

Comment Form for Draft 3 of the Frequency Response SAR

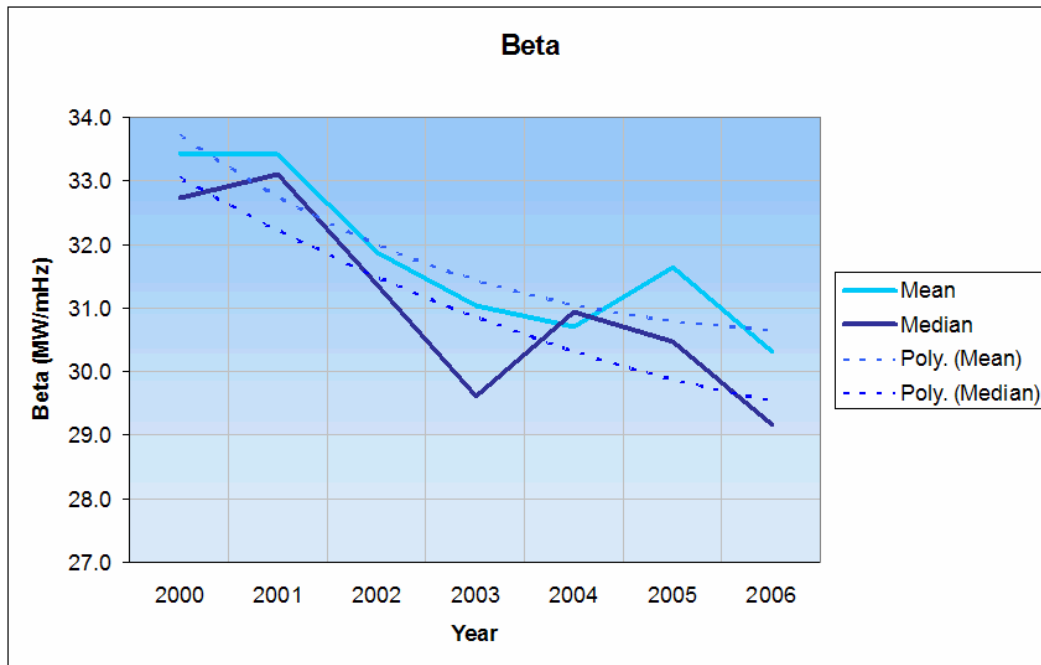
Please use this form to submit comments on the third draft of the Frequency Response SAR. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "FR SAR Draft 3" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 813-468-5998.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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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
<input type="checkbox"/> MRO	<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
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities

Background Information:

The original SAR on Frequency Response was submitted in large part due to a study that showed a 10+% decline in Eastern Interconnection Frequency Response over a 5-year period, when response should be increasing over time as the Interconnection grows. Other Interconnections were observing similar declines. The drafting team posted a white paper along with the SAR to outline the need for a standard.

The NERC Resources Subcommittee recently updated their estimate of Eastern Interconnection Frequency Response and found it still trending downward. Response in 2006 was on the order of 2,800 MW/0.1Hz (compared to 3,750 MW/0.1Hz in 1994). Frequency Response for larger events (greater than 35 mHz) in 2006 may be as low as 2,600 MW/0.1Hz. Below is an independently calculated estimate of the trend in Eastern Interconnection Frequency Response provided by the New York ISO. Note: Response is stated in engineering terms (MW/mHz) as opposed to the traditional MW/01.Hz.



The proposed Frequency Response standard (FRS) is a technical standard. Technical standards are described in the [Reliability Standards Development Procedure](#). The FRS is not proposed to be a performance standard and does not propose a minimum Frequency Response, below which penalties are applied.

Industry commenters agreed there is a reliability need for the FRS. Comments varied on the technical details of the standard. Because of the divergent views on the details of the FRS SAR, the NERC Standards Committee (SC) directed the SAR drafting team to revise the SAR to focus only on the data collection needed to support the development of accurate models of Frequency Response in North America.

The SAR drafting team has tried to meet the Standards Committee's directive with this third version of the SAR.

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The Version 3 of the Frequency Response SAR represents the changes requested by the NERC Standards Committee, while still meeting the June 2006 direction of the NERC Operating Committee. Specifically, the Operating Committee endorsed developing a Frequency Response standard that includes the following goals and objectives:

- Improving Interconnection Frequency Response event cataloging and benchmarking.
- Calculating balancing authority Frequency Response and requiring balancing authorities to analyze those cases where the response is significantly below the norm.
- Establishing time limits to complete the analyses.
- Tabulating non-responsive generators.
- Measuring generator response (those units on line).
- Including regional participation and review.

This revised SAR was reviewed and supported by the NERC Resources Subcommittee on December 4, 2006. The major changes between Draft 2 and Draft 3 include:

- Clarification on the role of the Load-serving Entity and Generator Operator.
- Inclusion of the applicability of Reliability Principles 3, 5, and 6.
- Reduced the scope to address only the collection of data needed to model Frequency Response in North America.
- Clarified that the data collected to model frequency response over a period of up to 5 minutes per event to help identify the window of time where frequency response appears to be masked by AGC action.

Note that because the changes to the SAR were quite significant, no redline showing the changes from Version 2 to Version 3 will be posted.

Please review the revised SAR and then answer the questions on the following page. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "FR SAR Draft 3" in the subject line.

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the reduced scope of this SAR — focusing only on the data collection needed to support the development of accurate models of Frequency Response in North America?

Yes

No

Comments:

We do not agree with the reduced scope of this SAR. It does not require a standard to enable a data collection task(s). Data collection procedures and processes, charged by a standing committee, e.g. the OC, or respective working groups, would be more than sufficient.

2. The proposed standard would have requirements for the following functional entities: Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, and Load-serving Entity. Do you agree that these are the right functional entities for the proposed standard?

Yes

No

Comments:

For the purpose of data collection, assigning responsibility to the Balancing Authority, Generator Operator and Load-serving Entity would suffice.

3. The SAR drafting team modified the SAR to clarify that data will be collected to model up to 5 minutes of frequency response. This should help identify the window of time where frequency response appears to be masked by AGC action. Do you agree with this clarification?

Yes

No

Comments:

4. Should a field trial be initiated, whereby a set of events for each Interconnection is posted throughout the year, to be used by BAs to calculate their 2007 Frequency Response?

Yes

No

Comments: A field test is a must and would definitely provide useful information on the types of event that would necessitate such data collection (The threshold needs to be clarified though - e.g. should it be >10MW loss of generator or some other threshold?), and any specific areas that need to be worked on in order to ensure that all relevant and required data is collected.

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5. Please provide any other comments (that you have not already provided in response to the first three questions on this form) that you have on the revised SAR.

Comments:

While we felt that the previous SAR was unclear on the intent, this SAR has such a reduced scope that the intended task does not require a reliability standard to achieve . A task team charged by a standing committee (the OC), would suffice. The requirements proposed in the SAR can be set as conditions for completing the data collection effort by the task team.