

Individual or group. (3 Responses)

Name (1 Responses)

Organization (1 Responses)

Group Name (2 Responses)

Lead Contact (2 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)

Comments (3 Responses)

Question 1 (3 Responses)

Question 1 Comments (3 Responses)

Question 2 (2 Responses)

Question 2 Comments (3 Responses)

Question 3 (2 Responses)

Question 3 Comments (3 Responses)

Question 4 (3 Responses)

Question 4 Comments (3 Responses)

Question 5 (2 Responses)

Question 5 Comments (3 Responses)

Group
Duke Energy Generation Services
Colby Bellville
Yes
Yes
Duke Energy believes that the implementation of this standard will require substantial upgrades and costs to wind farm control systems of older plants in order to enable the frequency response feature. Some older wind turbines are incapable of meeting this proposed requirement without major SCADA and turbine hardware upgrades due to the pitch control, generator type, and converters used in these systems. If these major upgrades are not realized during the design and build phase of a project, some owners may be unable to absorb the costs necessary for compliance to this standard. Since primary over frequency response is not a paid service in the ERCOT market at this time, there is the potential for lost revenue associated with lost MWh's produced by a generating plant when responding to an over frequency event. For the above stated reasons, Duke Energy believes that the proposed standard poses a serious and substantial burden on competitive markets.

Individual
Thomas Foltz
American Electric Power
Yes
AEP is confident that TRE did indeed follow their internal procedures in developing this regional standard. Though we were not able to participate in this project’s commenting periods (AEP was apparently not a part of the original ballot pool for this project), AEP looks forward to working with TRE to ensure that we don’t miss out on future opportunities to contribute.
No
AEP is not aware of any adverse impacts posed to reliability or commerce, in a neighboring region or interconnection, as a result of this proposed standard.
No
AEP is not aware of any serious and substantial threats posed to public health, safety, welfare, or national security as a result of this proposed standard.
No
AEP is not aware of any serious and substantial burden posed on competitive markets within the interconnection that is not necessary for reliability as a result of this proposed standard.
Yes
Group
Southern Company: Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation and Energy Marketing
Marcus Pelt
Yes
No
No
Yes
Possibly. If an entities speed control equipment is not currently capable of being programmed as specified in the proposed standard, it should be allowed to be exempt from the requirements rather than required to make investments to alter the functional capabilities of the existing equipment.
Yes
The proposed standard has requirements that are not included in the corresponding continent-

wide reliability standard - there is no existing continent wide standard specifying the Governor setting or performance criterion specification.