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 **Project 2017-01 Modifications to BAL-003-1.1**. The electronic form must be submitted by **8 p.m. Eastern, Wednesday, April 17, 2019**.

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 II of the Standard Authorization Request (SAR) and make corresponding modifications to BAL-003-2, as necessary.

**Standard affected: BAL-003-2**

The informal comment period for this survey is seeking inputs into the standard drafting team’s (SDT) Phase II modifications to BAL-003-2, as identified in the SAR:

* Make the Interconnection Frequency Response Obligation (IFRO) calculations and associated allocations: 1) more reflective of current conditions; 2) consider all characteristics affecting Frequency Response (e.g., load response, mix and type of generation); 3) include all applicable entities; and 4) be as equitable as possible; and
* Frequency Response Measure (FRM): 1) ensure that over-performance by one entity does not negatively impact the evaluation of performance by another; 2) measure types/periods of response in addition to secondary Frequency Response, particularly primary Frequency Response; 3) include all applicable entities; and 4) make allocations as equitable as possible.

NERC has been studying Frequency Response for several years, with the most recent study completed in 2018. The results of the studies have not identified any significant detrimental changes in Frequency Response on any Interconnection. This does not mean that potential changes in the resource mix and operation of the grid will not impact the response currently seen on the interconnections. Because of comments received, the drafting team is looking at several different areas of BAL-003 that could be changed to potentially improve the reliability and compliance process.

In this highly-complex standard, the drafting team has found that simple yes/no answers or selection of alternatives fail to communicate the concerns of the commenters effectively; this results in the drafting team having to guess the reasons for the answers provided. Consequently, the drafting team requests that all answers include an explanation of why the comment provides the best answer to the question asked. This allows the drafting team to understand the reasons for the comments supplied and enables the team to modify the standard to balance the reliability needs of the BES with the goals of those commenting.

Comments have stated that a two-year lag between the operation numbers used for allocation and the operation of the grid is too much lag. The current process uses the load and generation numbers as reported in the FERC 714 report.

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

## Questions

1. What is the maximum acceptable lag in the data to be used for IFRO allocation and minimum frequency bias determination?
	1. 2 Years [ ]
	2. 1 Year [ ]
	3. Quarterly [ ]
	4. Forward-looking forecast [ ]

Please explain your response:

1. If the SDT moves away from using FERC 714 data, should it consider:
2. Load and generation [ ]
3. Just generation [ ]
4. Just load [ ]

Please explain your response, including the source of the data you recommend:

Comments have been received stating that the current process recognizes there may be multiple sources of response, including, but not limited to, native load, contracted loads and generation. The comments further suggest that the current process requirement on the Balancing Authority (BA) be supplemented (or replaced) with a requirement on other entities, specifically the Generator Owner.

1. FERC’s Order 842 regarding new Generator Interconnection Agreements requires newly interconnecting large and small generating facilities, both synchronous and non-synchronous, to install, maintain, and operate equipment capable of providing primary Frequency Response as a condition of interconnection. Should there be a similar requirement in BAL-003 related to all equipment capable of providing primary Frequency Response?

[ ]  Yes

[ ]  No

Please explain your response:

Comments have been received stating there is a concern that the existing median methodology could be subject to reduced performance once a sufficient level of compliance has been achieved. One means of addressing this concern is to have an operational planning process and monitoring Real-time Frequency Response capability.

1. Should there be a requirement for Real-time Frequency Responsive Reserve (FRR) (similar to BAL-002, Requirement R2)?

[ ]  Yes

[ ]  No

 [ ]  Other

Please explain your response:

1. As a BA, do you calculate and monitor online FRRs in Real-time? If no, please explain impediments to doing so, if applicable. If yes, please describe your methodology.

[ ]  Yes

[ ]  No

 [ ]  N/A

Please explain your response: