

Comment Form — 2nd Posting of the draft ‘Balancing Authority Certification’ Standard

Note – This form is to be used to comment on version 2 of the Balancing Authority Certification Standard.

Comments will be accepted from August 19, 2004 — October 04, 2004.

Please review the draft standard and answer the questions in the yellow boxes. Send completed comment forms to sarcomm@nerc.com

If you have questions, please call Gerry Cauley at 609-452-8060 or send a question to gerry.cauley@nerc.net

SAR Commenter Information (For comment from individual entities)

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Key to Industry Segment #'s:

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

Yes

No

Comments:

2. The details of the Integrated Operational Plan are now identified in the Integrated Operational Plan Technical Reference document and are intended to provide elements of the plan, but are not requirements of the standard. The specific detailed requirements for an Integrated Operational Plan will be dependent on the needs of your Reliability Authority.

Do you agree with the elements identified in the Integrated Operational Plan technical reference document?

Yes

No

Comments: **We presume that other requirements, such as transmission outage information, will be included as details of an IOP related to other appropriate Authorities (i.e. Transmission Operator’s IOP Technical Reference will detail transmission outage information).**

3. Standard 1401 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments:

- 1. With regards to item (viii), the formation of review team requires three individuals from the listed category of entities. It needs to be clarified whether the listed categories be already certified prior to the BA certification. Allowance for a transition period since these other entities are not yet certified is needed.**
- 2. With regards to item (xiv), what happens if some Regional Committee(s) approves the certification application and some of them don’t for an Applicant who intends to operate in multiple NERC Regions. It needs to be clarified whether a disapproval from “one” Region shall result in denying of certification or is it applicable only when all regions disapprove.**

4. Standard 1402 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments:

1. The requirement to have agreements in place with other entities specified in the Functional Model will need to allow for a transition period since these other entities are not yet certified.

2. Measure 1(i) states that the LSE’s must provide load forecasts for the region being served. This measure should only be required if applicable to the BA being reviewed. The reason for this is that many BA’s are also providing the load forecast as one of the functions for its participants and does not require the LSE to provide a load forecast.

5. Standard 1403 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments:

1. Requirement 1, second sentence: “There should be only a BA certification for this standard. The fact that the BA may also be an IA, TO, and/or RA should involve separate certifications rather than being grouped with the BA.

2. Measure (3) shall read: “The Applicant shall have a projected schedule for a minimum period of 13 weeks ...”

6. Standard 1405 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments: Two new measures have been added in this version that relates to monitoring and verifying resource minimum governor response for all resources within BA. Currently Policy 1 treats unit governor response as a guide. It needs to be recognized that not all units are capable of the same governor response and hence

further discussion is needed in the industry before this is implemented.

7. Standard 1407 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments:

8. Standard 1408 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments: **Measure 2(iii): Clarification is required in regard with the type of data to be collected, so that consistency between BA areas is achieved.**

9. The elements of Standard 1409 Interconnected Operating Services Data Acquisition and Analysis section have been identified through the comments received as being redundant with elements in standards 1404 and 1408. Therefore the Standard Drafting Team has removed Standard 1409 as initially written to eliminate duplication.

Do you agree with this removal of redundancy?

Yes

No

Comments:

10. Standard 1411 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

Do you agree with modifications that were made to clarify the issues identified?

Yes

No

Comments: The requirement to have procedures or processes in place with other entities specified in the Functional Model will need to allow for a transition period since these other entities are not yet certified.

11. Standard 1412 – The Standard Drafting Team recognizes the confusion and redundancy that existed in the measures. Based on the comments received, modifications have been made to this standard in an attempt to simplify, as well as clarify the intent. The drafting team seeks industry affirmation to the changes that have been made for clarification.

Do you agree with modifications that were made to simplify and clarify the standard?

Yes

No

Comments:

12. Are there any elements that should be included in the standards that have not been identified?

Comments:

13. There were no Regional differences identified in the previous posting, are there any regional differences that should be identified for consideration in the standards?

Comments:

