

Consideration of Comments

Project Name:	2022-03 Energy Assurance with Energy-Constrained Resources Draft 1 TOP-003-7 and Draft 3 BAL-007-1
Comment Period Start Date:	9/19/2024
Comment Period End Date:	11/4/2024
Associated Ballot(s):	2022-03 Energy Assurance with Energy-Constrained Resources Draft 1 Implementation Plan IN 1 OT 2022-03 Energy Assurance with Energy-Constrained Resources Draft 1 TOP-003-7 IN 1 ST 2022-03 Energy Assurance with Energy-Constrained Resources BAL-007-1 AB 3 ST 2022-03 Energy Assurance with Energy-Constrained Resources Implementation Plan AB 3 OT

There were 54 sets of responses, including comments from approximately 167 different people from approximately 103 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, 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, contact Director, Standards Development [Jamie Calderon](#) (via email) or at (404) 446-9647.

Questions

BAL-007-1 Near-term ERAs

1. The drafting team (DT) modified BAL-007-1 based on industry feedback. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

BAL-007-1 Near-term ERAs

2. The DT updated the implementation plan to allow for 24 months for BAL-007-1 to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

BAL-007-1 Near-term ERAs

3. The DT proposes that the newly proposed BAL-007-1 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

BAL-007-1 Near-term ERAs

4. Provide any BAL-007-1 additional comments for the SDT to consider, if desired.

TOP-003-7

5. The drafting team (DT) modified TOP-003-6 to ensure industry that Near-Term ERA type data can be requested. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

TOP-003-7

6. The DT drafted the TOP-003-7 implementation plan allowing 18 months to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

TOP-003-7

7. The DT proposes that the modified TOP-003-7 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

TOP-003-7

8. Provide any TOP-003-7 additional comments for the SDT to consider, if desired.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System Performance)	1,3,5,6	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO

Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
George Brown	Pattern Operators LP	5	MRO
Larry Heckert	Alliant Energy (ALTE)	4	MRO
Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
Michael Ayotte	ITC Holdings	1	MRO
Andrew Coffelt	Board of Public Utilities-Kansas (BPU)	1,3,5,6	MRO
Peter Brown	Invenergy	5,6	MRO
Angela Wheat	Southwestern Power Administration	1	MRO

					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group, Inc.	3	RF
					Michelle Hribar	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
					Candace Morakinyo	WEC Energy Group, Inc.	4	RF
Independent Electricity System Operator	Helen Lainis	2		IRC SRC	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Charles Yeung	SPP	2	SERC
					Elizabeth Davis	PJM	2	RF

ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NPCC,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Jason Proconiar	Buckeye Power, Inc.	4	RF
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF

					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy- FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern Company Generation	5	SERC

Black Hills Corporation	Rachel Schuldt	6		Black Hills Corporation - All Segments	Travis Grablander	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power Company	1	NPCC

James Grant	NYISO	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC

Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
Vijay Puran	New York State Department of Public Service	6	NPCC
David Kiguel	Independent	7	NPCC
Joel Charlebois	AESI	7	NPCC
Joshua London	Eversource Energy	1	NPCC
Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
Joel Charlebois	AESI	7	NPCC
John Hastings	National Grid	1	NPCC
Erin Wilson	NB Power	1	NPCC
James Grant	NYISO	2	NPCC
Michael Couchesne	ISO-NE	2	NPCC
Kurtis Chong	IESO	2	NPCC
Michele Pagano	Con Edison	4	NPCC
Bendong Sun	Bruce Power	4	NPCC

					Carvers Powers	Utility Services	5	NPCC
					Wes Yeomans	NYSRC	7	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Nicolas Turcotte	Hydro Quebec	2	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	6		Dominion	Victoria Crider	Dominion Energy	3	NA - Not Applicable
					Sean Bodkin	Dominion Energy	6	NA - Not Applicable
					Steven Belle	Dominion Energy	1	NA - Not Applicable
					Barbara Marion	Dominion Energy	5	NA - Not Applicable
Shannon Mickens	Shannon Mickens		MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Mia Wilson	Southwest Power Pool Inc.	2	MRO
					Eddie Watson	Southwest Power Pool Inc.	2	MRO
					Erin Cullum	Southwest Power Pool Inc.	2	MRO

					Jonathan Hayes	Southwest Power Pool Inc.	2	MRO
					Jeff McDiarmid	Southwest Power Pool Inc.	2	MRO
					Scott Jordan	Southwest Power Pool Inc	2	MRO
					Mason Favazza	Southwest Power Pool Inc	2	MRO
					Sherri Maxey	Southwest Power Pool Inc.	2	MRO
					Josh Phillips	Southwest Power Pool Inc.	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC
Public Utility District No. 1 of Chelan County	Tamarra Hardie	6		CHPD	Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Rebecca Zahler	Public Utility District No. 1 of Chelan County	5	WECC

					Diane Landry	Public Utility District No. 1 of Chelan County	1	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC	Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC
					Santee Cooper	Vicky Budreau	3	
					Diana Scott	Santee Cooper	1,3,5,6	SERC

BAL-007-1 Near-term ERAs

1. The drafting team (DT) modified BAL-007-1 based on industry feedback. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Donald Lock - Talen Generation, LLC - 5

Answer

No

Document Name

Comment

R2.1.1-R2.1.3 lack specificity, creating risk that the scenarios postulated by BAs will fall short of the actual challenges that may be faced. This is especially the case when applying the rule, “The Near-Term ERA process shall account for...Forecasted or assumed Demand profiles.” PJM’s forecast for Winter Storm Elliott was low by 12 GW; ERCOT missed by 10 GW. BAL-007 ERAs may have little value until the forecasting state of the art advances enough to eliminate this problem.

A far more secure approach is to place more emphasis on R2.1.4, historical precedents. That is, require that ERCOT study a repeat of Winter Storm Uri, require that PJM study a repeat of the record-setting cold of January 1994, etc. The weather data for the plants we had in Texas in 2021 showed that Uri and the deep freeze event of Dec. 1989 were remarkably similar. There is no need for guesswork or statistical studies; just adopt the view that what happened before will eventually occur again.

BAL-007 should also require sufficient scenarios to address the changing mix of generation, e.g. a deep freeze with high wind for conventional plants, an ice storm for wind farms, and combination events (such as Winter Storm Uri).

Above all else, BAL-007 should make it clear that limiting the scenarios being studied to the EOP-012 ECWT is not sufficient. Recent generation capacity emergencies have generally involved temperatures well below the ECWT, plus high winds.

Likes 1

JEA, 1, McClung Joseph

Dislikes 0

Response

Thank you for your comment. A standard provides industry with the bare minimum of what is required to meet the standard. Balancing Authorities should use the most recent data and entities are welcome to go above and beyond the requirements of standard. Modification of the standard was made based on industry feedback.

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
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Document Name	
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Comment

BPA appreciates the effort made by the Drafting Team (DT) to make changes based on BPA’s comments during the previous comment period. BPA sees the value of the changes made but has identified an area for improved clarity in this draft. Please see comments below.

To allow for more defined coordination with other BAs, and to meet the intent of the “...Jointly with other Balancing Authorities...” language used throughout the BAL-007-1 requirements, BPA recommends the creation of a new term and definition similar to Reserve Sharing Group (RSG) in the NERC Glossary of Terms, as a NERC Compliance Registration (as seen with RSG, FRSG, etc.), and revisions to BAL-007-1 Requirement language, in order to allow an entity to be the ‘Responsible Entity’ for multiple BAs.

The intent of this new term and registration is to be included in BAL-007-1 in the applicability section and/or the Requirements to provide similar clarity to the placement of language used in BAL-002 and BAL-003, as seen below. BPA believes adding this to the standard would create continuity with other defined terms and registration types and clearly execute the intent for BAs to ‘jointly’ meet the reliability objectives outlined in BAL-007-1.

Section 4, Applicability of BAL-002-3:

4.1.1.1. “A Balancing Authority that is a member of a Reserve Sharing Group is the Responsible Entity only in periods during which the Balancing Authority is not in active status under the applicable agreement or governing rules for the Reserve Sharing Group.

4.1.2. Reserve Sharing Group

Section 4, Applicability of BAL-003-2:

4.1.1.1. Balancing Authority is the responsible entity unless the Balancing Authority is a member of a Frequency Response Sharing Group, in which case, the Frequency Response Sharing Group becomes the responsible entity.

4.1.2. Frequency Response Sharing Group

BAL-003-2, Requirement R1:

R1. "Each Frequency Response Sharing Group (FRSG) or Balancing Authority that is not a member of a FRSG shall..."

BPA believes its recommendations in question 1 align with benchmark 1, 8, and 10 of the 'Ten Benchmarks of an Excellent Reliability Standard' as referenced in the NERC Standards Process Manual, Section 4.4.2, 'Draft Reliability Standard'. BPA also views its recommendations as 'in scope' of this project as noted in bullet one of the SAR: "...create defined terms as needed..."

Additionally, BPA agrees with the Near-Term ERA Definition.

Likes	0
Dislikes	0

Response

Thank you for your comment.

The drafting team does not find developing a new term to capturing Reserve Sharing Group is appropriate at this time. It is clearly captured with BAL-007 that multiple BAs can work together and could create groups similar to Reserve Sharing Groups without a specific NERC-defined group. Other Regions may use different groups of multiple BAs that are called something other than "Reserve Sharing Groups;" therefore, the DT feels that multiple BAs is the appropriate path forward. Joint BAs enables BAs to work with other BAs to develop what is needed for BAL-007.

Dave Krueger - SERC Reliability Corporation - 10

Answer	No
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Document Name	
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Comment

The language in the current draft 3 BAL-007-1 R1 will allow entities to perform no evaluation of forecasted Demand and resource capabilities for self-determined time period(s). The language of BAL-007-1, draft 2 is preferred as compared to draft 3.

Likes 0

Dislikes 0

Response

Thank you for your comment. The draft standard was updated based on industry feedback, which is reflected in draft 3. Draft 3 also provides flexibility for entities, which was a major theme in the past round of comments.

Jessica Lopez - APS - Arizona Public Service Co. - 3

Answer

No

Document Name

Comment

The requirements in BAL-007-1 Draft 3 identify that “Each Balancing Authority shall, individually or jointly with other Balancing Authorities” perform/comply with the standard, however, this statement creates ambiguity and does not clearly specify ownership of compliance. To enhance clarity and accountability, it is essential to delineate the ownership and responsibility for compliance within the requirements more precisely. This can be achieved by specifying which functional entities are accountable for each compliance aspect and detailing the actions they must take. Such specificity facilitates better adherence to the requirements and clearly specifies ownership of compliance. In addition, the Measurement criteria should specify that each Balancing Authority shall have evidence of compliance. If the requirements include more than one BA or group of BAs, the measurements should be clear as to compliance ownership and mirror each requirement’s language.

For example, in BAL-002-WECC-3, the Functional Entities Applicability section 4.1, the Standard clearly defines who the responsible entity is for reporting:

4.1.1 Balancing Authority

4.1.1.1 The Balancing Authority is the responsible entity unless the Balancing Authority is a member of a Reserve Sharing Group, in which case, the Reserve Sharing Group becomes the responsible entity.

4.1.2 Reserve Sharing Group

4.1.2.1 The Reserve Sharing Group, when comprised of a Source Balancing Authority, becomes the source Reserve Sharing Group. 4.1.2.2 The Reserve Sharing Group when comprised of a Sink Balancing Authority becomes the sink Reserve Sharing Group.

There is concern that as BAL-007-1 Draft 3 includes each BA individually or jointly with other BAs, more specifically “jointly with other BAs” does not explicitly define who the responsible entity is for reporting. Since it is not written, a Balancing Authority may be under the impression that the group is the responsible entity for reporting and not the Balancing Authority themselves. With the inclusion of additional parties, it would be best served to explicitly define who the entity responsible is for compliance with the Standard.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT believes that “Each Balancing Authority” clearly puts the responsibility of meeting standard on each BA even if they perform activities to meet the standard together.

The DT does not find developing a new term to capturing Reserve Sharing Group is appropriate at this time. It is clearly captured within BAL-007 that multiple BAs can work together and could create groups similar to Reserve Sharing Groups without a specific NERC-defined group. Other Regions may use different groups of multiple BAs that are called something other than "Reserve Sharing Groups;" therefore, the DT feels that multiple BAs is the appropriate path forward. Joint BAs enables BAs to work with other BAs to develop what is needed for BAL-007.

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson

Answer

No

Document Name

Comment

RF has a concern with 1.3.1. An energy assessment should be required for each operating day. The intent of the standard is to conduct an energy assessment to identify a possible energy shortfall, by allowing an overly broad opt out option the intent of the standard will be lost. An applicable study should be on hand for each operating day (although performing a study periodically as proposed is acceptable).

Likes 0

Dislikes 0

Response

Thank you for your comment. The standard does not preclude an entity from completing energy assessments each operating day. It is up to the entity to determine when their energy assessments should be completed.

In addition, the standard requires specific timeframes based on 1.3.2 and for a documented method to determine when risk is low of an Energy Emergency.

Lastly, BAL-007 standard is not looking at next day. It is looking for several days out. The goal is to be prepared for next few days' to weeks' operations.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

No

Document Name

Comment

The flexibility and lack of defined methodology for defining time periods and criteria for identifying low risks is understandable, and perhaps appreciated, due to regional and system differences between entities. However, the lack of specificity creates concerns about how NERC will judge the proposed methodologies and criteria and how compliance will be measured/assessed.

Creating a 5-day plan will be very specific to conditions that have the potential to change, limiting the ability of our teams to act appropriately if they feel tied to the plan. Conversely, plans that are as long as 6 weeks are likely lacking timely enough data for decision making.

Additionally, the listed scenarios in R2 may not always be relevant and it's unclear whether each assessment must include an evaluation

of listed scenarios.

It is reasonable for to expect a level of preparedness planning when the scenarios in R2 are forecast but an action plan for mitigating risk is more what's needed rather than an operating plan to be implemented.

The ability to plan with other balancing authorities is appreciated.

Likes 0

Dislikes 0

Response

Thank you for your comment. If you are concerned with the development of your methodology, the DT encourages you to review it with your RC and your respective Region to get feedback.

The language was drafted to provide entities with flexibility allowing an entity to pick what is appropriate for you between 5 days and 6 weeks.

An entity must review each scenario laid out in Requirement R2. These are the bare minimum required of entities when complying with BAL-007-1.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

No

Document Name

Comment

We understand the purpose of the proposed BAL-007-1 reliability standard and Near-term Energy Reliability Assessment (ERA), however, a Near-term ERA is only necessary for special operating conditions which may be less than 10% of the time for many Balancing Authorities (BAs). Under normal operating conditions when the load is not high and resource availability is good, the Outage Coordination process in IRO-017-1 and Operations Planning process in TOP-002-4 would cover the desired contents of the Near-Term ERA, so the assessment is

not needed during normal operating conditions. The proposed BAL-007-1 requires too much procedural burden during normal operating conditions.

We suggest the Drafting Team revise Requirement R1 to reverse the order so that BAs document a process that accounts for **when** to conduct a Near-Term ERA first. Criteria for **when** BAs are required to conduct a Near-Term ERA should be listed as the first sub-requirement (e.g. Requirement R1.1) so that 90% of the time BAs do not have to complete one.

We agree with the details listed in Requirement R1.1.1 through R1.1.4. for what must be accounted for and the duration of the Near-Term ERA in Requirement R1.2., however, these should be listed after conditions for **when** a Near-Term ERA is required.

As currently written, the methodology for **when** a Near-Term ERA is not necessary because there is a low-risk of an Energy Emergency occurring is included down in Requirements R1.3.1 and R1.3.2. Since this is where BAs will operate more than 90% of the time, the conditions triggering a Near-Term ERA should be listed first in Requirement R1 and not last.

In addition, we suggest the Drafting Team simplify the original Requirement R1.3 and make it the new R1.1 as follows:

R1.1 The Near-Term ERA process shall specify the operating conditions for which the Balancing Authority will conduct a Near-Term ERA.

Likes 0

Dislikes 0

Response

Thank you for your comment. The draft standard was updated based on industry feedback, which is reflected in draft 3. Draft 3 also provides flexibility for entities, which was a major theme in the past round of comments.

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer

No

Document Name

Comment

The Los Angeles Department of Water and Power (LDWP) appreciates the opportunity to provide feedback on BAL-007-1. LDWP notes that many utilities, including those within our Balancing Authority Area, already comply with rigorous planning requirements set forth by state or local regulatory authorities, suggesting that the additional planning directives in BAL-007-1 may be potentially redundant. If the

intent is to improve coordination with the Reliability Coordinator (RC) during energy-constrained events, LDWP recommends that the Standard emphasize this goal directly, rather than imposing new planning mandates. This focused approach would prevent duplicating existing regulatory obligations.

Likes 0

Dislikes 0

Response

Thank you for your comment. The standard does not preclude an entity from completing energy assessments each operating day. It is up to the entity to determine when their energy assessments should be completed.

In previous drafts, it was proposed that the BA and RC complete back and forth coordination. Industry clearly explained that they felt this was an administrative burden based on the back and forth requirements drafted. At this point in the process, the DT feels it is important that the RC is made aware of the assessments completed. The RC may respond and if back and forth is completed by both functional entities, that additional step would be encouraged in the process.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

No

Document Name

Comment

ERCOT recommends that Requirement R1, Part 1.1 be revised to clarify that the Near-Term ERA process must account for the listed items as they may apply during the time period that any given Near-Term ERA assesses, not as generic items.

ERCOT likewise recommends that Requirement R1, Part 1.1.4 be revised to clarify that it refers to BES transmission constraints known at the time the Near-Term ERA is performed.

ERCOT further recommends that Requirement R1, Part 1.3 be clarified by replacing “the frequency with which the Balancing Authority will conduct Near-Term ERAs” with “how often the Balancing Authority will conduct Near-Term ERAs.”

To further clarify the Balancing Authority’s discretion in developing Scenarios under Requirement R2, ERCOT recommends that Part 2.1 be revised as follows: “ . . . (ii) other Scenarios that stress the system **to the degree determined and documented by the Balancing Authority** due to the following conditions . . . ”

ERCOT also recommends that Part 2.1.4 be revised to indicate that it refers to historical conditions from the time of year that the Near-Term ERA in question is assessing, thereby clarifying that responsible entities are not (for example) required to consider historical summer conditions during a Near-Term ERA that assesses a time period in the winter.

ERCOT appreciates the drafting team’s revisions to Requirements R3 and R5; however, ERCOT is concerned that these Requirements could be read to require potentially unnecessary actions based on assessments that rely on incomplete information (such as information regarding fuel supply chains) to examine events that have a very low probability of occurring. Consequently, ERCOT recommends that Requirements R3 and R5 be removed from BAL-007 so that entities can focus on dialing in their ERAs under this first version of BAL-007. If the requirements are retained, ERCOT recommends that Requirement R3 be revised to more explicitly indicate that Operating Plans are only required to be documented for forecasted EEA2 and EEA3 circumstances, consistent with Requirement R5.

Finally, ERCOT recommends that “documented” be replaced with “provided” in Measure M6 to better align with the language used in Requirement R6.

Likes	0
Dislikes	0

Response

Thank you for your comment. The standard was drafted at a level that allows flexibility among entities. During the drafting of this standard, the DT discovered that entities complete the ‘how’ in different ways. ERCOT can be as specific in its process as to how it is addressing the ‘how’ of the requirements.

The focus of Requirement R1 Part 1.1.4. is on Known Bulk Electric System (BES) Transmission constraints that limit the ability of generation to deliver their output to Load. Requirement R1 has been drafted at a generic level to provide flexibility on what works best for ERCOT. Based on comments received over the past many drafts, the DT does not feel it needs to provide more specificity. You can put your known BES transmission constraints within your process.

Requirement R1 focuses on you drafting out your process. You can be specific with how often you will conduct your Near-Term ERA in your process documentation. The flexibility is there for you to add something to the extent of "if deemed necessary."

The language in Requirement R2 is flexible enough for an entity to add to the degree determined and documented by the BA within its process of R1. In addition, the language is clear that Operating Plans are required for forecasted EEAs. Operating plans are the responses needed for forecasted EEAs.

While it is the intent for BAs to perform the ERA, jointly or individually, they are each responsible for documenting their scenarios and operating plans. The DT feels it is clear that this is what is required in R3 and R5.

Please see the updated measure M6.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	Yes
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Document Name	
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Comment

FirstEnergy has no comments on BAL-007-1's proposed draft.

Likes 0	
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Dislikes 0	
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Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer	Yes
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Document Name	
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Comment

Duke Energy supports the proposed changes made to BAL-007-1, Draft 3.

Likes 0	
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Dislikes	0
Response	
Thank you for your support.	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNM agrees with the changes to BAL-007-1.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 1	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI on question 1.	

Stephanie Kenny - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
See EEI Comments	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the proposed changes to BAL-007-1, Draft 3.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	

"See EEI Comments"	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed changes made to BAL-007-1, Draft 3.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
The response if provided on behalf of Exelon representing Segments 1 and 3	
Likes	0
Dislikes	0

Response	
Thank you.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company supports the submitted comments by EEI.	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE recommends using consistent verbiage for maintaining documented processes/specifications in BAL-007-1 and TOP-003-7. BAs and TOPs should be documenting and maintaining the processes and specifications. Texas RE recommends the following revisions in BAL-007-1 Requirements R1, R2, and R3:

R1. Each Balancing Authority shall, individually or jointly with other Balancing Authorities, **maintain a documented process** for conducting Near-Term Energy Reliability Assessments (ERA).

R2. Each Balancing Authority shall, individually or jointly with other Balancing Authorities, **maintain a documented set** of Scenarios, or a method for developing Scenarios, for use in performing Near-Term ERAs.

In Requirement R3, Texas RE is concerned that there is no limit associated with the probability of the risk level for documenting the operating plan(s). BAs should have the option to define the probabilistic threshold for declaring the Energy Emergency based on the simulations. It may be administratively cumbersome to document Operating Plan(s) for each ERA simulation for which the simulations indicate a low probability of an Energy Emergency. The BAs should define the probabilistic risk threshold limit based on their system conditions/scenarios (for example, if the probability of declaring Energy Emergency is less than X%, BAs should not have to document any Operating Plan(s)).

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see Requirement R6, which requires "Each Balancing Authority shall, individually or jointly with other Balancing Authorities, review, update, as necessary, and provide to the applicable Reliability Coordinator its Near-term ERA process, Scenarios or methods, and Operating Plan(s), documented under Requirements R1 through R3, at least once every 24 calendar months."

The Balancing Authorities are required to define and document their operating plans which include any thresholds by which they will implement. There is flexibility in how the BA develops its operating plans, but they must implement operating plans based on EEA and

scenarios. The DT does not believe that this precludes the use of probabilistic methods or risk of EEA for forecasted EEAs. The BA can define this in the BA’s documented process.

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

WECC voted Affirmative, but suggests the DT consider the following:

Requirement R2 provided the BA (or joint BAs) to either document a set of Scenarios OR a **method** for developing Scenarios however Requirement R2 Part 2.1 only describes a “set of Scenarios” and does not mention “method”. Suggest changing language to 2.1 “The set of Scenarios, **or the method for developing Scenarios** must include....” Requirement R3 should pluralize Reliability Coordinator as the BAs may very well have different Reliability Coordinators but intend to use the same Operating Plan(s). Requirement R6 should delineate the efforts of reviewing, updating, and providing the materials listed. A Near-Term ERA, by definition is Near-Term and will be reviewed and updated in a much shorter timeframe than 24 calendar months. Operating Plans are similar in nature in that they can cover a short time period. Perhaps the process documentation (Near-Term ERA document, Scenario method, methodology for not doing a Near Term ERA—which is not mentioned here) should be provided but the outputs need a more realistic time period for provision to the RC.

Likes 0

Dislikes 0

Response

Thank you for your comment. If you are concerned with the development of your methodology, the DT encourages you to review it with your RC and your respective Region to get feedback.

The language was drafted to provide entities with flexibility allowing an entity to pick what is appropriate for you between 5 days and 6 weeks.

An entity must review each scenario laid out in Requirement R2. These are the bare minimum required of entities when complying with BAL-007-1.

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

Document Name

Comment

For an entity whose generation is mostly reservoir-based hydro, the “near-term energy reliability assessment” horizon does not ensure reliability. Reliability is rather achieved on an annual and multi-annual horizon where water consumption, water levels and adequate storage are analyzed. In the near-term, refinement of what was planned in the long term is what occurs. In the case where an entity has full control over the reservoir, the notion of fuel supply, energy risk and energy emergency is low because this type of reservoir-based hydro is not a constrained resource. Is the new R1.3 meant to cover this scenario?

Likes 0

Dislikes 0

Response

Thank you for your comment. Requirement R1 focuses on you drafting out your process. You can be specific with how often you will conduct your Near-Term ERA in you process documentation. The flexibility is there for you to add something to the extent of "if deemed necessary."

Yes. The new R1.3 is meant to cover this scenario as well as the Near-term ERA is meant to support the refinement of what long-term planned.

BAL-007-1 Near-term ERAs

2. The DT updated the implementation plan to allow for 24 months for BAL-007-1 to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer No

Document Name

Comment

ERCOT appreciates the revised implementation timeline; however, ERCOT notes that entities are developing improvements to internal processes to improve energy capabilities for the operations planning horizon while these new NERC requirements are still being finalized. It is unknown at this time what the impacts of the new requirements will be, but resources will be needed to fully integrate and implement the NERC standards with internal processes. Consequently, while ERCOT appreciates the updates to the implementation plan, ERCOT requests that the implementation plan be further revised to allow at least 36 months for the implementation of all Requirements in BAL-007-1.

Likes 0

Dislikes 0

Response

Thank you for your comment. With the removal of the administrative type requirements from the last draft, the DT did not feel that 36-months had adequate justification for development, implementing, and maintaining of what is required in BAL-007-1. Therefore. The DT feels that 24 months suffices.

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern Company supports the submitted comments by EEI.

Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
If this Standard becomes enforceable, a 24-month implementation timeline would provide sufficient time for compliance.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
The response if provided on behalf of Exelon representing Segments 1 and 3	
Likes	0
Dislikes	0
Response	

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer Yes

Document Name

Comment

Yes, limiting the proposed BAL-007-1 to Balancing Authorities makes the 24-month implementation reasonable.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EI supports the proposed updated implementation plan.

Likes 0

Dislikes 0

Response

Thank you for your support.

Selene Willis - Edison International - Southern California Edison Company - 5

Answer Yes

Document Name	
Comment	
"See EEI Comments"	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the proposed updated implementation plan.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Stephanie Kenny - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	

See EEI Comments	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Jessica Lopez - APS - Arizona Public Service Co. - 3	
Answer	Yes
Document Name	
Comment	
APS agrees with the updated Implementation Plan to allow for 24 months for BAL-007-1 to become compliant.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 2	
Likes	0

Dislikes	0
Response	
Please see the DT's response to EEI.	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNM agrees with the 24 month implementation timeline.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Texas RE noticed there is no Effective Date header as is typical in other implementation plans.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. See updated implementation Plan.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	

Answer	Yes
Document Name	
Comment	
Duke Energy supports the proposed updated implementation plan.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no comments on BAL-007-1's implementation plan.	
Likes 0	
Dislikes 0	
Response	
Thank you.	
Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Dave Krueger - SERC Reliability Corporation - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donald Lock - Talen Generation, LLC - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	

Answer	
Document Name	
Comment	
BC Hydro is unable to support the implementation plan at this time as additional clarifications to Requirements are needed prior to assessing the implementation plan.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

BAL-007-1 Near-term ERAs

3. The DT proposes that the newly proposed BAL-007-1 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

There was no cost/benefit study to show this is a cost-effective approach. It appears that BAs will have to conduct assessments that they were never intended to do, and they will have to acquire the specialized skills needed.

Likes 1 Jennie Wike, N/A, Wike Jennie

Dislikes 0

Response

Thank you for your comment. The white paper released in December 2020 expressed the importance of ensuring energy adequacy with energy constrained resources. The problem statement identified that unassured fuel supplies, including the timing and inconsistent output from variable renewable energy resources, fuel location, and volatility in forecasted load, can result in insufficient amounts of energy on the system to serve electrical demand and ensure the reliable operation of the Bulk Power System (BPS) throughout the year. Based on the importance of the above listed problem statement, BAL-007 ensures that BAs assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon. Based on the importance of this risk, the DT feels the requirements are at an adequate level to achieve the reliability benefits in a cost-effective manner. In addition, please see technical justification in the SAR. Lastly, this is why questions are asked to industry with regards to the cost implication with regards to the requirements being drafted. This is the time for industry to provide feedback to the drafting team regarding overly burdensome costs that need to be considered when addressing the proposed Reliability Standards.

Jessica Lopez - APS - Arizona Public Service Co. - 3

Answer No

Document Name

Comment	
There is no technical justification of the reliability-related benefits and costs for this project.	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The white paper released in December 2020 expressed the importance of ensuring energy adequacy with energy constrained resources. The problem statement identified that unassured fuel supplies, including the timing and inconsistent output from variable renewable energy resources, fuel location, and volatility in forecasted load, can result in insufficient amounts of energy on the system to serve electrical demand and ensure the reliable operation of the Bulk Power System (BPS) throughout the year. Based on the importance of the above listed problem statement, BAL-007 ensures that BAs assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon. Based on the importance of this risk, the DT feels the requirements are at an adequate level to achieve the reliability benefits in a cost-effective manner. In addition, please see technical justification in the SAR. Lastly, this is why questions are asked to industry with regards to the cost implication with regards to the requirements being drafted. This is the time for industry to provide feedback to the drafting team regarding overly burdensome costs that need to be considered when addressing the proposed Reliability Standards.</p>	
<p>Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC</p>	
Answer	No
Document Name	
Comment	
No cost-benefit explanation or analysis was provided.	
Likes	0
Dislikes	0

Response

Thank you for your comment. The white paper released in December 2020 expressed the importance of ensuring energy adequacy with energy constrained resources. The problem statement identified that unassured fuel supplies, including the timing and inconsistent output from variable renewable energy resources, fuel location, and volatility in forecasted load, can result in insufficient amounts of energy on the system to serve electrical demand and ensure the reliable operation of the Bulk Power System (BPS) throughout the year. Based on the importance of the above listed problem statement, BAL-007 ensures that BAs assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon. Based on the importance of this risk, the DT feels the requirements are at an adequate level to achieve the benefits in a cost-effective manner. In addition, please see technical justification in the SAR. Lastly, this is why questions are asked to industry with regards to the cost implication with regards to the requirements being drafted. This is the time for industry to provide feedback to the drafting team regarding overly burdensome costs that need to be considered when addressing the proposed Reliability Standards.

Fausto Serratos - Los Angeles Department of Water and Power - 3

Answer

No

Document Name

Comment

Many utilities, including those within LDWP’s Balancing Authority Area, fulfill planning requirements set by their state or local regulatory authorities, making this Standard potentially redundant. From LDWP’s perspective, this Standard does not improve reliability and only adds an additional compliance burden to entities.

Likes 0

Dislikes 0

Response

Thank you for your comment. The white paper released in December 2020 expressed the importance of ensuring energy adequacy with energy constrained resources. The problem statement identified that unassured fuel supplies, including the timing and inconsistent output from variable renewable energy resources, fuel location, and volatility in forecasted load, can result in insufficient amounts of energy on the system to serve electrical demand and ensure the reliable operation of the bulk power system (BPS) throughout the year. Based on the importance of the above listed problem statement, BAL-007 ensures that BAs assess, report, and plan to address forecasted

Energy Emergencies in the near-term time horizon. Based on the importance of this project, the DT feels the requirements are at an adequate level to not add a cost-effective concern. In addition, please see technical justification in the SAR.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy has no comments on BAL-007-1's cost effectiveness.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

The response if provided on behalf of Exelon representing Segments 1 and 3

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name	
Comment	
Southern Company supports the submitted comments by EEI.	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donald Lock - Talen Generation, LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dave Krueger - SERC Reliability Corporation - 10	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy will not submit comments on the cost effectiveness of the proposed BAL-007-1 Reliability Standard.	

Likes 0	
Dislikes 0	
Response	
Thank you.	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	
Document Name	
Comment	
Black Hills Corporation will not comment on cost effectiveness.	
Likes 0	
Dislikes 0	
Response	

BAL-007-1 Near-term ERAs

4. Provide any BAL-007-1 additional comments for the SDT to consider, if desired.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

In the Near-Term Energy Reliability Assessment definition, it is unclear which operating day the definition is referring to, and it is unclear whether the term “assessment period” refers to the time period being assessed or the time the responsible entity spends performing the assessment. To clarify this, ERCOT recommends that the definition be revised to read as follows: “An Energy Reliability Assessment that assesses a time period that is between five days and six weeks long and begins no later than two days after the operating day in which the responsible entity begins conducting the Near-Term Energy Reliability Assessment.”

In BAL-007-1, Requirement R1, Part 1.2, it is likewise unclear whether “duration” refers to the time period being assessed or the time the responsible entity spends performing the assessment. To clarify this, ERCOT recommends that Part 1.2 be revised to read “The Near-Term ERA process shall specify the length of the time period that the Balancing Authority’s Near-Term ERAs will assess.”

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT feels that the current proposed definition is clear, based on comments received over the past couple of comment periods, and majority of industry is in agreement with what was proposed in draft 3. The DT does not feel that the proposed language provides additional clarity.

Regarding duration, it is up to the entity to select the duration that works for it based on the parameters placed in the definition of up to 5 days and 6 weeks.

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
Southern Company supports the submitted comments by EEI.	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	
Document Name	
Comment	
LDWP also have the following additional comments:	
<ol style="list-style-type: none"> 1. Because many utilities already have a comprehensive forward-looking plan that mirrors the Near-Term ERAs, creating a standard will cause undue burden upon the utilities without adding any margin to reliability. This undue burden would come in the form of additional documentation creation, documentation retention, and resources to effectively comply to the new Near-Term ERA requirements throughout the year and during audits (internal and external). 2. Clarification on Reporting Intent: Once a report is submitted to the RC, the Standard does not clearly specify any further actions beyond raising awareness. Is the primary intent of the Standard solely to inform the RC, or are additional measures anticipated? 3. Defining Forecasted Energy Constraints: Energy Emergency Alerts (EEAs) pertain to real-time events, whereas this Standard addresses forecasted energy or capacity shortfalls. LDWP suggests establishing a separate term, such as "Energy or Capacity Constrained Events" (ECCE), to distinguish forecasted constraints from real-time emergencies. 	

4. Is sub-requirement 2.1.2 essential? Entities are already mandated by BAL-002 to maintain Operating Reserves, which entities should already plan for through the Energy Planning Assessment period. Duplication of reserve requirements may be unnecessary.

Likes 0

Dislikes 0

Response

Thank you for your comments.

1. The DT respectfully disagrees that BAL-007-1 will cause an undue burden. Please see the Energy Assurance White Paper, which explains the importances of why this standard is needed today. Link to white paper:
<https://www.nerc.com/comm/RSTC/ERATF/ERATF%20Energy%20Adequacy%20White%20Paper.pdf>
2. In previous drafts, it was proposed that the BA and RC complete back and forth coordination. Industry clearly explained that they felt this was an administrative burden based on the back and forth requirements drafted. At this point in the process, the DT feels it is important that the RC is made aware of the assessments completed. The RC may respond and if back and forth is completed by both functional entities, that additional step would be encouraged in the process.
3. Forecasted EEAs are different from current EEAs.
4. Sub-Part 2.1.2. is important because modeling the effects of energy supply contingencies is critical to preparedness. While they may not require explicit actions to be taken in the absence of the occurrence of a contingency, neglecting the possibility of energy supply contingencies in an Energy Reliability Assessment will leave BAs unprepared when unexpected outages do occur. More simply put, ignoring the possibility of contingencies exposes operators to risks that they may not be prepared to mitigate.

Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	
Document Name	
Comment	
<p>It is the continued opinion of ACES that by referencing the EEA levels defined in EOP-011 Attachment 1 Section B, the SDT is deviating from the long-established precedent of NERC Reliability Standards being “stand-alone”.</p> <p>While we appreciate the difficulties faced by the SDT in meeting the deadline established for the proposed BAL-007-1, we do not agree that referencing another standard is the correct approach. We strongly recommend the SDT include the applicable EEA levels in an attachment to BAL-007-1 and not reference another Reliability Standard.</p> <p>Thank you for the opportunity to comment.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Per the NERC Standards process, it is fine to point to the EEAs in EOP-011 from BAL-007. Any drafting team making changes in the future, are required to review all connections that may change the intent from what is being modified and address accordingly.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	
Document Name	

Comment

We would like to thank the Drafting Team for considering the previous comments and understanding the impacts of how this new reliability standard may disproportionately affect organizations based on their business practices, corporate structure, and membership in cooperative organizations.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Document Name

Comment

Please see ACES comments, AEPC has signed on to ACES comments.

Likes 0

Dislikes 0

Response

Please see the DT's response to ACES.

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer

Document Name

Comment

For Requirement 1.3.1, “Each BA will conduct Near Term ERAs for all time periods...” are we to assume all time periods means the daily time period AND the monthly time period?

For Requirement 1.1.4, do the “Known Bulk Electric System Transmission constraints that limit the ability of generation to deliver their output to load” have to be identified in the Near-Term Energy Reliability Assessment period?

In Requirements 3 & 5, the operating plan for Energy Emergencies (EEA2 and EEA3) are documented in the EOP-011 Operating Plan. Is there a reason to have it here also?

Likes 0

Dislikes 0

Response

Thank you for your comment.

Requirement R1 Part 1.3.1. This is for all time periods.

Requirement R1 Part 1.1.4. Yes, it has to be identified in the Near-Term Energy Reliability Assessment period. Please see parent requirement.

Requirements R3 and R5. It is important that EEAs remain in BAL-007-1. There are three EEA levels, two of which are associated with forecasted Energy Emergencies. The criteria for forecasted Energy Emergency apply also to Scenarios identified in Requirement 2. This level of granularity allows for the BA to design an Operating Plan that fits the specific situation. Some Scenarios may be expected to enter the lower levels of an Energy Emergency, and the actions in an Operating Plan should be appropriate for that combination. Finally, by leveraging the existing terms used in EOP-011 for EEA, clear and well-understood definitions are already in place which require little to no training, beyond the advanced timing associated with BAL-007-1. BAs have existing interpretations of how they respond when nearing or entering an EEA and the existing interpretations are expected to be used, including those that involve interaction with Reserve Sharing Groups.

The DT does not believe that the EEAs descriptions need to be in this standard in addition to EOP-011 so that the two standards remain aligned. Per the NERC Standards process, it is fine to point to the EEAs in EOP-011 from BAL-007. Any drafting team making changes in the future, are required to review all connections that may change the intent from what is being modified and address accordingly.

Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	
Document Name	
Comment	
<p>Ameren supports the comments provided by MISO:</p> <p>Purpose: Should “time horizon” be “Operations Planning horizon?”</p> <p>To assess, report, and plan to address forecasted Energy Emergencies in the near-term <i>time horizon</i>.</p> <p>Part 2.1.4. Eliminate the word “best” as illustrated below.</p> <p>2.1.4. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based on the best information available at the time of Scenario development.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.</p> <p>Please see the updated BAL-007-1 where “best” has been removed from Requirement R2 Part 2.1.4.</p>	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	

Minnesota Power supports MRO’s NERC Standards Review Forum’s (NSRF) comments.

Likes 0

Dislikes 0

Response

Please see the DT’s response to MRO NSRF.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

Document Name

Comment

It is difficult to contemplate how NERC will measure compliance with this standard. What if conditions change such that different actions are necessary than what is filed/planned in the ERA? Are there ramifications or compliance issues?

Likes 0

Dislikes 0

Response

The standard lays out the what is an ERA and timeframe of an ERA, where needed, and not the how to perform an ERA. It is up to the entity to draft its processes and follow the process it has laid out for its entities regarding the ERA. If conditions change, then you will update your process accordingly.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

NPCC RSC supports the project.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	
Document Name	
Comment	
In the definition of Near-Term Energy Reliability Assessment, the term “no later than two days after the operating day” could be clarified to align better with the definition of Operational Planning Analysis. Clearer language should be used such as “current day” instead of “operating day”.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The DT feels that the current proposed definition is clear, based on comments received over the past couple of comment periods, and the majority of industry is in agreement with what was proposed in draft 3. The DT does not feel that the proposed language provides additional clarity.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	
Document Name	
Comment	

Coordinate “Effective Date” reference in the Standards (TOP-003 and BAL-007) to be consistent—either call out the Project (probably correct way) or the Standard—may be a Quality Review item. For Evidence Retention, six months is an ineffective retention date to demonstrate Requirement R6 evidence. The Evidence Retention needs to extend there to 24 calendar months as a minimum to be auditable in an effective manner. Without evidence being retained there would be a lot of questions needing answered to ascertain efforts.

Requirement R2 VSL discussing the method for Scenario creation but the language of R2 does not support the VSL (see comment above regarding R2). Requirement R6 VSL uses the descriptor “ERA” in front of Scenarios but that is not in the language of the Standard.

In the Implementation Plan, “Assessment” needs to be lower-cased in the proposed definition for Energy Reliability Assessment (second to last word in definition). The Implementation Plan for the definitions does not coincide with implementation of TOP-003-7 which uses “Near-Term Energy Reliability Assessment”. The DT should match the 18 month Implementation Plan of TOP-003-7 to be effective for the definitions.

Likes	0
Dislikes	0

Response

Thank you for your comments.

Please see the updated Implementation Plan regarding the “Effective Date.” In addition, the evidence retention section in TOP-003-7 has been updated with the Near-Term Energy Reliability Assessments for Requirements R2 and R4.

Please see the updated Requirements R2 and R6 VSLs.

Lastly, “Assessments” has been lowercased in the Implementation Plan.

Jessica Lopez - APS - Arizona Public Service Co. - 3

Answer	
Document Name	

Comment

APS offers the following comments for consideration:

- Currently, the BAL-007-1 Draft 3 “Purpose” states: *To assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon.*

The purpose statement as written appears to indicate that Balancing Authorities are to assess Energy Emergencies, report Energy Emergencies and address Energy Emergencies which is not the intent of the proposed Standard. Rather, the intent is for Balancing Authorities to assess their specific risks to mitigate potential Energy Emergencies and mitigate.

To provide greater specificity, the Standard Drafting Team should consider the following proposed revisions to the BAL-007-1 purpose statement as such: *To ensure the Balancing Authority has documented its Near-Term Energy Reliability Assessment process for identifying its risks, establishing plans to address risks, implement actions where applicable and report to its Reliability Coordinator(s).*

- The BAL-007-1 Draft 3 version proposes to remove the Reliability Coordinator from the Standards Applicability and solely identifies the Balancing Authority. In the BAL-007-1 Draft 3 version, Requirement 6 requires the BA to provide its Near-Term ERA process, scenarios, and Operating Plans to the RC, however, it is unclear what the expectation is for the Reliability Coordinator upon receipt of the information. The Standard Drafting Team should consider incorporating and/or marrying the expectations in Reliability Coordinator related Standards, such as IRO-010-4.
- The Balancing Authority and overall grid reliability are essential functions of electricity providers. In order to achieve and maintain this high level of reliability, providers already perform near term assessments of load and resource balances, reserve margins and fuel availability on a continuous basis. When potential problems are identified, mitigating actions are taken. Adding additional administrative burdens to document common industry practices is unnecessary and wasteful, potentially tying up resources that would be more effective elsewhere. This proposed standard would only add administrative burdens and costs to entities without adding incremental reliability benefits.

Likes 0

Dislikes 0

Response

Thank you for your comments. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.

In previous drafts, it was proposed that the BA and RC complete back and forth coordination. Industry clearly explained that they felt this was an administrative burden based on the back and forth requirements drafted. At this point in the process, the DT feels it is important that the RC is made aware of the assessments completed. The RC may respond and if back and forth is completed by both functional entities, that additional step would be encouraged in the process.

The DT respectfully disagrees that BAL-007-1 will cause an undue burden. Please see the Energy Assurance White Paper, which explains the importances of why this standard is needed today. Link to white paper:

<https://www.nerc.com/comm/RSTC/ERATF/ERATF%20Energy%20Adequacy%20White%20Paper.pdf>

Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 4

Likes	0
Dislikes	0
Response	
Please see the DT's response to MRO NSRF.	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	
Document Name	
Comment	
<p>Purpose: Should "time horizon" be "Operations Planning horizon?"</p> <p>To assess, report, and plan to address forecasted Energy Emergencies in the near-term <i>time horizon</i>.</p> <p>Part 2.1.4. Eliminate the word "best" as illustrated below.</p> <p>2.1.4. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based on the information available at the time of Scenario development.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.	
Please see the updated Requirements R2 and the removal of the word "best."	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	

Comment	
NA	
Likes	0
Dislikes	0
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	
Document Name	
Comment	
Suggest modifying:	
Purpose: "To assess, report, and plan to address forecasted Energy Emergencies in the Operations Planning time horizon".	
2.1.4. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based upon the information available at the time of Scenario development.	
Likes	0
Dislikes	0
Response	
Thank you for your comments. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	
Document Name	

Comment

Purpose: Should “time horizon” be “Operations Planning horizon?”

To assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon.

Part 2.1.4. Eliminate the word “best” as illustrated below.

2.1.4. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based on the information available at the time of Scenario development.

Likes 0

Dislikes 0

Response

Thank you for your comments. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.

Please see the updated Requirement R2 and the removal of the word “best.”

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Purpose: Should “time horizon” be “Operations Planning horizon?”

To assess, report, and plan to address forecasted Energy Emergencies in the near-term time horizon.

Part 2.1.4. Eliminate the word “best” as illustrated below.

2.1.4. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based on the information available at the time of Scenario development.

Likes	0
Dislikes	0
Response	
<p>Thank you for your comments. The focus of BAL-007-1 is Near-Term ERAs for operations planning. The team feels the current purpose within the standard is clear and has been accepted by majority of industry.</p> <p>Please see the updated Requirement R2 and the removal of the word “best.”</p>	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	
Document Name	
Comment	
<p>BC Hydro appreciates the drafting team's efforts and the opportunity to comment, and offers the following comments and suggestions:</p> <ol style="list-style-type: none"> Requirement R2 Part 2.1 as written appears to only apply if the BA elected to document a set of Scenarios. If the intent is for Part 2.1 to also apply if a methodology is chosen instead, BC Hydro recommends that R2 be revised to clarify whether the expectations to have a base Scenario and stressed Scenarios due to 2.1.1 through 2.1.4 conditions would also need to be part of the methodology. Requirement R2 Part 2.1.4 includes the word “best”. Other stressed conditions that have a historical precedent of occurring, as defined by the Balancing Authority, based on the best information available at the time of Scenario development. <p>BC Hydro recommends that the word “best” be removed as “best” is not measurable or auditable.</p> <ol style="list-style-type: none"> Measure M2 as written (“Each Balancing Authority shall document the rationale for the Scenarios”) appears to set a new Requirement, i.e. document a rationale, in addition to R2, which only requires documentation of Scenarios (or method). <p>BC Hydro requests that the Measure M2 be revised to conform to the language of the Requirement R2.</p> <ol style="list-style-type: none"> Requirement R3 requires a BA to document one or more Operating Plan(s) (OP(s)) to implement in response to forecasted Energy Emergencies, Requirement R5 requires a BA to implement the OP(s) as documented in Requirement R3 and Requirement R6 requires a BA to review the OP(s) at least every 24 calendar months. These three together can be interpreted that the intent of Requirement R3 is 	

for a BA to have a standing OP(s) that can be implemented for any forecasted Energy Emergency as opposed to specific OP(s) created once an individual Energy Emergency has been forecasted. This interpretation would also align with EOP-011-4 which requires a standing OP that is then implemented when an Energy Emergency happens. The technical rationale also implies a standing OP(s) as the wording mentions prior to forecasting Energy Emergencies. However, as Requirement R3 is not specific, another interpretation for Requirement R3 is that specific OP(s) are documented for each forecasted Energy Emergency after an Energy Emergency has been forecasted. This alternate interpretation would not align with Requirement R6 as there would be no standing OP(s) to review.

BC Hydro recommends that the drafting team clarify if the intent of Requirement R3 is for the BA to have a standing OP(s) which then, under Requirement R5 would be implemented for any forecasted Energy Emergency where specifics would be captured and which would align with Requirement R6; or if the intent is that the BA have a specific OP(s) for a forecasted Energy Emergency developed after an Energy Emergency is forecasted in which case Requirement R6 would need to be revised to remove the review of the OP(s) as the OP(s) would constantly be developed when a new Energy Emergency is forecasted.

If Requirement R3 is intended that OP(s) be created for specific forecasted Energy Emergencies, then if a BA has never had a forecasted Energy Emergency, they would not have an OP(s) under Requirement R3.

Regardless of which interpretation is chosen, as Requirement R3 does not specify a timeline for the BA to notify its RC of the OP(s), it's possible the OP(s) could have the RC notification be anytime (ex. notify RC of the forecasted Energy Emergency and OP(s) six months after the forecasted Energy Emergency). BC Hydro recommends revising Requirement R3 to include a timeline to notify the RC of the documented OP(s).

5. Requirement R6 references a BA's "applicable Reliability Coordinator", which can be subject to interpretation.

BC Hydro recommends that "applicable" be changed to "its" Reliability Coordinator which would align with the other Requirements as well as EOP-011.

6. BC Hydro notes that Requirement R6 includes providing the Near-term ERA process, Scenarios or methods to the applicable Reliability Coordinator. Therefore, the Reliability Coordinator would not see the Near-term ERA process, Scenarios or methods until potentially two years after they are documented. BC Hydro recommends documenting the reliability benefit of providing the Near-term ERA process, Scenarios or methods to the Reliability Coordinator as, as drafted, it is not timely and seems to be for information only.

7. Measure M6 requires each BA to “have evidence that it reviewed and documented its Near-term ERA process, Scenarios or methods, and Operating Plan(s) to its Reliability Coordinator”. BC Hydro suggests that M6 requires a grammar check. Similarly, the VSL Table for R6 Severe VSL would require a grammar check.

Likes 0

Dislikes 0

Response

Thank you for your comments.

1. The set of scenarios created from the process governed by the *method for developing Scenarios* should include the conditions in 2.1.1, 2.1.2, 2.1.3, and 2.1.4.
2. “best” has been removed from the Requirement R2 language.
3. Measure R2 has been updated to align with Requirement R2.
4. Operating Plans should be completed by Requirement R3.
5. The DT does not feel that “applicable” would be confusing when speaking to the applicable RC for the respective BA.
6. There is nothing precluding a BA from providing information to the RC earlier than two years.
7. The Requirement R6 measure has been updated to reflect the Requirement R6 language.

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	
Document Name	
Comment	
<p>Portland General Electric has two concerns with BAL-007 as currently drafted:</p> <p>First, the Requirements in the current draft for BAL-007 appear to document the Standard assessments that are occurring throughout the industry today. It is unclear whether any new actions will need to be taken, other than additional documentation of what is already being done. This only serves the purposes of compliance audits and reduces the value the Standard sought to add in the first place.</p> <p>Second, the SAR discusses the need for assessment of major regional or interconnection-wide disruptions, such as the loss of a major gas pipeline. This type of disruption could impact many Balancing Authorities and Reliability Coordinator areas simultaneously. In this situational example, each Balancing Authority potentially impacted by the outage would only be aware of the local impact, not the potential net regional impact. Each Balancing Authority would not know what responses other entities were taking because of the</p>	

disruption. It is reasonable to expect that each Balancing Authority would assume that their own gas plant capacity (or variable energy resources if that is what is being assessed) could be replaced by going to the market, based on historical availability, without the total impact being covered as part of any one assessment. As stated in comments on the previous draft, the Balancing Authority is not an appropriate entity to rely on, or put the burden on, for interconnection-wide reliability assessments. Per the NERC webinar on 10/10/24, there would be value if BA's, RC's and other regional entities came together to perform such assessments, but that is not a Requirement of BAL-007. Today, some regional entities are already pursuing this type of assessment, and others are not. There is no reason to believe that BAL-007 will change this. For that reason, BAL-007 does not appear to address the primary concerns from the SAR.

Likes 0

Dislikes 0

Response

Thank you for your comments. The purpose of BAL-007-1 is to assess the risks associated with Energy Emergencies in the near-term time horizon and take appropriate actions to address identified risk. As the Bulk-Power System becomes more reliant upon energy-constrained and variable resources, traditional capacity-based planning methods and strategies might not identify energy-related risks to reliable System operation. It is important for entities to assess and be prepared for the next week operations.

The DT updated BAL-007-1 based on industry comments received in the course of this project. The draft you see before you today, is where industry is in agreement. While additional assessments should be performed to assess system wide risks, this does not preclude the reliability benefit derived from BAs performing Near-term ERAs.

TOP-003-7

5. The drafting team (DT) modified TOP-003-6 to ensure industry that Near-Term ERA type data can be requested. Do you agree with the proposed changes? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Donald Lock - Talen Generation, LLC - 5

Answer No

Document Name

Comment

The information in TOP-003-7 R1.3.1, R1.3.2, R2.3.1 and R2.3.2 matches exactly that which must be developed by GOs for EOP-012-2, suggesting that generation plants are to forward this material to TOPs and BAs, who are then to make use of it. That exchange is not mandated by TOP-003-7, however, which says that TOPs and BAs shall have, "Provisions for notification of BES generating unit(s)...," i.e. TOP/BA-to-GO. Did you mean to call for GO-to-TOP/BA notification. i.e. from, not of?

Likes 1 JEA, 1, McClung Joseph

Dislikes 0

Response

Thank you for your comments. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6. Changes made are to make it clear that Near-Term ERA are to be part of the process. There are no specific changes on how you notify. That is up to the entities.

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

The Requirement R1 of the proposed TOP-003-7 (Draft 1) requires the TOP to maintain documented specification for the data and information necessary for it to perform its Energy Reliability Assessments.

The currently adopted TOP-003-6.1 Requirement R1 does not reference Energy Reliability Assessments. This drafted change has not been identified in the red line version of the proposed TOP-003-7, it was not covered during the October 10, 2024 industry webinar, nor was this proposed change indicated in any other documentation.

BC Hydro recommends that the language of R1 be revised to remove Energy Reliability Assessments which would align with TOP-003-6.1 R1.

Likes 0

Dislikes 0

Response

Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

BPA appreciates the effort made by the DT to make changes based on industry feedback. BPA has identified a few areas for improvement in this draft. Please see comments below.

BPA identified that R1 (applicable to the TOP) includes language pertaining to ‘Energy Reliability Assessments’. The ERA language was included in TOP-003-7 but not redlined as new from previous versions of TOP-003. BPA recommends the drafting team remove this language as Energy Reliability Assessments will be applicable to the BA, as per BAL-007-1, and included under R2 and R4 of TOP-003-7.

BPA seeks clarity regarding the DT’s inclusion of ‘Near-Term’ pertaining to ERA in TOP-003-7 R2 and R4. BPA has concerns that including a specific assessment term in the requirement language could potentially require standard revisions if any future assessments (or new terms/definitions) that may require data per TOP-003 are created. BPA offers a potential language revision for R2 and R4:

R2. Each Balancing Authority shall maintain documented specification(s) for the data and information necessary for it to perform its analysis functions (*e.g., Energy Reliability Assessments, etc.*) and Real-time monitoring. The data specification shall include, but not be limited to:

R2.1. A list of data and information needed by the Balancing Authority to support its analysis functions (*e.g., Energy Reliability Assessments, etc.*) and Real-time monitoring including non-Bulk Electric System data and information, and external network data and information, as deemed necessary by the Balancing Authority, and identification of the entity responsible for responding to the specification.

R4. Each Balancing Authority shall distribute its data and information specification(s) to entities that have data and information required by the Balancing Authority’s analysis functions (*e.g., Energy Reliability Assessments, etc.*) and Real-time monitoring.

Likes 0

Dislikes 0

Response

Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.

Based on industry feedback, half of industry was concerned that they would not be able to request data needed from TOP-003 to address Near-Term Energy Reliability Assessment in BAL-007-1. The DT added Near-Term ERA to TOP-003 to make it clear that this type of data can be requested via TOP-003. Per the standards development process, any time a definition is updated or changed, the DT making the change is to review all location. TOP-003 would be in that review before any modifications made and of course would go through the comment and ballot period with industry for comment and approval. Based on the last round of comments, majority of industry requested ERA be updated to the specific Near-Term ERA in TOP-003 as that is the data needed to address BAL-007-1. Therefore, the DT feels that Near-Term ERA is the appropriate term to use in TOP-003-7.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer	No
Document Name	
Comment	
R1 and R2 seem duplicative and ripe for error if you have shared responsibilities for the same information with the TO and BA. The applicability to the TO is also confusing as BAL-007 is specific to the BA. It is also unclear how compliance is evaluated - is NERC or the TO/BA identifying the relevant entities that have data and information required by the TO and/or BA's Operational Planning Analyses, Real-time monitoring, and Energy Reliability Assessments?	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no comments on TOP-003-6's proposed updates.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	

Comment

Duke Energy supports the changes made to TOP-003-6.

Likes 0

Dislikes 0

Response

Thank you for your support.

Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD

Answer

Yes

Document Name

Comment

There is an accidental reference to Energy Reliability Assessments in TOP-003-7 in R1, even though the BAL-007 data is not applicable to TOPs. As mentioned in the NERC project 2022-03 Energy Assurance Industry Webinar on 10/10/2024, this reference will be removed on the next draft.

Likes 1

Jennie Wike, N/A, Wike Jennie

Dislikes 0

Response

Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer

Yes

Document Name

Comment

EEI supports the changes made to TOP-003-6.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
TOP-003-7 R1 is only applicable to the TOP functions. It's not indicated as a redline but "Energy Reliability Assessments" were added to the R1 main requirement. This should be removed as it looks like it was added by mistake when the Near-Term Energy Assessments were added to the BA Requirements.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 5	

Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Jessica Lopez - APS - Arizona Public Service Co. - 3	
Answer	Yes
Document Name	
Comment	
APS agrees with the proposed changes to TOP-003-7.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	

Stephanie Kenny - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
See EEI Comments	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the changes made to TOP-003-6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	Yes
Document Name	
Comment	

"See EEI Comments"	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the changes made to TOP-003-6.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
Answer	Yes
Document Name	
Comment	
The proposed changes are minimal and will cause no undue burden on Balancing Authorities.	

Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
The response if provided on behalf of Exelon representing Segments 1 and 3	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company supports the submitted comments by EEI.	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	

Bryan Bennett - Sempra - San Diego Gas and Electric - 3	
Answer	Yes
Document Name	
Comment	
SDG&E needs to see what additional data, if any, will be needed by the CAISO as our BA so that they can perform the new Near-Term Energy Reliability Assessment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dave Krueger - SERC Reliability Corporation - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez

Answer	Yes
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
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Document Name	
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Comment	
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Texas RE noticed that TOP-003-7 Requirement R1 includes Energy Reliability Assessments in the documented specifications that the TOP shall maintain. BAL-007-1 requires BAs to conduct and Energy Reliability Assessment, but there does not appear to be a parallel requirement in TOP-003-7 for TOPs. Is it the intent of the SDT to require TOPs also conduct a Energy Reliability Assessment? Subpart 1.1 does not mention Energy Reliability Assessments. Texas RE is also concerned that the TOPs do not have the necessary system-wide level information for conducting Energy Reliability Assessments and would potentially be duplicating the work of the BAs.

Likes 0	
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Dislikes 0	
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Response	
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Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer

Document Name

Comment

Should TOP-003-7 take into account the scenario where a Near-Term ERA is determined to be not necessary for a specified time period(s) because there is a low risk of an Energy Emergency occurring during that specified time period(s) as per BAL-007-1 R1.3.1?

R1 of TOP-003-6.1 does not request maintaining documented specifications for data and information necessary for it to perform Energy Reliability Assessments, yet it has been added to R1 and is not redlined. Was it meant to be added to this requirement in this standard or was it meant for BAL-007-1? If meant for TOP-003-7, should Energy Reliability Assessments be listed in R1.1 as well given it is a sub requirement of R1?

Likes 0

Dislikes 0

Response

Thank you for your comment. TOP-003-7 Requirement R1 has been updated to reflect the correct language from TOP-003-6.

TOP-003-7

6. The DT drafted the TOP-003-7 implementation plan allowing 18 months to become compliant. Do you agree with the updated implementation plan? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer No

Document Name

Comment

Unknown at this time. SDG&E needs to see what additional data, if any will be needed by the CAISO before we are able to determine if 18 months will be sufficient time to become compliant.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez

Answer No

Document Name

Comment

IID believes that the implementation plan for TOP-003-7 should be the same 24-months implementation schedule as BAL-007-1.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The DT made TOP-003-7 effective at 18-months to allow GOs/GOPs to prepare data to be requested by BAs at the 24-month effective timeframe. The DT still feels that 18 months is appropriate for TOP-003-7 and 24 for BAL-007-1.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not support the proposed Implementation Plan for TOP-003-7 because it was not appropriately aligned with the Near-Term Energy Reliability Assessment definition Implantation Plan. EEI notes that this term will not go into effect until 6 months after TOP-003-7. Given this term is used in both Requirements R2 and R4 the implementation plan should not be approved until the implementation plan for this term is harmonized with the proposed implementation plan for TOP-003-7.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.	
Selene Willis - Edison International - Southern California Edison Company - 5	
Answer	No
Document Name	
Comment	

"See EEI Comments"	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
WEC Energy Group supports the comments of EEI.	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	No
Document Name	
Comment	
Ameren supports the comments provided by MISO:	

There is a mismatch in the implementation plan criteria. While standard TOP-003-7 becomes effective in 18 months following FERC approval, it refers to definitions under BAL-007 that do not become effective until 24 months following FERC approval. MISO proposes the Standard Drafting Team align the two so that they become effective at the same time.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez

Answer

No

Document Name

Comment

More information is needed to clarify TO and BA responsibilities, the documentation and evidence for required data and information and compliance obligations, in general.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer

No

Document Name

Comment

See EEI Comments	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	No
Document Name	
Comment	
ITC agrees with EEI's comments.	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Jessica Lopez - APS - Arizona Public Service Co. - 3	
Answer	No
Document Name	
Comment	
APS agree with the following EEI comments:	
EEI does not support the proposed Implementation Plan for TOP-003-7 because it was not appropriately aligned with the Near-Term Energy Reliability Assessment definition Implantation Plan. EEI notes that this term will not go into effect until 6 months after TOP-003-	

7. Given this term is used in both Requirements R2 and R4 the implementation plan should not be approved until the implementation plan for this term is harmonized with the proposed implementation plan for TOP-003-7.

Likes 1 Jennie Wike, N/A, Wike Jennie

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7. Please see the DT’s response to EEI.

Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments

Answer No

Document Name

Comment

Black Hills Corporation would like to see the Implementation Period changed to 24 months to align with the effective date of the definition for the Near-Term Energy Reliability Assessment.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT made TOP-003-7 effective at 18-months to allow GOs/GOPs to prepare data to be requested by BAs at the 24-month effective timeframe. The DT still feels that 18 months is appropriate for TOP-003-7 and 24 for BAL-007-1.

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

There is a mismatch in the implementation plan criteria. While standard TOP-003-7 becomes effective in 18 months following FERC approval, it refers to definitions under BAL-007 that don't become effective until 24 months following FERC approval.

NV Energy would recommend that the terms that are currently defined in BAL-007 have an implementation date prior to TOP-003-7 becoming effective.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 6

Likes 0

Dislikes 0

Response

Please see the DT's response to MRO NSRF and EEI.

Sean Bodkin - Dominion - Dominion Resources, Inc. - 6, Group Name Dominion

Answer

No

Document Name	
Comment	
Dominion Energy supports EEI comments on the necessity to coordinate this standard’s effective date with the effective date of the new definition in BAL-007.	
Likes 0	
Dislikes 0	
Response	
Please see the DT’s response to EEI.	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
There is a mismatch in the implementation plan criteria. While standard TOP-003-7 becomes effective in 18 months following FERC approval, it refers to definitions under BAL-007 that don’t become effective until 24 months following FERC approval. ISO.RTO Council Standards Review Committee (IRC SRC) proposes the Standard Drafting Team align the two so that they become effective at the same time.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months to line up with the 18-month implementation of TOP-003-7.	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No

Document Name	
Comment	
PNM does not support an 18 month implementation timeline for TOP-003-7 due to the Near-Term Reliability Assessment definition will not go into effect until 24 months after FERC approval. PNM would support a 24 month implementation of TOP-003-7. PNM also supports EEI's comments regarding question 6.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The DT made TOP-003-7 effective at 18-months to allow GOs/GOPs to prepare data to be requested by BAs at the 24-month effective timeframe. The DT still feels that 18 months is appropriate for TOP-003-7 and 24 for BAL-007-1.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Tri-State Generation and Transmission agrees with the MRO NSF Submitted Comments.	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to MRO NSRF	
Joshua London - Eversource Energy - 1, Group Name Eversource	
Answer	No
Document Name	
Comment	

<p>TOP-003 goes into effect in 18 months versus BAL-007’s 24 months, but uses the new glossary term from BAL-007 “Near-Term Energy Reliability Assessment.” This means that TOP-003 would be effective using a NERC glossary term that is not effective yet.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.</p>	
Ben Hammer - Western Area Power Administration - 1	
Answer	No
Document Name	
Comment	
<p>The implementation plan for TOP-003-7 is 18 months following FERC approval. The implementation plan for BAL-007 is 14 months following FERC approval. TOP-003-7 refers to definitions in BAL-007. It is recommended that the definitions in BAL-007 are implemented prior to implantation of TOP-003-7.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months to line up with the 18-month implementation of TOP-003-7.</p>	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	No
Document Name	
Comment	

There is a mismatch in the implementation plan criteria. While standard TOP-003-7 becomes effective in 18 months following FERC approval, it refers to definitions under BAL-007 that don't become effective until 24 months following FERC approval.

MRO NSRF would recommend that the terms that are currently defined in BAL-007 have an implementation date prior to TOP-003-7 becoming effective.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

There is a mismatch in the implementation plan criteria. While standard TOP-003-7 becomes effective in 18 months following FERC approval, it refers to definitions under BAL-007 that don't become effective until 24 months following FERC approval.

MRO NSRF would recommend that the terms that are currently defined in BAL-007 have an implementation date prior to TOP-003-7 becoming effective.

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer	No
Document Name	
Comment	
<p>Duke Energy does not support the proposed TOP-003-7 Implementation Plan but does support the following EEI response: EEI does not support the proposed Implementation Plan for TOP-003-7 because it was not appropriately aligned with the Near-Term Energy Reliability Assessment Definition Implantation Plan. EEI notes that this term will not go into effect until 6 months after TOP-003-7. Given this term is used in both Requirements R2 and R4 the implementation plan should not be approved until the implementation plan for this term is harmonized with the proposed implementation plan for TOP-003-7.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.</p>	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
<p>The Implementation Plan for TOP-003-7 is not aligned with the Near-Term Energy Reliability Assessment Definition Implantation Plan. This term will not go into effect until 6 months after TOP-003-7. Given this term is used in both Requirements R2 and R4 the implementation plan should not be approved until the implementation plan for this term is in parallel with the proposed implementation plan for TOP-003-7. FirstEnergy asks the DT to clarify.</p>	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern Company supports the submitted comments by EEI.

Likes 0

Dislikes 0

Response

Thank you for your support.

Daniel Gacek - Exelon - 1

Answer Yes

Document Name

Comment

Exelon does not oppose 18 months to implement TOP-003.

Exelon supports the concerns stated in the EEI comments regarding the opportunity to improve alignment between the implementation of the two standards.

The response is provided on behalf of Exelon representing Segments 1 and 3

Likes 0

Dislikes 0

Response

Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

Yes

Document Name

Comment

The proposed implementation timelines are sufficient for entities to both identify any additional data needed, and to communicate to entities the additional data request.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allele - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dave Krueger - SERC Reliability Corporation - 10	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Donald Lock - Talen Generation, LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza	
Answer	
Document Name	
Comment	
There is a mismatch in the implementation dates for TOP-003-7 and definitions in BAL-007 that come into effect at a later date than the TOP-003-7 standard.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The DT updated the implementation plan to reflect that the definition will be effective 18-months following FERC approval to line up with the 18-month implementation of TOP-003-7.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	
Document Name	
Comment	
BC Hydro is unable to support the implementation plan at this time as additional clarifications to Requirements are needed prior to assessing the implementation plan.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

TOP-003-7

7. The DT proposes that the modified TOP-003-7 meets the Standards Authorization Request in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Jessica Lopez - APS - Arizona Public Service Co. - 3

Answer No

Document Name

Comment

There is no technical justification of the reliability-related benefits and costs for this project.

Likes 0

Dislikes 0

Response

Please see the white paper explaining the importance of this project.

<https://www.nerc.com/comm/RSTC/ERATF/ERATF%20Energy%20Adequacy%20White%20Paper.pdf>

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer No

Document Name

Comment

Unknown at this time. SDG&E needs to see what additional data, if any will be needed by the CAISO before we are able to determine what the costs will be to provide the data.

Likes 0

Dislikes	0
Response	
Thank you for your comment.	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; Thomas Johnson, Salt River Project, 3, 6, 5, 1; Timothy Singh, Salt River Project, 3, 6, 5, 1; - Israel Perez	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy has no comments on TOP-003-7's cost effectiveness	
Likes	0
Dislikes	0
Response	

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer	Yes
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Document Name	
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Comment

Yes, there should be minimal impact on entities who must provide additional data to the Balancing Authorities under these proposed revisions to the Standard.

Likes 0	
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Dislikes 0	
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Response

Thank you for your comment.

Daniel Gacek - Exelon - 1

Answer	Yes
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Document Name	
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Comment

The response if provided on behalf of Exelon representing Segments 1 and 3

Likes 0	
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Dislikes 0	
------------	--

Response

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Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	Yes
Document Name	
Comment	
Southern Company supports the submitted comments by EEI.	
Likes 0	
Dislikes 0	
Response	
Please see the DT's response to EEI.	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donald Lock - Talen Generation, LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Tamarra Hardie - Public Utility District No. 1 of Chelan County - 6, Group Name CHPD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Helen Lainis - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dave Krueger - SERC Reliability Corporation - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Greg Sorenson - Greg Sorenson On Behalf of: Tremayne Brown, ReliabilityFirst , 10; - Greg Sorenson	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Danielle Moskop - Danielle Moskop On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Danielle Moskop	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Denise Sanchez - Denise Sanchez On Behalf of: Diana Torres, Imperial Irrigation District, 1, 6, 5, 3; George Kirschner, Imperial Irrigation District, 1, 6, 5, 3; Jesus Sammy Alcaraz, Imperial Irrigation District, 1, 6, 5, 3; Tino Zaragoza, Imperial Irrigation District, 1, 6, 5, 3; - Denise Sanchez	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
Duke Energy will not submit comments on the cost effectiveness of the proposed TOP-003-7 Reliability Standard.	

Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Black Hills Corporation - 6, Group Name Black Hills Corporation - All Segments	
Answer	
Document Name	
Comment	
Black Hills Corporation will not comment on cost effectiveness.	
Likes 0	
Dislikes 0	
Response	

8. Provide any TOP-003-7 additional comments for the SDT to consider, if desired.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

ERCOT notes that TOP-003-7 Requirement R1 includes a reference to Energy Reliability Assessments. This reference appears to be unnecessary, as R1 is limited to Transmission Operator data specifications, and BAL-007-1 is not applicable to Transmission Operators.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see updated standard that removed ERA from R1 of TOP-003-7.

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Document Name

Comment

Southern Company supports the submitted comments by EEI.

Likes 0

Dislikes 0

Response

Please see the DT's response to EEI.

Shannon Mickens - Shannon Mickens On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Thank you.

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

Document Name	EEI Near Final Draft Comments _ Project 2022-03 BAL-007 & TOP-003 Rev 0c _ 11_01_2024 (1).docx
Comment	
See EEI Comments	
Likes	0
Dislikes	0
Response	
Please see the DT's response to EEI.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	
Document Name	
Comment	
NPCC RSC supports the project.	
Likes	0
Dislikes	0
Response	
Please see the DT's response to NPCC.	
Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza	
Answer	
Document Name	
Comment	

Please correct the numbering in the subsections of the “C. Compliance section” they should read 1.1 to 1.3 instead of 4.1.1 to 4.1.3.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see updated standard.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	
Answer	
Document Name	
Comment	
Evidence Retention sections need to be modified to add references to “Near-Term Energy Reliability Assessments”.	
“Each Balancing Authority shall retain its dated, current, in force, documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments in accordance with Requirement R2 and Measurement M2 as well as any documents in force since the last compliance audit.”	
“Each Balancing Authority shall retain evidence for three calendar years that it has distributed its specification(s) to entities that have data required by the Balancing Authority’s analysis , Real-time monitoring, and Near-Term Energy Reliability Assessments in accordance with Requirement R4 and Measurement M4.”	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see the updated Standard.	
Jessica Lopez - APS - Arizona Public Service Co. - 3	
Answer	

Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Mary Smith - Southern Indiana Gas and Electric Co. - 1,3,5,6 - Texas RE,RF	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	

Likes	0	
Dislikes	0	
Response		
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro		
Answer		
Document Name		
Comment		
<p>The draft TOP-007-1 only includes the Near-Term ERA definition, which relies on the new ERA proposed definition. The proposed implementation plan indicates that the newly proposed definitions become effective “when the proposed standard is approved”, which may imply that ERA would only become effective upon approval of BAL-007-1. If BAL-007-1 is not approved on or before TOP-003-7 is approved, the Near-Term ERA definition may not be enforceable.</p> <p>BC Hydro suggests that the Implementation Plan be revised to ensure that the new ERA and Near-Term ERA definitions become effective at the same time.</p>		
Likes	1	JEA, 1, McClung Joseph
Dislikes	0	
Response		
Thank you for your comment. Please see updated implementation plan.		
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF		
Answer		
Document Name		
Comment		
None.		

Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	

End of Report