

Consideration of Comments on Initial Ballot of Interpretation of BAL-003-0 — Frequency Response and Bias, Requirements R2, R2.2, R5, and R5.1

Summary Consideration: The drafting team (Resources Subcommittee) did not make any changes based on the comments received during the initial ballot for the interpretation of BAL-003-0 Requirements R2, R2.2, R5 and R5.1.

| Segment | Organization | Comment |
|--|------------------------|--|
| 6 | Entergy Services, Inc. | The interpretation of Requirement 5 states that the floor bias setting establishes a minimum level of AGC and also ensures a consistent measure of control performance. It is not clear as to why the Resources Subcommittee believes that ERCOT need not meet the floor requirement on the bias setting - is it because they use a variable bias or is it because they are a single BA Interconnection, or both? It appears that the interpretation needs an interpretation. The interpretation of R5 should explicitly address whether or not that BAs that are either: a single BA Interconnect, or using variable bias, are subject to R5. |
| <p>Response: The Resources Subcommittee (RS) was providing background on the logic for having a minimum bias obligation. The RS does believe that ERCOT needs to meet the floor requirement on the bias setting. Both a single Balancing Authority Interconnection and a Balancing Authority using a variable bias are subject to Requirement R5.</p> | | |
| 8 | JDRJC Associates | Requirement 5 needs further clarification. |
| <p>Response: We agree there are better ways to say that all Balancing Authorities must have a monthly average Bias greater than or equal to 1% of its projected annual peak load (or generation if it does not serve load).</p> | | |

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