

Comment Form – Proposed Balancing Authority Certification Standards

This form is to be used to submit comments on the proposed Draft 3 of the Balancing Authority Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “BA Certification Standards Comments” 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 AND 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:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

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The Standard Drafting Team developed the BA Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

BA SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Balancing.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmodel.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "BA Certification Standards Comments" by **July 1, 2005**.

Balancing Authority Certification – Certification Modification

During the 2nd posting of the Balancing Authority Certification Standard, the Drafting Team received more comments regarding the inclusion of the Certification Process in the standard. After further consideration, the Standard Drafting Team has modified the standard regarding the inclusion of the process and wishes to provide some background information to the industry in seeking affirmation of the modifications.

Comments regarding the inclusion of the process started during the SAR process. The SAR Drafting Team at that time sought the guidance of NERC Legal Counsel to obtain input into how they should proceed. The opinion, at that time, was that since there was no other procedure in place for approval of the Certification Process, it should remain in the standard to maintain a consistent implementation. There was some concern expressed that although the process was in the standard, it did not necessarily fit the format of typical standards. Even though industry consensus was obtained during the SAR process, a minority opinion was expressed and continued to be expressed in subsequent postings of all SARs and Standards.

Since the SAR was approved to proceed to the Standard Drafting phase, the Certification & Compliance Committee (CCC) has been formed. As part of the scope for this Standing Committee, they have the responsibility for developing administrative procedures for NERC Certification Programs.

As a result of these continued comments on the Certification Process being contained in the standard, the Drafting Team sought NERC Legal Counsel input due to the formation of the CCC. NERC Legal Counsel recommendation was to remove the process from the standard and place it in the area of responsibility for the CCC. The process that is anticipated to occur through this path would be for the CCC to refine the current process, seek industry input, incorporate the input obtained into the process, and then seek NERC Board of Trustees approval for adoption. By utilizing this process, an administrative advantage is realized. Much like the procedures that are being used for the Control Area Readiness Audits, if adjustments are needed to refine the process,

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it can be accomplished more expeditiously through this recommended process than if it were part of the Standard. Although the Certification Process would not be a standard, it is still anticipated that all certifications would be administered consistently throughout the industry. The Drafting Team has included this requirement in the modifications that have been made to the standard.

In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the Balancing Authority function must be NERC Certified. **Those who submitted comments in the 1st posting of the Transmission Operator Certification Standards supported the modification.**

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It is because of the above stated reasons that the Standard Drafting Team has made these modifications to the standard and seeks industry affirmation and support for its actions.

1. Do you agree with the modifications made to the Balancing Authority Certification – Certification standard in removing the administrative process from the standard?

Yes

No

Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards and the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards and the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards and the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

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Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. 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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

6. 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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

8. 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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

9. 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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards and the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 2nd posting of the Balancing Authority Certification Standards and the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

11. 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: (i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time a BA could be compliant even if it took 24 hours.

(ii)- If the BA's primary facility becomes unavailable the BA's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the BA's physical plan for a back up control center.

(iii)- The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard.

(iv)- re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.

Standard – ORG-019-1 - Balancing Authority Certification – Reporting Requirements

The Drafting Team determined that this standard was redundant with the elements included in ORG-009-1 Balancing Authority Certification – Certification, Requirement R3. Based on determination, the Drafting Team has deleted this standard.

12. Do you agree with this modification?

Yes

No

Comments: There is no ORG-019-1 Document.

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

Comments: Additional Comments:

(i)- The ISO/RTO Council has a general concern with regard to the existing NERC Registration Process and the ultimate BA Certification Process. The concern regards the consistency, or lack thereof, of BA registrations already performed, and the various interpretations within the industry of what constitutes a BA. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the BA Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean....."

(iii)- It is expected that audits will be conducted for these standards. In that case we suggest that data retention period for any audit results be specified.

(iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) be clearly defined and registered/certified before the implementation of this certification standard.

14. Please identify any regional differences that should be included in the standards?

Comments: