

Comment Report

Project Name: 2022-03 Energy Assurance with Energy-Constrained Resources
Comment Period Start Date: 5/7/2024
Comment Period End Date: 6/24/2024
Associated Ballots:

There were 64 sets of responses, including comments from approximately 161 different people from approximately 99 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. **BAL-007-1 Near-term ERAs:** The standards drafting team (SDT) modified the Energy Reliability Assessment (ERA) definition 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.
2. **BAL-007-1 Near-term ERAs:** Based on industry feedback, the SDT updated Requirement R1 to clarify what near-term ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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.
3. **BAL-007-1 Near-term ERAs:** The SDT updated Requirements R2 through Requirement R8 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.
4. **BAL-007-1 Near-term ERAs:** The SDT proposes entities use forecasted Demand profiles for the time interval under study for the BAL-007 assessment. The SDT's goal is to align measures for ERAs with those used for EOP-011. Actions taken as part of a BAL-007 Operating Plan should be targeted to minimize any Energy Emergency events. Do you agree with the updated proposed language in Requirement R8? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.
5. **BAL-007-1 Near-term ERAs:** The SDT updated Requirement R9 based on industry feedback. Do you agree with the updated proposed language in Requirement R9? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.
6. **BAL-007-1 Near-term ERAs:** The SDT updated the implementation plan to allow for 18 months for Requirements R1 through R3 and 24 months for Requirements R4 through Requirement R10 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.
7. **BAL-007-1 Near-term ERAs:** The SDT believes that fuel data information needed to address BAL-007-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.
8. **BAL-007-1 Near-term ERAs:** The SDT 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.
9. **BAL-007-1 Near-term ERAs:** Provide any BAL-007-1 additional comments for the SDT to consider, if desired.
10. **BAL-008-1 Seasonal ERAs:** The SDT drafted BA-008-1 Requirement R1 to clarify what seasonal ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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.

11. BAL-008-1 Seasonal ERAs: The SDT drafted BAL-008-1 Requirements R2 through R13 based on industry feedback regarding seasonal ERAs. Do you agree with the proposed requirements? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

12. BAL-008-1 Seasonal ERAs: The SDT drafted the BAL-008-1 implementation plan to allow for 18 months for Requirements R1 through R6 and 24 months for Requirements R7- R13 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.

13. BAL-008-1 Seasonal ERAs: The SDT believes that fuel data information needed to address BAL-008-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

14. BAL-008-1 Seasonal ERAs: The SDT proposes that the newly proposed BAL-008-1 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.

15. BAL-008-1 Seasonal ERAs: Provide any BAL-008-1 additional comments for the SDT to consider, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
Public Utility District No. 1 of Chelan County	Anne Kronshage	1,3,5,6		Public Utility District No. 1 of Chelan County - Voting Group	Anne Kronshage	Public Utility District No. 1 of Chelan County	6	WECC
					Diane Landry	Public Utility District No. 1 of Chelan County	1	WECC
					Rebecca Zahler	Public Utility District No. 1 of Chelan County	5	WECC
					Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
Southwest Power Pool, Inc. (RTO)	Charles Yeung	2	MRO,SPP RE,WECC	SRC Energy Assurance	Charles Yeung	SPP	2	MRO
					Elizabeth Davis	PJM	2	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Greg Campoli	NYISO	2	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
WEC Energy Group, Inc.	Christine Kane	3,4,5,6		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
NiSource - Northern Indiana Public Service Co.	Dmitriy Bazylyuk	3,5,6		NIPSCO	Dmitriy Bazylyuk	NiSource - Northern Indiana Public Service Co.	6	RF
					Kathryn Tackett	NiSource - Northern	5	RF

						Indiana Public Service Co.		
					Steven Taddeucci	NiSource - Northern Indiana Public Service Co.	3	RF
					Alison Nickells	NiSource - Northern Indiana Public Service Co.	1	RF
Tacoma Public Utilities (Tacoma, WA)	Jennie Wike	1,3,4,5,6	WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
Eversource Energy	Joshua London	1,3		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
Florida Municipal Power Agency	LaKenya Vannorman	3,5,6	SERC	Florida Municipal Power Agency (FMPA)	Chris Gowder	Florida Municipal Power Agency	5	SERC
					Navid Nowakhtar	Florida Municipal Power Agency	3	SERC
					Jade Bulitta	Florida Municipal Power Agency	6	SERC
DTE Energy - Detroit Edison Company	Mohamad Elhusseini	3,5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF

					Marvin Johnson	DTE Energy - Detroit Edison Company	3	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
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
Emma Halilovic	Hydro One Networks, Inc.	1,2	NPCC
Emma Halilovic	Hydro One Networks, Inc.	1,2	NPCC
Chantal Mazza	Hydro Quebec	1,2	NPCC
Emma Halilovic	Hydro One Networks, Inc.	1,2	NPCC
Chantal Mazza	Hydro Quebec	1,2	NPCC
Nicolas Turcotte	Hydro-Quebec (HQ)	1	NPCC
Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC

					Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
					Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
					Joel Charlebois	AESI	7	NPCC
Dominion - Dominion Resources, Inc.	Sean Bodkin	5,6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Mia Wilson	Southwest Power Pool Inc.	2	MRO
					Heather Harris	Southwest Power Pool Inc.	2	MRO
					Ashley Stringer	Southwest Power Pool Inc.	2	MRO
					Jim Williams	Southwest Power Pool Inc.	2	MRO
					Jeff McDiarmid	Southwest Power Pool Inc.	2	MRO
					Mason Favazza	Southwest Power Pool Inc.	2	MRO
					Eddie Watson	Southwest Power Pool Inc.	2	MRO

					Margaret Quispe	Southwest Power Pool Inc.	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC
Sacramento Municipal Utility District	Tim Kelley	1,3,4,5,6	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	1,3,5,6		Santee Cooper	Rene' Free	Santee Cooper	1,3,5,6	SERC
					Christie Pope	Santee Cooper	1,3,5,6	SERC

1. BAL-007-1 Near-term ERAs: The standards drafting team (SDT) modified the Energy Reliability Assessment (ERA) definition 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.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

Though the current definition is better than the previous versions, the phrase "...a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon." is passive and may be better stated as "...a process for conducting near-term Energy Reliability Assessments (ERA)". The addition of using "...near-term time horizon" confuses this term with "Near-Term Planning Horizon" and "Near-Term Transmission Planning Horizon" that many entities are familiar with and are used in other NERC Standards.

It is still unclear why the ERA is elevated to two new standards and why it is not incorporated into TOP-002 Operating Plans. Adding an Energy Reliability criteria in TOP-002-4 R4 would be sufficient and would reduce the need for separate assessments, compliance documentation and corrective action plans. During enforcement, due to the ERA terminology, auditors will be focused on finding ERA specific documentation, rather than daily and near-term operating plans that some BAs typically use to show compliance . This exposes organizations to administrative compliance risk if they combine their ERA process into their TOP-002 Operating Plans.

Likes 1 JEA, 1, McClung Joseph

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer No

Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>Though the current definition is better than the previous versions, the phrase "...a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon." is passive and may be better stated as "...a process for conducting near-term Energy Reliability Assessments (ERA)". The addition of using "...near-term time horizon" confuses this term with "Near-Term Planning Horizon" and "Near-Term Transmission Planning Horizon" that many entities are familiar with and are used in other NERC Standards.</p> <p>It is still unclear why the ERA is elevated to two new standards and why it is not incorporated into TOP-002 Operating Plans. Adding an Energy Reliability criteria in TOP-002-4 R4 would be sufficient and would reduce the need for separate assessments, compliance documentation and corrective action plans. During enforcement, due to the ERA terminology, auditors will be focused on finding ERA specific documentation, rather than daily and near-term operating plans that some BAs typically use to show compliance . This exposes organizations to administrative</p>	
Likes 0	
Dislikes 0	
Response	

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Peter Yost - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Supporting EEI comments on BAL-007 and BAL-008.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports EEI comments and also is concerned that the definition does not have an energy component and energy is not clearly defined.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
Please see BPA's full response in question 9.	
Likes 1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	
Response	
Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group	
Answer	No
Document Name	
Comment	
CHPD supports WPP's response.	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	No
Document Name	
Comment	
<p>Though the current definition is better than the previous versions, the phrase "...a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon." is passive and may be better stated as "...a process for conducting near-term Energy Reliability Assessments (ERA)". The addition of using "...near-term time horizon" confuses this term with "Near-Term Planning Horizon" and "Near-Term Transmission Planning Horizon" that many entities are familiar with and are used in other NERC Standards.</p> <p>It is still unclear why the ERA is elevated to two new standards and why it is not incorporated into TOP-002 Operating Plans. Adding an Energy Reliability criteria in TOP-002-4 R4 would be sufficient and would reduce the need for separate assessments, compliance documentation and corrective action plans. During enforcement, due to the ERA terminology, auditors will be focused on finding ERA specific documentation, rather than daily and near-term operating plans that some BAs typically use to show compliance. This exposes organizations to administrative compliance risk if they combine their ERA process into their TOP-002 Operating Plans.</p>	
Likes 0	
Dislikes 0	
Response	

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power supports the Western Power Pool comments.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer No

Document Name

Comment

Still confusion around near-term time horizon with NER-Term Planning Horizon. Recommend incorporating the new studies into the existing TOP-002 standard and not create two new standards, OR at least put BAL-007 and BAL-008 into a single standard. Registered Entities will likely combine the process into their processes for TOP-002 thus producing one large set of compliance evidence.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer No

Document Name

Comment

The reality for entities with large hydraulic reservoirs, as is the case for HQ, is completely different from “fuel” constraints. Near term assessments begin 24-48 hours from the current day.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

Puget Sound Energy agrees with WPP's response to this question, shown below.

Though the current definition is better than the previous versions, the phrase "...a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon." is passive and may be better stated as "...a process for conducting near-term Energy Reliability Assessments (ERA)". The addition of using "...near-term time horizon" confuses this term with "Near-Term Planning Horizon" and "Near-Term Transmission Planning Horizon" that many entities are familiar with and are used in other NERC Standards.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

Puget Sound Energy agrees with WPP's response to this question, shown below.

Though the current definition is better than the previous versions, the phrase "...a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon." is passive and may be better stated as "...a process for conducting near-term Energy Reliability Assessments (ERA)". The addition of using "...near-term time horizon" confuses this term with "Near-Term Planning Horizon" and "Near-Term Transmission Planning Horizon" that many entities are familiar with and are used in other NERC Standards.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer No

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC believes the current definition is not a significant improvement from the previous version.

Specifically, the statement:

“A process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon.” is not well stated and may be better stated as “...a process for conducting near-term Energy Reliability Assessments (ERA)”.

Also, using “near-term time horizon” can lead to confusion with the terms “Near-Term Planning Horizon” and “Near-Term Transmission Planning Horizon”. These terms are currently defined in other enforceable NERC standards.

The FRCC believes that there is no compelling reason as to why the ERA has been included in two new enforceable NERC standards. It would better serve the industry to be incorporated into the current TOP-002 Operating Plans requirements. Incorporation of the proposed ERA requirements into TOP-002-4 R4 would satisfy the identified need for the ERA. TOP-002-4 already addresses the Operations Planning Time Horizon which includes day-ahead, up to, and including seasonal. Although R4 only addresses a next-day Operating Plan, this requirement could easily be modified to include the extended time period, or an additional requirement could be added and clarified within TOP-002-4. There are already requirements for distributing the Operating Plans to TOPs and the RC. This would eliminate the need for separate assessments, the large increase in compliance documentation and corrective action plans.

The FRCC believes that there will be an increase in exposure risk on maintaining documentation of receipt, timing of receipt, and timing of review notification. The current proposed ERA terminology will place the audit focus on documentation that is only specific to the ERA requirements. The current operating process that produces the daily and near-term operating plans for BAs will be rendered to be ineffective in meeting this requirement.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer

No

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

No

Document Name

Comment

The FRCC believes the current definition is not a significant improvement from the previous version.

Specifically, the statement:

“A process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon.” is not well stated and may be better stated as “...a process for conducting near-term Energy Reliability Assessments (ERA)”.

Also, using “near-term time horizon” can lead to confusion with the terms “Near-Term Planning Horizon” and “Near-Term Transmission Planning Horizon”. These terms are currently defined in other enforceable NERC standards.

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The FRCC believes that there will be an increase in exposure risk on maintaining documentation of receipt, timing of receipt, and timing of review notification. The current proposed ERA terminology will place the audit focus on documentation that is only specific to the ERA requirements. The current operating process that produces the daily and near-term operating plans for BAs will be rendered to be ineffective in meeting this requirement.

Likes 0

Dislikes 0

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC

Answer

No

Document Name

Comment

SMUD and BANC agree with the comments submitted by the Western Power Pool.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
<p>The ERA evaluates the risk of resources being unable to reliably supply the Electrical Energy required to serve Demand and to provide Operating Reserves for the Bulk Power System throughout the associated evaluation period.</p> <p>The purpose section in the introduction for BAL-007-1 is also missing a verb.</p>	
Likes 0	
Dislikes 0	
Response	
Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO	
Answer	No
Document Name	
Comment	
<p>NIPSCO supports MISO's feedback.</p>	
Likes 0	
Dislikes 0	
Response	
Chance Back - Muscatine Power and Water - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>Support the MRO NSRF comments.</p>	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	

Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Note: The same ERA definition applies under all the time horizons.	
Likes 1	Midcontinent ISO, Inc., 2, Welch Bobbi
Dislikes 0	
Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	Yes
Document Name	EEl Near Final Draft Comments _ Project 2022-03 BAL-007 BAL-008 Rev 0g __6_11_2024.docx
Comment	
Supporting comments from EEl (attached)	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group	
Answer	Yes
Document Name	

Comment

WEC Energy Group supports the comments submitted by EEI, and does not oppose the proposed definition.

Likes 0

Dislikes 0

Response**Rachel Schuldt - Black Hills Corporation - 1,3,5,6**

Answer

Yes

Document Name

Comment

Black Hills Corporation does not oppose the proposed definition for Energy Reliability Assessment (ERA).

Likes 0

Dislikes 0

Response**Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF**

Answer

Yes

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

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 does not oppose the proposed definition for Energy Reliability Assessment (ERA).

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Yes

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Yes

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

Yes

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

No Additional Comments

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI does not oppose the proposed definition for Energy Reliability Assessment (ERA).

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

The same ERA definition applies under all the time horizons.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer Yes

Document Name [2022-03_Unofficial Comment Form_BAL-007 and BAL-008_SRC Comments-FINAL.docx](#)

Comment

Note: The same ERA definition applies under all the time horizons.

The ERA definition appears to be missing a word; the ISO/RTO Council (IRC) Standards Review Committee (SRC) suggests that this be addressed by adding the word 'necessary' in the ERA definition:

“Evaluation of the resources necessary to reliably supply the Electrical Energy required to serve Demand and to provide Operating Reserves for the Bulk Power System throughout the associated evaluation period”.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

Yes

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5,6

Answer

Yes

Document Name

Comment

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

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

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

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**Ben Hammer - Western Area Power Administration - 1,6****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Hayden Maples - Evergy - 1,3,5,6 - MRO****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1,3****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

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

The ERA definition appears to be missing a word; MISO suggests that this be addressed by adding the word 'necessary' in the ERA definition:

“Evaluation of the resources **necessary** to reliably supply the Electrical Energy required to serve Demand and to provide Operating Reserves for the Bulk Power System throughout the associated evaluation period”.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE asserts that an “Energy Assessment” means a systematic evaluation of the ability of the resources to reliably and adequately deliver energy to meet the system demand under a specific timeframe and set of system conditions associated with any perceived constraints (such as fuel constraints, cooling water availability or other environmental constraints). Therefore, the ERA should emphasize evaluation of the resource’s ability to reliably supply energy to the system. Texas RE recommends the following revision to the ERA definition (in bold):

Evaluation of the **ability** of resources to reliably **and adequately** supply the Electrical Energy required to serve Demand and to provide Operating Reserves for the Bulk Power System throughout the associated evaluation period.

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

2. BAL-007-1 Near-term ERAs: Based on industry feedback, the SDT updated Requirement R1 to clarify what near-term ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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.

Alison MacKellar - Constellation - 5,6

Answer No

Document Name

Comment

Constellation has concerns on BAs developing their own process for lack of uniform requests to generator owners.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Michael Goggin - Grid Strategies LLC - 5

Answer No

Document Name

Comment

The drafting team should clarify how the requirement to account for "depletion of fuel" should be applied to interruptions to gas supply and transportation. This is important to clarify because correlated failures of gas generators, often due to fuel supply and transportation constraints and interruptions, have been the primary contributing factor in all recent cold snap events that have led to FERC-NERC reports. The drafting team should clarify that assessments should include the expected unavailability of gas generators, informed by past experience during winter peak demand periods, when accounting for "resource capabilities and operations."

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer

No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer

No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer

No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC

Answer No

Document Name

Comment

SMUD and BANC agree with the comments submitted by the Western Power Pool.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer No

Document Name [2022-03_Unofficial Comment Form_BAL-007 and BAL-008_MRO NSRF_06-11-24rev.docx](#)

Comment

The MRO NSRF supports and appreciates the direction taken by the Standard Drafting Team (SDT) to increase flexibility for BAs. While we agree Draft #2 is an improvement over Draft #1, we propose the following:

Modify Part 1.3.2. to align with Part 2.2

· Replace “depletion of fuel” with “fuel supply.” (Part 2.2.)

o “Depletion of fuel” is overly prescriptive and one-sided (fails to consider replenishment) whereas “fuel supply” allows for a broad consideration of all fuel supply factors without requiring the BA to maintain documentation specific to the depletion of fuel for each generating resource.

· Move “variable energy resources” and “electric storage” as examples to the Technical Rationale. It is misleading and incomplete for a standard to list a limited subset of resource technologies simply because they are “new.” There will be other technologies in the future. Examples are more appropriately located in the Technical Rationale.

· Add “unplanned generator outages” to Part 1.3.2 as this language will encompass all reasons leading to “unplanned generator outages/de-rates” and not limit it to fuel supply alone.

· Pursuant to the above comments, we suggest Part **1.3.2** be modified as shown below:

1.3.2. Known Resource capabilities and operations, including energy supply, fuel supply, unplanned generator outages and energy transfers between neighboring Balancing Authorities, and

§ Since Part 1.3.2 includes ‘resource capabilities,’ that should encompass transmission limitations. Therefore, the MRO NSRF requests Part 1.3.3 be stricken. If the SDT disagrees with removing Part 1.3.3. altogether, then MRO NSRF proposes the following modification:

1.3.3. Transmission outages that bottle generation and limit the generator’s output.

Likes 2

Midcontinent ISO, Inc., 2, Welch Bobbi; Muscatine Power and Water, 5, Back Chance

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

No

Document Name

Comment

The FRCC believes that BAL-007 R1 does not appear to allow BAs to generate a region-wide ERA, based on the common practice of sharing of resources, coordinated generation resource dispatch, or Reserve Sharing Groups.

The FRCC believes there is no allowance given to Resource Planners and/or BAs who may decide to complete these requirements through cooperative resource programs and that the proposed changes do not allow for BAs who have coordinated together on a region-wide Capacity and Energy Emergency Plan to use these plans for these requirements. These plans ensure that each BA throughout the region has taken all possible steps to avoid a declared Energy Emergency (EEA 2/3) or a capacity issue that could ultimately result in the shedding of Firm Native Customer Load. The requirement for each BA to create BA-specific ERAs could result in the lack of proper coordination between BAs and create a bigger risk to the interconnected Bulk Electric System.

The FRCC does not support the language in requirement 1.2.1 because it does not allow a BA the flexibility to determine the duration and frequency of performing an ERA and that performing studies to cover all time periods is extremely burdensome. It would be better for the BA to assess what time periods need to be covered based on their area and define that within their process. and defined scenarios.

As proposed, this requirement would disproportionately increase the administrative burden

without increasing reliability.

The FRCC also proposes changing “depletion of fuel” within requirement 1.2.2 to “fuel supply” to ensure consistency with the language used in requirement R2, 2.2.2.

The FRCC also would like to note that requirement 1.3.3 includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process and would require that a power flow study be performed for this constraint. This would add another level of complexity to the energy balancing study. The FRCC suggests removing the “delivery” language and instead should describe the constraints in terms of generator MW output ability.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer

No

Document Name

Comment

The SRC supports and appreciates the direction taken by the Standard Drafting Team (SDT) to increase flexibility for BAs. While the SRC agrees that Draft #2 is an improvement over Draft #1, the SRC has identified ambiguities and areas for further improvement, and consequently proposes the following:

As an initial matter, it is not clear whether the language in Part 1.1 is addressing the time period being assessed or the amount of time entities must spend performing the assessment. It is also unclear whether the language requires entities to begin a new ERA within two days of each operating day, or whether the language simply limits how far in the future the ERA may look. To clarify these issues, the SRC recommends that the language be revised to read “The near-term ERA must assess a time period that is between three and six weeks long and that begins no later than two days after the operating day in which the responsible entity begins conducting the near-term ERA.”

The SRC also proposes revisions to Part 1.3.2, as follows:

• Move “variable energy resources” and “electric storage” as examples to the Technical Rationale. It is misleading and incomplete for a standard to list a limited subset of resource technologies as examples, as it creates ambiguity regarding how other technologies should be addressed, particularly new technologies that are developed in the future. Standards should be limited to mandatory requirements; examples are more appropriately located in the Technical Rationale.

• Replace the reference to “depletion of fuel” in Part 1.3.2 with “unplanned generator outages,” as this language will encompass all reasons leading to unplanned generator outages and not be limited to fuel supply alone.

• Add the word “known” to resource capabilities and operations in Part 1.3.2 to avoid any ambiguity.

• Pursuant to the above comments, the SRC suggests Part 1.3.2 be modified as shown below:

1.3.2. Known Resource capabilities and operations, including energy supply, depletion of fuel supply, variable energy resources (e.g., wind, solar, and hydro), unplanned generator outages and energy transfers between neighboring Balancing Authorities, and electric storage; and

Finally, the SRC recommends removing Part 1.3.3, as Part 1.3.2 already includes ‘resource capabilities,’ which would take into account transmission limitations. If the SDT elects to keep Part 1.3.3., the SRC recommends that it be revised as follows:

1.3.3. Reasonably foreseeable Transmission Generation that is available but its Electrical Energy cannot be delivered to the point of interconnection or Balancing Authority Area due to one or more reasonably foreseeable transmission outage. constraints outages that bottle generation and limit the ability deliverability of generator’s ion to deliver their output. to load.]

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name

Comment

APS is of the opinion that while documenting and maintaining a process for conducting near-term ERAs is viable, performing near-term ERAs between five days and six weeks as prescribed in BAL-007-1 Draft 2 R1.1, would be difficult to perform by the Balancing Authority due to varying data inputs required, challenging to continuously manage, and may create significant administrative burden without increasing reliability. The Balancing Authority should not be required to study time periods that are not of concern or at risk simply to meet a requirement to perform an assessment.

To be succinct, the requirement language and support the scope of the SAR , the SDT should consider revising BAL-007-1 R1 and subparts with the following italicized proposals:

- R1.1 replace what is currently written to: *The time periodicity for near-term ERAs shall be defined by the Balancing Authority according to its risks to the BPS.* (As defined in the Project Scope of the ERATF SAR “Energy Assessments with Energy–Constrained Resources in the Operations and Operations Planning Time Horizons”, pp. 3-4.)
- R1.3.1 removing "assumed" resulting in *Forecasted Demand Profiles.*
- R1.3.2 revising to *Resource capability and deliverability.* "
- R1.3.3 revising to *Transmission constraints that limit generation output deliverability to load.*

Lastly, APS agrees with EEI’s comments and proposal of changing “depletion of fuel” within subpart 1.2.2 to “fuel supply” to ensure consistency with the language used in Requirement R2, subpart 2.2.2.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer No

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer No

Document Name

Comment

Seminole agrees with FRCC’s comments below

The FRCC believes that BAL-007 R1 does not appear to allow BAs to generate a region-wide ERA, based on the common practice of sharing of resources, coordinated generation resource dispatch, or Reserve Sharing Groups.

The FRCC believes there is no allowance given to Resource Planners and/or BAs who may decide to complete these requirements through cooperative resource programs and that the proposed changes do not allow for BAs who have coordinated together on a region-wide Capacity and Energy Emergency Plan to use these plans for these requirements. These plans ensure that each BA throughout the region has taken all possible steps to avoid a declared Energy Emergency (EEA 2/3) or a capacity issue that could ultimately result in the shedding of Firm Native Customer Load. The requirement for each BA to create BA-specific ERAs could result in the lack of proper coordination between BAs and create a bigger risk to the

interconnected Bulk Electric System.

The FRCC does not support the language in requirement 1.2.1 because it does not allow a BA the flexibility to determine the duration and frequency of performing an ERA and that performing studies to cover all time periods is extremely burdensome. It would be better for the BA to assess what time periods need to be covered based on their area and define that within their process. and defined scenarios.

As proposed, this requirement would disproportionately increase the administrative burden without increasing reliability.

The FRCC also proposes changing “depletion of fuel” within requirement 1.2.2 to “fuel supply” to ensure consistency with the language used in requirement R2, 2.2.2.

The FRCC also would like to note that requirement 1.3.3 includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process and would require that a power flow study be performed for this constraint. This would add another level of complexity to the energy balancing study. The FRCC suggests removing the “delivery” language and instead should describe the constraints in terms of generator MW output ability.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

The standard should be updated to allow for compliance through individual actions or participation in a Resource Adequacy or equivalent program similar to Frequency Response Sharing Group and Reserve Sharing Groups. Puget Sound Energy agrees with WPP’s response to this question, shown below.

As written, BAL-007 R1 does not appear to allow BAs to collectively pool resources to produce regional or sub-regional ERAs. No flexibility or deference is given to Resource Planners and entities who elect to do these tasks under programs like the Western Resource Adequacy Program in the Western Power Pool. The language used doesn’t provide flexibility for entities who have committed to sub-regional energy emergency plans, either. These plans are developed to ensure, prior to a declared EEP, that each entity in the sub-region has taken all action possible to avoid an energy or capacity issue. Perhaps the Drafting Team’s intent is to codify that BAs, Regions or sub-regions must have such plans, but the requirement does not clearly state this. The largest risk to requiring individual BAs to create independent ERAs is that they will not be coordinated with other BAs, and they may be reliant on erroneous assumptions of available mutual assistance or market access.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

No

Document Name

Comment

USV supports the comments provided by MISO.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

NV Energy supports and appreciates the direction taken by the Standard Drafting Team (SDT) to increase flexibility for BAs. While we agree Draft #2 is an improvement over Draft #1, we propose the following:

Modify Part 1.3.2. to align with Part 2.2

{C}· Replace “depletion of fuel” with “fuel supply.” (Part 2.2.)

{C}o “Depletion of fuel” is overly prescriptive and one-sided (fails to consider replenishment) whereas “fuel supply” allows for a broad consideration of all fuel supply factors without requiring the BA to maintain documentation specific to the *depletion* of fuel for each generating resource.

{C}· Move “variable energy resources” and “electric storage” as examples to the Technical Rationale. It is misleading and incomplete for a standard to list a limited subset of resource technologies simply because they are “new.” There will be other technologies in the future. Examples are more appropriately located in the Technical Rationale.

{C}· Add “unplanned generator outages” to Part 1.3.2 as this language will encompass all reasons leading to “unplanned generator outages/de-rates” and not limit it to fuel supply alone.

{C}· Pursuant to the above comments, we suggest **Part 1.3.2** be modified as shown below:

1.3.2. Known Resource capabilities and operations, including energy supply, fuel supply, unplanned generator outages and energy transfers between neighboring Balancing Authorities; and

- Since Part 1.3.2 includes ‘resource capabilities,’ that should encompass transmission limitations. Therefore, NV Energy requests **Part 1.3.3 be stricken**. If the SDT disagrees with removing Part 1.3.3. altogether, then NV Energy proposes the following modification:

1.3.3. Transmission outages that bottle generation and limit the generator’s output ability.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EEl does not support the language in subpart 1.2.1 because it does not allow the BA the flexibility to determine the duration and frequency of performing an ERA. Performing studies to cover all time periods does not increase reliability. The BA should not be required to study time periods that are not of concern simply to meet a requirement to perform studies. As proposed this requirement would disproportionately increase the administrative burden without increasing reliability.

We also proposed changing “depletion of fuel” within subpart 1.2.2 to “fuel supply” to ensure consistency with the language used in Requirement R2, subpart 2.2.2.

EEl additionally notes that in subpart 1.3.3, it includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process indicates that a power flow study is expected to be performed. This would add more complexity to what is intended to be an energy balancing study. To address this concern, we suggest removing the “delivery” language and instead describe constraints in terms of generator MW output ability.

To address our Requirement R1 concerns we have included edits in boldface below:

R1. Each Balancing Authority shall document and maintain a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

1.1. The near-term ERA shall be performed within a time period of **two days but no more than six weeks out from Real-time**.

1.2. The frequency **and duration** of near-term ERAs **shall be as defined by the responsible BA, utilizing the BA’s knowledge and experience of their BA Area to address conditions and forecasted events that they determine to be risks to BPS reliability**.

1.3. The ERA process for near-term ERAs must account for the following:

1.3.1. Forecasted or assumed Demand profiles;

1.3.2. Resource capabilities and operations, including fuel **supply**, variable energy resources (e.g., wind, solar, and hydro), energy transfers between neighboring Balancing Authorities, and electric storage; and

1.3.3. **Local known BES transmission** constraints that limit the ability of **a generator to output expected MWs**.

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer No

Document Name	
Comment	
<p>While ISO-NE believes the current version of R1 to be sufficient there are some potential edits to clarify or simplify aspects of the Requirement ISO-NE supports CAISO's suggestion to expand the ERA duration to between three days and six weeks to provide additional flexibility to BAs.</p> <p>Suggested revisions:</p> <p>R1.1 should be two separate sub requirements and clarify that the period listed is the assessment period:</p> <p>1.1 The near-term ERA must include an assessment period of between five days and six weeks.</p> <p>1.2 The near-term ERA shall begin no later than two days after the present operating day.</p> <p>Current 1.2-1.4 will need to be renumbered.</p> <p>R1.3.1 Forecasted demand profiles</p> <p style="padding-left: 40px;">Forecasted demand profiles are already based on assumptions</p> <p>R1.3.2 Change "depletion of fuel" to "fuel supplies"</p>	
Likes	0
Dislikes	0
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>The standard should be updated to allow for compliance through individual actions or participation in a Resource Adequacy or equivalent program similar to Frequency Response Sharing Group and Reserve Sharing Groups. Puget Sound Energy agrees with WPP's response to this question, shown below.</p> <p><i>As written, BAL-007 R1 does not appear to allow BAs to collectively pool resources to produce regional or sub-regional ERAs. No flexibility or deference is given to Resource Planners and entities who elect to do these tasks under programs like the Western Resource Adequacy Program in the Western Power Pool. The language used doesn't provide flexibility for entities who have committed to sub-regional energy emergency plans, either. These plans are developed to ensure, prior to a declared EEP, that each entity in the sub-region has taken all action possible to avoid an energy or capacity issue. Perhaps the Drafting Team's intent is to codify that BAs, Regions or sub-regions must have such plans, but the requirement does not clearly state this. The largest risk to requiring individual BAs to create independent ERAs is that they will not be coordinated with other BAs, and they may be reliant on erroneous assumptions of available mutual assistance or market access.</i></p>	
Likes	0
Dislikes	0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer No

Document Name

Comment

We suggest adding verbiage that allows some flexibility in the data requested:

For example, we suggest the following (underlined> addition to R1.3.2 : Resource capabilities and operations, including pertinent data such as depletion of fuel variable energy resources (e.g., wind, solar, and hydro), energy transfers between neighboring Balancing Authorities, and electric storage;

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer No

Document Name

Comment

Resource Adequacy is typically addressed by Resource Planners. The definition of a Resource Planner is one year and beyond but the current wording of this standard is more in line with what Resource Planners responsibilities.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer No

Document Name

Comment

Exelon supports EEI's comments suggesting greater flexibility.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power supports the Western Power Pool comments.

Additionally, the timing requirement in BAL-007-1 R1 is still confusing and unrealistic. Tacoma Power recommends instead of specifying a start (five days) and end time (six weeks), that BAL-007-1 R1 leave the evaluation period flexible. The evaluation time period may be different for each BA and have different timing considerations. If a specific timeline is kept in BAL-007-1 R1, then Tacoma Power requests a visual aid in the technical rationale to understand how the ERA timing overlaps with the TOP-001 and TOP-002 analyses.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 2

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

For section 1.3.2 it is recommended that:

- replace “depletion of fuel” with “fuel supply”
- move “variable energy resources” and “electric storage” to the Technical Rationale.
- Add “unplanned generator outages”

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

As written, BAL-007 R1 does not appear to allow BAs to collectively pool resources to produce regional or sub-regional ERAs. No flexibility or deference is given to Resource Planners and entities who elect to do these tasks under programs like the Western Resource Adequacy Program in the Western Power Pool. The language used doesn't provide flexibility for entities who have committed to sub-regional energy emergency plans, either. These plans are developed to ensure, prior to a declared EEA, that each entity in the sub-region has taken all action possible to avoid an energy or capacity issue. Perhaps the Drafting Team's intent is to codify that BAs, Regions or sub-regions must have such plans, but the requirement does not clearly state this. The largest risk to requiring individual BAs to create independent ERAs is that they will not be coordinated with other BAs, and they may be reliant on erroneous assumptions of available mutual assistance or market access.

The BA, as identified in the current draft of BAL-007, is the wrong function to address resources adequacy. The Resource Planner, as defined in the NERC ROP and NERC Glossary of Terms Used in the Reliability Standards, is the most appropriate functional entity to conduct ERAs. Arguably, the Resource Planner generally focuses on resource adequacy on "a long-term (generally [emphasis added] one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority area", but not on a short-term plan. It is the Resource Planner's responsibility to "[Coordinate] with Transmission Planners, Transmission Service Providers, Reliability Coordinators, and Planning Coordinators on resource adequacy plans" (see NERC Functional Model). BAs are not typically staffed with planners who are familiar with assessing resource adequacy, and they rely on assessments from Resource Planners, Transmission Planners, and the Load-Serving Entities to develop their Operating Plans regarding such things as energy capacity and fuel availability.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**Answer** No**Document Name****Comment**

TEPC agrees with EEI's comments - EEI does not support language that does not allow the BA the flexibility to determine the duration and frequency of performing an ERA. Performing studies to cover all time periods does not increase reliability. The BA should not be required to study time periods that are not of concern simply to meet a requirement to perform studies. This requirement would disproportionately increase the administrative burden without increasing reliability.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 5,6****Answer** No**Document Name****Comment**

Constellation has concerns on BAs developing their own process for lack of uniform requests to generator owners

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company****Answer** No**Document Name****Comment**

Southern Company supports the EEI comments and agrees with EEI's proposed language changes.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports the majority of WPP’s response. CHPD suggests that in paragraph 1, EEP should be EEA.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

Black Hills Corporation is in agreement with EEI. EEI does not support the language in subpart 1.2.1 because it does not allow the BA the flexibility to determine the duration and frequency of performing an ERA. Performing studies to cover all time periods does not increase reliability. The BA should not be required to study time periods that are not of concern simply to meet a requirement to perform studies. As proposed this requirement would disproportionately increase the administrative burden without increasing reliability.

We also proposed changing “depletion of fuel” within subpart 1.2.2 to “fuel supply” to ensure consistency with the language used in Requirement R2, subpart 2.2.2.

We also additionally note that in subpart 1.3.3, it includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process indicates that a power flow study is expected to be performed. This would add more complexity to what is intended to be an energy balancing study. To address this concern, we suggest removing the “delivery” language and instead describe constraints in terms of generator MW output ability.

To address our Requirement R1 concerns we have included edits in boldface below:

- R1. Each Balancing Authority shall document and maintain a process for conducting Energy Reliability Assessments (ERA) for the near-term time horizon. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- 1.1. The near-term ERA (*remove: **must have a***) shall be performed within (*remove: **the***) a time period of (*remove: **duration between five***) **two** days (*remove: **and***) **but no more than six weeks out from Real-time** (*remove: **and begin no later than two days after the present operating day***).
- 1.2. The frequency **and duration** of near-term ERAs **shall be as defined by the responsible BA, utilizing the BA’s knowledge and experience of their BA Area to address conditions and forecasted events that they determine to be risks to BPS reliability.** (*remove: **must be at intervals that ensure all time periods are covered by a near-term ERA.***)
- 1.3. The ERA process for near-term ERAs must account for the following:
- 1.3.1. Forecasted or assumed Demand profiles;
- 1.3.2. Resource capabilities and operations, including (*remove: **depletion of***) fuel **supply**, variable energy resources (e.g., wind, solar, and hydro), energy transfers between neighboring Balancing Authorities, and electric storage; and
- 1.3.3. **Local** (*remove: **Transmission***) **known BES transmission** constraints that limit the ability of (*remove: **generation to deliver their output to load***) **a generator to output expected MWs.**

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Please see BPA's full response in question 9.

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer**

No

Document Name**Comment**

PNM supports EEI recommended changes for BAL-007-1 R1.

Likes 0

Dislikes 0

Response**Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion****Answer**

No

Document Name**Comment**

While Dominion Energy supports EEI comments, we also are concerned that In sub requirement 1.3.1, usage of the NERC defined term "Demand" does not seem appropriate given the context within the requirement as Demand is not used for energy over time.

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group****Answer**

No

Document Name**Comment**

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy recommends the following modification to R1.3.3. to extend resources beyond the BA.

R1.3.3. "Known BES transmission constraints that limit the ability to utilize expected resources."

Additionally, Duke is supportive of EEI comments to leverage the operational experience of the BA, including the frequency of the ERA and not having to perform studies which encompass 'all time periods'. For instance, the BA, in the development of its near-term ERA process, may identify operational concerns as a tail risk condition requiring closer inspection via the documented ERA process.

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer

No

Document Name	
Comment	
<p>As written, BAL-007 R1 does not appear to allow BAs to collectively pool resources to produce regional or sub-regional ERAs. No flexibility or deference is given to Resource Planners and entities who elect to do these tasks under programs like the Western Resource Adequacy Program in the Western Power Pool. The language used doesn't provide flexibility for entities who have committed to sub-regional energy emergency plans, either. These plans are developed to ensure, prior to a declared EEP, that each entity in the sub-region has taken all action possible to avoid an energy or capacity issue. Perhaps the Drafting Team's intent is to codify that BAs, Regions or sub-regions must have such plans, but the requirement does not clearly state this. The largest risk to requiring individual BAs to create independent ERAs is that they will not be coordinated with other BAs, and they may be reliant on erroneous assumptions of available mutual assistance or market access.</p> <p>The BA, as identified in the current draft of BAL-007, is the wrong function to address resources adequacy. The Resource Planner, as defined in the NERC ROP and NERC Glossary of Terms Used in the Reliability Standards, is the most appropriate functional entity to conduct ERAs. Arguably, the Resource Planner generally focuses on resource adequacy on "a long-term (generally [emphasis added] one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority area", but not on a short-term plan. It is the Resource Planner's responsibility to "[Coordinate] with Transmission Planners, Transmission Service Providers, Reliability Coordinators, and Planning Coordinators on resource adequacy plans" (see NERC Functional Model). BAs are not typically staffed with planners who are familiar with assessing resource adequacy, and they rely on assessments from Resource Planners, Transmission Planners, and the Load-Serving Entities to</p>	
Likes	0
Dislikes	0
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes	0
Dislikes	0
Response	
Daren Brubaker - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

As written, BAL-007 R1 does not appear to allow BAs to collectively pool resources to produce regional or sub-regional ERAs. No flexibility or deference is given to Resource Planners and entities who elect to do these tasks under programs like the Western Resource Adequacy Program in the Western Power Pool. The language used doesn't provide flexibility for entities who have committed to sub-regional energy emergency plans, either. These plans are developed to ensure, prior to a declared EEP, that each entity in the sub-region has taken all action possible to avoid an energy or capacity issue. Perhaps the Drafting Team's intent is to codify that BAs, Regions or sub-regions must have such plans, but the requirement does not clearly state this. The largest risk to requiring individual BAs to create independent ERAs is that they will not be coordinated with other BAs, and they may be reliant on erroneous assumptions of available mutual assistance or market access.

The BA, as identified in the current draft of BAL-007, is the wrong function to address resources adequacy. The Resource Planner, as defined in the NERC ROP and NERC Glossary of Terms Used in the Reliability Standards, is the most appropriate functional entity to conduct ERAs. Arguably, the Resource Planner generally focuses on resource adequacy on "a long-term (**generally** [emphasis added] one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority area", but not on a short-term plan. It is the Resource Planner's responsibility to "[Coordinate] with Transmission Planners, Transmission Service Providers, Reliability Coordinators, and Planning Coordinators on resource adequacy plans" (see NERC Functional Model). BAs are not typically staffed with planners who are familiar with assessing resource adequacy, and they rely on assessments from Resource Planners, Transmission Planners, and the Load-Serving Entities to develop their Operating Plans regarding such things as energy capacity and fuel availability.

Likes 0

Dislikes 0

Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
<p>WECC generally supports the proposed revision but offers the following for clarity.</p> <p>Suggest for clarification for R1- Drop the phrase “for the near-term time horizon” and add “near-term” after “conducting”. Also add “s” to “ERA”. “Each Balancing Authority shall document and maintain a process for conducting near-term Energy Reliability Assessments (ERAs).” This edit will remove the efforts to determine what the “near-term time horizon” may be by industry and CMEP staff. Suggest for clarification 1.2 Remove “are” and add “will be”. Also add “s” to first use of ERA. “The frequency of near-term ERAs must be at intervals that ensure all time periods will be covered by a near-term ERA.” Saying “all” and “are” appear to go beyond the expectations of near-term ERA and may not be bounded by the duration of the evaluation period. In 1.3.2, it is not clear what is meant by “and operations”. Is the DT trying to capture projected availability of resources? Suggest “Resource capabilities and availability including variable energy resource (e.g., wind, solar, hydro); Fuel supply concerns and inventory; energy transfers between neighboring Balancing Authorities; and electric storage; and”. Should “electric storage” be BESS for consistency across Standards? Consider addressing hydro/wind/solar in the technical rationale to avoid limitations on future technologies.</p>	
Likes	0
Dislikes	0

Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 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	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

Document Name

Comment

BC Hydro appreciates the direction the drafting team has taken in allowing more flexibility for BAs.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

MISO supports and appreciates the direction taken by the Standard Drafting Team (SDT) to increase flexibility for BAs. While MISO agrees that Draft #2 is an improvement over Draft #1, MISO has identified ambiguities and areas for further improvement, and consequently proposes the following:

As an initial matter, it is not clear whether the language in Part 1.1 is addressing the time period being assessed or the amount of time entities must spend performing the assessment. It is also unclear whether the language requires entities to begin a new ERA within two days of each operating day, or whether the language simply limits how far in the future the ERA may look. To clarify these issues, MISO recommends that the language be revised

to read “The near-term ERA must assess a time period this is between five days and six weeks long and that begins no later than two days after the operating day in which the responsible entity begins conducting the near-term ERA.”

MISO also proposes revisions to Part 1.3.2, as follows:

- Replace “depletion of fuel” with “fuel supply.” (Part 2.2.) as “depletion of fuel” is overly prescriptive and one-sided since it fails to consider replenishment, whereas “fuel supply” allows for a broad consideration of all fuel supply factors without requiring the BA to maintain documentation specific to the *depletion* of fuel for each generating resource.
- Move “variable energy resources” and “electric storage” as examples to the Technical Rationale. It is misleading and incomplete for a standard to list a limited subset of resource technologies as examples, as it creates ambiguity regarding how other technologies should be addressed, particularly new technologies that are developed in the future. Standards should be limited to mandatory requirements; examples are more appropriately located in the Technical Rationale.
- Replace the reference to “depletion of fuel” in Part 1.3.2 with “unplanned generator outages,” as this language will encompass all reasons leading to unplanned generator outages and not be limited to fuel supply alone.
- Add the word “**known**” to resource capabilities and operations in Part 1.3.2 to avoid any ambiguity as shown below:**1.3.2. *Known*** Resource capabilities and operations, including fuel supply, unplanned generator outages and energy transfers between neighboring Balancing Authorities, and
- Finally, remove **Part 1.3.3**, from the standard altogether as Part 1.3.2 already includes ‘resource capabilities,’ which would take into account transmission limitations. If the SDT elects to keep Part 1.3.3., revise it as follows:

1.3.3. Reasonably foreseeable transmission outages that limit the deliverability of generator output.

Likes 0

Dislikes 0

Response

3. BAL-007-1 Near-term ERAs: The SDT updated Requirements R2 through Requirement R8 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.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard. This puts entities in a position where they create their own standard to be audited against. This creates a situation where many companies will choose to meet minimum compliance thresholds to not risk potential non-compliance. Entities who may want to put their best effort forward will be reluctant to do that because it will have a higher risk of non-compliance. R2 has no performance measurements associated with it specifying a required minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and rationales will result in subjective enforcement. Enforcement staff will likely leverage the ability to audit based on the quality of their ERA, not their performance to improve reliability.

Entities will be subject to compliance risks for administrative mistakes, rather than poor performance that results in actual risk to the BES. The drafting team is encouraged to consider what the minimal acceptable performance level should be for these assessments.

The Drafting Team utilizes the term "credible" several times. Credible is a very subjective term, and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.

R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified during the ERA, but it does not require implementation or effectiveness in avoiding an Energy Emergency. BAs maintain multiple Operating Plans under TOP-002, including identifying potential EEA situations. The Drafting Team it is not clear if their operating plans are the same or different Operating Plans generated TOP-002. If they are different, this is another set of plans that must be separately considered and coordinated. TOP-002 deals with next-day operations, it isn't clear if the proposed BAL-007 Operating Plans can, or cannot, be integrated with BA responsibilities under TOP-002.

R3 uses the phrase "...minimize forecasted Energy Emergencies..." this is subjective and not measurable. To what degree do the plans need to minimize? Though the intent of the drafting team seems clear, during enforcement it will be up to the interpretation of the auditor to determine if emergencies will be effectively minimized.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient to show performance. Measures are there to provide guidance to the entity on how they will be measured and parroting the requirement provides little-to-no-guidance. These two requirements are administrative and require generating documents for compliance, and they do not set a minimum criterion for performance. This encourages minimal compliance, not an acceptable level of performance.

R4: R4 requires the entity to review and update its near-term ERA process "if needed". There will be a burden on the entity to prove when updated is needed. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will be put in a position to explain why updates were not "needed". In these situations, auditors will look for errata errors in the documentation and argue that updating was, in fact, needed. This leads to a zero-defect compliance approach. NERC has been trying to distance itself from this type of enforcement through better written standards.

M4 continues to confuse the reader, because of the use of "as needed". M4 can be interpreted to exclude evidence if updates were determined to not be needed.

R5: In R5 the entities are asked to "...provide [their] near-term ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule." R1 requires the need for the BAs to develop a process and R4 requires the process to be

reviewed and updated at least once every 24 calendar months. R3 requires the entity to create Operating Plans based on the ERA process, these are done for time periods somewhere between 5 day and 6-week periods. The product from R3 is only relevant to the time period it is looking at. Requiring entities to provide the "...Scenarios or methods, and Operating Plans..." at least once

every 24 calendar months is confusing. The submission of the ERA process does make sense, since it is supposedly reviewed and updated in that period; however, Scenarios, methods and Operating Plans are of little use after the time they were completed for has passed. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months.

The ERA process submission to the RC should require resubmission any time a revision is made to the process. If, as currently stated, an entity submits their plan to the RC, then updates the document, they are not obligated to send the RC the current version until the next cycle. Other NERC Standards have the entity submit the updated processes within 30 or 60 days of any update, or on schedules that are mutually agreed to with the RC and the entity.

R6: The lead in sentence of R6 is written passively, and not consistent with good standard writing structure. The responsible entity should be stated first, then followed by the actions or requirement. The Drafting Team should consider rewriting the first sentence consistent with the other requirements. Perhaps: "The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R5, shall:"

If R6 focuses on the ERA process and not the Scenarios, methods or Operating Plans, there is little need for the RC to evaluate the process for reliability risks. Under common practices, the RCs would typically collect the ERA process documentation and only use it if there is a question related to how a company may have identified an emerging condition. There should be little need to provide feedback to the entity on its process, and there is no need to complete a review and evaluation within 60 days. This then makes R7 unnecessary and will reduce administrative failures of the RC and BA.

R7: R7 is not necessary for just the submission of the ERA process.

R8: It isn't clear why the Drafting Team elected to put the implementation of R1 as one of the last requirements. R8 should be combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer

No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer	No
Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard. This puts entities in a position where they create their own standard to be audited against. This creates a situation where many companies will choose to meet minimum compliance thresholds to not risk potential non-compliance. Entities who may want to put their best effort forward will be reluctant to do that because it will have a higher risk of non-compliance. R2 has no performance measurements associated with it specifying a required minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and rationales will result in subjective enforcement. Enforcement staff will likely leverage the ability to audit based on the quality of their ERA, not their performance to improve reliability. Entities will be subject to compliance risks for administrative mistakes, rather than poor performance that results in actual risk to the BES. The drafting team is encouraged to consider what the minimal acceptable performance level should be for these assessments. The Drafting Team utilizes the term "credible" several times. Credible is a very subjective term, and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.</p> <p>R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified during the ERA, but it does not require implementation or effectiveness in avoiding an Energy Emergency. BAs maintain multiple Operating Plans under TOP-002, including identifying potential EEA situations. The Drafting Team it is not clear if their operating plans are the same or different Operating Plans generated TOP-002. If they are different, this is another set of plans that must be separately considered and coordinated. TOP-002 deals with next-day</p>	

operations, it isn't clear if the proposed BAL-007 Operating Plans can, or cannot, be integrated with BA responsibilities under TOP-002. R3 uses the phrase "...minimize forecasted Energy Emergencies..." this is subjective and not measurable. To what degree do the plans need to minimize? Though the intent of the drafting team seems clear, during enforcement it will be up to the interpretation of the auditor to determine if emergencies will be effectively minimized.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient to show performance. Measures are there to provide guidance to the entity on how they will be measured and parroting the requirement provides little-to-no-guidance. These two requirements are administrative and require generating documents for compliance, and they do not set a minimum criterion for performance. This encourages minimal compliance, not an acceptable level of performance.

R4: R4 requires the entity to review and update its near-term ERA process "if needed". There will be a burden on the entity to prove when updated is needed. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will be put in a position to explain why updates were not "needed". In these situations, auditors will look for errata errors in the documentation and argue that updating was, in fact, needed. This leads to a zero-defect compliance approach. NERC has been trying to distance itself from this type of enforcement through better written standards.

M4 continues to confuse the reader, because of the use of "as needed". M4 can be interpreted to exclude evidence if updates were determined to not be needed.

R5: In R5 the entities are asked to "...provide [their] near-term ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule." R1 requires the need for the BAs to develop a process and R4 requires the process to be reviewed and updated at least once every 24 calendar months. R3 requires the entity to create Operating Plans based on the ERA process, these are done for time periods somewhere between 5 day and 6-week periods. The product from R3 is only relevant to the time period it is looking at. Requiring entities to provide the "...Scenarios or methods, and Operating Plans..." at least once

every 24 calendar months is confusing. The submission of the ERA process does make sense, since it is supposedly reviewed and updated in that period; however, Scenarios, methods and Operating Plans are of little use after the time they were completed for has passed. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months.

The ERA process submission to the RC should require resubmission any time a revision is made to the process. If, as currently stated, an entity submits their plan to the RC, then updates the document, they are not obligated to send the RC the current version until the next cycle. Other NERC Standards have the entity submit the updated processes within 30 or 60 days of any update, or on schedules that are mutually agreed to with the RC and the entity.

R6: The lead in sentence of R6 is written passively, and not consistent with good standard writing structure. The responsible entity should be stated first, then followed by the actions or requirement. The Drafting Team should consider rewriting the first sentence consistent with the other requirements. Perhaps: "The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R5, shall:"

If R6 focuses on the ERA process and not the Scenarios, methods or Operating Plans, there is little need for the RC to evaluate the process for reliability risks. Under common practices, the RCs would typically collect the ERA process documentation and only use it if there is a question related to how a company may have identified an emerging condition. There should be little need to provide feedback to the entity on its process, and there is no need to complete a review and evaluation within 60 days. This then makes R7 unnecessary and will reduce administrative failures of the RC and BA.

R7: R7 is not necessary for just the submission of the ERA process.

R8: It isn't clear why the Drafting Team elected to put the implementation of R1 as one of the last requirements. R8 should be combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy supports proposed EEI language modifications for R2.3, R3 and R6.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

No

Document Name

Comment

1. Requirement R2 uses the terms “credible” and “best” which are subjective and therefore not conducive to a measurable compliance assessment at audit. BC Hydro recommends revising to eliminate reliance on these terms.
2. Requirement R3 uses the term “minimize”, which can be subject to interpretation. BC Hydro recommends using “mitigate” instead, similar to the existing language in EOP-011 R2.
3. Requirement R4 mandates a 24 calendar months to review and update as necessary the R1 process, R2 Scenarios/methods, and R3 Operating Plan(s). This may constitute double-jeopardy, as failure to review and/or update may also constitute a possible noncompliance to the requirement to “maintain” the R1, R2, and R3 deliverables. BC Hydro recommends that R4 is not required, rather a measure of compliance be added in conjunction with the requirement to maintain under R1, R2, and R3.
4. Requirement R5 as written is vague and does not seem to provide value to reliability, particularly in case of Operating Plans, many of which would be obsolete on a 24-month provision timeframe. The Technical Rationale indicates that the intent is for the BAs and their respective RCs to have a mutually agreed protocol for the BC to provide updated R1, R2 and R3 documentation to the RC. BC Hydro recommends that R5 be revised to reflect the intent as stated in the Technical Rationale. Suggested wording provided below:

“R5 Each Balancing Authority and RC shall have and implement a documented protocol for the Balancing Authority to provide, at least once every 24 calendar months, its Reliability Coordinator with the near-term ERA process, Scenarios or methods, and Operating Plan(s) documented under Requirements R1 through R3.”

5. Given the overlap with EOP-011, BC Hydro recommends that the BAL-007 requirements be better align with the existing EOP-011 Requirements as existing EOP-011 based processes can be utilized to accommodate the net new requirements pertinent to ERAs.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

See comments below in questions 4 and 7

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer

No

Document Name

Comment

Dominion supports EEI comments but, in addition, For R2, usage of the word “credible” is subjective. This requirement should make clear that credibility of the Scenarios is for the BA to define and document. This language is pulled straight from the technical rationale for BAL-007-1. Recommend addition of “BA to define credible within their process”.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

No

Document Name

Comment

PNM supports EEI recommended changes for BAL-007-1 R2, R3, and R6.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Please see BPA's full response in question 9.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer

No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer

No

Document Name

Comment

Black Hills Corporation is aligned with EEI as stated below. EEI does not oppose the changes made to Requirements R4, R5, R7 and R8 but we do have concerns with the proposed changes to Requirements R2, R3 and R6.

Requirement R2 Concerns: EEI does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes “other scenarios with a credible risk”. We additionally do not agree that it is necessary to include “or historical” within subpart 2.3 because the BA already has awareness of the historical risks within their BA region and those risk factors would be factored into their assessment of what is a credible risk. To address our concerns, we offer the following changes to Requirement R2, subpart 2.3 (in boldface):

2.3. Other Scenarios with a credible (*remove: or historical*) risk of occurring (*remove: based on the best information available at the time of Scenario creation*) as determined by the BA.

Requirement R3 Concerns: While EEI appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, we are concerned that the proposed language provides no clarity regarding this process. To address this concern, we suggest including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R3: Each Balancing Authority shall document and maintain one or more Operating Plan(s) (*remove: to minimize forecasted Energy Emergencies*) as identified in the near-term ERA (*remove: , including*) that include provisions for notifying the Reliability Coordinator of a forecasted Energy Emergency (*remove: and the Operating Plan(s)*), when deemed necessary. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

Requirement R6 Concerns: EEI notes that Requirement R6 cites certain RC actions related to Requirement R5. Requirement R5 is an administrative Requirement that simply obligates the BA to supply their near-term ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. While Requirement R6 obligates the RC to review the R5 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days this is administrative and therefore should not have a VRF higher than Low. We note the following from the VRF Justification document:

Lower Risk Requirement: A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Southern Company supports the EEI comments and has the same concerns for R2, R5, and R6.

Likes 0

Dislikes 0

Response**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

Answer

No

Document Name

Comment

TEPC agrees with EEI's comments - EEI's concerns with the proposed changes to Requirements R2 (EEI does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes "other scenarios with a credible or historical risk".), R3 (While EEI appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, we are concerned that the proposed language provides no clarity regarding this process. To address this concern, we suggest that simply including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies would be sufficient.), and R6 (EEI notes that Requirement R6 cites certain RC actions related to Requirement R5. Requirement R5 is an administrative Requirement that simply obligates the BA to supply their near-term ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. While Requirement R6 obligates the RC to review the R5 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days this is administrative and therefore should not have a VRF higher than Low.).

Likes 0

Dislikes 0

Response**Kevin Conway - Western Power Pool - 4**

Answer

No

Document Name

Comment

R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard. This puts entities in a position where they create their own standard to be audited against. This creates a situation where many companies will choose to meet minimum compliance thresholds to not risk potential non-compliance. Entities who may want to put their best effort forward will be reluctant to do that because it will have a higher risk of non-compliance. R2 has no performance measurements associated with it specifying a required minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and rationales will result in subjective enforcement. Enforcement staff will likely leverage the ability to audit based on the quality of their ERA, not their performance to improve reliability.

Entities will be subject to compliance risks for administrative mistakes, rather than poor performance that results in actual risk to the BES. The drafting team is encouraged to consider what the minimal acceptable performance level should be for these assessments.

The Drafting Team utilizes the term “credible” several times. Credible is a very subjective term, and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.

R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified during the ERA, but it does not require implementation or effectiveness in avoiding an Energy Emergency. BAs maintain multiple Operating Plans under TOP-002, including identifying potential EEA situations. The Drafting Team it is not clear if their operating plans are the same or different Operating Plans generated TOP-002. If they are different, this is another set of plans that must be separately considered and coordinated. TOP-002 deals with next-day operations, it isn't clear if the proposed BAL-007 Operating Plans can, or cannot, be integrated with BA responsibilities under TOP-002.

R3 uses the phrase “...minimize forecasted Energy Emergencies...” this is subjective and not measurable. To what degree do the plans need to minimize? Though the intent of the drafting team seems clear, during enforcement it will be up to the interpretation of the auditor to determine if emergencies will be effectively minimized.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient to show performance. Measures are there to provide guidance to the entity on how they will be measured and parroting the requirement provides little-to-no-guidance. These two requirements are administrative and require generating documents for compliance, and they do not set a minimum criterion for performance. This encourages minimal compliance, not an acceptable level of performance.

R4: R4 requires the entity to review and update its near-term ERA process “if needed”. There will be a burden on the entity to prove when updated is needed. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will be put in a position to explain why updates were not “needed”. In these situations, auditors will look for errata errors in the documentation and argue that updating was, in fact, needed. This leads to a zero-defect compliance approach. NERC has been trying to distance itself from this type of enforcement through better written standards.

M4 continues to confuse the reader, because of the use of “as needed”. M4 can be interpreted to exclude evidence if updates were determined to not be needed.

R5: In R5 the entities are asked to “...provide [their] near-term ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule.” R1 requires the need for the BAs to develop a process and R4 requires the process to be reviewed and updated at least once every 24 calendar months. R3 requires the entity to create Operating Plans based on the ERA process, these are done for time periods somewhere between 5 day and 6-week periods. The product from R3 is only relevant to the time period it is looking at. Requiring entities to provide the “...Scenarios or methods, and Operating Plans...” at least once every 24 calendar months is confusing. The submission of the ERA process does make sense, since it is supposedly reviewed and updated in that period; however, Scenarios, methods and Operating Plans are of little use after the time they were completed for has passed. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months.

The ERA process submission to the RC should require resubmission any time a revision is made to the process. If, as currently stated, an entity submits their plan to the RC, then updates the document, they are not obligated to send the RC the current version until the next cycle. Other NERC Standards have the entity submit the updated processes within 30 or 60 days of any update, or on schedules that are mutually agreed to with the RC and the entity.

R6: The lead in sentence of R6 is written passively, and not consistent with good standard writing structure. The responsible entity should be stated first, then followed by the actions or requirement. The Drafting Team should consider rewriting the first sentence consistent with the other requirements. Perhaps: “The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R5, shall:”

If R6 focuses on the ERA process and not the Scenarios, methods or Operating Plans, there is little need for the RC to evaluate the process for reliability risks. Under common practices, the RCs would typically collect the ERA process documentation and only use it if there is a question related to how a company may have identified an emerging condition. There should be little need to provide feedback to the entity on its process, and there is no need to complete a review and evaluation within 60 days. This then makes R7 unnecessary and will reduce administrative failures of the RC and BA.

R7: R7 is not necessary for just the submission of the ERA process.

R8: It isn't clear why the Drafting Team elected to put the implementation of R1 as one of the last requirements. R8 should be combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

WECC is concerned that:

R2- The phrase "by a sufficient amount to stress the system within a range of credible situations" is ambiguous and will be applied inconsistently. Is varying conditions for an ERA intended to be sufficient enough to create an EEA level? There needs to be clarity in what may be expected in the rationales. Suggest "Include a rationale for the Scenarios or method of Scenario creation that includes support for criteria determined by the Balancing Authority for varying the following conditions." Suggest changing "operations" in R2.2. to "availability". Requirement 2.3 does not appear to be cohesive with the phrase "shall vary one or more of the following conditions..." Consider editing and adding as a second sentence in R2 as follows "Each Balancing Authority shall.....for use in performing near-term ERAs. Scenarios with a credible or historical risk of occurring may be used based on the best information available at the time of Scenario creation." As written each BA would not have to "consider" the other Scenarios called out in 2.3 (as mentioned in the Technical Rational). The "Other Scenarios" may not be seen as a "following condition" which will cause confusion. The DT is correct in including previous historical Scenarios that stress the System as a basis for an ERA. Consider adding a 2.2.4 "Energy transfers between neighboring Balancing Authorities" to support 1.3 language.

R3-This appears duplicative to EOP-011 R2. EOP-011 R2 has the time horizon for a near-term ERA covered and does not require the source of determination for an Energy Emergency (which means an ERA is a possible source of determination.)

R4/R5- Clarity may be needed in terms of for development of the Scenarios and Operating Plans every 24 calendar months (and associated submittals). Are the Scenarios intended to illustrate what is actually used (e.g., forecasted versus assumed Demand) in the near-term ERA versus the data itself? Operating Plans may change based on the near-term ERA duration selected and the conditions forecasted for the duration. Again, some overlap in EOP-011 to consider here. EOP-011 R2 requires the BA to "maintain" the Operating Plans without mention of a timeframe. While nothing precludes a BA from providing an ERA derived Operating Plan from being provided to the RC, anytime a specific timeline is placed within a Requirement registered entities tend to set internal milestones accordingly. In essence a registered entity could be in "compliance" for providing the Operating Plan at least once every 24 calendar months but not support reliability by maintaining the plan more frequently (also possibly in noncompliance with EOP-011).

R6- EOP-011 has a 30 calendar day timeline for Operating Plans associated with Energy Emergencies and is in conflict with this Requirements 60 calendar days. Suggest say "results" versus "information". It is not clear how the RC will avoid risks. Is it reviewing the Operating Plans only? As noted, it would be reasonable to expect Operating Plans to fit the conditions noted in a near-term ERA which has a limited duration (up to six weeks). What Operating Plans would be provided and of what value would Operating plans be if 24 months old? The Operating Plans for a Energy Emergency are to be reviewed by the RC prior to implementation. If Operating Plans are only reviewed once every 24 months versus as developed (and updated) how could coordination occur? Additionally, may need to indicate "Notify the submitting Balancing Authority..." versus "each" in Part 6.2.

R7- While not in conflict with EOP-011, EOP-011 may set a timeframe for response that could exceed the 60 calendar days. What is the expectation for the DT as to how a BA will address the reliability risks? Especially if the reliability risk is a coordination issue? It appears that for coordination caused/resultant reliability risks the RC would need to clearly indicate actions so that there is not an infinite loop of actions and reactions. Also, by using "any" that means a BA could address only one and be compliant. If supporting reliability, the BA should address ALL the reliability risks identified. What recourse does a BA have if it cannot alleviate the risk?

R8- While implicit, perhaps it should be explicit that applicable Scenarios based on the conditions should be utilized. The Scenarios may be developed for conditional issues and updated accordingly) so not all the Scenarios would be used.

R10- There are extended metrics (24 hrs) associated with the timing of notification which does not appear to support reliability. EOP-011 has a 30-minute requirement to notify others in the RC footprint for an Energy Emergency.

For all these Requirements, the DT just needs to ensure that the overlap between BAL-007 and EOP-011 is either minimized or, at least, coordinated in terms of expectations to avoid confusion.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

Part 2.3: it is recommended to remove the use of "the best".

Eliminate duplication for the need of an Operating Plan from BAL-007 R3-R7 with EOP-011 R2-R4.

Align and standardize time requirements of BAL-007 and EOP-011. Specifically:

- BAL-007, R5 mandates a 24-month review period for Operating Plan(s) whereas EOP-011, R2 leaves it up to the BA's discretion.
- BAL-007, R6 mandates a 60-day RC review period whereas EOP-011, R3 requires a 30-day RC review period.
- BAL-007, R7 mandates a 60-day period during which the BA must address issues identified by the RC whereas EOP-011, R4 allows the RC to specify the time period.

Suggested language modifications:

R4. The Balancing Authority shall review and update, if necessary, its near-term ERA process Scenarios or methods documented under Requirements R1 through R3 at least once every 24 calendar months.

R5. Each Balancing Authority shall provide its near-term ERA process Scenarios or methods documented under Requirements R1 through R3 to the Reliability Coordinator at least once every 24 calendar months, on a mutually agreed schedule.

R6. Within 60 calendar days of receipt of the information identified in Requirement R5, the Reliability Coordinator shall:

6.1. Review each submittal for coordination with other Balancing Authorities' in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

6.2. Notify each Balancing Authority of the results of its review and specifying any time frame for resubmittal if revisions are needed to address reliability risks.

R7.Each Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to R6 and resubmit the updated information to its Reliability Coordinator within a time period specified by its Reliability Coordinator.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power supports the MRO NSRF and Wester Power Pool comments.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer

No

Document Name

Comment

Exelon supports the concerns stated in the EEI comments.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer

No

Document Name

Comment

The use of the term “credible” is very subjective. This will create an issue for Registered Entities when the standard is being audited.

The requirement parts of R2 are typically scenarios that would be analyzed by Resource Planners for longer term. What is meant by “credible energy supply contingency”? This is subjective and could be analyzed differently based on the person performing the ERA.

For R2.3, how does a Registered Entity prove to an auditor that other scenarios (if any) were available at the time of the Scenario creation?

For R4, the requirement to review and update its near-term ERA process if needed places undue burden on an entity to provide “proof to negative”. During an audit, this leaves too much open to interpretation for an auditor.

For R8, this requirement to perform the ERAs according to your process should be combined with R2 or R3 or moved up into the standard.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC**Answer** No**Document Name****Comment**

Comment applicable to all requirements: We suggest the usage of “resource” instead of “fuel” in all requirements, as it is more inclusive and covers cases when all generation is hydraulic.

R4 : This requirement seems redundant with the obligation in R4 which requires the BA to review and update if necessary the documentation requested in R1, R2 and R3, where the BA has the obligation to “maintain” Scenarios, methods and Operating Plans. In our opinion, to maintain the documentation implies that it is kept at a particular level by reviewing it when necessary.

R5, R6 and R7 : Are these requirements applicable when the same entity is the only RC and BA of its Interconnexion? If not, we would suggest adding language to these requirements to clarify .

R8 : We suggest adding the verb “implement” to R1 and R2, which would thus render this requirement unnecessary. “R1 Each Balancing Authority shall document, and maintain and implement a process for conducting Energy Reliability Assessments ...”

Likes 0

Dislikes 0

Response**Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6****Answer** No**Document Name****Comment**

PSE generally agrees with WPP’s response to this question. Additional PSE comments are shown below.

R2: PSE would like there to be some guidance on what is an acceptable level of performance for the ERA. This is typically established at the RC or TPC level for transmission reliability levels and would give the BA better support for managing generation resources. There should be some objective reliability objective offered rather than leaving it up to each entity.

R3: PSE doesn’t think that TOP-002 operating plans have balancing requirements, rather having transmission plans to deliver the energy to the load. The EOP standard is currently the only balancing operating plan for capacity emergencies and therefore is already covered. Having a separate operating plan for actions outside real time is confusing. The only things we can really do is deny/recall generation outages.

R4: PSE would prefer a review and update schedule provided and thinks it makes a lot of sense to require the review to follow the same schedule as the EOP review and update schedule since they are closely linked. Possibly state shall be updated as part of Emergency Operating Procedure review... or similar language.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EEl does not oppose the changes made to Requirements R4, R5, R7 and R8 but we do have concerns with the proposed changes to Requirements R2, R3 and R6.

Requirement R2 Concerns: EEl does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes “other scenarios with a credible risk”. We additionally do not agree that it is necessary to include “or historical” within subpart 2.3 because the BA already has awareness of the historical risks within their BA region and those risk factors would be factored into their assessment of what is a credible risk. To address our concerns, we offer the following changes to Requirement R2, subpart 2.3 (in boldface):

2.3. Other Scenarios with a credible risk of occurring **as determined by the BA.**

Requirement R3 Concerns: While EEl appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, we are concerned that the proposed language provides no clarity regarding this process. To address this concern, we suggest including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R3: Each Balancing Authority shall document and maintain one or more Operating Plan(s) as identified in the near-term ERA **that include** provisions for notifying the Reliability Coordinator of a forecasted Energy Emergency, **when deemed necessary.** [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

Requirement R6 Concerns: EEl notes that Requirement R6 cites certain RC actions related to Requirement R5. Requirement R5 is an administrative Requirement that simply obligates the BA to supply their near-term ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. While Requirement R6 obligates the RC to review the R5 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days this is administrative and therefore should not have a VRF higher than Low. We note the following from the VRF Justification document:

Lower Risk Requirement: A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Expand Part 2.2. to include “energy transfers between neighboring BAs.” This will align Part 2.2 with Part 1.3.2 as illustrated below. For more details, see our response to Question 1. as illustrated below:

2.2. Known Resource capabilities and operations, including the following:

2.2.1. The effects of a credible energy supply contingency;

2.2.2. The effects of a credible fuel supply contingency; and

2.2.3. Unplanned generator outages; and

2.2.4. Energy transfers between neighboring Balancing Authorities

Part 2.3. Eliminate the use of “the best.” This will be difficult to prove in an audit.

2.3. Other Scenarios with a credible or historical risk of occurring based on the best information available at the time of Scenario creation.

Eliminate or modify BAL-007 requirements R3-R7 to remove duplication with EOP-011 requirements R2-R4. Since the goal of BAL-007 is to perform ERAs and provide the BA with more lead-time to address forecasted Energy Emergency Alerts (as defined in EOP-011, Attachment 1, Section B), **many BAs will likely modify and/or expand existing Operating Plan(s) to comply with BAL-007 and EOP-011 versus drafting new documents.**

Consideration should also be given to aligning and standardizing proposed BAL-007 requirements R3-R7 with EOP-011 requirements R2-R4. Currently, they vary just enough to increase the potential for human error without adding value to the process. For example:

{C}· BAL-007, R5 mandates a 24-month review period for Operating Plan(s) whereas EOP-011, R2 leaves it up to the BA’s discretion.

{C}· BAL-007, R6 mandates a 60-day RC review period whereas EOP-011, R3 requires a 30-day RC review period.

{C}· BAL-007, R7 mandates a 60-day period during which the BA must address issues identified by the RC whereas EOP-011, R4 allows the RC to specify the time period.

Aligning and standardizing BAL-007 with EOP-011 will:

{C}· Enable a smooth transition from BAL-007 to TOP-002 to TOP-001 and EOP-011

{C}· Decrease the potential for human error and eliminate the possibility of double jeopardy

NV Energy proposes the following modifications:

{C}· **BAL-007, R3** is duplicative of EOP-011, R2, Parts 2.2 and 2.2.1 as EOP-011 requires “one or more ...Operating Plan(s) to mitigate ... Energy Emergencies” and “notification to the RC.” To capture the balance of the intent, NV Energy Recommends a modification to EOP-011, Part 2.2.1. and eliminating R3 from BAL-007:

EOP-011, 2.2.1. Notification to its Reliability Coordinator of:

{C}§ The forecasted Energy Emergency and Operating Plan(s)

{C}§ Current and projected conditions when experiencing a Capacity Emergency or Energy Emergency;

{C}· **BAL-007, R4** duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, retain only that portion of BAL-007, R4 that is new, i.e. to update the near-term ERA process and Scenarios or methods only.

R4. The Balancing Authority shall review and update, if necessary, its near-term ERA process, and Scenarios or methods, documented under Requirements R1 through R3 at least once every 24 calendar months.

{C}· **BAL-007, R5** duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, retain only that portion of BAL-007, R5 that is new, i.e. to update the near-term ERA process and Scenarios or methods only.

R5. Each Balancing Authority shall provide its near-term ERA process, and Scenarios or methods, documented under Requirements R1 through R3 to the Reliability Coordinator at least once every 24 calendar months, on a mutually agreed schedule.

{C}· **BAL-007, R6** duplicates parts of EOP-011, R3 as EOP-011, R3 already requires the RC to review Operating Plan(s).

{C}o **BAL-007, Part 6.1** is partially duplicative of EOP-011, Part 3.1.2 as EOP-011, Part 3.1.2 already requires coordination of Operating Plan(s) for Wide area reliability. There is no need to specify “ERA information” as this is already specified in R5.

{C}o **BAL-007, Part 6.2** is partially duplicative of EOP-011, Part 3.1.3 as EOP-011, Part 3.1.3 already requires the RC to notify each BA of the results of their review. Recommend the time frame for resubmittal align with EOP-011., Part 3.1.3.

R6. Within 60 calendar days of receipt of the information identified in Requirement R5, the Reliability Coordinator shall:

6.1. Review each submittal for coordination with other Balancing Authorities’ in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

6.2. Notify each Balancing Authority of the results of its review and specifying any time frame for resubmittal if revisions are needed to address reliability risks.

{C}· **BAL-007, R7** should mirror EOP-011, R4 as EOP-011, R4 already requires BAs to resubmit their Operating Plan(s) to the RC within the time period specified by the RC.

R7. Each Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to R6 and resubmit the updated information to its Reliability Coordinator within a time period specified by its Reliability Coordinator.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

Puget Sound Energy (PSE) generally agrees with WPP's response to this question. Additional PSE comments are shown below.

R2: PSE would like there to be some guidance on what is an acceptable level of performance for the ERA. This is typically established at the RC or TPC level for transmission reliability levels and would give the BA better support for managing generation resources. There should be some objective reliability objective offered rather than leaving it up to each entity.

R3: PSE doesn't think that TOP-002 operating plans have balancing requirements, rather having transmission plans to deliver the energy to the load. The EOP standard is currently the only balancing operating plan for capacity emergencies and therefore is already covered. Having a separate operating plan for actions outside real time is confusing. The only things we can really do is deny/recall generation outages.

R4: PSE would prefer a review and update schedule provided and thinks it makes a lot of sense to require the review to follow the same schedule as the EOP review and update schedule since they are closely linked. Possibly state shall be updated as part of Emergency Operating Procedure review... or similar language.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer

No

Document Name

Comment

Seminole agrees with FRCC's comments below

R2:

The FRCC believes that R2 is too vague, especially the term "Credible". The lack of a specific definition will force individual BAs to create their own standard to be audited against. This situation will have the opposite effect of what is intended. The focus will be on compliance and not on actual Resource Adequacy. Also, the BAs will have to account for compliance risks due to administrative errors, not for inadequate performance that creates a real risk to the BES. The FRCC suggests the drafting team define what the minimal acceptable performance level should be for these assessments and define what "Credible" is intended to address.

R3:

The FRCC acknowledges the intent of the proposed language to minimize forecasted Energy Emergencies, but still has concerns that the proposed language provides no improved clarity regarding this process. The FRCC suggests including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R4:

The FRCC is concerned about the requirement for BAs to review and update its near-term ERA process "if needed". This places an undue burden on BAs to determine when an update is needed. The concern is that if there is no periodic update/review of the document, it has not been evaluated to be "needed". An auditor could then interpret this as not being maintained properly. There will be an additional compliance burden, where BAs will be forced to explain why updates were not "needed".

R5:

The FRCC suggests that the ERA process submission to the RC should require resubmission any time a revision is made to the process and on a schedule that is mutually agreed upon between the RC and the BA, not to exceed 24 calendar months if no updates have been made to the current plan. As written, if a BA submits a plan to the RC and then updates the plan document, there is no requirement to send the RC the current version until the next cycle (up to 24 months). There are examples in other NERC Standards that have the entity submit the updated processes within a certain time period after an update, or on schedules that are mutually agreed to with the RC and the entity.

R6:

The FRCC agrees with and supports the Edison Electric Institute (EEI) severity risk comments on R6:

Requirement R6 Concerns: EEI notes that Requirement R6 cites certain RC actions related to Requirement R5. Requirement R5 is an administrative Requirement that simply obligates the BA to supply their near-term ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. While Requirement R6 obligates the RC to review the R5 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days this is administrative and therefore should not have a VRF higher than Low. We note the following from the VRF Justification document:

Lower Risk Requirement: A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

R7:

The FRCC has no comments on R7.

R8:

The FRCC has no comments on R8.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)	
Answer	No
Document Name	
Comment	
FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>APS recognizes the importance of Energy Reliability Assessments however BAL-007-1 is duplicative of NERC Standards and Requirements prescribed under existing NERC Standards EOP-011, TOP-002 and TOP-003 and should not be prescribed in BAL-007-1. The BAL-007-1 Standard should be provided as a Technical Rationale or a Guidance Document that Balancing Authorities may use as an implementation Reference Guide. APS is in the opinion that there are alternative approaches in development to meet the near-term ERA needs such as the Western Resource Adequacy Program, which supports a wide area effort to assess and address resource adequacy to ensure reliability across the west. The WRAP Operations Program Timeline BPM outlines high level activities and associated timing of those activities that occur for the period starting from seven days prior to Operating Day, and in this way, captures the near-term assessment required to ensure resource adequacy.</p>	
Likes	0
Dislikes	0
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance	
Answer	No
Document Name	
Comment	
<p>The SRC recommends the following revisions to Requirements R2 through R8:</p> <p>(footnote: SPP is a party to these comments however does not support the references about duplication with EOP-011 requirements. SPP supports the need for reporting ERA results in BAL-007 however there is lack of clarity between the BAL-007 and EOP-011 obligations.)</p>	

The phrase “by a sufficient amount” in Requirement R2 is unnecessary and should be removed. This would better align the language in BAL-007-1 R2 with the language in BAL-008-1 R2.

Additionally, Part 2.3 appears to be unnecessary, as the same effect could be achieved by deleting Part 2.3 and inserting the “credible or historical risk of occurring” qualifier elsewhere in Requirement R2. If Part 2.3 is retained, it should be revised to eliminate the use of “the best.” This will be difficult to prove in an audit.

2.3. Other Scenarios with a credible or historical risk of occurring based on the best information available at the time of Scenario creation.

Eliminate BAL-007 requirements R3-R7 to remove duplication with EOP-011 requirements R2-R4. Since the goal of BAL-007 is to perform ERAs and provide the BA with more lead-time to address forecasted Energy Emergency Alerts (as defined in EOP-011, Attachment 1, Section B), it is unnecessary and duplicative for BAL-007 to include requirements addressing preparation for and management of emergencies because EOP-011 already covers this topic. To the extent that an ERA identifies previously unknown potential Energy Emergencies, EOP-011 already provides the necessary framework and obligations for BAs to modify or expand existing Operating Plan(s) to prepare for and minimize the likelihood of the potential emergency situation.

Consequently, proposed BAL-007 requirements R3-R7 should be deleted because they are substantively duplicative of EOP-011 requirements R2-R4 while simultaneously varying just enough to increase the potential for human error without improving system reliability. For example:

- BAL-007, R5 mandates a 24-month review period for Operating Plan(s) whereas EOP-011, R2 leaves it up to the BA’s discretion.

- BAL-007, R6 mandates a 60-day RC review period whereas EOP-011, R3 requires a 30-day RC review period.

- BAL-007, R7 mandates a 60-day period during which the BA must address issues identified by the RC whereas EOP-011, R4 allows the RC to specify the time period.

Removing BAL-007 R3 – R7 in recognition of EOP-011 will:

- Enable a smooth transition from BAL-007 to TOP-002 to TOP-001 and EOP-011, and

- Decrease the potential for human error, eliminate the possibility of double jeopardy, and reduce the risk that attempts to track and comply with similar-yet-disparate administrative requirements will overshadow the underlying reliability objective.

In further support of this recommendation, the SRC notes the following additional areas of overlap and modifications that would help reduce the amount of duplication evenness with EOP-011:

- BAL-007, R3 is duplicative of EOP-011, R2, Parts 2.2 and 2.2.1 as EOP-011 requires “one or more ...Operating Plan(s) to mitigate ... Energy Emergencies” and “notification to the RC.” Additionally, it is unclear how an entity would demonstrate or how a Regional Entity would audit whether a forecasted emergency has truly been “minimized.” Consequently, Requirement R3 should be eliminated. A corresponding modification could be made to EOP-011, Part 2.2.1, but may be unnecessary given that that notification requirement in EOP-011 Part 2.2.1 falls under the process to prepare for Emergencies and is therefore not necessarily limited to active emergency conditions:

EOP-011, 2.2.1. Notification to its Reliability Coordinator of:

- The any forecasted Energy Emergencies and associated Operating Plan(s), and
- to include cCurrent and projected conditions when experiencing a Capacity Emergency or Energy Emergency;

BAL-007: R3. Each Balancing Authority shall document and maintain one or more Operating Plan(s) to minimize forecasted Energy Emergencies as identified in the near-term ERA, including provisions for notifying the Reliability Coordinator of the forecasted Energy Emergency and the Operating Plan(s).

• BAL-007, R4 duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, if R4 is retained, it should be revised to only address updates to the near-term ERA process and Scenarios or methods.

R4. The Balancing Authority shall review and update, if necessary, its near-term ERA process, and Scenarios or methods, and Operating Plan(s) documented under Requirements R1 through R3 at least once every 24 calendar months.

• BAL-007, R5 duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, if R5 is retained, it should be revised to only address updates to the near-term ERA process and Scenarios or methods.

R5. Each Balancing Authority shall provide its near-term ERA process, and Scenarios or methods, and Operating Plan(s) documented under Requirements R1 through R3 to the Reliability Coordinator at least once every 24 calendar months, on a mutually agreed schedule.

• BAL-007, R6 duplicates parts of EOP-011, R3 as EOP-011, R3 already requires the RC to review Operating Plan(s).

o BAL-007, Part 6.1 is partially duplicative of EOP-011, Part 3.1.2 as EOP-011, Part 3.1.2 already requires coordination of Operating Plan(s) for Wide area reliability. There is no need to specify “ERA information” as this is already specified in R5.

o BAL-007, Part 6.2 is partially duplicative of EOP-011, Part 3.1.3 as EOP-011, Part 3.1.3 already requires the RC to notify each BA of the results of their review. If R6 is retained, it should be revised as follows:

R6. Within 60 calendar days of receipt of the information identified in Requirement R5, the Reliability Coordinator shall:

6.1. Review each submittal for coordination with other Balancing Authorities’ ERA information in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

6.2. Notify each Balancing Authority within its Reliability Coordinator Area of the results of its review and specifying any time frame for resubmittal if revisions are needed to address reliability risks.

• If BAL-007, R7 is retained, it should likewise follow the proposed revisions to R6 to align with the approach used in EOP-011, R4 as EOP-011, R4 already requires BAs to resubmit their Operating Plan(s) to the RC within the time period specified by the RC.

R7. Within 60 calendar days of receipt of the Reliability Coordinator's notice under Requirement R6, eEach Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to R6 and resubmit the updated information required in Requirement R4 to its Reliability Coordinator within a time period specified by its Reliability Coordinator.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

No

Document Name

Comment

R2:

The FRCC believes that R2 is too vague, especially the term "Credible". The lack of a specific definition will force individual BAs to create their own standard to be audited against. This situation will have the opposite effect of what is intended. The focus will be on compliance and not on actual Resource Adequacy. Also, the BAs will have to account for compliance risks due to administrative errors, not for inadequate performance that creates a real risk to the BES. The FRCC suggests the drafting team define what the minimal acceptable performance level should be for these assessments and define what "Credible" is intended to address.

R3:

The FRCC acknowledges the intent of the proposed language to minimize forecasted Energy Emergencies, but still has concerns that the proposed language provides no improved clarity regarding this process. The FRCC suggests including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R4:

The FRCC is concerned about the requirement for BAs to review and update its near-term ERA process “if needed”. This places an undue burden on BAs to determine when an update is needed. The concern is that if there is no periodic update/review of the document, it has not been evaluated to be “needed”. An auditor could then interpret this as not being maintained properly. There will be an additional compliance burden, where BAs will be forced to explain why updates were not “needed”.

R5:

The FRCC suggests that the ERA process submission to the RC should require resubmission any time a revision is made to the process and on a schedule that is mutually agreed upon between the RC and the BA, not to exceed 24 calendar months if no updates have been made to the current plan. As written, if a BA submits a plan to the RC and then updates the plan document, there is no requirement to send the RC the current version until the next cycle (up to 24 months). There are examples in other NERC Standards that have the entity submit the updated processes within a certain time period after an update, or on schedules that are mutually agreed to with the RC and the entity.

R6:

The FRCC agrees with and supports the Edison Electric Institute (EEI) severity risk comments on R6: Requirement R6 Concerns: EEI notes that Requirement R6 cites certain RC actions related to Requirement R5. Requirement R5 is an administrative Requirement that simply obligates the BA to supply their near-term ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. While Requirement R6 obligates the RC to review the R5 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days this is administrative and therefore should not have a VRF higher than Low. We note the following from the VRF Justification document:

Lower Risk Requirement: A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

R7:

The FRCC has no comments on R7.

R8:

The FRCC has no comments on R8.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

[2022-03_Unofficial Comment Form_BAL-007 and BAL-008_MRO NSRF_06-11-24rev.docx](#)

Comment

Expand Part 2.2. to include “energy transfers between neighboring BAs.” This will align Part 2.2 with Part 1.3.2 as illustrated below. For more details, see our response to Question 1. as illustrated below:

2.2. Known Resource capabilities and operations, including the following:

2.2.1. The effects of a credible energy supply contingency;

2.2.2. The effects of a credible fuel supply contingency;

2.2.3. Unplanned generator outages; and

2.2.4. Energy transfers between neighboring Balancing Authorities

Part 2.3. Eliminate the use of “the best.” This will be difficult to prove in an audit.

2.3. Other Scenarios with a credible or historical risk of occurring based on information available at the time of Scenario creation.

Eliminate or modify BAL-007 requirements R3-R7 to remove duplication with EOP-011 requirements R2-R4. Since the goal of BAL-007 is to perform ERAs and provide the BA with more lead-time to address forecasted Energy Emergency Alerts (as defined in EOP-011, Attachment 1, Section B), **many BAs will likely modify and/or expand existing Operating Plan(s) to comply with BAL-007 and EOP-011 versus drafting new documents.**

Consideration should also be given to aligning and standardizing proposed BAL-007 requirements R3-R7 with EOP-011 requirements R2-R4. Currently, they vary just enough to increase the potential for human error without adding value to the process. For example:

- BAL-007, R5 mandates a 24-month review period for Operating Plan(s) whereas EOP-011, R2 leaves it up to the BA’s discretion.
- BAL-007, R6 mandates a 60-day RC review period whereas EOP-011, R3 requires a 30-day RC review period.
- BAL-007, R7 mandates a 60-day period during which the BA must address issues identified by the RC whereas EOP-011, R4 allows the RC to specify the time period.

Aligning and standardizing BAL-007 with EOP-011 will:

- Enable a smooth transition from BAL-007 to TOP-002 to TOP-001 and EOP-011
- Decrease the potential for human error and eliminate the possibility of double jeopardy

The MRO NSRF proposes the following modifications:

- **BAL-007, R3** is duplicative of EOP-011, R2, Parts 2.2 and 2.2.1 as EOP-011 requires “one or more ...Operating Plan(s) to mitigate ... Energy Emergencies” and “notification to the RC.” To capture the balance of the intent, the MRO NSRF Recommends a modification to EOP-011, Part 2.2.1. and eliminating R3 from BAL-007:

EOP-011, 2.2.1. Notification to its Reliability Coordinator of:

§ The forecasted Energy Emergency and Operating Plan(s)

§ to include cCurrent and projected conditions when experiencing a Capacity Emergency or Energy Emergency;

BAL-007: (please review the attached document).

· **BAL-007, R4** duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, retain only that portion of BAL-007, R4 that is new, i.e. to update the near-term ERA process and Scenarios or methods only.

R4. The Balancing Authority shall review and update, if necessary, its near-term ERA process and Scenarios or methods, documented under Requirements R1 through R3 at least once every 24 calendar months.

· **BAL-007, R5** duplicates parts of EOP-011, R2 as EOP-011, R2 already requires Operating Plan(s) to be maintained. Therefore, retain only that portion of BAL-007, R5 that is new, i.e. to update the near-term ERA process and Scenarios or methods only.

R5. Each Balancing Authority shall provide its near-term ERA process, Scenarios or methods, documented under Requirements R1 through R3 to the Reliability Coordinator at least once every 24 calendar months, on a mutually agreed schedule.

· **BAL-007, R6** duplicates parts of EOP-011, R3 as EOP-011, R3 already requires the RC to review Operating Plan(s).

o **BAL-007, Part 6.1** is partially duplicative of EOP-011, Part 3.1.2 as EOP-011, Part 3.1.2 already requires coordination of Operating Plan(s) for Wide area reliability. There is no need to specify “ERA information” as this is already specified in R5.

o **BAL-007, Part 6.2** is partially duplicative of EOP-011, Part 3.1.3 as EOP-011, Part 3.1.3 already requires the RC to notify each BA of the results of their review. Recommend the time frame for resubmittal align with EOP-011., Part 3.1.3.

R6. Within 60 calendar days of receipt of the information identified in Requirement R5, the Reliability Coordinator shall:

6.1. Review each submittal for coordination with other Balancing Authorities’ in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

6.2. Notify each Balancing Authority of the results of its review and specifying any time frame for resubmittal if revisions are needed to address reliability risks.

· **BAL-007, R7** should mirror EOP-011, R4 as EOP-011, R4 already requires BAs to resubmit their Operating Plan(s) to the RC within the time period specified by the RC.

R7. Requirement R6, Each Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to R6 and resubmit the updated information required in Requirement R4 to its Reliability Coordinator within a time period specified by its Reliability Coordinator.

Likes	0
Dislikes	0
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC	
Answer	No
Document Name	

Comment

SMUD and BANC agree with the comments submitted by the MRO NERC Standards Review Forum (NSRF).

Likes 0

Dislikes 0

Response**Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4**

Answer

No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response**Israel Perez - Salt River Project - 1,3,5,6 - WECC**

Answer

No

Document Name

Comment

While SRP appreciates the flexibility of creating an operating plan with timelines and scenarios that are appropriate for its BA, more guidance could be helpful to ensure an Operating Plan and associated evidence meets the expectations of the standard.

Likes 0

Dislikes 0

Response**Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6**

Answer

No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer

No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer

No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer Yes

Document Name

Comment

Yes, with minor suggested edits

Suggest removing “by a sufficient amount” in R2. It is unnecessary and is vague which may or not be an auditable aspect of the requirement.

Suggest revising R2.1 to Forecasted demand profiles.

Suggest removing “the best” from R2.3. This is subjective and may not be an auditable aspect of the requirement.

EOP-011 does **not** address energy on an hourly basis as this proposed BAL-007 does. Additionally, Energy Emergency does not seem to cover a time horizon in EOP-011 as it is covered by BAL-007.

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

Yes

Document Name

Comment

The terms 'credible situation', 'credible energy supply Contingency,' and 'credible fuel supply Contingency' are new to this Standard. Consider including clarifications of the meanings of these terms in the Technical Rationale.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

SPP requests the removal of the "on mutually agreed upon schedule" from R5 leaving a set time requirement of at least once every 24 calendar months. Requiring a mutually agreed upon schedule for each entity is administratively burdensome for the documented evidence.

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

An entity's interpretation of "Sufficient amount" is subject to regulatory review.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

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

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

MISO supports the comments of the MRO NSRF..

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Michael Goggin - Grid Strategies LLC - 5

Answer	
Document Name	
Comment	
	<p>R2 appears to allow the BA to account for EITHER "Forecasted or assumed Demand profiles" OR the disruptions to supply listed under 2.2. Given that most if not all recent reliability events have been caused by a combination of a spike in demand coincident with a failure of generation supply, R2 should require the BA to model a scenario in which both demand is high and generation supply experiences outages.</p> <p>The modeling of generation supply outages should be based on the most severe historical supply disruptions the BA has experienced, which for most BAs is a correlated loss of gas generation.</p>
Likes 0	
Dislikes 0	
Response	

4. BAL-007-1 Near-term ERAs: The SDT proposes entities use forecasted Demand profiles for the time interval under study for the BAL-007 assessment. The SDT's goal is to align measures for ERAs with those used for EOP-011. Actions taken as part of a BAL-007 Operating Plan should be targeted to minimize any Energy Emergency events. Do you agree with the updated proposed language in Requirement R8? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

The language in Requirement R8 should be revised to reflect the fact that conditions may not warrant analysis of each Scenario every time. For example, some Scenarios may be winter only and others summer only. Consequently, the SRC proposes the modifications below:

R8. Each Balancing Authority shall perform near-term ERAs according to the process documented in Requirement R1 using at least one of the applicable Scenario(s) or method(s) documented in Requirement R2.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

As conditions may not warrant analysis of each Scenario every time, the language in R8 should reflect this. For example, some Scenarios may be Winter only and others Summer only. NV Energy proposes the modifications below:

R8. Each Balancing Authority shall perform near-term ERAs according to the process documented in Requirement R1 using at least one of the applicable Scenario(s) or method(s) documented in Requirement R2.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer No

Document Name

Comment

As mentioned in question 3, R8 is unnecessary if we add “implement” in the first requirement.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

Conditions may not warrant analysis of each Scenario every time. Suggested language modification:

R8. Each Balancing Authority shall perform near-term ERAs according to the process documented in Requirement R1 using at least one of the applicable Scenario(s) or method(s) documented in Requirement R2.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

If the intent is to utilize the same forecasted Demand profiles that align with EOP-011, then this should be explicit. Specifying EEAs from EOP-011 in R9 does not address the fact that these are different time frames being evaluated. There is no guarantee that the same forecasted Demand profiles will be used or relevant. The Drafting team needs to consider how a compliance auditor will address their intent to use the same data. Each Standard must stand on its own, the auditor will not be able to find fault with the entity if it doesn't use the same data if it is not specified. The Drafting Team should also evaluate how not to use references to other standards, since those standards can change, and it could unintentionally impact this proposed standard.

As R8 is currently written, this requirement should be moved from the bottom of the requirement list and combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Please see BPA's full response in question 9.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

The scenarios in R2 only require single contingencies for energy and fuel supply which would "stress" the system. This language is vague and would allow even small contingencies to qualify in many cases. This would be difficult to enforce and leaves the auditor and entity to debate the level of severity required to stress the system. The same is true of the load forecast: the entity could argue that any increase in the load forecast above the base case puts additional stress on the system even if it's small.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

No

Document Name

Comment

The Requirement R9 (revised BAL-007-1 Draft 1 R8) now references the EOP-011 Attachment 1 Section B. EOP-011 Attachment 1 Section B also includes specific responsibilities in addition to the EEA Levels definitions. BC Hydro suggests that EEA Level Definitions are more appropriate in the NERC Glossary of Terms, and recommends against embedding requirements by reference to different Reliability Standards.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

Comment

As conditions may not warrant analysis of each Scenario every time, the language in R8 should reflect this. For example, some Scenarios may be Winter only and others Summer only. The MRO NSRF proposes the modifications below:

R8. Each Balancing Authority shall perform near-term ERAs according to the process documented in Requirement R1 using at least one of the applicable Scenario(s) or method(s) documented in Requirement R2.

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

If the intent is to utilize the same forecasted Demand profiles that align with EOP-011, then this should be explicit. Specifying EEAs from EOP-011 in R9 does not address the fact that these are different time frames being evaluated. There is no guarantee that the same forecasted Demand profiles will be used or relevant. The Drafting team needs to consider how a compliance auditor will address their intent to use the same data. Each Standard must stand on its own, the auditor will not be able to find fault with the entity if it doesn't use the same data if it is not specified. The Drafting Team should also evaluate how not to use references to other standards, since those standards can change, and it could unintentionally impact this proposed standard. As R8 is currently written, this requirement should be moved from the bottom of the requirement list and combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.

Likes 0

Dislikes 0

Response**Michael Jang - Seattle City Light - 1,3,4,5,6****Answer**

No

Document Name**Comment**

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response**Daren Brubaker - Seattle City Light - 1,3,4,5,6****Answer**

No

Document Name**Comment**

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response**Chris Shultz - Seattle City Light - 1,3,4,5,6****Answer**

No

Document Name	
Comment	
Seattle City Light agrees with WPP Submitted Comment.	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
Idaho Power agrees with WPP's response to this question, shown below.	
<p>If the intent is to utilize the same forecasted Demand profiles that align with EOP-011, then this should be explicit. Specifying EEAs from EOP-011 in R9 does not address the fact that these are different time frames being evaluated. There is no guarantee that the same forecasted Demand profiles will be used or relevant. The Drafting team needs to consider how a compliance auditor will address their intent to use the same data. Each Standard must stand on its own, the auditor will not be able to find fault with the entity if it doesn't use the same data if it is not specified. The Drafting Team should also evaluate how not to use references to other standards, since those standards can change, and it could unintentionally impact this proposed standard.</p> <p>As R8 is currently written, this requirement should be moved from the bottom of the requirement list and combined with R2 or R3 as a performance requirement following the R1 requirement. Alternatively, R8 could be moved up to R3, and renumbering the current requirements R3 through R7.</p>	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer Yes

Document Name

Comment

The FRCC suggests that the forecasted Demand profiles align with EOP-011, this should be clearly stated. The FRCC also would like to note that referencing other standards could cause conflict when these standards change and are not aligned with each other.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer	Yes
Document Name	
Comment	
FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.	
Likes 0	
Dislikes 0	
Response	
Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Seminole agrees with FRCC's comments below	
The FRCC suggests that the forecasted Demand profiles align with EOP-011, this should be clearly stated. The FRCC also would like to note that referencing other standards could cause conflict when these standards change and are not aligned with each other.	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
We assume that this question is referring to BAL-007 Requirement R9, rather than R8 as stated in the question.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
EEl supports the proposed changes and linkage to the EOP-011 EEA Measures as contained in Attachment 1 of the Standard.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Yes
Document Name	
Comment	
No Additional Comments	
Likes 0	
Dislikes 0	
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Supporting EEl comments.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	

Comment

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Agree with language in Requirement 8 but this question does not recognize the “assumed Demand profiles” that is allowed by the Requirement language. This question appears to relate to Requirement 3 language(?). Measure M8 needs to add an “s” to “near-term ERA” so that the expectation is not simply one near-term ERA. In some respects, understanding the frequency of the ERAs will dictate how many ERAs would be reviewed to ensure meeting R8’s expectations. To support alignment with EOP-011, consider using terms already established in EOP-011 (like “fuel supply”).

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

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 agrees that the BAL-007 ERAs, which the SDT propose to be used to predict Forecasted Energy Emergenies or FEEAs, should align with EOP-011 EEA Attachment 1.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

Yes

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldts - Black Hills Corporation - 1,3,5,6

Answer

Yes

Document Name

Comment

Black Hills Corporation is in agreement with EEI. EEI supports the proposed changes and linkage to the EOP-011 EEA Measures as contained in Attachment 1 of the Standard.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

Yes

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 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

Constantin Chitescu - Ontario Power Generation Inc. - 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**Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1,3****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

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

The language in Requirement R8 should be revised to reflect the fact that conditions may not warrant analysis of each Scenario every time. For example, some Scenarios may be winter only and others summer only. Consequently, MISO proposes the modifications below:

R8. Each Balancing Authority shall perform near-term ERAs according to the process documented in Requirement R1 using **at least one of** the **applicable** Scenario(s) or method(s) documented in Requirement R2.

Likes 0

Dislikes 0

Response

5. BAL-007-1 Near-term ERAs: The SDT updated Requirement R9 based on industry feedback. Do you agree with the updated proposed language in Requirement R9? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

R9 does a good job of establishing a performance target, unlike many of the other requirements of TOP-007. R9 should follow good standards writing style where the responsible entity is the first part of the sentence, and the performance actions follow. The Drafting Team should consider rewriting the first sentence as: "The Balancing Authority shall implement Operating Plan(s), as documented in Requirement R3, when near-term ERAs identifies any of the following forecasted Energy Emergencies:"

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer No

Document Name

Comment

R9 does a good job of establishing a performance target, unlike many of the other requirements of TOP-007. R9 should follow good standards writing style where the responsible entity is the first part of the sentence, and the performance actions follow. The Drafting Team should consider rewriting the first sentence as: "The Balancing Authority shall implement Operating Plan(s), as documented in Requirement R3, when near-term ERAs identifies any of the following forecasted Energy Emergencies:"

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer No

Document Name

Comment

The Requirement R9 references the EOP-011 Attachment 1 Section B. EOP-011 Attachment 1 Section B also includes specific responsibilities in addition to the EEA Levels definitions. BC Hydro suggests that EEA Level Definitions are more appropriate in the NERC Glossary of Terms, and recommends against embedding requirements by reference to different Reliability Standards.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports EEI comments but also has concerns that EEA 1s should not be included within this requirement. Energy assurance should focus on EEA 2s and 3s which pose elevated risk to reliability.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

PNM supports EEI recommended changes for BAL-007-1 R9.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Please see BPA's full response in question 9.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

Black Hills Corporation is in agreement with EEI comments here: Requirement R10 lacks sufficient clarity to ensure that RC will not be needlessly burdened to report forecasted Energy Emergencies that do not pose imminent risk to BES reliability. To address our concern, we offer edits in boldface that provide greater clarity when the RC needs to meet the notification requirements identified in Requirement R10.

In addition to EEI comments, Black Hills feels 10.2 can be removed from the Requirement. We believe 10.3 is sufficient enough to cover the need. The RC has the ability to utilize several means to deem credible a forecasted Energy emergency.

R10 Each Reliability Coordinator, within 24 hours of receiving a notification **pursuant to Requirement R3 that 1) has been transmitted from a Balancing Authority within its footprint, 2) meets the criteria set in 10.1 through 10.3, and 3) has forecast an Energy Emergency and implemented an Operating Plan pursuant to Requirement R8; shall notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area and neighboring Reliability Coordinators of the forecasted condition(s), and the Balancing Authority’s Operating Plan(s).** [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

- 10.1 Forecasted a reliability concern which has the potential of occurring within the 2 days or within the upcoming week; and**
- 10.2 Is based on reliable weather data; and**
- 10.3 Has been deemed credible by the RC.**

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Southern Company supports the EEI comments and agrees with the EEI language changes.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC agrees with EEI's comments - Requirement R10 lacks sufficient clarity to ensure that RC will not be needlessly burdened to report forecasted Energy Emergencies that do not pose imminent risk to BES reliability.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer	No
Document Name	
Comment	
R9 does a good job of establishing a performance target, unlike many of the other requirements of TOP-007. R9 should follow good standards writing style where the responsible entity is the first part of the sentence, and the performance actions follow. The Drafting Team should consider rewriting the first sentence as: "The Balancing Authority shall implement Operating Plan(s), as documented in Requirement R3, when near-term ERAs identify any of the following forecasted Energy Emergencies:"	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	No
Document Name	
Comment	
Ameren supports MISO's comments on this project.	
Likes 0	
Dislikes 0	
Response	
Nazra Gladu - Manitoba Hydro - 1,3,5,6	
Answer	No
Document Name	
Comment	
Manitoba Hydro supports comments of MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	

Answer	No
Document Name	
Comment	
Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
The R9 requirement should not require the BA to "implement" an Operating Plan(s) upon a "forecasted" Energy Emergency. Suggested language modifications:	
R9. If a near-term ERA identifies any of the following forecasted Energy Emergencies listed below, the Balancing Authority shall continue to monitor and implement an Operating Plan(s), as documented in Requirement R3, when appropriate.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 5	
Likes 0	
Dislikes 0	
Response	

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer No

Document Name

Comment

Exelon supports the concerns stated in the EEI comments.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer No

Document Name	
Comment	
<p>EEAs should be left for BAs to enter as currently defined. Issuing an EEA too far out will not carry much weight because circumstances will likely change the closer to next day a BA approaches.</p> <p>Flooding an RC with notifications regarding implementation of an Operating Plan days ahead of time is too much. The RC role by definition is to prevent or mitigate operating situations in both next-day analysis and real-time operations. This is the time frame that an RC should focus on and not days ahead of next-day operations. Too many notifications to an RC takes their focus away from real-time operations.</p>	
Likes	0
Dislikes	0
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
<p>Requirement R10 lacks sufficient clarity to ensure that RC will not be needlessly burdened to report forecasted Energy Emergencies that do not pose imminent risk to BES reliability. To address our concern, we offer edits in boldface that provide greater clarity when the RC needs to meet the notification requirements identified in Requirement R10.</p> <p>R10 Each Reliability Coordinator, who receives notification of a forecasted Energy Emergency, pursuant to Requirement R3 that includes an implemented Operating Plan pursuant to Requirement R8 that is forecasted to be a reliability concern within the upcoming week and evaluated as credible by the Reliability Coordinator; shall within 24 hours of receiving the notification, notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area and neighboring Reliability Coordinators of the forecasted condition(s), and the Balancing Authority's Operating Plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</p>	
Likes	0
Dislikes	0
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
<p>As written, requirement R9 requires the BA to "implement" an Operating Plan(s) upon identifying a forecasted Energy Emergency. This may result in wasted effort when a forecast fails to result in a Real-Time Emergency. Therefore, some consideration should be given to monitoring the situation and</p>	

acting when warranted so that a higher bar (more effort) isn't required in managing issues identified in a near-term ERA than those identified in an Operational Planning Analysis (TOP-002) or Real-Time Assessment (TOP-001). NV Energy proposes the modifications below:

R9. If a near-term ERA identifies any of the following forecasted Energy Emergencies listed below, the Balancing Authority shall continue to monitor and implement an Operating Plan(s), as documented in Requirement R3, when appropriate.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

No

Document Name

Comment

USV is concerned with the potential for duplicative efforts between EOP-011 R2 and BAL-007 R9; both require the BA to implement operating plans for forecasted energy emergencies. USV supports the additional context provided by MISO in their comments to this question.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name

Comment

APS is of the opinion that R9 should be removed from BAL-007-1 as it reaches beyond the near-term scope of BAL-007-1 and falls within Real-time Operations, specifically EOP-011. The SDT should consider revising BAL-007-1 R3 to include implementing the Operating Plan should conditions arise. If the intent of near-term ERAs is to have time to implement mitigation actions with longer lead times to minimize energy emergencies and overall risk, then the near-term ERA Operating Plan would address and/or reduce the identified risks. Should Risk occur closer to Real-time, EOP-011 R2 would be implemented.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer	No
Document Name	
Comment	
<p>(footnote: SPP is a party to these comments however does not support the references about duplication with EOP-011 requirements. SPP supports the need for reporting ERA results in BAL-007 however there is lack of clarity between the BAL-007 and EOP-011 obligations.)</p> <p>As written, requirement R9 requires the BA to “implement” an Operating Plan(s) upon identifying a forecasted Energy Emergency. This is duplicative of EOP-011 Requirement R2, which already addresses implementation of Operating Plans in multiple time horizons to mitigate Energy Emergencies. In addition to being duplicative, BAL-007 Requirement R9 may result in wasted effort when a forecast fails to result in a Real-Time Emergency. Therefore, Requirement R9 should be removed to avoid duplication of EOP-011. If R9 is retained, it should be revised to consider the wisdom of monitoring the situation and acting when warranted so that a higher bar (more effort) isn’t required in managing issues identified in a near-term ERA than those identified in an Operational Planning Analysis (TOP-002) or Real-Time Assessment (TOP-001). If R9 is retained, the SRC proposes the modifications below: R9. If a near-term ERA identifies any of the following forecasted Energy Emergencies listed below, the Balancing Authority shall continue to monitor the situation and implement an Operating Plan(s), as documented in Requirement R3, when appropriate.</p>	
Likes	0
Dislikes	0
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes	0
Dislikes	0
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	No
Document Name	2022-03_Unofficial Comment Form_BAL-007 and BAL-008_MRO NSRF_06-11-24rev.docx
Comment	
As written, requirement R9 requires the BA to “implement” an Operating Plan(s) upon identifying a forecasted Energy Emergency. This may result in wasted effort when a forecast fails to result in a Real-Time Emergency. Therefore, some consideration should be given to monitoring the situation and	

acting when warranted so that a higher bar (more effort) isn't required in managing issues identified in a near-term ERA than those identified in an Operational Planning Analysis (TOP-002) or Real-Time Assessment (TOP-001). The MRO NSRF proposes the modifications below:

R9. If a near-term ERA identifies any of the following forecasted Energy Emergencies listed below, the Balancing Authority shall continue to monitor and implement an Operating Plan(s), as documented in Requirement R3, when appropriate.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer

No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

Assuming the scenarios apply in more than one real-world situation that we might encounter, a high-level plan may be implemented. Specific actions should not be included in operating plans such that they are not useful in reality.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer

No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Dmitriy Bazilyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer

No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer

No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

This language seems to duplicate EOP-011.

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer Yes

Document Name

Comment

ISO-NE agrees with the addition of the Forecasted EEA aspects of BAL-007.

For example this allows entities to perform additional assessments and notification activities without implementing the EEA actions as determined by EOP-011.

A specific example is as follows:

For an Energy Alert-

An Energy Alert exists when either an FEEA1 or FEEA2 take place in days 6 through 42 of the ERA.

- 1) During an Energy Alert, to the extent possible, the reasoning for the alert should be included in the results.
- 2) Generator Fuel and Emissions Surveys shall be distributed on a daily basis.
- 3) Additional ERAs shall be performed based on available data, which includes information obtained through the Fuel Emission Survey.
- 4) Results of the updated ERA shall be published daily on the entity's external website.

In this case no actions are taken other than increasing frequency of the ERAs, and notifications via publishing on the entity's website.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer Yes

Document Name

Comment

Puget Sound Energy agrees with WPP's response to this question, shown below.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer Yes

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #5: Requirement R10 lacks sufficient clarity to ensure that RC will not be needlessly burdened to report forecasted Energy Emergencies that do not pose imminent risk to BES reliability. To address our concern, we offer edits in boldface that provide greater clarity when the RC needs to meet the notification requirements identified in Requirement R10.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer Yes

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer Yes

Document Name

Comment

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #5: Requirement R10 lacks sufficient clarity to ensure that RC will not be needlessly burdened to report forecasted Energy Emergencies that do not pose imminent risk to BES reliability. To address our concern, we offer edits in boldface that provide greater clarity when the RC needs to meet the notification requirements identified in Requirement R10.

R10 Each Reliability Coordinator, who receives notification of a forecasted Energy Emergency, pursuant to Requirement R3 that includes an implemented Operating Plan pursuant to Requirement R8 that is forecasted to be a reliability concern within the upcoming week and evaluated as credible by the Reliability Coordinator; shall within 24 hours of receiving the notification ,notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area and neighboring Reliability Coordinators of the forecasted condition(s), and the Balancing Authority's Operating Plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

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

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

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

Constantin Chitescu - Ontario Power Generation Inc. - 5**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Mark Flanary - Midwest Reliability Organization - 10****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Greg Sorenson - ReliabilityFirst - 10 - RF****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

As written, requirement R9 requires the BA to “implement” an Operating Plan(s) upon identifying a forecasted Energy Emergency. This is duplicative of EOP-011 Requirement R2, which already addresses implementation of Operating Plans in multiple time horizons to mitigate Energy Emergencies. In addition to being duplicative, BAL-007 Requirement R9 may result in wasted effort when a forecast fails to result in a Real-Time Emergency. Therefore, Requirement R9 should be removed to avoid duplication of EOP-011. If R9 is retained, it should be revised to consider the wisdom of monitoring the situation and acting when warranted so that a higher bar (more effort) isn’t required in managing issues identified in a near-term ERA than those identified in an Operational Planning Analysis (TOP-002) or Real-Time Assessment (TOP-001). If R9 is retained, MISO proposes the modifications below:

R9. If a near-term ERA identifies any of the following forecasted Energy Emergencies listed below, the Balancing Authority shall continue to monitor the situation and implement an Operating Plan(s), as documented in Requirement R3, when appropriate.

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

6. BAL-007-1 Near-term ERAs: The SDT updated the implementation plan to allow for 18 months for Requirements R1 through R3 and 24 months for Requirements R4 through Requirement R10 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.

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer No

Document Name

Comment

The FRCC does not support an 18-month implementation period for Requirements R1 through R3. The resulting burden of work associated with changing internal processes, developing credible scenarios and operating plans will be very time consuming. The FRCC recommends an implementation period of **at least 24 months** for all requirements.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

The SRC notes that entities are developing improvements to internal processes to improve energy capabilities for the operations planning horizon while these new NERC requirements are yet to be finalized. It is unknown at this time what the impacts of the new requirements will be on the ISO/RTOs but there will be resources needed to fully integrate and implement the NERC standards with the internal processes. Consequently, while the SRC appreciates the updates to the implementation plan, the SRC requests that the implementation plan be further revised to allow 36 months for the implementation of all Requirements.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

APS agrees with the following EEI comments:

EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow for 24 months for all of the Requirements.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPPA)

Answer No

Document Name

Comment

FMPPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer No

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC does not support an 18-month implementation period for Requirements R1 through R3. The resulting burden of work associated with changing internal processes, developing credible scenarios and operating plans will be very time consuming. The FRCC recommends an implementation period of at least 24 months for all requirements.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

No

Document Name

Comment

USV supports the comments provided by MISO regarding the number of resources required to address BAL-007 implementation.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow for 24 months for all of the Requirements.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 6

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Clarity is needed in the Implementation Plan as it states that BAL-007-1 will be “effective on the first day of the first calendar quarter that is 18 months after the effective date of the applicable governmental authority’s order approving the standard.” Then, for phased-in Compliance Date there is language for R1, R2, and R3 that states entities have 18 months after the effective date of the Standard in essence allowing 36 months after the effective date for

entities to be compliant. Other Requirements also have the "following the effective date" with 24 month additional time period. Please draw a timeline of expected implementation so that all parties, including FERC, are in clear understanding of when Requirements actually become auditable and enforceable. As is, the first 18 months, as written, is not an effective time period as nothing changes in terms of efforts. Drawing a timeline associated with effective implementation dates should be part of the Standards process.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

No

Document Name

Comment

The Timeline proposed states that the entities have 18 months to comply with R1 through R3. The problem is that under R1 the ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R3 compliance. Stepping through this process results in significant delay in implementation of R2 and R3. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-007. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, R4 through R7 can be implemented by 18 months after the effective date, and full implementation of the standards will be completed by 24 months after the effective date.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

No

Document Name

Comment

TEPC agrees with EEI's comments - EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow for 24 months for all of the requirements.

Likes 0

Dislikes 0

Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern Company supports the EEI comments and agrees that 24 months is a more reasonable implementation timeframe for all requirements.	
Likes	0
Dislikes	0
Response	
Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group	
Answer	No
Document Name	
Comment	
CHPD supports WPP's response.	
Likes	0
Dislikes	0
Response	
Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
LG&E & KU agree with comments provided by EEI.	
Likes	0
Dislikes	0
Response	

Rachel Schultdt - Black Hills Corporation - 1,3,5,6**Answer** No**Document Name****Comment**

Black Hills Corporation agrees with the longer timeline (24 months) proposed by EEI. EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow for 24 months for all of the Requirements.

Likes 0

Dislikes 0

Response**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC****Answer** No**Document Name****Comment**

Please see BPA's full response in question 9.

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer** No**Document Name****Comment**

PNM support a 24-month implementation timeline for all BAL-007-1 requirements.

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group**

Answer	No
Document Name	
Comment	
WEC Energy Group supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	No
Document Name	
Comment	
DTE supports MISO's feedback	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
Duke Energy supports proposed EEI language modifications for Question 6.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	No
Document Name	

Comment

The Timeline proposed states that the entities have 18 months to comply to R1 through R3. The problem is that under R1 the ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R3 compliance. Stepping through this process results in significant delay in implementation of R2 and R3. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-007. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, R4 through R7 can be implemented by 18 months after the effective date, and full implementation of the standards will be completed by 24 months after the effective date.

Likes 0

Dislikes 0

Response**Michael Jang - Seattle City Light - 1,3,4,5,6****Answer**

No

Document Name**Comment**

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response**Daren Brubaker - Seattle City Light - 1,3,4,5,6****Answer**

No

Document Name**Comment**

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

The Timeline proposed states that the entities have 18 months to comply to R1 through R3. The problem is that under R1 the ERA process must be sent to the RC for review. If the RC is sent the

ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R3 compliance. Stepping through this process results in significant delay in implementation of R2 and R3. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-007. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, R4 through R7 can be implemented by 18 months after the effective date, and full implementation of the standards will be completed by 24 months after the effective date.

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Keith Jonassen - ISO New England, Inc. - 2 - NPCC****Answer**

Yes

Document Name**Comment**

While ISO-NE agrees that the timeline for the Implementation Plan is specific. R4 could also be effective 18 months after the approval of the Standard. The reasoning is that R4 requires a review and update of the ERA Process within 24 months. If the original ERA Document is approved by 18 months, R4 and its reviews should be effective the same time as the original ERA process document.

ISO-NE would also support an extended Implementation Plan to 36 months for all requirements.

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1,3,5,6****Answer**

Yes

Document Name**Comment**

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 1,3,6****Answer**

Yes

Document Name**Comment**

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 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**Constantin Chitescu - Ontario Power Generation Inc. - 5****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

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

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

Ben Hammer - Western Area Power Administration - 1,6

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

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

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

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

The resources and expertise needed to implement BAL-007 (particularly if ERAs are going to be automated) may already be engaged on other long-term projects that will need to be completed before being available to address BAL-007 implementation. Consequently, while the SRC appreciates the updates to the implementation plan, the SRC requests that the implementation plan be further revised to allow 36 months for the implementation of all Requirements. T

Likes 0

Dislikes 0

Response

7. BAL-007-1 Near-term ERAs: The SDT believes that fuel data information needed to address BAL-007-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-007 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1,3,4,5,6

Answer

No

Document Name

Comment

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-007 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.
Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

Comment

Past practice clearly indicates a change to TOP-003 is necessary to collect “fuel supply and inventory concerns” information year-round.

· TOP-003-5 is unclear as to what information must be provided by entities in support of ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.” (Items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003, R2 likewise is limited in support of TOP-002 and TOP-001 only.

· In addition, if fuel data needed by BAs to address BAL-007 is covered under TOP-003, why then was TOP-003 updated to specifically require information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07? (See **TOP-003-5** and **TOP-0003-6.1, Part 2.3.1.2**)

Both Cold Weather projects modified TOP-003 to mandate the provision of “fuel supply and inventory concerns,” so that it only applies during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

No

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

Past experience clearly indicates a change to TOP-003 is necessary to enable BAs to collect the necessary information regarding “fuel supply and inventory concerns” year-round (to the extent this information is even available from NERC-registered entities).

- TOP-003-5 does not extend to information needed to perform ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments” (items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003-5, R2 is likewise limited to information needed for TOP-002 and TOP-001 only.
- In addition, TOP-003 was recently updated to specifically address information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07 (See TOP-003-5 and TOP-0003-6.1, Part 2.3.1.2). This indicates that TOP-003 does not address fuel-related information that would be needed to implement BAL-008.

The modifications to TOP-003 to mandate the provision of “fuel supply and inventory concerns,” only require this information to be provided during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round if BAL-008 persists in its current form.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer	No
Document Name	
Comment	
DTE supports MISO's feedback	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5	
Answer	No
Document Name	
Comment	
TOP-003 covers data needs specific to Operations Planning Assessments (OPA), Real-time Assessments (RTA) and Real-time Monitoring (RTM) and may not provide sufficient authority for the BA to request specific data necessary for ERAs. BC Hydro suggests that a revision to the current TOP-003 or a new ERA-specific Requirement would be necessary.	
Likes 0	
Dislikes 0	
Response	
Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	No
Document Name	
Comment	
This could potentially put the BA at odds with the GO and GOP as to the applicability of TOP-003 in these scenarios. TOP-003 today is only used for data in the near real time horizon and the GO or GOP could argue that the data required for these studies is beyond the scope of TOP-003. While the BAs could attempt to use TOP-003 for this data acquisition, it would be better to include the requirement to supply the data needed in the standard.	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	No
Document Name	
Comment	
Please see BPA's full response in question 9.	
Likes 0	
Dislikes 0	
Response	
Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group	
Answer	No
Document Name	
Comment	
CHPD supports WPP's response.	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	No
Document Name	
Comment	
<p>The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-007 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.</p> <p>Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.</p>	
Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 1,3,6**Answer** No**Document Name****Comment**

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1,3,5,6****Answer** No**Document Name****Comment**

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response**Hillary Creurer - Allete - Minnesota Power, Inc. - 1****Answer** No**Document Name****Comment**

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

Likes 0

Dislikes 0

Response**Ben Hammer - Western Area Power Administration - 1,6****Answer** No

Document Name	
Comment	
Current practice clearly indicates that a change to TOP-003 is necessary to collect "fuel supply and inventory concerns" information year-round.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	No
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 7	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power endorses the comments provided by the Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	

It will likely be a problem getting fuel information from entities that are not Registered Entities as they are not required to comply with the NERC Reliability Standards.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

PSE generally agrees with WPP's response to this question. In addition, the fuel data necessary is often times non-public information and subject to commercial agreements between the generating plants and their fuel suppliers. Getting the nature of those contracts, including measures for curtailment will create a FERC SOC concern since the utility often has their own units and then balances third party resources within the BA.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Past practice clearly indicates a change to TOP-003 is necessary to collect "fuel supply and inventory concerns" information year-round.

{C}- TOP-003-5 is unclear as to what information must be provided by entities in support of ERAs. Requirement R1 is limited to "Operational Planning Analyses, Real-time monitoring, and Real-time Assessments." (Items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003, R2 likewise is limited in support of TOP-002 and TOP-001 only.

{C}- In addition, if fuel data needed by BAs to address BAL-007 is covered under TOP-003, why then was TOP-003 updated to specifically require information regarding "fuel supply and inventory concerns" under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07? (See **TOP-003-5** and **TOP-0003-6.1, Part 2.3.1.2**)

Both Cold Weather projects modified TOP-003 to mandate the provision of “fuel supply and inventory concerns,” so that it only applies during local forecasted Cold Weather conditions. Therefore, **a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round.**

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

No

Document Name

Comment

TOP-003 enables the BA's to collect the necessary information, but it does not clearly specify the data necessary for ERAs, which are more akin to planning studies. USV supports the additional comments and suggestions provided by MISO.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

Puget Sound Energy (PSE) generally agrees with WPP's response to this question. Additional PSE comments are shown below.

The fuel data necessary is often times non-public information and subject to commercial agreements between the generating plants and their fuel suppliers. Getting the nature of those contracts, including measures for curtailment will create a FERC SOC concern since the utility often has their own units and then balances third party resources within the BA.

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

No

Document Name

Comment

TOP-003-5 does not cover the data requirements for ERA and we believe this could lead to issues with enforcing the standard. Two possible options for addressing this are 1) modify TOP-003-5 to include data requirements for ERA or 2) add a requirement to BAL-007-1 to address this data requirement.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer

No

Document Name

Comment

Past experience clearly indicates a change to TOP-003 is necessary to enable BAs to collect the necessary information regarding “fuel supply and inventory concerns” year-round (to the extent this information is even available from NERC-registered entities).

• TOP-003-5 does not extend to information needed to perform ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments” (items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003-5, R2 is likewise limited to information needed for TOP-002 and TOP-001 only.

• In addition, TOP-003 was recently updated to specifically address information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 (See TOP-003-5 and TOP-0003-6.1, Part 2.3.1.2). This indicates that TOP-003 does not address fuel-related information that would be needed to implement BAL-007.

The modifications to TOP-003 to mandate the provision of “fuel supply and inventory concerns,” only require this information to be provided during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round if BAL-007 persists in its current form.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response**Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4**

Answer

No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response**Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO**

Answer

No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response**Chance Back - Muscatine Power and Water - 1,3,5,6**

Answer

No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

Yes

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI and agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer

Yes

Document Name

Comment

Black Hills Corporation already has experience with TOP-003 and feels fuel data information can be achieved by adding it to our data specs.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

Yes

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

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 EEI comments

Likes 0

Dislikes 0

Response	
Kimberly Turco - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
WECC agrees with the concept that may already be in place for EOP-011 fuel data information required. However, the DT should consider using the same language as EOP-011. Additionally, TOP-003 may be considered limiting in that it is for data used in Operation Planning Analyses, Real-time monitoring, and Real-time Assessments. DT should provide language in the Technical Rationale to indicate an ERA is a form of OPA that would cover next day operations so that the definition of OPA is met (and alleviate anyone's concerns regarding use of TOP-003).	
Likes	0
Dislikes	0
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Supporting EEI comments.	
Likes	0
Dislikes	0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer Yes

Document Name

Comment

Under TOP-003 R2 the “Each BA shall maintain a documented specification for the data necessary for it to perform its **analysis function** and real-time monitoring”, with an Operations Planning time horizon.

ISO-NE believes that TOP-003 R2 satisfies the data collection requirements of BAL-007 and no additional fuel data collection requirement wholly contained in BAL-007 or a modification of TOP-003 R2 is required.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EEl agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer Yes

Document Name

Comment

Seminole agrees with FRCC’s comments below

The FRCC agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer Yes

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer Yes

Document Name

Comment

The FRCC agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Joshua London - Eversource Energy - 1,3, Group Name Eversource****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**Rachel Coyne - Texas Reliability Entity, Inc. - 10****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

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

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

8. BAL-007-1 Near-term ERAs: The SDT 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.

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC

Answer No

Document Name

Comment

SMUD and BANC agree with the comments submitted by Tacoma Power.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer No

Document Name

Comment

The FRCC does not have any means to conduct an analysis or study determining that this proposal is cost-effective, and therefore does not support this statement.

As previously noted, the proposed standard will most likely lead to an increase in staffing and administrative costs for all BAs and the RC function.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

(footnote: SPP is a party to these comments however does not support the references about duplication with EOP-011 requirements. SPP supports the need for reporting ERA results in BAL-007 however there is lack of clarity between the BAL-007 and EOP-011 obligations.)

As detailed elsewhere in the SRC's comments, BAL-007 is currently substantively duplicative of EOP-011, TOP-002, and IRO-014 while simultaneously imposing additional administrative burdens that do not enhance system reliability. In addition, the standard presumes that BAs have access to fuel-related information that they do not possess and currently have no cost-effective method of obtaining. Addressing the information provision issues and eliminating duplication and overlap with other standards would minimize bureaucracy and allow entities to comply with BAL-007 in a more cost-effective manner. For more details, see the SRC's response to Questions 3, 7, and 9.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

APS is in the opinion that implementation of BAL-007-1 would not meet the SAR in a cost effective manner as it creates an administrative burden for entities to either replace or revise existing processes that work well and may create a need for additional staffing to manage continuous near-term ERAs.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPPA)

Answer

No

Document Name

Comment

FMPPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer

No

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC does not have any means to conduct an analysis or study determining that this proposal is cost-effective, and therefore does not support this statement.

As previously noted, the proposed standard will most likely lead to an increase in staffing and administrative costs for all BAs and the RC function.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

Puget Sound Energy (PSE) agrees with WPP's response to this question. Additional PSE comments are shown below.

In non-organized markets (WECC) the impact of BA to BA interchange scheduled by merchants make implementation difficult to impossible. This could be alleviated by utilizing historic interchange numbers similar to long term planning; however, in real time the interchange numbers have a very large impact on performance. Those final numbers often aren't finalized until an hour prior to the hour. In the day ahead time frame the BA has some indication of possible range; however both those times are outside the scope of the BAL standards. These transactions are market/merchant related and there is no mechanism to have commitments or data within these standards time frame.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Eliminating duplication and overlap with other standards would minimize bureaucracy and allow entities to comply with BAL-007 in a more cost-effective manner. For more details, see our response to Questions 3 and 7.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

PSE agrees with WPP's response to this question. Additionally, in non-organized markets (WECC) the impact of BA to BA interchange scheduled by merchants make implementation difficult to impossible. This could be alleviated by utilizing historic interchange numbers similar to long term planning; however, in real time the interchange numbers have a very large impact on performance. Those final numbers often aren't finalized until an hour prior to the hour. In the day ahead time frame the BA has some indication of possible range; however both those times are outside the scope of the BAL standards. These transactions are market/merchant related and there is no mechanism to have commitments or data within these standards time frame.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer	No
Document Name	
Comment	
<p>R4 : This requirement is redundant with the “maintain” obligation state in R1, R2 and R3.</p> <p>When there is only one RC and BA in an Interconnexion, R5 to R7 should be not applicable.</p>	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Implementation of this standard will not be cost effective because the additional study work that will be required will likely require additional personnel.	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
<p>Tacoma Power does not agree that the newly proposed BAL-007-1 is cost effective, because it does not allow or recognize the efficiencies of BAs participating in an energy resource adequacy group, like the Western Power Pool. The current language in the Standard requires an individual BA to perform an ERA. An entity that jointly prepares their ERA with a group or an adjacent BA would not meet strict compliance. Additionally, smaller BAs need to coordinate with other BAs to ensure adequate resources. A single BA may not have sufficient resources to meet the adequacy criteria set in the Standard. Tacoma Power recommends that the Requirements be edited to allow joint preparation of ERAs. For example, “Each Balancing Authority, whether individually or jointly with a resource adequacy group, shall perform near-term ERAs according to the process documented in Requirement R1 using the Scenarios or methods documented in Requirement R2.”</p>	
Likes 0	
Dislikes 0	

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer No

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 8

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

As written, there is duplication/overlap with other standards. Modifications (such as suggested above) are needed to reduce duplication/overlap.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6**Answer** No**Document Name****Comment**

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 1,3,6****Answer** No**Document Name****Comment**

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response**Kevin Conway - Western Power Pool - 4****Answer** No**Document Name****Comment**

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this question was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-007 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC does not agree, The new requirements will require additional staff and change in office configuration to add new desks.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5**Answer** No**Document Name****Comment**

Based on our comments in response to Questions above, BC Hydro suggests that implementing regulatory requirements to conduct energy reliability assessments can be achieved in a more cost-effective manner by eliminating duplication and overlap with other currently effective standards.

Likes 0

Dislikes 0

Response**Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy****Answer** No**Document Name****Comment**

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response**Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group****Answer** No**Document Name****Comment**

Eliminating duplication and overlap with other standards would minimize bureaucracy and allow entities to comply with BAL-007 in a more cost-effective manner. For more details, see our response to Questions 3 and 7.

Likes 0

Dislikes 0

Response**Reed Adam - Seattle City Light - 1,3,5,6 - WECC**

Answer	No
Document Name	
Comment	
<p>We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this question was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.</p> <p>BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-007 does not provide the ability to do that and will therefore be a burden on many BAs.</p>	
Likes	0
Dislikes	0
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
<p>SCL is in support and alignmnet with WPP's & Idaho's submitted comments.</p>	
Likes	0
Dislikes	0
Response	
Daren Brubaker - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
<p>I agree with the comments provided by Western Power Pool.</p>	
Likes	0
Dislikes	0
Response	

Chris Shultz - Seattle City Light - 1,3,4,5,6**Answer** No**Document Name****Comment**

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response**Sean Steffensen - IDACORP - Idaho Power Company - 1****Answer** No**Document Name****Comment**

Idaho Power agrees with WPP's response to this question, shown below.

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this question was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-007 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response**Keith Jonassen - ISO New England, Inc. - 2 - NPCC****Answer** Yes**Document Name****Comment**

No Additional Comments

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 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

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No comment on cost-effectiveness.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

Black Hills Corporation will not comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Document Name

Comment

PNM does not have a comment or answer to this question at this time.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.) MISO supports the SRC comments.

BAL-007 is currently substantively duplicative of EOP-011, TOP-002, and IRO-014 while simultaneously imposing additional administrative burdens that do not enhance system reliability. In addition, the standard presumes that BAs have access to fuel-related information that they do not possess and currently have no cost-effective method of obtaining. Addressing the information provision issues and eliminating duplication and overlap with other standards would minimize bureaucracy and allow entities to comply with BAL-007 in a more cost-effective manner. For more details, see our response to Questions 3, 7, and 9.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy's vision is a highly reliable and secure bulk power system and will therefore not comment on cost-effectiveness.

Likes 0

Dislikes 0

Response

9. BAL-007-1 Near-term ERAs: Provide any BAL-007-1 additional comments for the SDT to consider, if desired.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces a lot of administrative processes. It introduces a lot of compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.

The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.

RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. RCs who oversee large numbers of BAs, on the other hand, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need to be addressed where there are adjacent BAs and RCs competing for the same resources.

Likes 1

JEA, 1, McClung Joseph

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer	
Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
<p>In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces a lot of administrative processes. It introduces a lot of compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.</p> <p>The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.</p> <p>RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. RCs who oversee large numbers of BAs, on the other hand, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need</p>	

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy supports proposed EEI language modifications for Question 9.

Duke is also supportive of the EEI comments regarding R10 and the edits to that requirement. Additionally, R10 requires the RC to act upon receipt of a notification from a BA in its footprint 'per Requirement R8'. This appears to be an error in the language of R10 after the renumber of prior requirements. The reference to R8 should be modified to be R9 since that is the requirement in which the BA *implements* the Operating Plan(s).

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

Document Name

Comment

Purpose: There appears to be a word missing in the Purpose statement (page 3 of 12). Previously this was “assess and mitigate.”

“To _____ the risks associated with Energy Emergencies in the near-term time horizon and take appropriate actions...”

Requirement R10 requires the BA to notify the RC and then the RC must notify entities with a role and neighboring RCs. This is both a duplicative and non-value-added step that should be modified to eliminate overlap and duplication with IRO-014, R3 and align with TOP-002, R5 as:

· IRO-014, R3 already requires the RC to notify other RCs of expected Emergencies.

IRO-014, R3. Each Reliability Coordinator, *upon identification of an expected or actual Emergency* in its Reliability Coordinator Area, shall notify other impacted Reliability Coordinators.

· TOP-002-5, R5 already requires BAs to notify entities with a role in their Operating Plan(s)

TOP-002-5, R5. Each Balancing Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s).

The MRO NSRF recommends the SDT modify BAL-007, R10 as follows:

(please see attached document)

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

Purpose: There appears to be a word missing in the Purpose statement (page 3 of 12).

“To _____ the risks associated with Energy Emergencies in the near-term time horizon and take appropriate actions...”

The BAL-008 purposes statement does not appear to be missing this word, as it begins with “To assess the risks associated...”

Requirement R10 imposes notification requirements on BAs and RCs. This is a duplicative and non-value-added step that is already addressed by IRO-014, R3 and TOP-002, R5:

IRO-014, R3 already requires the RC to notify other RCs of expected Emergencies.

IRO-014, R3. Each Reliability Coordinator, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, shall notify other impacted Reliability Coordinators.

TOP-002-5, R5 already requires BAs to notify entities with a role in their Operating Plan(s)

TOP-002-5, R5. Each Balancing Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s).

Consequently, MISO recommends the SDT remove BAL-007, R10:

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

Document Name

Comment

The VSL Table for Requirement R9 identifies a High Severity Level if a BA fails to implement an Operating Plan for forecasted conditions per R8. R9 only obligates the BA to implement an Operating Plan for Energy Emergencies that meet the EEA1, EEA2 and EEA3 definitions. Recommend revising for consistency.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Document Name

Comment

PNM supports EEI recommended changes to the BAL-007-1 purpose statement and R10.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer

Document Name

Comment

Dominion Energy is concerned that the communications required for R10 will lead to communication overload for the RC and for the entities that the RC is required to communicate with. This communication should be handled within the TOP-002 timeframe.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

LG&E & KU agree with comments provided by EEI, with the following additional feedback on the wording for consistency:

- Page 4: B (R1) (1.3.3) – Capitalize “Constraints” and “Load” to signify reference to a NERC defined term: "1.3.3. Transmission cConstraints that limit the ability of generation to deliver their output to load."
- Page 4: B (R2) (2.2.1) – Change “...energy supply contingency” to “...energy supply Contingency” to signify reference to a NERC defined term.
- Page 4: B (R2) (2.2.2) – Change “...fuel supply contingency” to “...fuel supply Contingency” to signify reference to a NERC defined term.
- Page 5: B (R4) – Change “The Balancing Authority...” to “Each Balancing Authority...” to match language in the rest of the document.
- Page 5: B (M4) – Add reference to Requirements R1 through R3 to match wording in R4. Add reference to 24 calendar months to match wording in R4. Change to: “Each Balancing Authority shall have evidence that it reviewed and updated, if necessary, its near-term ERA process, Scenarios or methods, Operating Plan(s) documented under Requirement R1 through R3 at least once every 24 calendar months, in accordance with Requirement R4.”
- Page 5: B (M6) – Change “...the results of the review in accordance...” to “...the results of the review within 60 calendar days receiving a submittal from Requirement R6” to add reference to timeline.
- Page 5: B (M7) – Change “...resubmitted information to its Reliability Coordinator in accordance with...” to “...resubmitted updated information to its Reliability Coordinator within 60 calendar days of receipt of notice from Requirement R7” to add reference to timeline.
- Page 9: Violation Severity Table (R4) (High Violation) – Change “...but failed to update within 24 months” to “...but failed to update, *if necessary*, within 24 *calendar* months” to match wording in R4.
- Page 9: Violation Severity Table (R4) (Severe Violation) – Remove “...to the Reliability Coordinator” since R4 does not reference providing the Reliability Coordinator as that is included in R5.
- Page 9: Violation Severity Table (R5) (High Violation) – Change “...but failed to submit to the Reliability Coordinator within 24 months” to “...but failed to submit to the Reliability Coordinator within 24 *calendar* months” to match wording in R5.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

To align with NERC’s Reliability Principles, BPA believes NERC drafting teams should strive to make reliability standards as clear as possible, especially regarding each responsible entity’s authorities and responsibilities. BPA’s understanding is that NERC is relying on TOP-003-5 for a Balancing Authority’s (BA) authority to require the information needed to conduct the Energy Reliability Assessments under proposed BAL-007-1 and BAL-008-1. However, it’s not clear the proposed standards are utilizing a BA’s authority to require information under TOP-003-5. It requires an entity to refer to another suite of reliability standards to find requirements that could potentially empower a BA to require the necessary information, and put other entities on notice that they must provide the required information.

For clarity and effectiveness of the proposed standards, BPA suggests revising the Technical Rationale document by outlining a BA’s authority to request data, and the responsibility/obligation for other entities to provide data via TOP-003-5. By issuing a clarification that TOP-003 does apply, NERC could empower BAs to obtain the data they need, as BPA believes TOP-003 intended.

Given that the fuel and future dispatch level of generation in current bilateral markets of the Pacific Northwest is considered ‘market sensitive’ information, generator owners and operators may not be willing to share such information with BAs or Transmission System Providers. As a result, the standards need to make absolutely clear that providing such information is required

Likes 1	Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia
Dislikes 0	
Response	
Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group	
Answer	
Document Name	
Comment	
In the BAL-007-1 standard, under A. Introduction, 3. Purpose, CHPD recommends adjusting the language to something like “Assess the risks associated with...”	
Likes 0	
Dislikes 0	
Response	
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 EEI comments and agrees with the EEI language changes to the Purpose statement.	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

Document Name

Comment

TEPC agrees with EEI's comments - EEI does not agree that the language currently contained in the purpose statement for BAL-007-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide any meaningful value to the purpose.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Document Name

Comment

In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces additional administrative processes. It also introduces compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.

The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.

RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. On the other hand, RCs who oversee large numbers of BAs, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need to be addressed where there are adjacent BAs and RCs competing for the same resources.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

WECC offers the following:

It appears the Purpose of the Standard is missing a term. Suggest adding “identify” after “To” (“To identify the risks.....”). It would be clearer to use language already used in other Standards—example in 1.3.2. what is consider “operations”? That is the question Regional Entities will get asked as it is not clear what the DT expectations are here. Using “sufficient” and “credible” equates to professional judgement being questioned just to determine how an entity determined what “sufficient” and “credible” means to an entity. Regional Entities will get asked what their version of “sufficient” and “credible” is to meet compliance. The Technical Rationale provides some examples which is good but will not cover the spectrum. It will be difficult to ascertain what is “sufficient” and “credible” in a consistent manner by entities and, perhaps, Regional Entities.

The Evidence Retention section needs to be addressed to reflect the time period within the particular Requirements. Six months is insufficient retention for Requirement R4 and Requirement R5. The boilerplate language about other evidence is not realistic in these cases. In order to capture effective evidence a BA and RC would need to be audited within 6 months of actions called out in R4 and R5. Additionally, if an EEA is called as a result of an ERA it potentially may trigger a compliance monitoring tool to evaluate compliance to these Requirements because of the restrictive data retention timeframe.

High VSL for R2 is set to create tension between entities and NERC in determining what is sufficient and what is credible. VSLs for R4/R5 needs to add “calendar” in front of months. Severe VSL for R10 references R8 but should reference R9.

R7 High/Severe VSL- Should it read “The Balancing Authority addressed **the** reliability risks...”? What happens if the BA does not address all the reliability risks identified? Severe VSL should reference R5 not R4.

R10 VSLs should clearly indicate that if a BA is contacted by the TOPs are not there is a reliability concern and possible a violation. Suggest adding “one or more” in front of TOP.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allele - 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

Ben Hammer - Western Area Power Administration - 1,6

Answer

Document Name

Comment

R10 requires the BA to notify the RC. This is duplicative with IRO-014, R3 and TOP-002-5, R5. It is recommended that R10 is removed from BAL-007.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 9

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE noticed that an action verb is missing from the purpose statement of BAL-007-1. Texas RE recommends the following (in bold):

Purpose: To **evaluate** 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.

With the addition of Requirement R5, Requirement R10 should reference Requirement R9 instead of Requirement R8, which is the near-term ERAs and Requirement R9 refers to implementing an Operating Plan(s) based on the circumstances.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer

Document Name

Comment

Exelon does not oppose BAL-007, we support EEI's comments to clarify the Purpose statement.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer

Document Name

Comment

The Purpose statement is missing a word or something. Maybe it should read "To mitigate the risks associated ...".

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer

Document Name

Comment

HQ recognizes that the work the drafting team has put in the development of these standards and is supportive of performing seasonal studies. However, we are concerned that certain requirements as they are written add an unnecessary burden in the process.

R3 : We suggest adding the following precision in bold:

Each Balancing Authority shall document and maintain one or more Operating Plan(s) to minimize **the impact** of forecasted Energy Emergencies as identified in the near-term ERA, including provisions for notifying the Reliability Coordinator of the forecasted Energy Emergency and the Operating Plan(s).

R4 : this requirement is redundant with R1, R2 and R3. All those processes, Scenarios and method shall be maintained.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer

Document Name

Comment

PSE agrees with WPP's response to this question. Puget Sound Energy agrees with the goal of reducing Energy Emergencies during operations. There is a need for a mechanism for assessing resource adequacy and ensuring capacity during real time. PSE would like the standard to allow for regional assessment and coordination to meet the intent. In the Pacific Northwest there are a large number of Balancing Authorities with some being generation deficient and others having large generation surplus. Allowing for coordination and regional assessment would be more effective and provide greater benefit to our customers.

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer

Document Name

Comment

No Additional Comments

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

EEl does not agree that the language currently contained in the purpose statement for BAL-007-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, report and plan to address energy constraints in the near-term time horizon.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

Document Name

Comment

Puget Sound Energy (PSE) agrees with WPP's response to this question. Additional PSE comments are shown below.

PSE agrees with the goal of reducing Energy Emergencies during operations. There is a need for a mechanism for assessing resource adequacy and ensuring capacity during real time. PSE would like the standard to allow for regional assessment and coordination to meet the intent. In the Pacific

Northwest there are a large number of Balancing Authorities with some being generation deficient and others having large generation surplus. Allowing for coordination and regional assessment would be more effective and provide greater benefit to our customers.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #9:

EEI does not agree that the language currently contained in the purpose statement for BAL-007-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, report and plan to address the risks associated with Energy Emergencies energy constraints 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.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPPA)

Answer

Document Name

Comment

FMPPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer	
Document Name	
Comment	
<p>The BAL-007-1 Draft 2 "Purpose" statement is missing a verb in the first sentence. Currently as written it states, "To the risks associated with Energy Emergencies...." The SDT should consider revising to state "To <i>identify</i> the risks associated with Energy Emergencies..."</p> <p>Additionally, in the Purpose Statement and Requirement 1, the term "near-term time horizon" is not listed in the NERC glossary of terms or in the NERC Time Horizon criteria and referenced in the standard. The SDT should consider revising "near-term time horizon" to "near-term time period" to avoid confusion with NERC defined Time Horizons.</p> <p>Lastly, the administrative effort needed to implement BAL-007-1 may not work for all entities and will create administrative burdens for Balancing Authorities whose responsibility is to integrate resources, maintain load-interchange-generation balance and supports Interconnection frequency in real time. If Balancing Authorities are to perform near-term ERAs, it may create an added layer of complexity to day-to-day operational challenges. Additionally, data information needed to perform near-term ERAs such as forecasted Demand and Resource capability and deliverability may not be available nor provided to the Balancing Authority during a near-term (5 days to 6 weeks) time period and furthermore circumstances may change in Real-time.</p>	

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer

Document Name

Comment

Purpose: There appears to be a word missing in the Purpose statement (page 3 of 12).

"To _____ the risks associated with Energy Emergencies in the near-term time horizon and take appropriate actions..."

The BAL-008 purposes statement does not appear to be missing this word, as it begins with "To assess the risks associated..."

Requirement R10 imposes notification requirements on BAs and RCs. This is a duplicative and non-value-added step that is already addressed by IRO-014, R3 and TOP-002, R5:

- IRO-014, R3 already requires the RC to notify other RCs of expected Emergencies.

IRO-014, R3. Each Reliability Coordinator, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, shall notify other impacted Reliability Coordinators.

- TOP-002-5, R5 already requires BAs to notify entities with a role in their Operating Plan(s)

TOP-002-5, R5. Each Balancing Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s).

Consequently, the SRC recommends the SDT remove BAL-007, R10:

R10. Each Reliability Coordinator, within 24 hours of receiving a notification that a Balancing Authority within its footprint has implemented an Operating Plan pursuant to Requirement R8, shall notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area and neighboring Reliability Coordinators of the forecasted condition(s), and the Balancing Authority's Operating Plan(s).

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

Document Name

Comment

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #9: EEI does not agree that the language currently contained in the purpose statement for BAL-007-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, report and plan to address energy constraints in the near-term time horizon.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer	
Document Name	
Comment	
See comments submitted by the Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO	
Answer	
Document Name	
Comment	
NIPSCO supports MISO's feedback.	
Likes 0	
Dislikes 0	
Response	
Chance Back - Muscatine Power and Water - 1,3,5,6	
Answer	
Document Name	
Comment	
Support the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
George E Brown - Pattern Operators LP - 5	
Answer	
Document Name	

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

10. BAL-008-1 Seasonal ERAs: The SDT drafted BA-008-1 Requirement R1 to clarify what seasonal ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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.

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer No

Document Name

Comment

If two BAs define two different seasonal periods and one BA is dependent on energy transfers, would the neighboring BA have that energy to transfer if the seasonal timeframes are different?

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC

Answer	No
Document Name	
Comment	
SMUD and BANC agree with the comments submitted by the Western Power Pool.	
Likes	0
Dislikes	0
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	No
Document Name	2022-03_Unofficial Comment Form_BAL-007 and BAL-008_MRO NSRF_06-11-24rev.docx
Comment	
<p>Some of the proposed language is unclear. Please clarify how these two concepts are intended to be applied: “does not need to include all hours in the seasonal period” and “its seasons...must cover an entire calendar year.” Modify BAL-008 to reflect what is in the Technical Rationale, pages 5-6.</p> <p>In addition, we have the same concerns with BAL-008 as those expressed for BAL-007 in our response to Question 2.</p> <p>§ Since Part 1.4.3. includes ‘resource capabilities,’ that should encompass transmission limitations. Therefore, the MRO NSRF requests Part 1.4.3 be stricken. If the SDT disagrees with removing Part 1.4.3. altogether, then MRO NSRF proposes the following modification:</p> <p>1.4.3. Transmission outages that bottle generation and limit the generator’s output ability.</p>	
Likes	0
Dislikes	0
Response	
Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8	
Answer	No
Document Name	
Comment	
<p>The FRCC proposes changing “depletion of fuel” within requirement 1.4.2 to “fuel supply” to ensure consistency with the language used in requirement R2 2.2.2.</p> <p>The FRCC also would like to note that requirement 1.4.3 includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process and would require that a power flow study be performed for this constraint. This would add another level of complexity to</p>	

energy balancing study. The FRCC suggests removing the “delivery” language and instead should describe the constraints in terms of generator MW output ability.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer

No

Document Name

Comment

Some of the proposed language is unclear. Specifically, the SRC requests clarification of how the following two concepts are intended to be applied: “does not need to include all hours in the seasonal period” and “its seasons...must cover an entire calendar year.” The SRC recommends that BAL-008 be modified to reflect what is in the Technical Rationale, pages 5-6. In addition, the SRC’s concerns with BAL-007 R1 detailed in the SRC’s response to Question 2 also apply to BAL-008 R1. The SRC also recommends removing Part 1.4.3, as Part 1.4.2 already includes ‘resource capabilities’ that would take into account transmission limitations

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name	
Comment	
<p>APS suggests specifying a minimum number of seasons to cover the time period. The SDT should consider specifying in R1.3, the frequency of seasonal ERAs as it is not sufficiently clear. If not specified, can a yearly assessment be performed? If no, what is preventing an entity to perform a single (yearly) seasonal assessment in R1?</p>	
Likes	0
Dislikes	0
Response	
LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)	
Answer	No
Document Name	
Comment	
<p>FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.</p>	
Likes	0
Dislikes	0
Response	
Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
<p>Seminole agrees with FRCC's comments below</p> <p>The FRCC proposes changing "depletion of fuel" within requirement 1.4.2 to "fuel supply" to ensure consistency with the language used in requirement R2 2.2.2.</p> <p>The FRCC also would like to note that requirement 1.4.3 includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process and would require that a power flow study be performed for this constraint. This would add another level of complexity to energy balancing study. The FRCC suggests removing the "delivery" language and instead should describe the constraints in terms of generator MW output ability.</p>	
Likes	0
Dislikes	0
Response	

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

Puget Sound Energy agrees with WPP's response to this question, shown below.

The proposed language in BAL-008 regarding seasonal timelines is vague and ambiguous. There is no consistency in seasonal selection as proposed, and in practice this will lead to studies between BAs that are not coordinated, creating gaps in reliability. The seasonal ERA process should include how entities will ensure coordination with their neighboring entities for access to resources and fuel during a forecasted energy adequacy problem.

During enforcement, audit staff will tend to challenge entities who do not select traditional seasonal studies. They will apply subjective judgement if they disagree that the entity's defined seasons are more appropriate than traditionally defined seasons. Entities will struggle with compliance risk when the auditors evaluate the quality of the process.

The Drafting Team should consider, either sticking with traditional summer and winter seasonal studies, or defining the studies such as: Winter (November-Feb), Spring Shoulder (March-May), Summer (June-August) and Fall Shoulder (Sept-Oct). This would be more performance oriented and will assist entities in coordinating their seasonal studies for reliability.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

While EEI generally supports the language proposed for Requirement R1, there are two issues that still need to be addressed. The first issue relates to the consistent use of language. In Requirement R1, subpart 1.4.2 uses the term "depletion of fuel", while in Requirement R2, subpart 2.2.2 "fuel supply" is used to address the same issue/concern. To address this concern, we suggest that "fuel supply" is a clearer term and aligns with the language used in the SAR.

EEI additionally notes that in subpart 1.4.3, it includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process indicates that a power flow study is expected to be performed. This would add more complexity to what is intended to be an energy balancing study. To address this concern, we suggest removing the "delivery" language and instead describe constraints in terms of generator MW output ability.

To address our Requirement R1 concerns we have included edits in boldface below:

R1. Each Balancing Authority shall document and maintain a process for conducting Energy Reliability Assessments (ERA) for the seasonal time horizon. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

1.1. The Balancing Authority shall define its seasons, which do not have to align with traditional seasonal definitions but must cover an entire calendar year.

1.2. The seasonal ERAs will be representative of the risks or conditions within each seasonal period. The Balancing Authority will determine the duration for each seasonal ERA to represent those risks or conditions and does not need to include all hours in the seasonal period.

1.3. The Balancing Authority shall define a periodicity for conducting the seasonal ERAs that provides for completion at least 30 calendar days prior to but no greater than 12 months before the beginning of each season.

1.4. The ERA process for seasonal ERAs must account for the following:

1.4.1. Forecasted or assumed Demand profiles;

1.4.2. Resource capabilities and operations, including fuel **supply**, variable energy resources, (e.g., wind, solar, and hydro) energy transfers between neighboring Balancing Authorities, and electric storage; and

1.4.3. **Local known BES transmission** constraints that limit the ability of **a generator to output expected MWs**.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

Some of the proposed language is unclear. Please clarify how these two concepts are intended to be applied: "*does not need to include all hours in the seasonal period*" and "*its seasons...must cover an entire calendar year.*" Modify BAL-008 to reflect what is in the Technical Rationale, pages 5-6.

In addition, we have the same concerns with BAL-008 as those expressed for BAL-007 in our response to Question 2.

- Since Part 1.4.3. includes 'resource capabilities,' that should encompass transmission limitations. Therefore, NV Energy requests **Part 1.4.3 be stricken**. If the SDT disagrees with removing Part 1.4.3. altogether, then NV Energy proposes the following modification:

1.4.3. Transmission outages that bottle generation and limit the generator's output ability.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

PSE agrees with WPP's response to this question, shown below.

The proposed language in BAL-008 regarding seasonal timelines is vague and ambiguous. There is no consistency in seasonal selection as proposed, and in practice this will lead to studies between BAs that are not coordinated, creating gaps in reliability. The seasonal ERA process should include how entities will ensure coordination with their neighboring entities for access to resources and fuel during a forecasted energy adequacy problem.

During enforcement, audit staff will tend to challenge entities who do not select traditional seasonal studies. They will apply subjective judgement if they disagree that the entity's defined seasons are more appropriate than traditionally defined seasons. Entities will struggle with compliance risk when the auditors evaluate the quality of the process.

The Drafting Team should consider, either sticking with traditional summer and winter seasonal studies, or defining the studies such as: Winter (November-Feb), Spring Shoulder (March-May), Summer (June-August) and Fall Shoulder (Sept-Oct). This would be more performance oriented and will assist entities in coordinating their seasonal studies for reliability.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer No

Document Name

Comment

The reality for entities with large hydraulic reservoirs, as is the case for HQ, is completely different from "fuel" constraints. . Our Seasonal ERA begin two years from the current day.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer

No

Document Name

Comment

We appreciate a BA has the flexibility to define its seasons. This again can lead to an interpretation during audit if not more clearly defined.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer

No

Document Name

Comment

Exelon supports the comments submitted by the EEI

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 10

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer

No

Document Name

Comment

Please clarify conflicting concepts:

“does not need to include all hours in the seasonal period” and “its season....must cover an entire calendar year”.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

WECC suggests placing "seasonal" in front of Energy Reliability Assessments to be consistent with suggested changes to BAL-007 and consistency throughout BAL-008. Similar concerns with language use here and EOP-011. "Fuel supply" and "availability" are consistent terms used in EOP-011. Also add "s" to "ERA". In 1.4.2, it is not clear what is meant by "and operations". Is the DT trying to capture projected availability of resources? Suggest

“Resource capabilities and availability including variable energy resource (e.g., wind, solar, hydro); Fuel supply concerns and inventory; energy transfers between neighboring Balancing Authorities; and electric storage; and”. Should “electric storage” be BESS for consistency across Standards? Consider addressing hydro/wind/solar in the technical rationale to avoid limitations on future technologies

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

The proposed language in BAL-008 regarding seasonal timelines is vague and ambiguous. There is no consistency in seasonal selection as proposed, and in practice this will lead to studies between BAs that are not coordinated, creating gaps in reliability. The seasonal ERA process should include how entities will ensure coordination with their neighboring entities for access to resources and fuel during a forecasted energy adequacy problem.

During enforcement, audit staff will tend to challenge entities who do not select traditional seasonal studies. They will apply subjective judgement if they disagree that the entity’s defined seasons are more appropriate than traditionally defined seasons. Entities will struggle with compliance risk when the auditors evaluate the quality of the process.

The Drafting Team should consider, either sticking with traditional summer and winter seasonal studies, or defining the studies such as: Winter (November-Feb), Spring Shoulder (March-May), Summer (June-August) and Fall Shoulder (Sept-Oct). This would be more performance oriented and will assist entities in coordinating their seasonal studies for reliability.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC agrees with EEI's comments - While EEI generally supports the language proposed for Requirement R1, there are two issues within BAL-008 that need to be addressed. The first issue relates to the lack of a minimum requirement for the seasons to be studied in Requirement R1, subpart 1.1. We do not agree that this should be open ended, instead we suggest a minimum of two seasons, noting that for most regions summer and winter are typically associated with the highest risk to the transmission system.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Southern Company supports the EEI comments and agrees with the EEI language changes to R1.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Please see BPA's full response in question 15.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI's comments, included here. While EEI generally supports the language proposed for Requirement R1, there are two issues that still need to be addressed. The first issue relates to the consistent use of language. In Requirement R1, subpart 1.4.2 uses the term "depletion of fuel", while in Requirement R2, subpart 2.2.2 "fuel supply" is used to address the same issue/concern. To address this concern, we suggest that "fuel supply" is a clearer term and aligns with the language used in the SAR.

EEI additionally notes that in subpart 1.4.3, it includes transmission constraints that limit the flow of MWs from the generator to the load in the ERA process indicates that a power flow study is expected to be performed. This would add more complexity to what is intended to be an energy balancing study. To address this concern, we suggest removing the "delivery" language and instead describe constraints in terms of generator MW output ability.

To address our Requirement R1 concerns we have included edits in boldface below:

R1. Each Balancing Authority shall document and maintain a process for conducting Energy Reliability Assessments (ERA) for the seasonal time horizon. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

1.1. The Balancing Authority shall define its seasons, which do not have to align with traditional seasonal definitions but must cover an entire calendar year.

1.2. The seasonal ERAs will be representative of the risks or conditions within each seasonal period. The Balancing Authority will determine the duration for each seasonal ERA to represent those risks or conditions and does not need to include all hours in the seasonal period.

1.3. The Balancing Authority shall define a periodicity for conducting the seasonal ERAs that provides for completion at least 30 calendar days prior to but no greater than 12 months before the beginning of each season.

1.4. The ERA process for seasonal ERAs must account for the following:

1.4.1. Forecasted or assumed Demand profiles;

1.4.2. Resource capabilities and operations, including (*remove: depletion of*) fuel **supply**, variable energy resources, (e.g., wind, solar, and hydro) energy transfers between neighboring Balancing Authorities, and electric storage; and

1.4.3. **Local** (*remove: Transmission*) **known BES transmission** constraints that limit the ability of (*remove: generation Facilities to deliver their output to Load*) **a generator to output expected MWs.**

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

No

Document Name

Comment

PNM supports EEI recommended changes for BAL-008-1 R1.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Adopt R1.1 language.

Duke Energy recommends the following modification to R1.4.3. to extend resources beyond the BA.

R1.4.3. "Known BES transmission constraints that limit the ability to utilize expected resources."

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

The proposed language in BAL-008 regarding seasonal timelines is vague and ambiguous. There is no consistency in seasonal selection as proposed, and in practice this will lead to studies between BAs that are not coordinated, creating gaps in reliability. The seasonal ERA process should include how entities will ensure coordination with their neighboring entities for access to resources and fuel during a forecasted energy adequacy problem. During enforcement, audit staff will tend to challenge entities who do not select traditional seasonal studies. They will apply subjective judgement if they disagree that the entity's defined seasons are more appropriate than traditionally defined seasons. Entities will struggle with compliance risk when the auditors evaluate the quality of the process.

The Drafting Team should consider, either sticking with traditional summer and winter seasonal studies, or defining the studies such as: Winter (November-Feb), Spring Shoulder (March-May), Summer (June-August) and Fall Shoulder (Sept-Oct). This would be more performance oriented and will assist entities in coordinating their seasonal studies for reliability.

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1,3,4,5,6

Answer

No

Document Name

Comment

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer

No

Document Name

Comment

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer	No
Document Name	
Comment	
Seattle City Light agrees with WPP Submitted Comment.	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
Idaho Power agrees with WPP's response to this question, shown below.	
<p>The proposed language in BAL-008 regarding seasonal timelines is vague and ambiguous. There is no consistency in seasonal selection as proposed, and in practice this will lead to studies between BAs that are not coordinated, creating gaps in reliability. The seasonal ERA process should include how entities will ensure coordination with their neighboring entities for access to resources and fuel during a forecasted energy adequacy problem.</p> <p>During enforcement, audit staff will tend to challenge entities who do not select traditional seasonal studies. They will apply subjective judgement if they disagree that the entity's defined seasons are more appropriate than traditionally defined seasons. Entities will struggle with compliance risk when the auditors evaluate the quality of the process.</p> <p>The Drafting Team should consider, either sticking with traditional summer and winter seasonal studies, or defining the studies such as: Winter (November-Feb), Spring Shoulder (March-May), Summer (June-August) and Fall Shoulder (Sept-Oct). This would be more performance oriented and will assist entities in coordinating their seasonal studies for reliability.</p>	
Likes 1	JEA, 1, McClung Joseph
Dislikes 0	
Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
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

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Goggin - Grid Strategies LLC - 5

Answer

Document Name**Comment**

The drafting team should clarify how the requirement to account for "depletion of fuel" should be applied to interruptions to gas supply and transportation. This is important to clarify because correlated failures of gas generators, often due to fuel supply and transportation constraints and interruptions, have been the primary contributing factor in all recent cold snap events that have led to FERC-NERC reports. The drafting team should clarify that assessments should include the expected unavailability of gas generators, informed by past experience during winter peak demand periods, when accounting for "resource capabilities and operations," particularly for winter energy reliability assessments.

Likes 0

Dislikes 0

Response**Wayne Guttormson - SaskPower - 1****Answer****Document Name****Comment**

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response**Keith Jonassen - ISO New England, Inc. - 2 - NPCC****Answer****Document Name****Comment**

While ISO-NE believes R1 is sufficient, ISO-NE requests that the SDT provide clarification to R1.2 and an explanation why the seasonal ERA does not need to include all hours in the seasonal period?

Suggest changing R1.1. to

1.1 The Balancing Authority shall define its seasons as follows:

1.1.1 Must include a minimum of two (2) seasons, which do not have to align with traditional seasonal definitions

1.1.2 Seasons must encompass an entire year.

Suggest changing R1.4.1. to "Forecasted demand profiles"

Suggest changing R1.4.2 "depletion of fuel" to "fuel supplies"

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

Some of the proposed language is unclear. Specifically, we request clarification of how the following two concepts are intended to be applied: "*does not need to include all hours in the seasonal period*" and "*its seasons...must cover an entire calendar year.*" MISO recommends BAL-008 be modified to reflect what is in the Technical Rationale, pages 5-6.

In addition, MISO's concerns with BAL-007 R1 detailed in our response to Question 2 also apply to BAL-008 R1.

Finally, we recommend removing **Part 1.4.3**, as Part 1.4.2 already includes 'resource capabilities' that would take into account transmission limitations.

Likes 0

Dislikes 0

Response

11. BAL-008-1 Seasonal ERAs: The SDT drafted BAL-008-1 Requirements R2 through R13 based on industry feedback regarding seasonal ERAs. Do you agree with the proposed requirements? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard which puts entities in a position where they will be held accountable for their own practices. This incentivizes companies to meet minimum criteria to not risk potential non-compliance. Entities exceeding expectations will be rewarded with additional compliance risk. R2 has no performance measurements associated and no minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and the rationales will result in subjective enforcement and issues related to quality. Entities will be exposed to compliance risk for administrative mistakes and errata errors, rather than poor performance that can put the BES in risk. The drafting team is encouraged to consider what a minimal acceptable performance should be for seasonal ERAs.

The Drafting Team utilizes the term "credible" several times. Credible is a subjective term and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.

R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified through the ERA, but they are not required to implement plans when an Energy Emergency is identified. BAs maintain Operating Plans under TOP-002, and it is not clear if these can be the same or different Operating Plans identified in TOP-002. TOP-002 deals with next-day operations and it is confusing if the proposed BAL-008 Operating Plans are superseded by next day or real-time Operation Plans.

R3 uses the phrase "...minimize forecasted Energy Emergencies..." the term "minimize" is subjective and not measurable. Though the intent of the drafting team seems clear, enforcement it will be up to the auditor to determine if the entity is effectively minimizing identified Energy Emergencies.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient. The two requirements are administrative and require documents for compliance, but do not set a minimum criterion for performance. This encourages minimal compliance, and not acceptable levels of performance.

R4: R4 properly identifies a performance-based criteria.

R5: R5 properly identifies a performance-based criteria.

R6: R6 is properly worded and is performance-based.

R7: R7 requires the entity to review and update its seasonal ERA process "if needed". This puts a burden on the entity to prove when and updated is warranted. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will have to explain why there was no need to update the documentation. Auditors will default to looking for errata errors in the documentation. This leads to zero defect compliance practices that NERC has been trying to distance itself from with better written standards.

R8: In R8 the entities are asked to "...provide [their] seasonal ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule." R1 and R2 require the BAs to develop a seasonal ERA process and Scenarios, and R3 requires the entity to create Operating Plans based on the ERA process. The Operating Plans are done each season identified by the individual BA. This makes the product from R3 only relevant to the season it is looking at. Requiring entities to provide the "...Scenarios or methods, and Operating Plans..." at least once every 24 calendar months is confusing and provides no benefit since the Scenarios and operating plans will be stale. The

submission of the ERA process under R1 makes sense, since it is supposedly reviewed and updated in that period; but providing Scenarios, methods and Operating Plans every 24 months is of no use. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months. Seasonal assessment results should be provided no later than 30 days prior to the start of the season, and operating plans should not be included.

The ERA process submission to the RC should require resubmission after any revision is made to the process. The current proposal allows an entity to submit its plan to the RC, then if they update their document, it doesn't have to be resubmitted until the next 24-month submittal. Other NERC Standards require entities to submit revised processes within 30 or 60 days of any update.

R9: The lead in sentence of R9 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider a: "The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R9, shall:"

R10: The lead in sentence of R10 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider: "The Balancing Authority shall address any reliability risks identified by its Reliability Coordinator and resubmit updated information within the schedule specified by the Reliability Coordinator."

R11: It is not clear why the Drafting Team elected to put a follow-on requirement to R1 so low in the list of requirements. R11 should be combined with R2 or R3 as a performance requirement the R1 requirement. Alternatively, R11 could be moved up to R3, and renumbering the current requirements R3 through R13.

R12: R12 is not needed, since BAL-007 requirements require short-term assessments and operating plans, which would address and override any plans made over 6 months out in a seasonal ERA.

R13: R13 is confusing, since it is requiring 7 days of notice of the implementation of an operating plan that would most likely be implemented in, or very close to, real-time. Fundamentally, operation plans from seasonal studies will be overridden by BAL-007 operating plans in the near-term.

Likes	1	JEA, 1, McClung Joseph
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Dislikes	0	
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Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer	No
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Document Name	
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Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes	0	
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Dislikes	0	
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Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer	No
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Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard which puts entities in a position where they will be held accountable for their own practices. This incentivizes companies to meet minimum criteria to not risk potential non-compliance. Entities exceeding expectations will be rewarded with additional compliance risk. R2 has no performance measurements associated and no minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and the rationales will result in subjective enforcement and issues related to quality. Entities will be exposed to compliance risk for administrative mistakes and errata errors, rather than poor performance that can put the BES in risk. The drafting team is encouraged to consider what a minimal acceptable performance should be for seasonal ERAs.</p> <p>The Drafting Team utilizes the term “credible” several times. Credible is a subjective term and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.</p> <p>R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified through the ERA, but they are not required to implement plans when an Energy Emergency is identified. BAs maintain Operating Plans under TOP-002, and it is not clear if these can be the same or different Operating Plans identified in TOP-002. TOP-002 deals with next-day operations and it is confusing if the proposed BAL-008 Operating Plans are superseded by next day or real-time Operation Plans.</p> <p>R3 uses the phrase “...minimize forecasted Energy Emergencies...” the term “minimize” is subjective and not measurable. Though the intent of the drafting team seems clear, enforcement it will be up to the auditor to determine if the entity is effectively minimizing identified Energy Emergencies. The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient. The two requirements are</p>	

administrate and require documents for compliance, but do not set a minimum criterion for performance. This encourages minimal compliance, and not acceptable levels of performance.

R4: R4 properly identifies a performance-based criteria.

R5: R5 properly identifies a performance-based criteria.

R6: R6 is properly worded and is performance-based.

R7: R7 requires the entity to review and update its seasonal ERA process “if needed”. This puts a burden on the entity to prove when and updated is warranted. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will have to explain why there was no need to update the documentation. Auditors will default to looking for errata errors in the documentation. This leads to zero defect compliance practices that NERC has been trying to distance itself from with better written standards.

R8: In R8 the entities are asked to “...provide [their] seasonal ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule.” R1 and R2 require the BAs to develop a seasonal ERA process and Scenarios, and R3 requires the entity to create Operating Plans based on the ERA process. The Operating Plans are done each season identified by the individual BA. This makes the product from R3 only relevant to the season it is looking at. Requiring entities to provide the “...Scenarios or methods, and Operating Plans...” at least once every 24 calendar months is confusing and provides no benefit since the Scenarios and operating plans will be stale. The submission of the ERA process under R1 makes sense, since it is supposedly reviewed and updated in that period; but providing Scenarios, methods and Operating Plans every 24 months is of no use. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months. Seasonal assessment results should be provided no later than 30 days prior to the start of the season, and operating plans should not be included.

The ERA process submission to the RC should require resubmission after any revision is made to the process. The current proposal allows an entity to submit its plan to the RC, then if they update their document, it doesn't have to be resubmitted until the next 24-month submittal. Other NERC Standards require entities to submit revised processes within 30 or 60 days of any update.

R9: The lead in sentence of R9 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider a: “The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R9, shall:”

R10: The lead in sentence of R10 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider: “The Balancing Authority shall address any reliability risks identified by its Reliability Coordinator and resubmit updated information within the schedule specified by the Reliability Coordinator.”

R11: It is not clear why the Drafting Team elected to put a follow-on requirement to R1 so low in the list of requirements. R11 should be combined with R2 or R3 as a performance requirement the R1 requirement. Alternatively, R11 could be moved up to R3, and renumbering the current requirements R3 through R13.

R12: R12 is not needed, since BAL-007 requirements require short-term assessments and operating plans, which would address and override any plans made over 6 months out in a seasonal ERA.

R13: R13 is confusing, since it is requiring 7 days of notice of the implementation of an operating plan that would most likely be implemented in, or very close to, real-time. Fundamentally, operation plans from seasonal studies will be overridden by BAL-007 operating plans in the near-term.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy supports proposed EEI language modifications to R2, R3 and R9 for Question 11.

Also, R13 should be deleted from the proposed BAL-008 standard. The results of the seasonal ERA are more appropriately provided to the ERO as a part of its response to seasonal reliability assessments.

Additionally, the data sharing requirements in R6 should be modified to utilize the data content and format utilized by the RP. The Resource Planner should not be required to modify the content or format of data to solely support the needs of the BA.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

Comment

There is an incomplete framework for R4. Need a more defined way of obtaining data from the Generator Operators as described in our response to Question 13.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

No

Document Name

Comment

The data requirements for seasonal ERAs per Requirement R4 may include market sensitive information and assumptions. Some of these assumptions may require synchronization between adjacent entities, and there may be subject to international agreements. BC Hydro suggests that a defined framework and possibly data sharing agreements would be required to enable the exchange of relevant information with other entities.

Requirement R7 mandates a 24 calendar months to review and update as necessary the R1 process, R2 Scenarios/methods, and R3 Operating Plan(s). This may constitute double-jeopardy, as failure to review and/or update may also constitute a possible noncompliance to the requirement to "maintain" the R1, R2, and R3 deliverables. BC Hydro recommends that R7 is not required, rather a measure of compliance be added in conjunction with the requirement to maintain under R1, R2, and R3.

Requirement R8 as written is vague and does not seem to provide value to reliability, particularly in case of Operating Plans, many of which would be obsolete on a 24-month provision timeframe. The Technical Rationale indicates that the intent is for the BAs and their respective RCs to have a mutually agreed protocol for the BC to provide updated R1, R2 and R3 documentation to the RC. BC Hydro recommends that R5 be revised to reflect the intent as stated in the Technical Rationale. Suggested wording provided below:

"R8 Each Balancing Authority and RC shall have and implement a documented protocol for the Balancing Authority to provide, at least once every 24 calendar months, its Reliability Coordinator with the near-term ERA process, Scenarios or methods, and Operating Plan(s) documented under Requirements R1 through R3."

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

See comments in question 13

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

PNM supports EEI recommended changes for BAL-007-1 R2, R3, R9, and R13.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports EEI comments but has the additional concerns:

R2: For R2, usage of the word “credible” is subjective. This requirement should make clear that credibility of the Scenarios is for the BA to define and document. This language is pulled straight from the technical rationale for BAL-008-1. Recommend addition of “BA to define credible within their process”.

R6: Since this requirement is for seasonal ERAs, Same-Day Operations and Real-Time Operations should be removed from the time horizon.

R12/13: R12 and R13 do not seem appropriate for seasonal reliability assessments. BAL-007-1 addresses energy reliability in an appropriate timeframe where action should be taken. Recommend removal of these requirements.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI's comments. EEI does not oppose the changes made to Requirements R4, R5, R6, R7, R8, R10, R11 and R12 but we do have concerns with the proposed changes to R2, R3, R9 and R13.

Requirement R2 Concerns: EEI does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes "other scenarios with a credible risk". We additionally do not agree that it is necessary to include "or historical" within subpart 2.3 because the BA already has awareness of historical risks within their BA region and those risks factor into their assessment of what is a credible risk. To address our concerns, we offer the following changes to Requirement R2, subpart 2.3 (in boldface):

2.3. Other Scenarios with a credible (*remove: or historical*) risk of occurring (*remove: based on the best information available at the time of Scenario creation*) as determined by the BA."

Requirement R3 Concerns: While EEI appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, the proposed language provides no clarity regarding this process. To address this concern, including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies is needed. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R3: Each Balancing Authority shall document and maintain one or more Operating Plan(s) (*remove: to minimize forecasted Energy Emergencies*) as identified in the seasonal ERA (*remove: , including*) that include provisions for notifying the Reliability Coordinator of a forecasted Energy Emergency and the Operating Plan(s), **when deemed necessary**. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

Requirement R9 Concerns: EEI notes that Requirement R9 cites certain RC actions related to Requirement R8. Requirement R8 is an administrative Requirement that simply obligates the BA to supply their seasonal ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. Under Requirement R9 the RC is obligated to review the R8 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days and therefore is administrative activity and should not have a VRF higher than Low.

Requirement R13 Concerns: EEI does not support the proposed language of Requirement R13 because of the following concerns:

1. For a seasonal forecasted Energy Emergency, obligating the RC to respond within 7 days when a seasonal forecasted Energy Emergency is unlikely to ever represent an imminent emergency is unjustified. EEI suggests 30 days as a more appropriate and reasonable timeframe.
2. Not all forecasted seasonal EEA need to be circulated. The RC needs to review the forecasted EEA and determine if it is credible. If not, they should return it to the BA with questions before circulating it to other BAs within their footprint and neighboring RCs.
3. EEI does not support a medium VRF for forecasted seasonal EEA given a seasonal Forecasted EEA does not have the same level of urgency as a seasonal forecasted EEA.

R13. Each Reliability Coordinator, **who receives notification of a forecasted seasonal Energy Emergency, pursuant to Requirement R3 that includes an implemented Operating Plan pursuant to Requirement R8 and evaluated as credible by the Reliability Coordinator; shall** within (*remove: seven*) **thirty (30)** calendar days of receiving (*remove: a*) the notification (*remove: that a Balancing Authority within its footprint has implemented an Operating Plan pursuant to Requirement R8, shall*) notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators of the forecasted condition(s) and the Balancing Authority's Operating Plan(s). **If the RC**

determines the forecasted seasonal Energy Emergency is not credible or they have questions, they shall transmit their concerns to the responsible BA for further review & discussion. [Violation Risk Factor: (remove: **Medium**) Low] [Time Horizon: Operations Planning]

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer

No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Please see BPA's full response in question 15.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer

No

Document Name

Comment

CHPD supports WPP's response.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Southern Company supports the EEI comments and agrees with the EEI language changes.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

No

Document Name

Comment

TEPC agrees with EEI's comments - EEI has concerns with the proposed changes to R2 (EEI does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes "other scenarios with a credible or historical risk".), R3 (While EEI appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, the proposed language provides no clarity regarding this process. To

address this concern, including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies is needed. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and worthy of notification under this Requirement), R9 (EEI notes that Requirement R9 cites certain RC actions related to Requirement R8. Requirement R8 is an administrative Requirement that simply obligates the BA to supply their seasonal ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. Under Requirement R9 the RC is obligated to review the R8 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days and therefore is administrative activity and should not have a VRF higher than Low.), and R13 (EEI suggests 30 days as a more appropriate and reasonable timeframe).

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

No

Document Name

Comment

R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard which puts entities in a position where they will be held accountable for their own practices. This incentivizes companies to meet minimum criteria to not risk potential non-compliance. Entities exceeding expectations will be rewarded with additional compliance risk. R2 has no performance measurements associated and no minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and the rationales will result in subjective enforcement and issues related to quality. Entities will be exposed to compliance risk for administrative mistakes and errata errors, rather than poor performance that can put the BES in risk. The drafting team is encouraged to consider what a minimal acceptable performance should be for seasonal ERAs.

The Drafting Team utilizes the term “credible” several times. Credible is a subjective term and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.

R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified through the ERA, but they are not required to implement plans when an Energy Emergency is identified. BAs maintain Operating Plans under TOP-002, and it is not clear if these can be the same or different Operating Plans identified in TOP-002. TOP-002 deals with next-day operations and it is confusing if the proposed BAL-008 Operating Plans are superseded by next day or real-time Operation Plans.

R3 uses the phrase “...minimize forecasted Energy Emergencies...” the term “minimize” is subjective and not measurable. Though the intent of the drafting team seems clear, enforcement it will be up to the auditor to determine if the entity is effectively minimizing identified Energy Emergencies.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient. The two requirements are administrative and require documents for compliance, but do not set a minimum criterion for performance. This encourages minimal compliance, and not acceptable levels of performance.

R4: R4 properly identifies a performance-based criteria.

R5: R5 properly identifies a performance-based criteria.

R6: R6 is properly worded and is performance-based.

R7: R7 requires the entity to review and update its seasonal ERA process “if needed”. This puts a burden on the entity to prove when and updated is warranted. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will have to explain why there was no need to update the documentation. Auditors will default to looking for errata errors in the documentation. This leads to zero defect compliance practices that NERC has been trying to distance itself from with better written standards.

R8: In R8 the entities are asked to “...provide [their] seasonal ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule.” R1 and R2 require the BAs to develop a seasonal ERA process and Scenarios, and R3 requires the entity to create Operating Plans based on the ERA process. The Operating Plans are done each season identified by the individual BA. This makes the product from R3 only relevant to the season it is looking at. Requiring entities to provide the “...Scenarios or methods, and Operating Plans...” at least once every 24 calendar months is confusing and provides no benefit since the Scenarios and operating plans will be stale. The submission of the ERA process under R1 makes sense, since it is supposedly reviewed and updated in that period; but providing Scenarios, methods and Operating Plans every 24 months is of no use. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months. Seasonal assessment results should be provided no later than 30 days prior to the start of the season, and operating plans should not be included.

The ERA process submission to the RC should require resubmission after any revision is made to the process. The current proposal allows an entity to submit its plan to the RC, then if they update their document, it doesn't have to be resubmitted until the next 24-month submittal. Other NERC Standards require entities to submit revised processes within 30 or 60 days of any update.

R9: The lead in sentence of R9 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider a: “The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R9, shall:”

R10: The lead in sentence of R10 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider: “The Balancing Authority shall address any reliability risks identified by its Reliability Coordinator and resubmit updated information within the schedule specified by the Reliability Coordinator.”

R11: It is not clear why the Drafting Team elected to put a follow-on requirement to R1 so low in the list of requirements. R11 should be combined with R2 or R3 as a performance requirement the R1 requirement. Alternatively, R11 could be moved up to R3, and renumbering the current requirements R3 through R13.

R12: R12 is not needed, since BAL-007 requirements require short-term assessments and operating plans, which would address and override any plans made over 6 months out in a seasonal ERA.

R13: R13 is confusing, since it is requiring 7 days of notice of the implementation of an operating plan that would most likely be implemented in, or very close to, real-time. Fundamentally, operation plans from seasonal studies will be overridden by BAL-007 operating plans in the near-term.

Likes	0
Dislikes	0

Response

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

Answer No

Document Name

Comment

WECC believes the phrase “by a sufficient amount to stress the system within a range of credible situations” is ambiguous and will be applied inconsistently. Is varying conditions for an ERA intended to be sufficient enough to create an EEA level? There needs to be clarity in what may be

expected in the rationales. Suggest "Include a rationale for the Scenarios or method of Scenario creation that includes support for criteria determined by the Balancing Authority for varying the following conditions." Suggest changing "operations" in R2.2. to "availability". Requirement 2.3 does not appear to be cohesive with the phrase "shall vary one or more of the following conditions..." Consider editing and adding as a second sentence in R2 as follows "Each Balancing Authority shall.....for use in performing near-term ERAs. Scenarios with a credible or historical risk of occurring may be used based on the best information available at the time of Scenario creation." As written each BA would not have to "consider" the other Scenarios called out in 2.3 (as mentioned in the Technical Rational). The "Other Scenarios" may not be seen as a "following condition" which will cause confusion. The DT is correct in including previous historical Scenarios that stress the System as a basis for an ERA. Consider adding a 2.2.4 "Energy transfers between neighboring Balancing Authorities" to support 1.4 language.

R4/R5/R6- A data specification provision (and associated responsibilities) already exists in TOP-003. It is unclear what a Resource Planner would provide as they are looking at long-term plan (generally one year and beyond) for resource adequacy of specific loads within a Planning Authority/Planning Coordinator Area. That implies that data the Resource Planner has may not fit the seasonal ERA performance expectations ("at least 30 calendar days prior to but no greater than 12 months before the beginning of each season."). The DT should consider either the PC or RC in terms of providing data that it may not already have for its "analysis functions" per TOP-003.

R7/R8- Similar to BAL-007. Operating Plans are likely to change from one winter to the next (as an example) and reviewing/providing those Operating Plans at least once every 24 months does not appear to support reliability. It is clear the process and considerations of Scenarios needs to be periodically reviewed.

R9- EOP-011 has a 30 calendar day timeline for Operating Plans associated with Energy Emergencies and is in conflict with this Requirements 60 calendar days. Suggest say "results" versus "information". It is not clear how the RC will avoid risks. Is it reviewing the Operating Plans only? As noted, it would be reasonable to expect Operating Plans to fit the conditions noted in a near-term ERA which has a limited duration (up to six weeks). What Operating Plans would be provided and of what value would Operating plans be if 24 months old? The Operating Plans for an Energy Emergency are to be reviewed by the RC prior to implementation. If Operating Plans are only reviewed once every 24 months versus as developed (and updated) how could coordination occur? Additionally, may need to indicate "Notify the submitting Balancing Authority..." versus "each" in Part 9.2.

R10- While not in conflict with EOP-011, EOP-011 may set a timeframe for response that could exceed the 60 calendar days. What is the expectation for the DT as to how a BA will address the reliability risks? Especially if the reliability risk is a coordination issue? It appears that for coordination caused/resultant reliability risks the RC would need to clearly indicate actions so that there is not an infinite loop of actions and reactions. Also, by using "any" that means a BA could address only one and be compliant. If supporting reliability, the BA should address ALL the reliability risks identified. What recourse does a BA have if it cannot alleviate the risk?

R13- If implementing an Operating Plan is in Real-time what good is "seven calendar day" notification? An Operating Plan may be developed during the seasonal ERA but may not be implemented until the conditions actually exist. It is as if the Operating Plan based on an ERA is expected to perform an action at a date within the study period that is greater than 7 days ahead of Real-time.

Likes	0
Dislikes	0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

A defined requirement to obtain data from Generator Operators is needed. Such as modification to TOP-003 as described in question 13.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 11

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer No

Document Name

Comment

Exelon supports the comments submitted by the EEI

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer No

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer No

Document Name

Comment

R1 : We suggest adding verbiage that allows some flexibility in the data requested:. For example, we suggest adding the text in bold below to R1.4.2.

R1.4.2 : Resource capabilities and operations, **including pertinent data** such as depletion of fuel...

R2.2.2 : Fuel/Resource supply contingency is not applicable in an hydraulic context such as Hydro-Quebec. [\[A1\]](#)

R4 to R6 : These requirements should be placed in TOP-003 standard.

R7 : This requirement is redundant with the “maintain” obligation state in R1, R2 and R3.

R8 to R10 : When there is only one RC and BA in an Interconnexion, R8 to R10 should be not applicable.

R11. We suggest adding the verb “implement” to R1 and R2, which would thus render this requirement unnecessary. " R1 Each Balancing Authority shall document, maintain and **implement** a process for conducting Energy Reliability Assessments ..."

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

PSE agrees with WPP's response to this question, shown below.

R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard which puts entities in a position where they will be held accountable for their own practices. This incentivizes companies to meet minimum criteria to not risk potential non-compliance. Entities exceeding expectations will be rewarded with additional compliance risk. R2 has no performance measurements associated and no minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and the rationales will result in subjective enforcement and issues related to quality. Entities will be exposed to compliance risk for administrative mistakes and errata errors, rather than poor performance that can put the BES in risk. The drafting team is encouraged to consider what a minimal acceptable performance should be for seasonal ERAs.

The Drafting Team utilizes the term "credible" several times. Credible is a subjective term and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.

R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified through the ERA, but they are not required to implement plans when an Energy Emergency is identified. BAs maintain Operating Plans under TOP-002, and it is not clear if these can be the same or different Operating Plans identified in TOP-002. TOP-002 deals with next-day operations and it is confusing if the proposed BAL-008 Operating Plans are superseded by next day or real-time Operation Plans.

R3 uses the phrase "...minimize forecasted Energy Emergencies..." the term "minimize" is subjective and not measurable. Though the intent of the drafting team seems clear, enforcement it will be up to the auditor to determine if the entity is effectively minimizing identified Energy Emergencies.

The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient. The two requirements are administrative and require documents for compliance, but do not set a minimum criterion for performance. This encourages minimal compliance, and not acceptable levels of performance.

R4: R4 properly identifies a performance-based criteria.

R5: R5 properly identifies a performance-based criteria.

R6: R6 is properly worded and is performance-based.

R7: R7 requires the entity to review and update its seasonal ERA process "if needed". This puts a burden on the entity to prove when and updated is warranted. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will have to explain why there was no need to update the documentation. Auditors will default to looking for errata errors in the documentation. This leads to zero defect compliance practices that NERC has been trying to distance itself from with better written standards.

R8: In R8 the entities are asked to "...provide [their] seasonal ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule." R1 and R2 require the BAs to develop a seasonal ERA process and Scenarios, and R3 requires the entity to create Operating Plans based on the ERA process. The Operating Plans are done each season identified by the individual BA. This makes the product from R3 only relevant to the season it is looking at. Requiring entities to provide the "...Scenarios or methods, and Operating Plans..." at least once every 24 calendar months is confusing and provides no benefit since the Scenarios and operating plans will be stale. The submission of the ERA process under R1 makes sense, since it is supposedly reviewed and updated in that period; but providing Scenarios, methods and Operating Plans every 24 months is of no use. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months. Seasonal assessment results should be provided no later than 30 days prior to the start of the season, and operating plans should not be included.

The ERA process submission to the RC should require resubmission after any revision is made to the process. The current proposal allows an entity to submit its plan to the RC, then if they update their document, it doesn't have to be resubmitted until the next 24-month submittal. Other NERC Standards require entities to submit revised processes within 30 or 60 days of any update.

R9: The lead in sentence of R9 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider: "The Reliability Coordinator, within 60 days of receipt of the information identified in Requirement R9, shall:"

R10: The lead in sentence of R10 is written passively and should be revised to follow good standard writing structure. The responsible entity should be stated first, then the actions or requirement should follow. The Drafting Team should consider: "The Balancing Authority shall address any reliability risks identified by its Reliability Coordinator and resubmit updated information within the schedule specified by the Reliability Coordinator.

R11: It is not clear why the Drafting Team elected to put a follow-on requirement to R1 so low in the list of requirements. R11 should be combined with R2 or R3 as a performance requirement the R1 requirement. Alternatively, R11 could be moved up to R3, and renumbering the current requirements R3 through R13.

R12: R12 is not needed, since BAL-007 requirements require short-term assessments and operating plans, which would address and override any plans made over 6 months out in a seasonal ERA.

R13: R13 is confusing, since it is requiring 7 days of notice of the implementation of an operating plan that would most likely be implemented in, or very close to, real-time. Fundamentally, operation plans from seasonal studies will be overridden by BAL-007 operating plans in the near-term.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

There is an incomplete framework for R4. Need a more defined way of obtaining data from the Generator Operators as described in our response to Question 13.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEl does not oppose the changes made to Requirements R4, R5, R6, R7, R8, R10, R11 and R12 but we do have concerns with the proposed changes to R2, R3, R9 and R13.

Requirement R2 Concerns: EEI does not support language contained in subpart 2.3 because the BA should have sole authority to determine what constitutes “other scenarios with a credible risk”. We additionally do not agree that it is necessary to include “or historical” within subpart 2.3 because the BA already has awareness of historical risks within their BA region and those risks factor into their assessment of what is a credible risk. To address our concerns, we offer the following changes to Requirement R2, subpart 2.3 (in boldface):

2.3. Other Scenarios with a credible risk of occurring **as determined by the BA.**

Requirement R3 Concerns: While EEI appreciates the intent of the proposed language to minimize forecasted Energy Emergencies, the proposed language provides no clarity regarding this process. To address this concern, including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies is needed. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R3: Each Balancing Authority shall document and maintain one or more Operating Plan(s) as identified in the seasonal ERA **that include** provisions for notifying the Reliability Coordinator of a forecasted Energy Emergency and the Operating Plan(s), **when deemed necessary.** [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

Requirement R9 Concerns: EEI notes that Requirement R9 cites certain RC actions related to Requirement R8. Requirement R8 is an administrative Requirement that simply obligates the BA to supply their seasonal ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. Under Requirement R9 the RC is obligated to review the R8 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days and therefore is administrative activity and should not have a VRF higher than Low.

Requirement R13 Concerns: EEI does not support the proposed language of Requirement R13 because of the following concerns:

1. For a seasonal forecasted Energy Emergency, obligating the RC to respond within 7 days when a seasonal forecasted Energy Emergency is unlikely to ever represent an imminent emergency is unjustified. EEI suggests 30 days as a more appropriate and reasonable timeframe.
2. Not all forecasted seasonal EEA need to be circulated. The RC needs to review the forecasted EEA and determine if it is credible. If not, they should return it to the BA with questions before circulating it to other BAs within their footprint and neighboring RCs.
3. EEI does not support a medium VRF for forecasted seasonal EEA given a seasonal Forecasted EEA does not have the same level of urgency as a seasonal forecasted EEA.

R13. Each Reliability Coordinator, **who receives notification of a forecasted seasonal Energy Emergency, pursuant to Requirement R3 that includes an implemented Operating Plan pursuant to Requirement R8 and evaluated as credible by the Reliability Coordinator; shall** within **thirty (30)** calendar days of receiving the notification notify other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators of the forecasted condition(s) and the Balancing Authority’s Operating Plan(s). **If the RC determines the forecasted seasonal Energy Emergency is not credible or they have questions, they shall transmit their concerns to the responsible BA for further review & discussion.** [Violation Risk Factor: Low] [Time Horizon: Operations Planning]

Likes	0
Dislikes	0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer	No
Document Name	
Comment	
<p>Puget Sound Energy agrees with WPP's response to this question, shown below.</p> <p><i>R2: In general, R2 is vague and ambiguous. It amounts to a fill-in-the-blank standard which puts entities in a position where they will be held accountable for their own practices. This incentivizes companies to meet minimum criteria to not risk potential non-compliance. Entities exceeding expectations will be rewarded with additional compliance risk. R2 has no performance measurements associated and no minimum level of performance. NERC Standards should be performance based, not administrative. Documentation of Scenarios, methods, and the rationales will result in subjective enforcement and issues related to quality. Entities will be exposed to compliance risk for administrative mistakes and errata errors, rather than poor performance that can put the BES in risk. The drafting team is encouraged to consider what a minimal acceptable performance should be for seasonal ERAs.</i></p> <p><i>The Drafting Team utilizes the term "credible" several times. Credible is a subjective term and what is credible to one entity (or auditor), may not be credible to another. This leaves the entity in a very difficult situation when being audited against R2.</i></p> <p><i>R3: R3 requires the BA to document and maintain one or more Operating Plans to minimize forecasted Energy Emergencies identified through the ERA, but they are not required to implement plans when an Energy Emergency is identified. BAs maintain Operating Plans under TOP-002, and it is not clear if these can be the same or different Operating Plans identified in TOP-002. TOP-002 deals with next-day operations and it is confusing if the proposed BAL-008 Operating Plans are superseded by next day or real-time Operation Plans.</i></p> <p><i>R3 uses the phrase "...minimize forecasted Energy Emergencies..." the term "minimize" is subjective and not measurable. Though the intent of the drafting team seems clear, enforcement it will be up to the auditor to determine if the entity is effectively minimizing identified Energy Emergencies.</i></p> <p><i>The measures in both R2 and R3 give little guidance to an entity, or the auditor, as to what evidence is sufficient. The two requirements are administrative and require documents for compliance, but do not set a minimum criterion for performance. This encourages minimal compliance, and not acceptable levels of performance.</i></p> <p><i>R4: R4 properly identifies a performance-based criteria.</i></p> <p><i>R5: R5 properly identifies a performance-based criteria.</i></p> <p><i>R6: R6 is properly worded and is performance-based.</i></p>	

R7 requires the entity to review and update its seasonal ERA process “if needed”. This puts a burden on the entity to prove when and updated is warranted. During enforcement, if a document is not updated regularly, the auditor will assume it is not being maintained properly. Entities will have to explain why there was no need to update the documentation. Auditors will default to looking for errata errors in the documentation. This leads to zero defect compliance practices that NERC has been trying to distance itself from with better written standards.

R8: In R8 the entities are asked to “...provide [their] seasonal ERA process, Scenarios or methods, and Operating Plans(s)... to the RC at least once every 24 Calendar Months, on a mutually agreed schedule.” R1 and R2 require the BAs to develop a seasonal ERA process and Scenarios, and R3 requires the entity to create Operating Plans based on the ERA process. The Operating Plans are done each season identified by the individual BA. This makes the product from R3 only relevant to the season it is looking at. Requiring entities to provide the “...Scenarios or methods, and Operating Plans...” at least once every 24 calendar months is confusing and provides no benefit since the Scenarios and operating plans will be stale. The submission of the ERA process under R1 makes sense, since it is supposedly reviewed and updated in that period; but providing Scenarios, methods and Operating Plans every 24 months is of no use. It is recommended that ONLY the updated ERA process be submitted to the RC every 24 calendar months. Seasonal assessment results should be provided no later than 30 days prior to the start of the season, and operating plans should not be included.

The ERA process submission to the RC should require resubmission after any revision is made to the process. The current proposal allows an entity to submit its plan to the RC, then if they update their document, it doesn't have to be resubmitted until the next 24-month submittal. Other NERC Standards require entities to submit revised processes within 30 or 60 days of any update.

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R13: R13 is confusing, since it is requiring 7 days of notice of the implementation of an operating plan that would most likely be implemented in, or very close to, real-time. Fundamentally, operation plans from seasonal studies will be overridden by BAL-007 operating plans in the near-term.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer No

Document Name

Comment

Seminole agrees with FRCC's comments below

R2:

The FRCC believes that R2 is too vague, especially the "Credible" term, will in turn, promote BAs to create their own standard to be audited against. This situation will have the opposite effect of what is intended. The focus will be on compliance and not on actual Resource Adequacy. Also, the BAs will have to account for compliance risks due to administrative errors, not for inadequate performance that creates a real risk to the BES. The FRCC suggests the drafting team define what the minimal acceptable performance level should be for these assessments and define what "Credible" is intended to address.

R3:

The FRCC acknowledges the intent of the proposed language to minimize forecasted Energy Emergencies, but still has concerns that the proposed language provides no improved clarity regarding this process. The FRCC suggests including language that makes it clear that the BA has sole discretion regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R9:

The FRCC agrees with and supports the Edison Electric Institute (EEI) severity risk comments on R9:
Requirement R9 Concerns: EEI notes that Requirement R9 cites certain RC actions related to Requirement R8. Requirement R8 is an administrative Requirement that simply obligates the BA to supply their seasonal ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. Under Requirement R9 the RC is obligated to review the R8 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days and therefore is administrative activity and should not have a VRF higher than Low.

R13:

The FRCC has the following concerns with the proposed language of Requirement R13:
1. It is extremely unlikely that there would ever be a scenario where, due to a forecasted Energy Emergency from a seasonal forecast where it would be necessary for the RC to respond within 7 days to mitigate the imminent emergency. The FRCC suggests 30 days as a more realistic and appropriate timeframe.
2. The FRCC believes that the seasonal ERAs should be reviewed and verified to be accurate. Should the RC not agree with the results of the seasonal ERA, it should be returned to the respective BA for revision. The RC should only publish and/or communicate the results to the BAs within its reliability area and adjacent Reliability Coordinators when this review and approval is complete.
3. The FRCC agrees with and supports EEI's severity risk comments on R13.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer No

Document Name

Comment	
FMPC supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>APS agrees with some of the proposed BAL-008 requirements but not all.</p> <p>Regarding R4, as it relates to Balancing Authority data specifications, how do entities obligate third-party merchants that may not be required to comply with NERC Standards to provide data to Balancing Authorities?</p> <p>Regarding R10, what is the metric for reliability risks identified by the RC? If Balancing Authorities are defining the risks or conditions within each seasonal period, R10 appears to require Balancing Authorities to comply with the reliability risks identified by its Reliability Coordinator which are not explicitly defined in the requirement. More definition is warranted on how a Reliability Coordinator defines reliability risk and when. If it is intended to be predefined from other standards, it is recommended to explicitly call out the energy reliability risks within this requirement.</p> <p>Regarding R12, APS is of the opinion that R12 reaches beyond the seasonal time period scope. If Balancing Authorities are provided the flexibility to define the circumstances, risks, or conditions within each seasonal period, it appears the forecasted EEA1 circumstances as defined in EOP-011 Attachment 1 Section B identified in R12 must be included in R1 as it is not included or defined. APS is of the opinion that R12 is duplicative of efforts already performed within EOP-011 R2.</p> <p>Regarding R13, APS agrees with the following EEI comments:</p> <p>Requirement R13 Concerns: EEI does not support the proposed language of Requirement R13 because of the following concerns:</p> <ol style="list-style-type: none"> For a seasonal forecasted Energy Emergency, obligating the RC to respond within 7 days when a seasonal forecasted Energy Emergency is unlikely to ever represent an imminent emergency is unjustified. EEI suggests 30 days as a more appropriate and reasonable timeframe. 	
Likes	0
Dislikes	0
Response	
Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance	
Answer	No
Document Name	

Comment

(footnote: SPP is a party to these comments however does not support the references about duplication with EOP-011 requirements. SPP supports the need for reporting ERA results in BAL-007 however there is lack of clarity between the BAL-007 and EOP-011 obligations.)

The framework in R4 – R6 is incomplete. Specifically, it also needs to address data acquisition from Generator Operators as described in the SRC’s response to Question 13.

Requirements R3, R7 – R10, and R12 – R13 are unnecessarily duplicative of EOP-011, IRO-014, and TOP-002 in same manner as BAL-007 R3 - R7, R9, and R10, as discussed in more detail in the SRC’s responses to questions 3, 5, and 8. These requirements should either be removed or, if retained, modified consistent with the SRC’s responses to questions 3, 5, and 8.

The SRC particularly requests that the SDT clarify in Part 9.1 that coordination with other BAs is specific to BAs within the RC Area and remove the unnecessary reference to ERA information, and proposes that Part 9.1 be revised to read as follows:

R9.1. Review each submittal for coordination with other Balancing Authorities in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

No

Document Name

Comment

R2:
The FRCC believes that R2 is too vague, especially the “Credible” term, will in turn, promote BAs to create their own standard to be audited against. This situation will have the opposite effect of

what is intended. The focus will be on compliance and not on actual Resource Adequacy. Also, the BAs will have to account for compliance risks due to administrative errors, not for inadequate performance that creates a real risk to the BES. The FRCC suggests the drafting team define what the minimal acceptable performance level should be for these assessments and define what “Credible” is intended to address.

R3:

The FRCC acknowledges the intent of the proposed language to minimize forecasted Energy Emergencies, but still has concerns that the proposed language provides no improved clarity regarding this process. The FRCC suggests including language that makes it clear that the BA has **sole discretion** regarding when it is necessary to notify the RC of forecasted Energy Emergencies. Such discretion would rightly provide due weight to the technical expertise of the BA allowing that functional entity to recognize when there is an imminent risk to the reliability of the BES and when it would be necessary to issue a notification under this Requirement.

R9:

The FRCC agrees with and supports the Edison Electric Institute (EEI) severity risk comments on R9:

Requirement R9 Concerns: EEI notes that Requirement R9 cites certain RC actions related to Requirement R8. Requirement R8 is an administrative Requirement that simply obligates the BA to supply their seasonal ERA process, Scenarios or methods and Operating Plan(s) at least once every 24 months. Under Requirement R9 the RC is obligated to review the R8 materials and notify each BA if revisions are needed to their ERA process, Scenarios or methods and Operating Plan(s) within 60 days and therefore is administrative activity and should not have a VRF higher than Low.

R13:

The FRCC has the following concerns with the proposed language of Requirement R13:

1. It is extremely unlikely that there would ever be a scenario where, due to a forecasted Energy Emergency from a seasonal forecast where it would be necessary for the RC to respond within 7 days to mitigate the imminent emergency. The FRCC suggests 30 days as a more realistic and appropriate timeframe.
2. The FRCC believes that the seasonal ERAs should be reviewed and verified to be accurate. Should the RC not agree with the results of the seasonal ERA, it should be returned to the respective BA for revision. The RC should only publish and/or communicate the results to the BAs within its reliability area and adjacent Reliability Coordinators when this review and approval is complete.
3. The FRCC agrees with and supports EEI's severity risk comments on R13.

Likes 0

Dislikes 0

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD and BANC

Answer

No

Document Name

Comment

SMUD and BANC agree with the comments submitted by the Western Power Pool.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

R4 Proposed revision - Replace "Resource Planners" with "Resource Planner(s)" to align with R5 and proposed R6 revision below. R6 Proposed revision - "Resource Planner(s) receiving a data specification from the Balancing Authority per Requirement R5 shall satisfy the obligations of the documented specifications using:

6.1 A mutually agreeable format;

6.2 A mutually agreeable process for resolving data conflicts; and

6.3 A mutually agreeable data security protocol."

This makes it clear there may be more than one resource planner (as in R5) and also clarifies that the Balancing Authority and Resource Planner(s) must mutually agree on the requirements in 6.1-6.3.

In addition, Resource Planners may not be the appropriate responsible entity for seasonal ERAs for all entities. SRP appreciates the flexibility of creating an operating plan with timelines and scenarios that are appropriate for its BA, more guidance could be helpful to ensure an Operating Plan and associated evidence meets the expectations of the standard.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6**Answer** No**Document Name****Comment**

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response**Dmitriy Bazilyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO****Answer** No**Document Name****Comment**

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response**Chance Back - Muscatine Power and Water - 1,3,5,6****Answer** No**Document Name****Comment**

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response**George E Brown - Pattern Operators LP - 5****Answer** No

Document Name	
Comment	
Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.	
Likes 0	
Dislikes 0	
Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Yes
Document Name	
Comment	

Recommend changing R2.1 to "Forecasted Demand profiles"

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

Yes

Document Name

Comment

The terms 'credible situation', 'credible energy supply Contingency,' and 'credible fuel supply Contingency' are new to this Standard. Consider including clarifications of the meanings of these terms in the Technical Rationale.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

SPP requests the removal of the "on mutually agreed upon schedule" from R8 leaving a set time requirement of at least once every 24 calendar months. Requiring a mutually agreed upon schedule for each entity is administratively burdensome for the documented evidence.

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

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2**Answer****Document Name****Comment**

MISO answers "No." (We had difficulty entering our comments into the SBS.)

The framework in R4 – R6 is incomplete. Specifically, it also needs to address data acquisition from Generator Operators as described in the SRC’s response to Question 13.

Requirements R3, R7 – R10, and R12 – R13 are unnecessarily duplicative of EOP-011, IRO-014, and TOP-002 in same manner as BAL-007 R3 - R7, R9, and R10, as discussed in more detail in our response to questions 3, 5, and 8. These requirements should either be removed or, if retained, modified consistent with the SRC’s responses to questions 3, 5, and 8.

We request the SDT clarify in Part 9.1 that coordination with other BAs is specific to BAs within the RC Area and remove the unnecessary reference to ERA information, and proposes that Part 9.1 be revised to read as follows:

9.1. Review each submittal for coordination with other Balancing Authorities in its Reliability Coordinator Area to avoid risks to Wide Area reliability; and

Likes 0

Dislikes 0

Response**Rachel Coyne - Texas Reliability Entity, Inc. - 10****Answer****Document Name****Comment**

It appears BAL-008-1 Requirement R13 should reference Requirement 12, which refers to the implementation of an Operating Plan(s) based on the circumstances, instead of Requirement R8, which is the periodic submission of BA’s documented seasonal ERA process, Scenarios or methods,

The Requirement R13 Violation Severity Levels table language correctly refers to Requirement R12.

Likes 0

Dislikes 0

Response**Wayne Guttormson - SaskPower - 1****Answer**

Document Name	
Comment	
Support the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Michael Goggin - Grid Strategies LLC - 5	
Answer	
Document Name	
Comment	
<p>R2 appears to allow the BA to account for EITHER "Forecasted or assumed Demand profiles" OR the disruptions to supply listed under 2.2. Given that most if not all recent reliability events have been caused by a combination of a spike in demand coincident with a failure of generation supply, R2 should require the BA to model a scenario in which both demand is high and generation supply experiences outages.</p> <p>The modeling of generation supply outages should be based on the most severe historical supply disruptions the BA has experienced, which for most BAs is a correlated loss of gas generation.</p>	
Likes 0	
Dislikes 0	
Response	

12. BAL-008-1 Seasonal ERAs: The SDT drafted the BAL-008-1 implementation plan to allow for 18 months for Requirements R1 through R6 and 24 months for Requirements R7- R13 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.

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer No

Document Name

Comment

SPP has concerns about implementing at the same time as BAL-007 and would request a staggered implementation plan between the BAL-007 and BAL-008 standards.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer No

Document Name

Comment

The FRCC does not support an 18-month implementation period for Requirements R1 through R3. The resulting burden of work associated with changing internal processes, developing credible scenarios and operating plans will be very time consuming. The FRCC recommends an implementation period of **at least** 24 months for all requirements.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

As noted in the SRC's response to Question 13, the plan is incomplete without a commensurate update and Implementation Plan for TOP-003 that takes place prior to the implementation timeline for BAL-008. Additionally, as noted in the SRC's response to question 6, the resources and expertise needed to implement BAL-008 (particularly if ERAs are going to be automated) may already be engaged on other long-term projects that will need to be completed before being available to address BAL-008 implementation. Consequently, while the SRC appreciates the updates to the implementation plan, the SRC requests that the implementation plan be further revised to allow 36 months for the implementation of all Requirements.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer

No

Document Name

Comment

APS agrees with the following EEI comments:

EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow 24 months for all of the requirements.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer

No

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer

No

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC does not support an 18-month implementation period for Requirements R1 through R3. The resulting burden of work associated with changing internal processes, developing credible scenarios and operating plans will be very time consuming. The FRCC recommends an implementation period of at least 24 months for all requirements.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

Puget Sound Energy agrees with WPP's response to this question, shown below.

The timeline proposed states that the entities have 18 months to comply to R1 through R6. The problem is that under R1 the seasonal ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R6 compliance. Stepping through this process results in a significant delay in implementation of R2 through R6. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-008. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, The other requirements can be implemented by 18 months after the effective date, with full implementation of the standards reached within 24 months after the effective date.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEl does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow 24 months for all of the requirements.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

As noted in our response to Question 13, the plan is incomplete without a commensurate update and Implementation Plan for TOP-003 that takes place prior to the implementation timeline for BAL-008.

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer No

Document Name

Comment

USV supports the comments provided by MISO regarding the number of resources required to address BAL-008 implementation.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

PSE agrees with WPP's response to this question, shown below.

The timeline proposed states that the entities have 18 months to comply to R1 through R6. The problem is that under R1 the seasonal ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R6 compliance. Stepping through this process results in a significant delay in implementation of R2 through R6. If the process is followed as the

implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-008. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, The other requirements can be implemented by 18 months after the effective date, with full implementation of the standards reached within 24 months after the effective date.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

No

Document Name

Comment

Supporting EEl comments.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Energy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 12

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer

No

Document Name

Comment

The plan is incomplete without an update and implementation Plan for TOP-003 that takes place prior to the implementation timeline for BAL-008.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

WECC believes clarity is needed as the Implementation Plan as it states that BAL-008-1 will be “effective on the first day of the first calendar quarter that is 18 months after the effective date of the applicable governmental authority’s order approving the standard.” Then, for phased-in Compliance Date there is language for R1, R2, R3, R4, R5 and R6 that states entities have 18 months after the effective date of the Standard in essence allowing 36 months after the effective date for entities to be compliant. Other Requirements also have the “following the effective date” with 24 month additional time period. Please draw a timeline of expected implementation so that all parties, including FERC, are in clear understanding of when Requirements actually become auditable and enforceable. As is, the first 18 months, as written, is not an effective time period as nothing changes in terms of efforts. Drawing a timeline associated with effective implementation dates should be part of the Standards process.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

No

Document Name

Comment

The timeline proposed states that the entities have 18 months to comply to R1 through R6. The problem is that under R1 the seasonal ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R6 compliance. Stepping through this process results in a significant delay in implementation of R2 through R6. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-008. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, The other requirements can be implemented by 18 months after the effective date, with full implementation of the standards reached within 24 months after the effective date.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer No

Document Name

Comment

TEPC agrees with EEI's comments - EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow for 24 months for all of the requirements.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response. CHPD, suggests another acceptable implementation timeline is to have a version initially submitted by the effective date, and an approved version within six months of implementation.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Please see BPA's full response in question 15.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1,3, Group Name Eversource

Answer No

Document Name

Comment

Eversource supports the comments of EEI.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6**Answer** No**Document Name****Comment**

Black Hills Corporation agrees with EEI's comments. EEI does not support 18 months for Requirements R1 through R3. The work associated with changing internal processes, developing credible scenarios and operating plans will be time consuming. To address this concern, the implementation plan should allow 24 months for all of the requirements.

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer** No**Document Name****Comment**

PNM supports a 24-month implementation timeline for all BAL-008-1 requirements.

Likes 0

Dislikes 0

Response**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5****Answer** No**Document Name****Comment**

For the reasons outlined in our response to the Questions above, BC Hydro is unable to support the proposed implementation plan at this time.

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group**

Answer	No
Document Name	
Comment	
WEC Energy Group supports the comments submitted by EEI.	
Likes 0	
Dislikes 0	
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	No
Document Name	
Comment	
DTE supports MISO's feedback	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	No
Document Name	
Comment	
As noted in our response to Question 13, the plan is incomplete without a commensurate update and Implementation Plan for TOP-003 that takes place prior to the implementation timeline for BAL-008.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	

Comment

Duke Energy supports proposed EEI language modifications for Question 12.

Likes 0

Dislikes 0

Response**Reed Adam - Seattle City Light - 1,3,5,6 - WECC**

Answer

No

Document Name

Comment

The timeline proposed states that the entities have 18 months to comply to R1 through R6. The problem is that under R1 the seasonal ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R6 compliance. Stepping through this process results in a significant delay in implementation of R2 through R6. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-008. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, The other requirements can be implemented by 18 months after the effective date, with full implementation of the standards reached within 24 months after the effective date.

Likes 0

Dislikes 0

Response**Michael Jang - Seattle City Light - 1,3,4,5,6**

Answer

No

Document Name

Comment

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6**Answer** No**Document Name****Comment**

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response**Chris Shultz - Seattle City Light - 1,3,4,5,6****Answer** No**Document Name****Comment**

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response**Sean Steffensen - IDACORP - Idaho Power Company - 1****Answer** No**Document Name****Comment**

Idaho Power agrees with WPP's response to this question, shown below.

The timeline proposed states that the entities have 18 months to comply to R1 through R6. The problem is that under R1 the seasonal ERA process must be sent to the RC for review. If the RC is sent the ERA process for review at the end of the 18-month period, the RC then has 60 days to review, and can send the process back to the entity for correction. The entity can take another 60 days to correct and resubmit the process to the RC. Finally, the RC has an additional 60 days to review and accept the modified process. Once the plan is accepted by the RC, the entity can begin to meet R2 and R6 compliance. Stepping through this process results in a significant delay in implementation of R2 through R6. If the process is followed as the implementation plan suggests, entities run the risk of creating the ERA process, developing Scenarios and operating plans, that will all have to be redone due to a problem that the RC finds with their ERA process.

The Drafting Team should consider adjusting the implementation of BAL-008. Perhaps it is more appropriate to require implementation of R1 by 12 months after the effective date of the standard, The other requirements can be implemented by 18 months after the effective date, with full implementation of the standards reached within 24 months after the effective date.

Likes 0

Dislikes 0

Response

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

For the same reason in BAL-007 R4, ISO-NE recommends moving BAL-008 R7 to the 18 month effective date.

ISO-NE would support a change to 36 months Implementation timeframe for all requirements.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

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 EEI comments and agrees with EEI that 24 months is a more reasonable implementation timeframe.

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 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

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1,3****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**Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO answers "No." (We had difficulty entering our comments into the SBS.)

As noted in MISO's response to Question 13, the plan is incomplete without a commensurate update and Implementation Plan for TOP-003 that takes place prior to the implementation timeline for BAL-008. Additionally, as noted in MISO's response to question 6, the resources and expertise needed to implement BAL-008 (particularly if ERAs are going to be automated) may already be engaged on other long-term projects that will need to be completed before being available to address BAL-008 implementation. Consequently, while MISO appreciates the updates to the implementation plan, MISO requests that the implementation plan be further revised to allow 36 months for the implementation of all Requirements.

Likes 0

Dislikes 0

Response

13. BAL-008-1 Seasonal ERAs: The SDT believes that fuel data information needed to address BAL-008-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer No

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-008 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners, or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer No

Document Name

Comment

I agree with the comments provided by Western Power Pool.

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1,3,4,5,6

Answer

No

Document Name

Comment

SCL is in support and alignmnet with WPP's & Idaho's submitted comments.

Likes 0

Dislikes 0

Response

Reed Adam - Seattle City Light - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-008 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners, or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

No

Document Name

Comment

Past experience clearly indicates a change to TOP-003 is necessary to enable BAs to collect the necessary information regarding “fuel supply and inventory concerns” year-round (to the extent this information is even available from NERC-registered entities).

- TOP-003-5 does not extend to information needed to perform ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments” (items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003-5, R2 is likewise limited to information needed for TOP-002 and TOP-001 only.
- In addition, TOP-003 was recently updated to specifically address information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07 (See TOP-003-5 and TOP-0003-6.1, Part 2.3.1.2). This indicates that TOP-003 does not address fuel-related information that would be needed to implement BAL-008.

The modifications to TOP-003 to mandate the provision of “fuel supply and inventory concerns,” only require this information to be provided during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round if BAL-008 persists in its current form.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

Comment

Past practice indicates a change to TOP-003 is necessary to collect “fuel supply and inventory concerns” information year-round.

· TOP-003-5 is unclear as to what information must be provided by entities in support of ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.” (Items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003, R2 likewise is limited in support of TOP-002 and TOP-001 only. TOP-003 does not include the collection of data necessary to perform seasonal ERAs (more akin to planning studies).

· In addition, if fuel data needed by BAs to address BAL-008 is covered under TOP-003, why then was TOP-003 updated to specifically require information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07? (See TOP-003-5 and TOP-0003-6.1, Part 2.3.1.2)

Both Cold Weather projects modified TOP-003 to mandate the provision of “fuel supply and inventory concerns,” so that it only applies during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer No

Document Name

Comment

TOP-003 is covers data needs specific to OPA, RTA and RTM and may not provide sufficient authority for the BA to request specific data necessary for ERAs. BC Hydro suggests that a revision to the current TOP-003 or a new ERA-specific Requirement would be necessary prior to implementing BAL-008-1.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

This could potentially put the BA at odds with the GO and GOP as to the applicability of TOP-003. TOP-003 today is only used for data in the near real time horizon and the GO or GOP could argue that the data required for these studies is beyond the scope of TOP-003. While the BAs could attempt to use TOP-003 for this data acquisition, it would be better to include the requirement to supply the data needed in the standard.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**Answer** No**Document Name****Comment**

Please see BPA's full response in question 15.

Likes 0

Dislikes 0

Response**Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group****Answer** No**Document Name****Comment**

CHPD supports WPP's response

Likes 0

Dislikes 0

Response**Kevin Conway - Western Power Pool - 4****Answer** No**Document Name****Comment**

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-008 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners, or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1,6

Answer	No
Document Name	
Comment	
Current practice clearly indicates that a change to TOP-003 is necessary to collect "fuel supply and inventory concerns" information year-round.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	No
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 13	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power endorses the comments provided by the Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper	
Answer	No
Document Name	

Comment

It will likely be a problem getting fuel information from entities that are not Registered Entities as they are not required to comply with the NERC Reliability Standards.

Likes 0

Dislikes 0

Response**Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6****Answer**

No

Document Name**Comment**

PSE agrees with WPP's response to this question, shown below.

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-008 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners, or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response**Carver Powers - Utility Services, Inc. - 4****Answer**

No

Document Name**Comment**

Same response as question 7: TOP-003 enables the BA's to collect the necessary information, but it does not clearly specify the data necessary for ERAs, which are more akin to planning studies. USV supports the additional comments and suggestions provided by MISO.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Past practice indicates a change to TOP-003 is necessary to collect “fuel supply and inventory concerns” information year-round.

{C}· TOP-003-5 is unclear as to what information must be provided by entities in support of ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.” (Items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003, R2 likewise is limited in support of TOP-002 and TOP-001 only. TOP-003 does not include the collection of data necessary to perform seasonal ERAs (more akin to planning studies).

{C}· In addition, if fuel data needed by BAs to address BAL-008 is covered under TOP-003, why then was TOP-003 updated to specifically require information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07? (See **TOP-003-5** and **TOP-0003-6.1, Part 2.3.1.2**)

Both Cold Weather projects modified TOP-003 to mandate the provision of “fuel supply and inventory concerns,” so that it only applies during local forecasted Cold Weather conditions. Therefore, **a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round.**

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer No

Document Name

Comment

Puget Sound Energy agrees with WPP’s response to this question, shown below.

The BAs can expand their Operational Reliability Data requests through TOP-003, however this could further slow the implementation of proposed standard BAL-008 due to the time needed to notify the entities, and for them to turn the information around back to the BA before the ERA process can begin.

Fuel information from entities not listed in TOP-003 can be problematic. This includes natural gas suppliers, and entities not registered as users, owners, or operators of the BES, not under the purview of the BA or who have contracts specifically limiting access to market sensitive information.

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer No

Document Name

Comment

TOP-003-5 does not cover the data requirements for ERA and we believe this could lead to issues with enforcing the standard. Two possible options for addressing this are 1) modify TOP-003-5 to include data requirements for ERA or 2) add a requirement to BAL-008-1 to address this data requirement.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

Past experience clearly indicates a change to TOP-003 is necessary to enable BAs to collect the necessary information regarding “fuel supply and inventory concerns” year-round (to the extent this information is even available from NERC-registered entities).

• TOP-003-5 does not extend to information needed to perform ERAs. Requirement R1 is limited to “Operational Planning Analyses, Real-time monitoring, and Real-time Assessments” (items required in support of TOP-002 and TOP-001 only). When viewed in conjunction with R2, a case could be made that TOP-003-5, R2 is likewise limited to information needed for TOP-002 and TOP-001 only.

• In addition, TOP-003 was recently updated to specifically address information regarding “fuel supply and inventory concerns” under cold weather conditions pursuant to Project 2019-06 and further expanded under Project 2021-07 (See TOP-003-5 and TOP-0003-6.1, Part 2.3.1.2). This indicates that TOP-003 does not address fuel-related information that would be needed to implement BAL-008.

The modifications to TOP-003 to mandate the provision of “fuel supply and inventory concerns,” only require this information to be provided during local forecasted Cold Weather conditions. Therefore, a change to TOP-003 would be required to mandate the provision of “fuel supply and inventory concerns” year-round if BAL-008 persists in its current form.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer	Yes
Document Name	
Comment	
WEC Energy Group supports the comments submitted by EEI and agrees that TOP-003 provides an appropriate mechanism for gathering needed fuel data in support of BAL-008-1.	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldts - Black Hills Corporation - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Black Hills Corporation already has experience with TOP-003 and feels fuel data information can be achieved by adding it to our data specs.	
Likes 0	
Dislikes 0	
Response	
Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
LG&E & KU agree with comments provided by EEI.	
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 EEI comments.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 5,6**

Answer

Yes

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**

Answer

Yes

Document Name

Comment

TEPC does not agree, The new requirements will require additional staff and change in office configuration to add new desks.

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

Answer

Yes

Document Name

Comment

WECC agrees with the concept that may already be in place for EOP-011 fuel data information required. However, the DT should consider using the same language as EOP-011. Additionally, TOP-003 may be considered limiting in that it is for data used in Operation Planning Analyses, Real-time monitoring, and Real-time Assessments. In this case (seasonal ERA) DT should provide language in the Technical Rationale to indicate a seasonal ERA maybe considered a form of OPA that would cover next day operations so that the definition of OPA is met (and alleviate anyone's concerns regarding use of TOP-003). May require an adjustment to TOP-003 to accommodate the seasonal aspect.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer

Yes

Document Name

Comment

Supporting EEI comments.

Likes 0

Dislikes 0

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

Under TOP-003 R2 the "Each BA shall maintain a documented specification for the data necessary for it to perform its **analysis function** and real-time monitoring", with an Operations Planning time horizon.

ISO-NE believes that TOP-003 R2 satisfies the data collection requirements of BAL-008 and no additional data collection requirement wholly contained in BAL-008 or a modification of TOP-003 R2 is required.

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
EEI agrees that TOP-003 provides an appropriate mechanism for gathering needed fuel data in support of BAL-008-1.	
Likes 0	
Dislikes 0	
Response	
Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Seminole agrees with FRCC's comments below	
The FRCC agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.	
Likes 0	
Dislikes 0	
Response	
LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)	
Answer	Yes
Document Name	
Comment	
FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes

Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8	
Answer	Yes
Document Name	
Comment	
The FRCC agrees that TOP-003 provides the mechanism needed by BAs to request fuel data information.	
Likes 0	
Dislikes 0	
Response	
Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
See comments submitted by the Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

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

Daniel Gacek - Exelon - 1,3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC

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

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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Constantin Chitescu - Ontario Power Generation Inc. - 5

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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Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer	Yes
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Document Name	
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Comment	
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Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

14. BAL-008-1 Seasonal ERAs: The SDT proposes that the newly proposed BAL-008-1 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.

George E Brown - Pattern Operators LP - 5

Answer No

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer No

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer No

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer No

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer No

Document Name

Comment

The FRCC does not have and does not have any means to conduct an analysis or study determining that this proposal is cost-effective, and therefore does not support this statement. As previously noted in the BAL-007 comments, this proposed standard will most likely lead to an increase in staffing and administrative costs for all BAs and the RC function.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer No

Document Name

Comment

It is unclear why this activity cannot be accomplished under NERC's existing Reliability Assessment Committee (RAS) in a voluntary and collaborative fashion, as the RAS currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter Assessments currently performed under this umbrella.

Consideration should also be given to how migrating this activity to a mandatory standard will harm the openness and sharing that is currently done both within and outside the group with interested stakeholders, including state regulators that have authority over matters of resource adequacy.

From an overall Standards Efficiency Review perspective, the latter 2/3 of BAL-008 (R5-R13) introduce unnecessary bureaucracy and new administrative requirements in comparison to the first 1/3 of BAL-008 (R1-R4), which seems to focus more on attempting to produce reliability results. Additionally, as detailed elsewhere in the SRC's comments, BAL-008 is currently substantively duplicative of EOP-011, TOP-002, and IRO-014 while simultaneously imposing additional administrative burdens that do not enhance system reliability. In addition, the standard presumes that BAs have access to fuel-related information that they do not possess and currently have no cost-effective method of obtaining. Removing the duplication and fully addressing the information access issues are necessary prerequisites to meeting the Standards Authorization Request in a cost-effective manner.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

APS is in the opinion that implementation of BAL-008-1 would not meet the SAR in a cost effective manner as it creates an administrative burden for entities to either replace or revise existing processes that work well and may create a need for additional staffing to manage continuous seasonal ERAs.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPPA)

Answer No

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response**Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6**

Answer

No

Document Name

Comment

Seminole agrees with FRCC's comments below

The FRCC does not have and does not have any means to conduct an analysis or study determining that this proposal is cost-effective, and therefore does not support this statement.

As previously noted in the BAL-007 comments, this proposed standard will most likely lead to an increase in staffing and administrative costs for all BAs and the RC function.

Likes 0

Dislikes 0

Response**Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6**

Answer

No

Document Name

Comment

: Puget Sound Energy agrees with WPP's response to this question, shown below.

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this questions was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-008 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

No

Document Name

Comment

It is unclear why this activity cannot be accomplished under NERC's existing [Reliability Assessment Committee \(RAS\)](#) in a voluntary and collaborative fashion as the RAS currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter Assessments currently performed under this umbrella.

Consideration should also be given to how migrating this activity to a mandatory standard will impact the openness and sharing that is currently done both *within* and *outside* the group with interested stakeholders, including state regulators having purview over matters of resource adequacy.

From an overall Standards Efficiency Review perspective, the latter 2/3 of BAL-008 (R5-R13) introduce a lot of bureaucracy and new administrative requirements in comparison to 1/3 of BAL-008 (R1-R4) which focuses on producing "reliability results."

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6

Answer

No

Document Name

Comment

PSE agrees with WPP's response to this question, shown below.

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this questions was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-008 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response

Vicky Budreau - Santee Cooper - 1,3,5,6, Group Name Santee Cooper

Answer

No

Document Name

Comment

Implementation of this standard will not be cost effective because the additional study work that will be required will likely require additional personnel.

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

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 14

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer No

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer No

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this questions was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-008 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer No

Document Name

Comment

CHPD supports WPP's response. It would be helpful to pool resources for seasonal planning purposes.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

BAs who would benefit from these types of studies are most likely already doing something similar to what is defined in this standard. They will likely only need to change their process to match the standard which will not be a significant expense. For other BAs, such as very small BAs and

generation only BAs, for example, who are not currently performing similar studies, acquiring the tools needed and hiring staff with the expertise to perform the studies will incur expenses far beyond any benefits they might realize from this process.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

No

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

No

Document Name

Comment

It is unclear why this activity cannot be accomplished under NERC's existing [Reliability Assessment Committee \(RAS\)](#) in a voluntary and collaborative fashion as the RAS currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter Assessments currently performed under this umbrella.

Consideration should also be given to how migrating this activity to a mandatory standard will impact the openness and sharing that is currently done both within and outside the group with interested stakeholders, including state regulators having purview over matters of resource adequacy.

From an overall Standards Efficiency Review perspective, the latter 2/3 of BAL-008 (R5-R13) introduce a lot of bureaucracy and new administrative requirements in comparison to 1/3 of BAL-008 (R1-R4) which focuses on producing "reliability results."

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer	No
Document Name	
Comment	
<p>MISO supports the comments of the SRC and MRO NSRF.</p> <p>It is unclear why this activity cannot be accomplished under NERC's existing Reliability Assessment Committee (RAS) in a voluntary and collaborative fashion, as the RAS currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter Assessments currently performed under this umbrella.</p> <p>Consideration should also be given to how migrating this activity to a mandatory standard will harm the openness and sharing that is currently done both <i>within</i> and <i>outside</i> the group with interested stakeholders, including state regulators that have authority over matters of resource adequacy.</p> <p>From an overall Standards Efficiency Review perspective, the latter 2/3 of BAL-008 (R5-R13) introduce unnecessary bureaucracy and new administrative requirements in comparison to the first 1/3 of BAL-008 (R1-R4), which seems to focus more on attempting to produce reliability results. Additionally, as detailed elsewhere in our comments, BAL-008 is currently substantively duplicative of EOP-011, TOP-002, and IRO-014 while simultaneously imposing additional administrative burdens that do not enhance system reliability. In addition, the standard presumes that BAs have access to fuel-related information that they do not possess and currently have no cost-effective method of obtaining. Removing the duplication and fully addressing the information access issues are necessary prerequisites to meeting the Standards Authorization Request in a cost-effective manner.</p>	
Likes	0
Dislikes	0
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
<p>We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this questions was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.</p> <p>BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-</p>	
Likes	0
Dislikes	0
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	

Answer	No
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Daren Brubaker - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Chris Shultz - Seattle City Light - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
Seattle City Light agrees with WPP Submitted Comment.	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	

Comment

Idaho Power agrees with WPP's response to this question, shown below.

We are not aware of any analysis or study determining that this proposal is cost-effective, and therefore do not support this statement. Since the proposed standard requires the BA to be responsible to meet the ERA studies, it will most likely require the hiring of specialized skill sets that are not currently on staff. This can have a significant cost impact to BAs when the resource adequacy analyses are shifted from the Resource Planners to the BAs. The cost/benefit has not been articulated by the Drafting Team, and when this questions was asked during a Drafting Team workshop, the Drafting Team admitted there was no analysis for cost effectiveness.

BAs, if given the opportunity, will try and pool their resources and create Emergency Energy Plans and form Resource Adequacy Pools. The current proposed BAL-008 does not provide the ability to do that and will therefore be a burden on many BAs.

Likes 0

Dislikes 0

Response**Ben Hammer - Western Area Power Administration - 1,6**

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response**Keith Jonassen - ISO New England, Inc. - 2 - NPCC**

Answer

Yes

Document Name

Comment

No Additional Comments

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 5,6**

Answer	Yes
Document Name	
Comment	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes 0	
Dislikes 0	
Response	
Greg Sorenson - ReliabilityFirst - 10 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No comment on cost-effectiveness.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

Document Name

Comment

TEPC agrees with EEI's comments -

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

LG&E & KU agree with comments provided by EEI.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6

Answer

Document Name

Comment

Black Hills Corporation will not comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Document Name

Comment

PNM does not have a comment or answer to this question at this time.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy's vision is a highly reliable and secure bulk power system and will therefore not comment on cost-effectiveness.

Likes 0

Dislikes 0

Response

15. BAL-008-1 Seasonal ERAs: Provide any BAL-008-1 additional comments for the SDT to consider, if desired.

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer

Document Name

Comment

Idaho Power agrees with WPP's response to this question, shown below.

In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces a lot of administrative processes. It introduces a lot of compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.

The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.

RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. RCs who oversee large numbers of BAs, on the other hand, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need to be addressed where there are adjacent BAs and RCs competing for the same resources.

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 1,3,4,5,6

Answer

Document Name

Comment

Seattle City Light agrees with WPP Submitted Comment.

Likes 0

Dislikes 0

Response

Daren Brubaker - Seattle City Light - 1,3,4,5,6

Answer	
Document Name	
Comment	
I agree with the comments provided by Western Power Pool.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1,3,4,5,6	
Answer	
Document Name	
Comment	
SCL is in support and alignmnet with WPP's & Idaho's submitted comments.	
Likes 0	
Dislikes 0	
Response	
Reed Adam - Seattle City Light - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
<p>In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces a lot of administrative processes. It introduces a lot of compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.</p> <p>The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.</p> <p>RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. RCs who oversee large numbers of BAs, on the other hand, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need to be addressed where there are adjacent BAs and RCs competing for the same resources.</p>	

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy supports proposed EEI language modifications for Question 15.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO supports the comments of the SRC and MRO NSRF.

While seasonal studies may be valuable, it is unclear why this activity cannot be accomplished by NERC's existing [Reliability Assessment Committee \(RAS\)](#) in a voluntary and collaborative fashion as the RAS, in working with the Regional Entities, currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter studies. Consideration should be given to how migrating this activity to a mandatory standard will harm the openness and sharing that is currently done in these groups.

Until a final decision can be made with respect to how seasonal studies are performed, the SRC supports the move to develop separate standards for seasonal ERAs and near-term ERAs.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

Document Name

Comment

The MRO NSRF is supportive of performing seasonal studies.

That said, it is unclear why this activity cannot be accomplished under NERC's existing [Reliability Assessment Committee \(RAS\)](#) in a voluntary and collaborative fashion as the RAS, in working with the Regional Entities, currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter studies. Consideration should be given to how migrating this activity to a mandatory standard will impact the openness and sharing that is currently done in these groups.

Until a final decision can be made with respect to how seasonal studies are performed, the MRO NSRF supports the move to develop separate standards for seasonal ERAs and near-term ERAs.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

Document Name

Comment

DTE supports MISO's feedback

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5

Answer

Document Name

Comment

1. The first sentence of the Purpose section appears incomplete. "To the risks associated with Energy Emergencies ..." should read "To assess the risks associated with Energy Emergencies..." Also the second sentence provides additional background information that is appropriate for the Technical Rationale rather than the Purpose section of the Standard.

2. The VSL Table for Requirement R1 of BAL-001-8 indicates a Moderate VSL if the BA fails to maintain the ERA Process annually. R1 does not specify a minimum required maintenance interval. BC Hydro recommend reviewing the VSL Table and revising for alignment between Requirements and associated VSLs.

3. The VSL Table for Requirement R13 identifies Severity Levels based on an RC failing to notify starting at the 24-hour mark. Requirement R13 mandates that the RC notifies applicable entities within seven calendar days. BC Hydro recommends that the VSL Table be reviewed and revised as necessary for alignment with the Requirements.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3,4,5,6, Group Name WEC Energy Group

Answer

Document Name

Comment

WEC Energy Group supports the comments submitted by EEI.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Document Name

Comment

PNM supports EEI recommended changes to the BAL-007-1 purpose statement.

Likes 0

Dislikes 0

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

LG&E & KU agree with comments provided by EEI, with the following additional feedback on the wording for consistency:

- Page 3: B (R2) – Change “...vary one or more of the following conditions to stress its System...” to “...vary one or more of the following conditions by a sufficient amount to stress the System...” to match wording in BAL 007-1.
- Page 5: B (R7) – Change “The Balancing Authority...” to “Each Balancing Authority...” to match rest of document wording.
- Page 5: B (M7) – Make the following changes: 1. Add reference to updates to match wording in R7 and reference to Requirements R1 through R3 to match wording in R7; 2. Remove reference to provide to Reliability Coordinator since that is detailed in R8/M8; 3. Add reference to calendar months to match wording in R7. (“Each Balancing Authority shall have evidence that it reviewed and updated its seasonal ERA process, Scenarios or methods, and Operating Plan(s) documented under Requirements R1 through R3 at least once every 24 calendar months, in accordance with Requirement R7.”)
- Page 5: B (M9) – Change “...the review within 60 days of...” to “...the review within 60 calendar days of...” to match wording in R9.
- Page 9: Violation Severity Table (R3) (High Violation) – Change “...maintained Operating Plan(s) but...” to “...maintained Operating Plan(s) to minimize forecasted Energy Emergencies, as identified in the seasonal ERA, but...” to match wording in R3.
- Page 10: Violation Severity Table (R7) (High Violation) – Remove reference to providing to Reliability Coordinator on mutually agreed schedule since that is detailed in R8 and add reference to calendar months to match wording in R7. (“...but failed to update within 24 calendar months.”)
- Page 10: Violation Severity Table (R7) (Severe Violation) – Remove “...to its Reliability Coordinator” since R7 does not reference providing the Reliability Coordinator as that is included in R8. Change “...to review or update...” to “...review and update, if necessary,....” to match wording in R7.
- Page 10: Violation Severity Table (R8) (High Violation) – Change “...but failed to submit to the Reliability Coordinator within 24 months” to “...but failed to submit to the Reliability Coordinator within 24 calendar months” to match wording in R8.
- Page 10: Violation Severity Table (R9) (Severe Violation) – Change “...Reliability Coordinator failed to review the information in Requirement R8 for coordination...” to “...Reliability Coordinator failed to review each submittal for coordination...” match wording in R9 high severity.
- Page 10: Violation Severity Table (R10) (High Violation) – Change “R7” to “R8” to match R10 wording.
- Page 10: Violation Severity Table (R10) (Severe Violation) – Change “R7” to “R8” to match R10 wording.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

To align with NERC's Reliability Principles, BPA believes NERC drafting teams should strive to make reliability standards as clear as possible, especially regarding each responsible entity's authorities and responsibilities. BPA's understanding is that NERC is relying on TOP-003-5 for a Balancing Authority's (BA) authority to require the information needed to conduct the Energy Reliability Assessments under proposed BAL-007-1 and BAL-008-1. However, it's not clear the proposed standards are utilizing a BA's authority to require information under TOP-003-5. It requires an entity to refer to another suite of reliability standards to find requirements that could potentially empower a BA to require the necessary information, and put other entities on notice that they must provide the required information.

For clarity and effectiveness of the proposed standards, BPA suggests revising the Technical Rationale document by outlining a BA's authority to request data, and the responsibility/obligation for other entities to provide data via TOP-003-5. By issuing a clarification that TOP-003 does apply, NERC could empower BAs to obtain the data they need, as BPA believes TOP-003 intended.

Given that the fuel and future dispatch level of generation in current bilateral markets of the Pacific Northwest is considered 'market sensitive' information, generator owners and operators may not be willing to share such information with BAs or Transmission System Providers. As a result, the standards need to make absolutely clear that providing such information is required

Likes 1 Public Utility District No. 1 of Snohomish County, 1, Rhoads Alyssia

Dislikes 0

Response

Anne Kronshage - Public Utility District No. 1 of Chelan County - 1,3,5,6, Group Name Public Utility District No. 1 of Chelan County - Voting Group

Answer

Document Name

Comment

For R8, CHPD suggests adjusting the language to "...mutually agreed upon schedule and format."

Likes 0

Dislikes 0

Response

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 EEI comments and agrees with the EEI language changes for the Purpose statement.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

Document Name

Comment

TEPC agrees with EEI's comments - EEI does not agree that the language currently contained in the purpose statement for BAL-008-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide any meaningful value to the purpose.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Document Name

Comment

In general, the need for Energy Assurance with Energy-Constrained Resources is understood. The drafting team has worked hard to address the needs to ensure energy adequacy and has invested a lot of time discussing and addressing concerns in the development of this standard. It is difficult to support the proposed standard because it is not performance-based and introduces a lot of administrative processes. It introduces a lot of compliance risk without enhancing BES reliability. The fill-in-the blank concept adds additional risk and incentivizes entities to meet the lowest common denominator of compliance, rather than encouraging exceptionalism. The proposal may seem workable from a practicable sense, but when enforced, the standard has a lot of subjective language that will be problematic. Requiring BA's to be responsible for resource adequacy seems like the wrong functional home for the ERA when that was typically the role of the Resource Planners.

The drafting team should focus on a coordinated resource plan as the end goal. It should consider where some entities have already made progress in developing solutions to address energy adequacy, and it should not exclude those programs that are already in existence.

RCs who oversee large BAs and markets should not find the requirements in this proposal too onerous due to the economy of scale. RCs who oversee large numbers of BAs, on the other hand, will have challenges in meeting the review timelines. The RCs will also struggle to ensure that energy adequacy is sufficiently coordinated amongst the multiple BAs. Seams issues will need to be addressed where there are adjacent BAs and RCs competing for the same resources.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The Evidence Retention section needs to be addressed as it mentions the “near-term” time horizon. Additionally, the act of submitting /reviewing ERA (and other items mentioned) occurs on a time period that could be longer than the retention requirements. Evidence should be retained to allow an entity to easily demonstrate compliance. Resource Planner is not called out (but as previously commented, should the RP be changed?).

In the VSLs a general note—Is the expectation for a single method or multiple methods of Scenario creation? Seems like it should be methods to match Standard.

R1 Moderate VSL mentions maintaining the ERA process “annually” which is not part of the Requirement. The High and Severe R1 VSLs do not cover 1.5 and should to be accurate.

R7 VSL for High and Severe need adjusting as the Reliability Coordinator submittal is not in the Requirement. Suggest for High- “The Balancing Authority reviewed the seasonal ERA process, Scenarios or methods of Scenario creation, and Operating Plan(s) but did not update the materials (as needed) within 24 calendar months.” Severe VSL- “The Balancing Authority did not review and update seasonal ERA process, Scenarios or methods of Scenario creation and Operating Plan(s) within 24 calendar months.”

R8 High VSL needs to add “calendar” in front of months to match Requirement.

R9- Is the RC to notify “each” BA or just the BA submitting information? If former, VSL would need adjustment

R10 High VSL- Should it read “The Balancing Authority addressed **the** reliability risks...”? What happens if the BA does not address all the reliability risks identified? R10 VSLs should reference R8 not R7.

R13 VSL-All the VSLs do not match the “seven calendar days” called out in the Requirement language. Correct spelling in Severe for “Coordinator” towards end of sentence. The High VSL added “Area” to the neighboring Reliability Coordinator—need to remove it. The VSL needs to be clearly understood in that if the RC notified a Balancing Authority but failed to notify any TOPs there would be a reliability concern and possibly a violation. Suggest adding “one or more” in front of TOP.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Document Name

Comment

Ameren supports MISO's comments on this project.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

Manitoba Hydro supports comments of MRO NSRF.

Likes 0

Dislikes 0

Response

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

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 15

Likes 0

Dislikes 0

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer

Document Name

Comment

Tacoma Power endorses the comments provided by the Western Power Pool.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1,3

Answer

Document Name

Comment

Exelon does not oppose BAL-008, we support EEI's comments to clarify the Purpose statement.

Likes 0

Dislikes 0

Response

Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer	
Document Name	
Comment	
Supporting EEI comments.	
Likes 0	
Dislikes 0	
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1,3,5,6	
Answer	
Document Name	
Comment	
PSE agrees with WPP's response to this question. PSE doesn't see a need for a seasonal assessment in addition to the ERA specified in BAL-007. There are no additional reliability actions the BA can perform in this time horizon that aren't also available in the BAL-007 time horizon. Our preference would be to implement the BAL-007 first and then pursue a long term planning resource adequacy standard where resource proposals could be solicited. This approach would make more sense and provide better reliability than creating duplicative assessments in the operations planning time horizon.	
Likes 0	
Dislikes 0	
Response	
Chantal Mazza - Hydro-Quebec (HQ) - 2 - NPCC	
Answer	
Document Name	
Comment	
HQ recognizes that the work the drafting team has put in the development of these standards and is supportive of performing seasonal studies. However we are concerned that certain requirements as they are written add an unnecessary burden in the process.	
Likes 0	
Dislikes 0	
Response	

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer

Document Name

Comment

No Additional Comments

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

Document Name

Comment

NPCC RSC support the project.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name**Comment**

EEI does not agree that the language currently contained in the purpose statement for BAL-008-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, **report and plan for energy constraints** associated with Energy Emergencies in the seasonal time horizon.

Likes 0

Dislikes 0

Response

Heather Pierce - Puget Sound Energy, Inc. - 1,3,5,6

Answer**Document Name****Comment**

Puget Sound Energy (PSE) agrees with WPP's response to this question. Additional PSE comments are shown below.

PSE doesn't see a need for a seasonal assessment in addition to the ERA specified in BAL-007. There are no additional reliability actions the BA can perform in this time horizon that aren't also available in the BAL-007 time horizon. Our preference would be to implement the BAL-007 first and then pursue a long term planning resource adequacy standard where resource proposals could be solicited. This approach would make more sense and provide better reliability than creating duplicative assessments in the operations planning time horizon.

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 1,3,4,5,6

Answer**Document Name****Comment**

Seminole agrees with FRCC's comments below

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #15:
EEI does not agree that the language currently contained in the purpose statement for BAL-008-1 is sufficiently clear. And while we do not disagree with

the last sentence in the purpose, it does not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, report and plan mitigations for energy constraints the risks associated with Energy Emergencies in the seasonal 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.

Likes 0

Dislikes 0

Response

LaKenya Vannorman - Florida Municipal Power Agency - 3,5,6 - SERC, Group Name Florida Municipal Power Agency (FMPA)

Answer

Document Name

Comment

FMPA supports FRCC/ORS comments with the exception of FRCC/ORS perspectives on adding to the TOP-002 burden.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

APS proposes revisions to the purpose statement. Within the Purpose statement of BAL-008-1 Draft 1 it states: "To assess the risks associated with Energy Emergencies in the seasonal time horizon and **take appropriate actions** to address identified risk."

APS proposes the SDT remove "take appropriate actions" and replace with "develop plans" as stated below: "To assess the risks associated with Energy Emergencies in the seasonal time horizon and **develop plans** to address identified risk."

Additionally, in the Purpose Statement and Requirement 1, the term "seasonal time horizon" is not listed in the NERC glossary of terms or in the NERC Time Horizon criteria and referenced in the standard. The SDT should consider revising "seasonal time horizon" to "seasonal time period" to avoid confusion with NERC defined Time Horizons.

Likes 0

Dislikes 0

Response

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SRC Energy Assurance

Answer

Document Name

Comment

While seasonal studies may be valuable, it is unclear why this activity cannot be accomplished by NERC's existing Reliability Assessment Committee (RAS) in a voluntary and collaborative fashion as the RAS, in working with the Regional Entities, currently performs both Summer and Winter Reliability Assessments. In fact, seasonal ERAs could replace the existing deterministic Summer/Winter studies. Consideration should be given to how migrating this activity to a mandatory standard will harm the openness and sharing that is currently done in these groups.

Until a final decision can be made with respect to how seasonal studies are performed, the SRC supports the move to develop separate standards for seasonal ERAs and near-term ERAs.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Vince Ordax - Florida Reliability Coordinating Council – Member Services Division - 8

Answer

Document Name

Comment

The FRCC agrees with and supports the Edison Electric Institute (EEI) comments on question #15: EEI does not agree that the language currently contained in the purpose statement for BAL-008-1 is sufficiently clear. And while we do not disagree with the last sentence in the purpose, it does

not provide meaningful value to the purpose. To address our concerns, we offer the following proposed changes to the Purpose statement:

Purpose: To assess, report and plan for energy constraints associated with Energy Emergencies in the seasonal time horizon.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

Document Name

Comment

The concept of an “operating plan” and the corresponding process/documentation is a little opaque. In today's operating world the tools we utilize in short term planning can provide us up to 7 days of what we could consider an “operating plan” but that function doesn't materialize into an actual gen plan until we get to the day in question. Furthermore, when referencing BA it looks like it is tied more to real-time operations, so we are not sure of the need for the BA to be associated with the concept of leading an operating plan.

Secondly, we don't understand the need for anything beyond (1) plan, Requirement 3 opens the door for additional operating plans, which we are oppose to due to the number of plans we already produce today.

Lastly, it's not clear what is driving the need for submitting to the RC. Is this expected to be done daily? We are also not entirely comfortable with the idea of submitting something to the RC that moves beyond the day in question. Not sure what value or benefit there is in submitting to the RC for these forward days. We disagree with this requirement.

Likes 0

Dislikes 0

Response

Benjamin Widder - MGE Energy - Madison Gas and Electric Co. - 3,4

Answer

Document Name

Comment

Madison Gas and Electric supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Wayne Guttormson - SaskPower - 1

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Robert Blackney - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Dmitriy Bazylyuk - NiSource - Northern Indiana Public Service Co. - 3,5,6, Group Name NIPSCO

Answer

Document Name

Comment

NIPSCO supports MISO's feedback.

Likes 0

Dislikes 0

Response

Chance Back - Muscatine Power and Water - 1,3,5,6

Answer

Document Name

Comment

Support the MRO NSRF comments.

Likes 0

Dislikes 0

Response

George E Brown - Pattern Operators LP - 5

Answer

Document Name

Comment

Pattern Energy supports Midwest Reliability Organization's NERC Standards Review Forum's (MRO NSRF) comments on this question.

Likes 0

Dislikes 0

Response

Submitted comments from Avista Corp. – Mike Magruder, Robert Follini

1. The standards drafting team (SDT) modified the Energy Reliability Assessment (ERA) definition 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.

Yes

No

Comments:

2. Based on industry feedback, the SDT updated Requirement R1 to clarify what near-term ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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: We agree with EEI's comments.

3. The SDT updated Requirements R2 through Requirement R8 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: We agree with EEI's comments.

4. The SDT proposes entities use forecasted Demand profiles for the time interval under study for the BAL-007 assessment. The SDT's goal is to align measures for ERAs with those used for EOP-011. Actions taken as part of a BAL-007 Operating Plan should be targeted to minimize any Energy Emergency events. Do you agree with the updated proposed language in Requirement R8? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

5. The SDT updated Requirement R9 based on industry feedback. Do you agree with the updated proposed language in Requirement R9? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: We agree with EEI's comments.

6. The SDT updated the implementation plan to allow for 18 months for Requirements R1 through R3 and 24 months for Requirements R4 through Requirement R10 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: We agree with EEI's comments.

7. The SDT believes that fuel data information needed to address BAL-007-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

8. The SDT 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: No comment on the cost-effectiveness as we have not yet evaluated the impacts.

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

Comments: See EEI's comments.

BAL-008-1 Seasonal ERAs

10. The SDT drafted BA-008-1 Requirement R1 to clarify what seasonal ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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: We agree with EEI's comments.

11. The SDT drafted BAL-008-1 Requirements R2 through R13 based on industry feedback regarding seasonal ERAs. Do you agree with the proposed requirements? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: We agree with EEI's comments.

12. The SDT drafted the BAL-008-1 implementation plan to allow for 18 months for Requirements R1 through R6 and 24 months for Requirements R7-R13 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: We agree with EEI's comments.

13. The SDT believes that fuel data information needed to address BAL-008-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

14. The SDT proposes that the newly proposed BAL-008-1 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: No comment on the cost-effectiveness as we have not yet evaluated the impacts.

15. Provide any BAL-008-1 additional comments for the SDT to consider, if desired.

Comments: We support EEI's comments here.

In addition, the Applicability section (4) ascribes applicability to the Resource Planner. We are not aware a standard could be applicable to a Resource Planner. What is the registration criterion?

Submitted comments from Talen Energy – Donald Lock

1. The standards drafting team (SDT) modified the Energy Reliability Assessment (ERA) definition 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.

Yes

No

Comments:

2. Based on industry feedback, the SDT updated Requirement R1 to clarify what near-term ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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:

3. The SDT updated Requirements R2 through Requirement R8 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: The, “credible energy supply contingency,” and “credible fuel supply contingency,” of R2.2 lack adequate specificity, particularly as regards extreme winter storms. Plans based on the ECWT of EOP-012 would be insufficient, for example, because Winter Storm Uri, the 2014 Polar Vortex and other recent generation capacities involved below-ECWT temperatures. The same is true of, “Unplanned generator outages.” If ice storms wreak havoc among the wind sleet that case needs to be studied.

4. The SDT proposes entities use forecasted Demand profiles for the time interval under study for the BAL-007 assessment. The SDT’s goal is to align measures for ERAs with those used for EOP-011. Actions taken as part of a BAL-007 Operating Plan should be targeted to minimize any Energy Emergency events. Do you agree with the updated proposed language in Requirement R8? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: See our comments for R2 above.

5. The SDT updated Requirement R9 based on industry feedback. Do you agree with the updated proposed language in Requirement R9? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments:

6. The SDT updated the implementation plan to allow for 18 months for Requirements R1 through R3 and 24 months for Requirements R4 through Requirement R10 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:

7. The SDT believes that fuel data information needed to address BAL-007-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: GOs' TOP-003 reporting of fuel supply and inventory concerns and fuel switching capabilities has very little to do with predicting NG insufficiencies during extreme winter storms. The issues of principal importance are NG production facility winterization, NG storage levels, localized pipeline capacity and the like, over which GOs have no control or knowledge.

8. The SDT 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:

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

Comments: It does not address the issues at hand, per our comments above, and therefore cannot be cost-effective.

BAL-008-1 Seasonal ERAs

10. The SDT drafted BA-008-1 Requirement R1 to clarify what seasonal ERAs mean and to allow flexibility for Balancing Authorities when developing their process. 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: Seasonal average demand and capability have minimal importance. The paramount issue is generation supply adequacy for extreme events, especially worst-case winter storms.

11. The SDT drafted BAL-008-1 Requirements R2 through R13 based on industry feedback regarding seasonal ERAs. Do you agree with the proposed requirements? If you do not agree, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: The terms, "credible energy supply Contingency," "credible fuel supply Contingency" and, "Unplanned generator outage," lack adequate specificity, per our comments for R2 of BAL-007-1.

12. The SDT drafted the BAL-008-1 implementation plan to allow for 18 months for Requirements R1 through R6 and 24 months for Requirements R7-R13 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:

13. The SDT believes that fuel data information needed to address BAL-008-1 can be achieved through TOP-003. Do you agree with this statement? If not, please provide your recommendation, and if appropriate, technical, or procedural justification suggestions for revisions.

Yes

No

Comments: See our TOP-003-related comments for BAL-007.

14. The SDT proposes that the newly proposed BAL-008-1 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: It does not address the issues at hand, and therefore cannot be cost-effective.

15. Provide any BAL-008-1 additional comments for the SDT to consider, if desired.

Comments: