

**Individual or group. (19 Responses)**  
**Name (8 Responses)**  
**Organization (8 Responses)**  
**Group Name (11 Responses)**  
**Lead Contact (11 Responses)**  
**Contact Organization (11 Responses)**  
**Question 1 (18 Responses)**  
**Question 1 Comments (18 Responses)**  
**Question 2 (18 Responses)**  
**Question 2 Comments (18 Responses)**  
**Question 3 (14 Responses)**  
**Question 3 Comments (18 Responses)**  
**Question 4 (0 Responses)**  
**Question 4 Comments (18 Responses)**

Group
Northeast Power Coordinating Council
Guy Zito
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 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.
No
Individual
Thomas Foltz
American Electric Power
Yes
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 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.
No

No
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).
Individual
Greg Travis
Idaho Power
No
No
No
Group
MRO NERC Standards Review Forum
Joe DePoorter
Madison Gas & Electric
Yes
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.
Yes
ERCOT and HQ do not have Inadvertent Interchange. Additionally, any material changes to BAL-006 would need to be coordinated with NAESB.
Yes
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.
As we are unsure of what was done with our prior comments from April, we are providing them here. General Comments on BAL-005 • We agree with streamlining the standard and making it clearer. • While we are OK with changing the title of the standard, we have concerns about removing the term "Automatic Generation Control". This term 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. • 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). Specific Comments on BAL-005 • 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. • 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). • 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. • 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. • 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. • 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. General Comments and Comments on PRT Recommendations for BAL-006 • We agree with eliminating the redundant requirements and moving the real-time requirements to BAL-005. • 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. • 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. • 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. 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. • 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. • On the PRT recommendation for R5, we believe the current requirement is acceptable as-is. • The proposed changes to definitions look acceptable. Specific Comments on BAL-006 • 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.

Individual

Leonard Kula

Independent Electricity System Operator

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 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.

No

Group

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

Marcus Pelt

Southern Company Compliance
No
No
No
Individual
Eric Scott
Ameren
Group
SPP Standards Review Group
Robert Rhodes
Southwest Power Pool
Yes
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. 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. 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. In the sentence following the proposed purpose, capitalize Tie Line Bias and insert 'interconnection' between 'single-BA' and 'exception'. 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.' Requirement R1 – In the 4th line insert 'regarding' between 'FAC SDT' and 'moving'. 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? 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. Requirement R6 – Delete the 'the' at the end of the 3rd line. Requirement R7 – In the last line replace the 'where' with 'and'. 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.' Requirement R14 – Replace the 'for' in the next-to-last line with 'and considered during'.
No
No
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.
Individual
Karin Schweitzer
Texas Reliability Entity, Inc.
Yes
BAL-005 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. 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. 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. BAL-006 While the ERCOT region does not have issues with coordination of accounting figures between Adjacent Balancing Authorities, Texas RE supports the proposed revisions.

No

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.

No

Group

Bureau of Reclamation

Erika Doot

Power Resources Office

Yes

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 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.

No

No

Group

Duke Energy

Michael Lowman

Duke Energy

No

No

No

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. General Comment re: BAL-005: 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. Duke Energy agrees with the PRT's recommendation that the NERC Glossary of Terms definition 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 updates/revsions to the NERC definitions mentioned above would not impact other NERC Reliability Standards. 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. 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. 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.

Group

ISO Standards Review Committee

Terry Bilke

MISO

Yes

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.

Yes

ERCOT and HQ do not have Inadvertent Interchange. Additionally, any material changes to BAL-006 would need to be coordinated with NAESB.

Yes

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.

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.

Group

DTE Electric Co.

Kathleen Black

NERC Training & Standards Development

No

No

No

We agree that R15 of BAL-005 belongs in EOP-008.

Individual

Jo-Anne Ross

Manitoba Hydro

No

No

Group

Bonneville Power Administration

Jamison Dye

Transmission Reliability Standards Group

No
No
No
Group
ACES Standards Collaborators
Ben Engelby
ACES
Yes
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.
No
We are not aware of regional variances or business practices that need to be considered.
No
We are not aware of any Canadian provincial or other regulatory requirements that need to be considered.
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.
Individual
Chris Scanlon
Exelon companies, BGE, ComEd, PECO
No
No
No
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.
Group
Associated Electric Cooperative, Inc. - JRO00088
Phil Hart
Associated Electric Cooperative, Inc. - NCR01177
Yes
The PRT has argued the IERP recommendation stating hourly meter checkouts are not a reliability related task, but purely economic. AECEI 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. 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.

No

No

Individual

Richard Vine

California ISO

Yes

The ISO supports the comments submitted by the ISO/RTO Council Standards Review Committee

Yes

The ISO supports the comments submitted by the ISO/RTO Council Standards Review Committee

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.