzer	Texas Reliability Entity, Inc.												X
17.	Individual	Jo-Anne Ross	Manitoba Hydro			X		X	X						
18.	Individual	Chris Scanlon	Exelon companies, BGE, ComEd, PECO			X		X	X						
19.	Individual	Richard Vine	California ISO		X										

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
Ameren	Agree	We agree with and support MISO's comments for BAL-005 and BAL-006.

1. Do you have any specific questions or comments relating to the scope of the proposed standard action or any component of the SAR outside of the pro forma standard?

Summary Consideration:

Organization	Yes or No	Question 1 Comment
Southern Company: Southern Company Services, Inc; Alabama Power Company, Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
Duke Energy	No	
DTE Electric Co.	No	
Bonneville Power Administration	No	
Idaho Power	No	
Manitoba Hydro	No	
Exelon companies, BGE, ComEd, PECO	No	
Northeast Power Coordinating Council	Yes	BAL-006 Requirement R4 was recommended to be retired by the independent Expert Recommendation Report (IERR) as it was only for energy accounting. The Periodic Review Team (PRT) disagreed with the

Organization	Yes or No	Question 1 Comment
		<p>IERR claiming that there was a reliability concern if adjacent BAs did not agree to NSI and NAI in a timely manner. The accounting occurs after the fact. Can the PRT provide examples of what reliability issues the revised requirement would guard against? What would a new “timely basis” be? As long as the agreement between BAs continues to be after the fact, regardless of the “timely basis”, there isn’t a potential reliability issue and agrees with the IERR recommendation in favor of retiring the requirement. The new definition of Inadvertent Interchange will still be covered by the revised requirements R1 and R2 if requirement R4 is retired as per the IERR recommendation.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p>
MRO NERC Standards Review Forum	Yes	<p>The general scope of the SAR is fine. The challenge is the SAR covers the entire scope recommended by the Periodic Review Team. The PRT work was out for comment and to our knowledge no changes were made to the PRT’s recommendations based on comments received. We had concerns with some of the PRT proposals and the previous comments should be addressed prior to substantive work.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p>
SPP Standards Review Group	Yes	<p>In the 3rd line of the Objectives section, delete the 2nd ‘define’. Be consistent with the capitalization of Real-time throughout the SAR. For BAL-005 Reword the end of the next-to-last sentence in the overview of BAL-005 on Page 3 to read: ‘...the PRT recommends requirements which are focused on Real-time operating data.</p>

Organization	Yes or No	Question 1 Comment
		<p>Thank you for your comments.</p> <p>Effectively changing the definition of AGC may be confusing since AGC is an acronym for automatic generation control. You can take generation out of the definition but AGC will always be automatic generation control. We suggest a total change of the term. If it is to reference control of all resources, why not label it automatic resource control (ARC). Then the acronym fits the terminology.</p> <p>The SDT believes that the term Automatic Generation Control (AGC) should not be changed since it is used extensively throughout the NERC standards.</p> <p>Purpose - While concurring with the proposed change to the purpose, we suggest replacing ‘under’ with ‘using’. Also, since Tie Line Bias is the defined term not Tie Line Bias control, don’t capitalize control.</p> <p>The SDT does not reference the phrase “under Tie-Line Bias Control”.</p> <p>In the sentence following the proposed purpose, capitalize Tie Line Bias and insert ‘interconnection’ between ‘single-BA’ and ‘exception’.</p> <p>Thank you for your comment. The SDT does not believe that the suggested modification provides for additional clarity.</p> <p>Applicability - We suggest modifying this to read: ‘The SDT should remove “Generator Operators”, “Transmission Operators”, and “Load Serving Entities” as applicable entities unless they are specifically included in a standard requirement by the SDT.’</p> <p>Thank you for your comment. The SDT does not believe that the suggested modification provides for additional clarity.</p> <p>Requirement R1 - In the 4th line insert ‘regarding’ between ‘FAC SDT’ and ‘moving’.</p> <p>Thank you for your comment.</p>

Organization	Yes or No	Question 1 Comment
		<p>Requirement R3 - The sentence in the 9th line that reads ‘Specific to the concern on swapping hourly values in BAL-005 posted for industry comment.’ doesn’t make any sense. Has something been left out? Thank you for your comment.</p> <p>Split the next sentence into two sentences by replacing the comma after ‘R3.5.2’ with a period and capitalizing ‘The’ to begin the second sentence. Thank you for your comment.</p> <p>Requirement R6 - Delete the ‘the’ at the end of the 3rd line. Thank you for your comment.</p> <p>Requirement R7 - In the last line replace the ‘where’ with ‘and’. Thank you for your comment. The SDT does not believe that the suggested modification provides for additional clarity.</p> <p>Requirement R9, Part 9.1 - Rewrite the last sentence to read: ‘By focusing on Real-time Reporting ACE, the PRT assures reliability is addressed and maintained at all times.’ Thank you for your comment. The SDT does not believe that the suggested modification provides for additional clarity.</p> <p>Requirement R14 - Replace the ‘for’ in the next-to-last line with ‘and considered during’. Thank you for your comment. The SDT does not believe that the suggested modification provides for additional clarity.</p>
Bureau of Reclamation	Yes	<p>The Bureau of Reclamation supports the drafting team’s recommendation to remove Generator Operators (GOPs), Transmission Operators (TOPs), and Load Serving Entities (LSEs) from the scope of BAL-005. Reclamation believes that generation and transmission interconnection requirements</p>

Organization	Yes or No	Question 1 Comment
		<p>ensure that facilities are within the metered boundaries of a Balancing Authority area before they are placed in service. Reclamation notes that this requirement has imposed a compliance paperwork burden on GOPs, TOPs, and LSEs because Balancing Authorities are not required to provide information confirming that facilities are within the metered boundaries of a balancing authority area under the standard, and this effort has not provided a corresponding reliability benefit. In the alternative, Reclamation suggests that Balancing Authorities be required to coordinate to ensure that all facilities fall within their metered boundaries because BAs determine the boundaries.</p> <p>The SDT agrees with your comment and has removed them from the draft standard.</p>
ISO Standards Review Committee	Yes	<p>The SRC supports the comments included in BAL-005, R1 regarding the correct boundaries for applicability to the BA versus LSE, TOP and GOP for specific obligations.</p> <p>The SDT agrees with your comment and has removed them from the draft standard.</p>
ACES Standards Collaborators	Yes	<p>We agree with the SAR's recommendation to revise BAL-005 and BAL-006. We support the 5-year review team's recommendation of removing the TOP, GOP, and LSE functions from the applicability section of BAL-005 and to retire or consolidate several requirements. We also support the team's recommendations to retire many of the requirements in BAL-006.</p> <p>The SDT agrees with your comment and has removed them from the draft standard BAL-005. The SDT is still reviewing BAL-006.</p>
Associated Electric Cooperative, Inc. - JRO00088	Yes	<p>The PRT has argued the IERP recommendation stating hourly meter checkouts are not a reliability related task, but purely economic.</p>

Organization	Yes or No	Question 1 Comment
		<p>AECI agrees with the PRT that it is a helpful process in identifying errors in tie values, however as long as an entities ACE is established, (which is required by other standards) no real risk to reliability is taken, merely economic settlement on the errors within the meters.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p> <p>The PRT has created a requirement that addresses identifying and troubleshooting errors with interchange (draft BAL-005 R3.5.2), without requiring specific hourly checkouts of every meter on the system. This is something entities are extremely concerned with for economic reasons so there is no doubt the action will be performed, but creating this as a requirement only creates administrative burden without any additional benefit to reliability (NAI error checks are already required in R3.5.2). For this reason, the currently drafted BAL-005 R3.2 is redundant with R3.5.2. AECI requests that the SDT strike R3.2.</p> <p>The SDT has modified the draft standard to address your concern in an equally effective and efficient manner.</p>
American Electric Power	Yes	<p>There needs to be a mechanism to allow the BA to gather what they need from the other functional entities in calculating ACE. It appears that the SAR may lead in a direction that removes the TOP, LSE, and GOP from the standard, leaving “stranded obligations” where no requirements remain which would obligate the TOP, LSE, or GOP to provide the BA what it needs. The SAR states that consideration is being given to include similar obligations as part of a FAC standard, however we are not certain we could support the proposed changes to BAL-005 without also seeing exactly how it will be addressed in the FAC standard(s). In addition, rather than adding such obligations solely to a FAC standard, AEP believes the best approach</p>

Organization	Yes or No	Question 1 Comment
		<p>would be to add the obligation as a separate requirement within BAL-005 (as a real time obligation) *and* the FAC standard (as a forward looking obligation).The SAR removes the GOP, TOP, and LSE from the standard while also stating the drafting team’s intent to explore whether the role of TOP could assume the obligations of the LSE. The TOP and LSE are separate entities with unique obligations as specified in the NERC glossary. Requiring the TOP to assume the obligations of the LSE could prove very problematic, blurring roles which are currently well defined.</p> <p>The SDT agrees with your comment and has revised both BAL-005 and FAC-001 to address your concern.</p>
Independent Electricity System Operator	Yes	<p>BAL-006 Requirement R4 was recommended to be retired by the Independent Expert Recommendation Report (IERR) as it was only for energy accounting. The Periodic Review Team (PRT) disagreed with the IERR claiming that there was a reliability concern if Adjacent BA's did not agree to NSI and NAI in a timely manner. The IESO questions this concern, given that the accounting occurs after-the-fact. Can the PRT provide examples of what reliability issues the revised requirement would guard against? What would a new "timely basis" be? As long as the the agreement between BA's continues to be after-the-fact, regardless of the "timely basis", the IESO does not see a potential reliability issue and agrees with the IERR recommendation in favour of retiring the requirement. The new definition of Inadvertent Interchange will still be covered by the revised Requirement 1 and 2 if requirement 4 was to be retired as per the IERR recommendation.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p>
Texas Reliability Entity, Inc.	Yes	BAL-005

Organization	Yes or No	Question 1 Comment
		<p>1) Purpose statement: Texas Reliability Entity, Inc. (Texas RE) requests that the purpose statement be revised to remove “under Tie-Line Bias Control.” ERCOT has only DC ties modeled as internal generation or load and effectively utilizes only frequency bias control. The SDT does not reference the phrase “under Tie-Line Bias Control”.</p> <p>2) R3.2 and 1st sentence of R3.5.2: Texas RE requests the rationale for moving hourly error checking from Requirement R3.2 and R3.5.2 to a guideline document be clearly documented within the draft revision. The SDT believes that by using a common data source the possibility for errors due to different values is minimized.</p> <p>3) R13: Texas RE requests the rationale for moving hourly error checking from Requirement R13 to a guideline document be clearly documented within the draft revision. This requirement was broken apart and is now a part of Requirements R1 and R7.</p> <p>BAL-006</p> <p>While the ERCOT region does not have issues with coordination of accounting figures between Adjacent Balancing Authorities, Texas RE supports the proposed revisions. The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p>
California ISO	Yes	<p>The ISO supports the comments submitted by the ISO/RTO Council Standards Review Committee</p> <p>Thank you for your comment and please review the response to the ISO/RTO Council SRC.</p>

2. If you are aware of the need for a regional variance or business practice that should be considered with this phase of the project, please identify it here

Summary Consideration:

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	
Southern Company: Southern Company Services, Inc; Alabama Power Company, Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
SPP Standards Review Group	No	
Bureau of Reclamation	No	
Duke Energy	No	
DTE Electric Co.	No	

Organization	Yes or No	Question 2 Comment
Bonneville Power Administration	No	
ACES Standards Collaborators	No	<p>We are not aware of regional variances or business practices that need to be considered.</p> <p>Thank you for your comment.</p>
Associated Electric Cooperative, Inc. - JRO00088	No	
American Electric Power	No	
Idaho Power	No	
Independent Electricity System Operator	No	
Texas Reliability Entity, Inc.	No	<p>The issues which are unique to the ERCOT region would be addressed by the suggested changes made by Texas RE in response to Question 1 for BAL-005.</p> <p>Thank you for your comment and please review the response to Question #1.</p>
Manitoba Hydro	No	
Exelon companies, BGE, ComEd, PECO	No	
MRO NERC Standards Review Forum	Yes	<p>ERCOT and HQ do not have Inadvertent Interchange. Additionally, any material changes to BAL-006 would need to be coordinated with NAESB.</p>

Organization	Yes or No	Question 2 Comment
		Thank you for your comment. The SDT will be consulting with NAESB when it is evaluating BAL-006 for possible revisions.
ISO Standards Review Committee	Yes	ERCOT and HQ do not have Inadvertent Interchange. Additionally, any material changes to BAL-006 would need to be coordinated with NAESB. Thank you for your comment. The SDT will be consulting with NAESB when it is evaluating BAL-006 for possible revisions.
California ISO	Yes	The ISO supports the comments submitted by the ISO/RTO Council Standards Review Committee Thank you for your comment and please review the response to the ISO/RTO Council SRC.

3. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements

Summary Consideration:

Organization	Yes or No	Question 3 Comment
Southern Company: Southern Company Services, Inc; Alabama Power Company, Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
SPP Standards Review Group	No	
Bureau of Reclamation	No	
Duke Energy	No	
DTE Electric Co.	No	
Bonneville Power Administration	No	

Organization	Yes or No	Question 3 Comment
ACES Standards Collaborators	No	<p>We are not aware of any Canadian provincial or other regulatory requirements that need to be considered.</p> <p>Thank you for your comment.</p>
Associated Electric Cooperative, Inc. - JRO00088	No	
American Electric Power	No	<p>AEP is not aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s).</p> <p>Thank you for your comment.</p>
Idaho Power	No	
Texas Reliability Entity, Inc.	No	
Exelon companies, BGE, ComEd, PECO	No	
MRO NERC Standards Review Forum	Yes	<p>While there are Order No. 693 directives for these standards, several of these directives may have become immaterial (e.g. directive may be to make a paragraph 81-type change) or counter-productive at this point. The drafting team should focus on creating streamlined high-quality results-based standards. If a directive causes a problem or does not add value to reliability, the drafting team should document their reasoning and not blindly make changes.</p> <p>Thank you for your comment.</p>
ISO Standards Review Committee	Yes	<p>While there are Order No. 693 directives for these standards, several of these directives may have become immaterial (e.g. directive may be to make a paragraph 81-type change) or counter-productive at this point. The drafting team should focus</p>

Organization	Yes or No	Question 3 Comment
		<p>on creating streamlined high-quality results-based standards. If a directive causes a problem or does not add value to reliability, the drafting team should document their reasoning and not blindly make changes.</p> <p>Thank you for your comment.</p>

4. If you have any other comments on this SAR that you haven't already mentioned, please provide them here

Summary Consideration:

Organization	Question 4 Comment
MRO NERC Standards Review Forum	<p>As we are unsure of what was done with our prior comments from April, we are providing them here.</p> <p>General Comments on BAL-005</p> <ul style="list-style-type: none"> o We agree with streamlining the standard and making it clearer. <p>Thank you for your comment.</p> <ul style="list-style-type: none"> o While we are OK with changing the title of the standard, we have concerns about removing the term “Automatic Generation Control”. This term is or its acronym are used well over 50 times in the standards and are commonly understood in the industry (tens of thousands of references to it on the internet). Given the intent of the FERC directive, we propose changing the exiting definition in the NERC glossary to : Equipment that automatically adjusts generation and other resources in a Balancing Authority Area from a central location to maintain the Balancing Authority’s interchange schedule plus Frequency Bias. AGC may also accommodate automatic inadvertent payback and time error correction. <p>The SDT agrees and has modified the definition in an equally effective manner to that which you have proposed.</p> <ul style="list-style-type: none"> o We agree with removing all entities other than Balancing Authorities in the applicability section, but disagree with moving some of the requirements to a FAC standard (reasons explained below).

Organization	Question 4 Comment
	<p>Specific Comments on BAL-005</p> <ul style="list-style-type: none"> o On the current R1 (and R3), we agree with removing the requirements about generation, load and transmission be within the metered bounds of a BA. These requirements also should not be punted to a FAC standard. These were “control area criteria” (i.e. concepts) that were swept into the V0 standard. The proof that all load, generation and transmission is within metered bounds is achieved via Inadvertent Accounting. There is no need for a different explicit requirement. BAs should be the only applicable entity in this standard. <p>The SDT disagrees with your comment. The SDT believes that Inadvertent Accounting does not guarantee everything is captured – as proposed R1 and R2 is intended to capture all facilities within the BA.</p> <ul style="list-style-type: none"> o On the current R3 and R4: We believe these requirements are important and generally should remain as-is (although they could be consolidated). We also believe that avoidance of Burden (a defined and understandable term) is a reasonable objective for the requirement(s). <p>The SDT has incorporated the intent of these requirements into other requirement within the standard (Requirements R1 and R8).</p> <ul style="list-style-type: none"> o The current R5 would not be necessary if all BAs had to report their control performance. The problem is the current practice whereby BAs who receive overlap regulation don’t have to report their performance. Thus, we believe this requirement should stay. It only applies to a relatively small proportion of BAs. <p>The SDT has incorporated the intent of these requirements into other requirement within the standard (Requirements R1 and R8).</p> <ul style="list-style-type: none"> o With regard to the redline R2, the team appears to be duplicating requirements in the INT standards. A BA should not be subject to multiple non-compliances for missing a schedule. <p>The SDT has modified the requirement to ensure no duplication.</p>

Organization	Question 4 Comment
	<p>o With regard to the redline R3, R3.1 is a piece of information and not a requirement. R3.4 is redundant with the parent requirement. There is no requirement today to swap hourly values, and this should not be added.</p> <p>The SDT agrees and has made the necessary modifications.</p> <p>o The redline R3.5 should be simplified to “ACE source data shall be acquired and ACE calculated at least every 6 seconds). R3.5.2. is redundant with R3.2 and should be eliminated.</p> <p>The SDT agrees and has made the necessary modifications.</p> <p>General Comments and Comments on PRT Recommendations for BAL-006</p> <p>o We agree with eliminating the redundant requirements and moving the real-time requirements to BAL-005.</p> <p>o On the PRT recommendation for R1, we disagree with the proposal to add a performance metric with regard to inadvertent interchange. The other balancing standards adequately address the reliability impact of imbalance.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p> <p>o On the PRT recommendation for R2, we disagree with the need to change the definition of Inadvertent Interchange to add the complexity mentioned. If both parties to a transaction agree to a common number and have operated against common points in real time, it makes no difference to the Interconnection.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p> <p>o On the PRT recommendation for R3, we disagree with the need to “swap” hourly values. There are many tools in place to detect significant and persistent metering and balancing errors. There has not been a need to call an AIE survey for at least 5 years.</p>

Organization	Question 4 Comment
	<p>At most, we would suggest a requirement in BAL-005 for each BA to share in real time its NIa with each adjacent BA and its RC as well as share its NIs with its RC. This would accommodate the “cross check” the PRT appears to be seeking. If this requirement were added, the other proposed “granular” requirements in BAL-005 on pseudo-ties and dynamic schedules could likely be simplified. This adjacent information is already an implied requirement in Attachment 1-TOP-005.</p> <p>The SDT disagrees with your comment concerning the swapping of values. The SDT believes that his practice will help to guarantee a more accurate Reporting ACE value.</p> <p>o On the PRT recommendation for R4 and its sub-requirements, we disagree with the suggestion of adding complexity to the definition of Inadvertent Interchange and of performing and reporting more frequently as well as the suggestion again for a performance requirement.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p> <p>o On the PRT recommendation for R5, we believe the current requirement is acceptable as-is.</p> <p>Thank you for your comment. The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p> <p>o The proposed changes to definitions look acceptable.</p> <p>Thank you for your comment.</p> <p>Specific Comments on BAL-006</p> <p>o On the redline R1.3 and R1.4, these should be changed to reflect the current practice that monthly data is to be submitted and agreed to with counterparties in the Inadvertent Interchange reporting portal. The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take</p>

Organization	Question 4 Comment
	<p>your comment into consideration as it reviews the current standard. However, some information should be within a guideline paper rather than a standard (guideline is more of how to accomplish - a standard should not define how to accomplish).</p>
California ISO	<p>BAL-005 requirement R8 presently states: “The Balancing Authority shall ensure that data acquisition for and calculation of ACE occur at least every six seconds.” In order for this requirement to have the desired effect of ensuring a Balancing Authority’s ACE value is refreshed and accurate as of every six seconds, the tie line metering data being sampled by each Balancing Authority must also be accurate and updated at least every six seconds. Therefore, the ISO recommends that the SAR include within its scope the requirement for ensuring the tie line meter data being relied on for the “data acquisition for and calculation of ACE” is updated at least every six seconds to match the required sampling frequency.</p> <p>The SDT agrees and has made the necessary modifications to thee requirement.</p>
Duke Energy	<p>Comments: Duke Energy thanks the Periodic Review Team for their efforts, and would like to express our support for the recommendations made. The following comments are suggestions for the standard drafting team’s consideration.</p> <p>General Comment re: BAL-005:</p> <p>Unless the Standard Drafting Team chooses to revise, a re-post of the red-lined version of the current BAL-005 is necessary so that it may accurately reflect the numbering of the original version.</p> <p>The SDT has elected to not provide a redline version of the present standard since the proposed standard is a complete re-writing of the current standard. The SDT is providing a Mapping Document so that an entity can see what the SDT is proposing to be done with the present requirements.</p> <p>Duke Energy agrees with the PRT’s recomendation that the NERC Glossary of Terms defintion of ACE and Reporting ACE should be reviewed. In addition, we agree that a comprehensive review of the NERC standards is necessary to ensure that any</p>

Organization	Question 4 Comment
	<p>updates/revsions to the NERC definitions mentioned above would not impact other NERC Reliability Standards.</p> <p>1) Requirement 1: Duke Energy echoes the concerns of the Periodic Review Team in ensuring to keep responsibility of staying in a metered boundary with the LSE, TOP, and GOP. We do not agree with the possibility of placing this responsibility with the BA. The SDT agrees and has proposed to move this requirement to FAC-001.</p> <p>2) Requirement 13: We agree with the approach suggested by the Periodic Review Team. Also, we support the development of a guideline document to further expand on the topic, and clarify any potential ambiguities that may exist. The SDT has moved this requirement into the proposed Requirements R1 and R7.</p> <p>3) Requirement 14: Duke Energy is in agreement with the industry comments referenced by the Periodic Review Team for this requirement. If covered elsewhere, we feel that this requirement should be retired. The SDT disagrees with your comment. The SDT has moved this requirement into Requirements R5 and R8.</p>
<p>Exelon companies, BGE, ComEd, PECO</p>	<p>Exelon recognizes that this is a large Project. We appreciate the scope of the proposed changes and encourage the drafting team to be cautious so as to not re-assign obligations to other entities if requirements are “mapped” to other Standards. In general, Exelon agrees with the changes proposed in the SAR and to changes in the applicability, including the removal of the LSE. We note however, changes to LSE applicable requirements need to be considered in light of the RRB initiative. Exelon believes that applicability for R17 is solely to the Balancing Authority; we agree with the PRT recommendation that BAL-005 R17 be written to be specific to the equipment used to determine the frequency component required for reporting ACE as is detailed in the interpretation effective 8/27/2008 in BAL-005-0.2.b for R17. See Appendix 1 which limits the requirement to BA frequency monitoring.</p> <p>The SDT thanks you for your comment and agrees.</p>

Organization	Question 4 Comment
ISO Standards Review Committee	<p>The general scope of the SAR is fine. The challenge is the SAR covers the entire scope recommended by the Periodic Review Team and also references a separate document. A SAR is intended to set the general bounds of a standard. Our approval of the SAR does not imply we agree with everything included. We strongly request that the previous comments submitted earlier in the year be addressed prior to substantive work.</p> <p>The SAR provides an outline of what could transpire during the development/revision of the proposed standard. The SDT will take your comment into consideration as it reviews the current standard.</p>
SPP Standards Review Group	<p>There were several documents (redlined standards, Consideration of Comments, directives and issues, IERP recommendations) mentioned in the Unofficial Comment Form which indicated they were included in this posting but they aren't on the project page.</p> <p>The SDT apologizes for this omission. However, the SDT has revised the standards in an equally effective and efficient manner than what was originally developed by the PRT.</p>
DTE Electric Co.	<p>We agree that R15 of BAL-005 belongs in EOP-008.</p> <p>The SDT thanks you for your comment.</p>
ACES Standards Collaborators	<p>We will provide specific comments on the proposed changes to the standards after the SAR is approved and the formal standards development process begins. Thank you for the opportunity to comment.</p> <p>The SDT thanks you for your comment.</p>

END OF REPORT