Unofficial Comment Form

Project 2017-01 Modifications to BAL-003-1.1

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the **Project 2017-01 Modifications to BAL-003-1.1** project. The electronic form must be submitted by **8 p.m. Eastern, Tuesday, July 18, 2017**.

Documents and information about this project are available on the [Project 2017-01 Modifications to BAL-003-1.1](http://www.nerc.com/pa/Stand/Pages/Project201701ModificationstoBAL00311.aspx) page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

# Background

The supporting documents for BAL-003-1.1 were developed using engineering judgment on the data collection and process needed to determine the Interconnection Frequency Response Obligation (IFRO) as well as the processing of raw data to determine compliance. Now that the standard is in place and the data is available for analysis, minor errors in assumptions as well as process inefficiencies have been identified. It was anticipated that as frequency response improves, the approaches embedded in the standard for annual samples may need to be modified. In addition to fixing the inconsistencies identified in the Frequency Response Annual Analysis Report (FRAA), the drafting team may separate the administrative and procedural items and reassign them to an alternative process subject to ERO and NERC Operating Committee approval.

Please provide your responses to the questions listed below along with any detailed comments.

## Questions

1. The SAR discusses revising BAL-003-1.1 standard concerning the ratio of Point C to Value B to correct the inconsistency in the ratio identified in the FRAA report. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. The SAR discusses revising the BAL-003-1.1 standard concerning modifying the Resource Contingency Protection Criteria (RCPC) to help ensure sufficient primary frequency response is maintained. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. The SAR proposes to review and modify as necessary Attachment A of the standard to remove administrative tasks and provide additional clarity. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. The SAR proposes to modify the FRS Forms to allow for collection and submission of performance data for Frequency Response Sharing Groups. Do you agree with this proposed revision? If not, please provide specific language on the proposed revision.

[ ]  Yes

[ ]  No

Comments:

1. Based on the scope of the SAR, do you have any other comments for drafting team consideration?

[ ]  Yes

[ ]  No

Comments: