**Unofficial Comment Form**

Project 2007-12 Frequency Response

Please **DO NOT** use this form to submit comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=8ae5c0020d524f71842f142d195435bc)  to submit comments on the BAL-003-1 Frequency Response and Bias Setting. The electronic comment form must be completed by 8 p.m. ET **November 5, 2012.**

<http://www.nerc.com/filez/standards/Frequency_Response.html>

If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

### **Background Information**

This posting is soliciting formal comment.

Frequency Response, a measure of an Interconnection’s ability to stabilize frequency immediately following the sudden loss of generation or load, is a critical component to the reliable operation of the bulk power system, particularly during disturbances and restoration. There is evidence of continuing decline in Frequency Response over the past 10 years, but no confirmed reason for the apparent decline. The proposed standard requires entities to provide data so that Frequency Response in each of the Interconnections can be analyzed, and the reasons for the decline in Frequency Response can be identified. The standard would set a minimum Frequency Response obligation for each Balancing Authority, provide a uniform calculation of Frequency Response and Frequency Bias Settings that transition to values closer to natural Frequency Response, and encourage coordinated AGC operation.

The Drafting Team made significant modifications to the proposed standard BAL-003-1 and associated documents based on industry comments from the second posting and initial ballot. These modifications include:

* Modifying the definition for Frequency Response Measure
* Removing reference to Reserve Sharing Groups and replacing with Frequency Response Sharing Group
* Creation of definition for Frequency Response Sharing Group
* Modifying Requirement R2
* Creating a new Requirement R3 for entities using variable Frequency Bias
* Removing requirement for operating in Tie Line Bias mode
* Removing Requirement R5 and combining into revised Requirement R2 and new Requirement R3
* Modifying Attachment A to provide additional clarity
* Creating a Procedure to provide instructions for the ERO to follow in supporting the standard
* Re-writing the Background Document to incorporate additional language for justification of requirements and provide additional clarity

You do not have to answer all questions. Enter all comments in simple text format.

1. The SDT has made minor modifications to the proposed definition for Frequency Response Measure based on industry comments. Do you agree that these modifications provide sufficient clarity? If not, please explain in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has created a definition for Frequency Response Sharing Group. The definition is as follows:

A group whose members consist of two or more Balancing Authorities that collectively maintain, allocate, and supply operating resources required to jointly meet the Frequency Response Obligations of its members.

Do you agree with this definition? If not, please explain in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The SDT has added Requirement R3 for entities using variable Frequency Bias.

R3. Each Balancing Authority that is a member of a multiple Balancing Authority Interconnection, is not receiving Overlap Regulation Service and utilizing a variable Frequency Bias Setting shall maintain a Frequency Bias Setting that is:

3.1 Less than zero at all times, and

3.3 Equal to or more negative than its Frequency Response Obligation when Frequency varies from 60 Hz by more than +/-0.036 Hz.

Do you agree with the proposed requirement? If not, please explain in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. Based on Industry comments the SDT has modified ”Attachment A- Supporting Document” to provide additional clarity. Do you agree with the modifications? If not, what modifications do you disagree with?

[ ]  Yes

[ ]  No

Comments:

1. The SDT has moved a portion of the material located in Attachment A and all of the material located in ”Attachment B- Process for Adjusting Bias Setting Floor” into a new document “Procedure for ERO Support of Frequency Response and Frequency Bias Setting Standard”. The SDT created this document to assign tasks to the ERO and provide instructions for the ERO to follow when carrying them out under the BAL-003-1 standard. Do you agree that the ERO should perform these tasks and that this document provides sufficient detail for the ERO to do it under the BAL-003-1 standard? If not, what needs to be added to the document?”.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is now using the method detailed in the Frequency Response Initiative Report dated September 30, 2012 to calculate the Interconnection Frequency Response Obligation. Do you agree that this method provides for the proper amount of Frequency Response? If not, what specifically needs to be changed?

[ ]  Yes

[ ]  No

Comments:

1. Based on Industry comments received the SDT made significant clarifying modifications to the Background Document. Do you agree that this document provides sufficient information to justify the rationale used by the SDT in developing the draft standard and provides the industry with sufficient understanding of the issues being addressed by the standard?

[ ]  Yes

[ ]  No

Comments:

1. If you are not in support of this draft standard, what modifications do you believe need to be made in order for you to support the standard? Please list the issues and your proposed solution to the issue.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard BAL-003-1.

Comments: