

Comment Form

Fifth Posting of the Balancing Authority Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: sarcomm@nerc.com with the words "Proposed Revisions to Balancing Authority Standards" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE. IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

DO: Do enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

DO NOT: Do not insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
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NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities

Background Information:

- To understand the Standard Drafting Team's philosophy used to create the standard, refer to the Balancing Authority Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:
ftp://www.nerc.com/pub/sys/all_updl/standards/sar/BA_CERTIFICATION_01_04.pdf
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the Certification Drafting team has referenced applicable Version 0 standards. Specific Version 0 Standard requirements have not been included to allow for future modifications. A reference document is being developed by the Certification Standard Drafting Team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.

Standard – ORG-009-1 - Balancing Authority Certification – Certification

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Certification standard?

- Yes
 No

Comments:

- (i) *Specific to R4, shouldn't a Balancing Authority have in place procedures, processes and tools for adhering to **all** applicable NERC reliability standards. By singling out the need to adhere to Cyber Security begs the question on the need to adhere to other reliability requirements.*
- (ii) *D1.1.2: Please revise to "...Requirements R5 and R6." as there is no R7.*

Standard – ORG-010-1 - Balancing Authority Certification – Agreements

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Agreements standard?

- Yes
 No

Comments:

- (i) *It needs to be clear that the BA is to ensure "load-interchange-generation" balance in real time. We suggest R1.1 be revised to add this clarity.*
- (ii) *R1: The added sentence " **The entities identified below are the typical information sources, however the information identified can be obtained from alternative sources and must be identified in the appropriate agreements.**" is confusing or perhaps misplaced. Moving this sentence to R2 would seem more appropriate. We recommend that this structure (with the above sentence moved to R2) be considered for use also in the Agreements standards for RC and TOP Certification.*

Standard – ORG-011-1 - Balancing Authority Certification – Personnel

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Personnel standard?

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Yes

No

Comments: *We suggest that the first two bullets in R3.1 be revised to clarify that it is the load-interchange-generation balance that needs to be ensured.*

Standard – ORG-012-1 - Balancing Authority Certification – Balancing

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Balancing standard?**

Yes

No

Comments:

Standard – ORG-013-1 - Balancing Authority Certification – Data Acquisition

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Data Acquisition standard?**

Yes

No

Comments:

Standard – ORG-014-1 - Balancing Authority Certification – Frequency Control

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Frequency Control standard?**

Yes

No

Comments:

Standard – ORG-015-1 - Balancing Authority Certification – Interchange Approval and Implementation

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Interchange Approval and Implementation standard?**

Yes

No

Comments:

Standard – ORG-016-1 - Balancing Authority Certification – Information Dissemination

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Information Dissemination standard?**

Yes

No

Comments:

Standard – ORG-017-1 - Balancing Authority Certification – Emergency Operations

9. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Emergency Operations standard?**

Yes

No

Comments: *Requirements: There should only be R1 and R2, not R7 and R8.*

Standard – ORG-018-1 - Balancing Authority Certification – Loss of Control Center Functionality

10. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

11. **Please identify any elements that should be included in the standards that have not been identified?**

Comments:

12. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)**

Comments:

13. **The Drafting Team believes that the BA Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments: *Once the above comments are addressed then we would consider these ready for balloting.*