

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)

Name

Organization

Industry Segment #

Telephone

E-mail

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

SAR Commenter Information (For Industry Groups Submitting Group Comments)		
Name of Group: ISO/RTO Council Standards Review Committee	Group Representative: Karl Tammar Representative Phone: 518-356-6205 Representative Email: ktammar@nyiso.com	
List of Group Participants that support these Comments:		
Name	Company	Industry Segment #
Dale McMaster	AESO	2
Ed Riley	CAISO	2
Sam Jones	ERCOT	2
Don Tench	IMO	2
Peter Brandien	ISO-NE	2
Bill Phillips	MISO	2
Karl Tammar	NYISO	2
Bruce Balmat	PJM	2
Charles Yeung	SPP	2

Background Information:

- To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Balancing Authority Certification SAR and the Functional Model. Both of these documents were used in the drafting of the standard. Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

1. Comments received during the Balancing Authority Certification Standard posting period indicated that either clarification and/or additional details should be included in the definition of the Integrated Operational Plan. The Standard Drafting Team feels that the level of detail that was provided in the initial definition was imposing additional requirements. It is the Standard Drafting Team’s interpretation that definitions should not impose additional requirements. The Standard Drafting Team has modified the Integrated Operational Plan definition to be consistent with the format of defined terms. This high level perspective will accommodate the specific needs of your Reliability Authority.

Do you agree with the revised definition of an Integrated Operational Plan?

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 recognize that the details of the Integrated Operational Plan (“IOP”) identified in the IOP Technical Reference document provide elements of the plan applicable to the BA Functions. 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:

Revise item (viii) under Requirement (2) to read:

“Representative from an Independent System Operator or Regional Transmission Organization, when applicable.”

The last paragraph of item (viii) under Requirement (2) allows for an “*alternative ..to engage a completely independent review team.*” We recommend some definition of what is meant by “independent and how this “*independent review team*” is differentiated from the Review Team defined in the standard.

The scope and depth of the reviews and inspections identified in item (viii) under Requirement (2) should be determined and agreed upon ahead of the on-site visit. The ISOs and RTOs support the development and application of a consistent approach and review plan for review teams to use on visits to facilities

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:

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:

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: We recommend that Measures (2) and (3) be removed. The Requirements and measurements should be based on existing standards. At this time there are no standards related to measures (2) and (3).

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:

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:

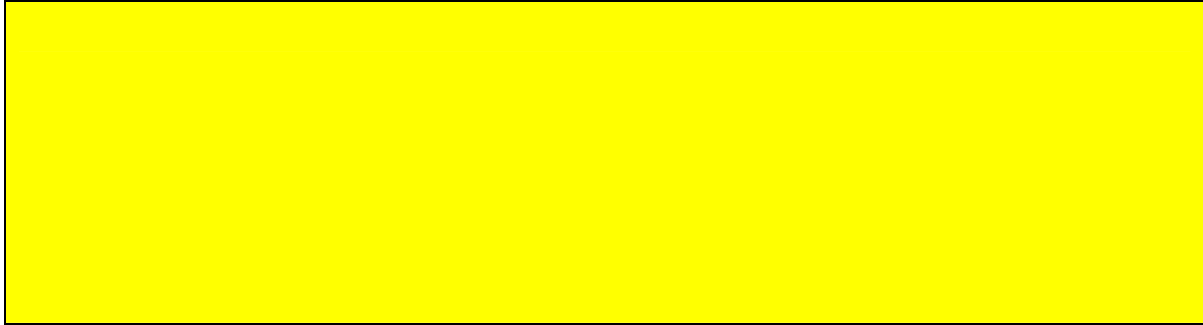
10. Standard 1411 – The Standard Drafting Team has made modifications to the standard to provide clarification to issues identified by commentors during the 1st posting period.

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

Yes

No

Comments:



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:

Several of the Standards require agreements with entities, as defined by the Functional Model. We recognize that some of the Authority entities do not exist yet or may not exist as certified entities if this Standard is implemented independently. A transition period will allow for agreements to be finalized.

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:

