

Comment Form — 1st Posting of the draft 'Balancing Authority Certification' Standard

Note – This form is to be used to comment on version 1 of the Balancing Authority Certification Standard.

Comments will be accepted from April 2, 2004 — May 17, 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)

Name	Khaqan Khan
Organization Operator (IMO)	Independent Electricity Market
Industry Segment #	2
Telephone	905-855-6288
E-mail	khaqan.khan@theIMO.com

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

2. 1402 — Requirements — Because the only interaction between the Balancing Authority and the Transmission Service Provider is associated with the reporting of loss allocations, the Standard Drafting team deleted the Transmission Service Provider agreements from the standard since loss allocation is a business issue and not a reliability issue.

Do you agree with this deletion?

Yes

No

Comments:

3. The Integrated Operations Plan is identified in the Functional Model, but was not defined. The Standard Drafting Team identified the high level elements included in the plan.

Do you agree with the elements identified as part of the Integrated Operations Plan?

Yes

No

Comments: Under the section of definitions, subsection IOP element #5 mentions about a “uniform time interval” for all information. It needs to be clarified that how would this be applied in developing an IOP?

4. Do you agree with the requirements and measures identified for 1402?

Yes

No

Comments: The requirement to have agreements in place with other “authorities” will need to allow for a transition period since these other authorities are not yet defined.

The standard states that the LSE’s must provide load forecasts for the region being served. This should only be required if applicable to the BA being reviewed. The reason for this is many BA’s provide the load forecast as one of the functions for its participants and does not require the LSE to provide a load forecast. Please clarify this in the final standard.

5.

Do you agree with the requirements and measures identified for 1403?

Yes

No

Comments: 3rd bullet under Requirement (1) associated with loss allocations appears to be a

business issue, not a reliability issue.

6. Do you agree with the requirements and measures identified for 1404?

Yes

No

Comments:

7. Do you agree with the requirements and measures identified for 1405?

Yes

No

Comments: More clarity/detail is required in Measure (2) as to the expectations for governor response. Should an applicant require a 5% droop characteristic? Or a testing program to demonstrate frequency response?

8. Do you agree with the requirements and measures identified for 1406?

Yes

No

Comments:

9. Do you agree with the requirements and measures identified for 1407?

Yes

No

Comments: Is the term under Measures (1) and (2) actually “Integrated Operation Plan” rather than “Interconnected Operation Plan”? If it is the latter, then it needs to be defined.

10. Do you agree with the requirements and measures identified for 1408?

Yes

No

Comments:

11. Do you agree with the requirements and measures identified for 1409?

Yes

No

Comments:

12. Do you agree with the requirements and measures identified for 1410?

Yes

No

Comments: There is a need to provide more elaboration about what data is required to be archived, the frequency of archival, the retention period, and why such archival is necessary. Wide open data retention requirements could be problematic for systems, especially considering the requirement to be fully compliant within 3 months of approval of this standard.

13. Do you agree with the requirements and measures identified for 1411?

Yes

No

Comments:

14. Do you agree with the requirements and measures identified for 1412?

Yes

No

Comments:

15. The Compliance Monitor Process for the standards addresses the completion of the Applicant questionnaire and providing elements that support the questionnaire during the on-site visit.

Do you agree with the Compliance Monitor Process elements for Standards 1402 to 1412?

Yes

No

Comments:

16. The levels of non-compliance and sanctions for all of the standards are identical.

Do you agree with the Levels of Non-Compliance and Sanctions identified in Standards 1402 to 1412?

Yes

No

Comments:

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

Yes

No

Comments:

General comments:

We also support the overall comments developed by ISO/RTO Standards Review Committee” and CP-9.

18. Are there any regional differences that should be identified in the standards?

Yes

No

Comments: