Unofficial Comment Form

Project 2022-03 Energy Assurance with Energy-Constrained Resources

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on draft three of **BAL-007-1 – Near-term Energy Reliability Assessments** and draft one of **TOP-003-7 Transmission Operator and Balancing Authority Data and Information Specification and Collection** by **8 p.m. Eastern, Monday, November 4, 2024.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-03EnergyAssurancewithEnergy-ConstrainedResources.aspx). If you have questions, contact Senior Standards Developer, [Jordan Mallory](mailto:jordan.mallory@nerc.net) (via email).

## Background Information

Project 2022-03 currently is addressing the operations/operational planning time horizon Standard Authorization Requests (SARs) that seek to enhance reliability by requiring entities to perform Energy Reliability Assessments (ERAs) to evaluate energy assurance and develop Corrective Action Plan(s), Operating Plan(s), or other mitigating actions to address identified risks to each respective time horizon.

The Standards Committee (SC) accepted the revised SAR at its January 25, 2023, meeting. At the same meeting, the SC authorized drafting of the Reliability Standard(s) identified in the SAR. Since that time, the team has conducted several meetings, both remote and in-person, and posted a draft of a new standard for informal comment to solicit feedback and completed one initial comment and ballot period for BAL-007-1.

## Summary of changes Overview

Based on industry feedback, the drafting team (DT) modified BAL-007-1 to remove redundant and administrative burden type requirements. The updated standard provides flexibility to industry when completing its Near-Term Energy Reliability Assessments. The team decided to focus its efforts on BAL-007-1 Near-Term ERAs and is holding off on BAL-008-1, which address seasonal ERAs. The team will discuss and determine the next steps regarding the Seasonal ERA standard following the completion of BAL-007-1. In addition to the updates of BAL-007-1, the DT worked to address concerns from industry that it is not clear that Near-Term ERA type data can be required through TOP-003-7. The DT modified TOP-003-7 to include the term “Near-Term ERA” within the TOP-003-7 standard to make this clear.

As a reminder, the proposed definition is not balloted separately but is being balloted via the BAL-007-1 standard. As such, when voting on the standard, ballot body participants will also be voting on the proposed definition used in the standard.

## 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.

Yes

No

Comments:

1. 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.

Yes

No

Comments:

1. 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.

Yes

No

Comments:

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

Comments:

**TOP-003-7**

1. 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.

Yes

No

Comments:

1. 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.

Yes

No

Comments:

1. 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.

Yes

No

Comments:

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

Comments: