

**ReliabilityFirst Planning Resource Adequacy Analysis, Assessment and Documentation (BAL-502-RF-03) 30-Day Comment Period - 09/12/2016 - 10/11/2016**

<b>Question 1</b>	Do you agree with the newly added Time Horizons for each Requirement? If not, please provide specific comments on why you do not agree with the newly designated Time Horizons.
-------------------	---

<b>Consideration of Comments</b>	One commenter agreed with the newly designated Time Horizons. One commenter indicated that the BAL-502-RF-03 Standard should be retired. The SDT disagreed as it is outside the scope of the SAR to determine if the BAL-502-RF-03 Standards should be retired. No changes made.
----------------------------------	--

<b>Answers</b>	<b>Frequency</b>
Yes	1
No	1
Abstain	0

<b>Commenter</b>	<b>Answer</b>	<b>Comment</b>	<b>Response</b>
Scott Cunningham (OVEC)	No	The standard should be retired as it does not address a reliability need. There are adequate market incentives to fill the planning reserve requirement.	<p>It is outside of the Standards Authorization Request (SAR) to determine whether the standards should be retired. During the SAR comment period (conducted 04/01/16 – 05/10/16), all individuals whom provided comments agreed with the scope of the SAR. Furthermore during the “five year review” comment period (conducted 02/29/16 – 03/09/16), all individuals who provided comments indicated the Standard should be re-affirmed.</p> <p>Also, the BAL-502-RF-03 standards does not require the Planning Coordinator to “fill the planning reserve requirement”, rather it establishes common criteria, based on “one day in ten year” loss of Load expectation principles, for the analysis, assessment</p>

			and documentation of Resource Adequacy for Load in the ReliabilityFirst Corporation region.
Sean Bodkin (Dominion)	Yes		Thank you.

<b>Question 2</b>	Do you agree with the non-substantive changes made throughout the Standard? If not, please provide specific comments on why you do not agree with the non-substantive changes made throughout the Standard.
-------------------	---

<b>Consideration of Comments</b>	Both commenters agreed with the non-substantive changes. It was noted, outside of the comment period, that there was two non-substantive formatting in Section C (Compliance). The first issue was the numbering started with a five and it should have started with a one. The second issue was the heading for 1.1 was incorrectly labeled as “Compliance Monitoring Authority” when it should have been labeled as “Compliance Enforcement Authority”. Both non-substantive issues have been addressed and reflected in the posted redline version.
----------------------------------	--

Answers	Frequency
Yes	2
No	0
Abstain	0

Commenter	Answer	Comment	Response
Scott Cunningham (OVEC)	Yes		Thank you.
Sean Bodkin (Dominion)	Yes		Thank you.

<b>Question 3</b>	Do you agree that the newly added Requirement R3 is responsive to the Directive noted in FERC Order No 747, to include a requirement requiring the Planning Coordinator to identify any gap between the needed amount of planning reserves defined in Requirement R1.1 and the planning reserves determined from the resource adequacy analysis? If not, please provide specific comments on why you do not agree that the newly added Requirement R3 is responsive to the FERC Directive.
-------------------	--

<b>Consideration of Comments</b>	One commenter agreed with the newly added Requirement R3. One commenter indicated that there is no requirement in any standard to address the gap. The SDT agreed as NERC’s ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA. No changes made.
----------------------------------	--

Answers	Frequency
Yes	1
No	1
Abstain	0

Commenter	Answer	Comment	Response
Scott Cunningham (OVEC)	No	Even if the PC identifies a gap, there is no requirement in any standard to address the gap. There are market incentives for resource owners to address the planning reserve requirement.	You are correct, if the PC identifies a gap, there is no requirement in any standard to address the gap. NERC's ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA and thus no corresponding requirement is proposed.  Furthermore, the addition of the new requirement R3 was a result of a Directive noted in FERC Order No 747.
Sean Bodkin (Dominion)	Yes		Thank you.

<b>Question 4</b>	Do you agree with the newly included Measure M3? If not, please provide specific comments on why you do not agree with the newly included Measure M3.
-------------------	---

<b>Consideration of Comments</b>	One commenter agreed with the newly added Measure M3. One commenter indicated that there is no requirement in any standard to address the gap. The SDT agreed as NERC's ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA. No changes made.
----------------------------------	--

Answers	Frequency
Yes	1
No	1
Abstain	0

Commenter	Answer	Comment	Response
Scott Cunningham (OVEC)	No	Similar to the above question, the PC may document load and	You are correct, if the PC identifies a gap, there is no requirement in any

		resources, but there is no requirement in the standards to address any gaps.	standard to address the gap. NERC's ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA and thus no corresponding requirement is proposed.  Furthermore, the addition of the new requirement R3 was a result of a Directive noted in FERC Order No 747.
Sean Bodkin (Dominion)	Yes		Thank you.

<b>Question 5</b>	Do you agree with the newly included Violation Severity Levels (VSLs) for Requirement R3? If not, please provide specific comments on why you do not agree with the newly included VSLs for Requirement R3.
-------------------	---

<b>Consideration of Comments</b>	One commenter agreed with the newly added VSLs. One commenter indicated these standards must function in a market environment, market incentives should address the requirements. The SDT noted that the BAL-502-RF-03 standards does not require the Planning Coordinator to "fill the planning reserve requirement", rather it establishes common criteria, based on "one day in ten year" loss of Load expectation principles, for the analysis, assessment and documentation of Resource Adequacy for Load in the ReliabilityFirst Corporation region. The SDT also noted NERC's ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA. No changes made.
----------------------------------	---

Answers	Frequency
Yes	1
No	1
Abstain	0

Commenter	Answer	Comment	Response
Scott Cunningham (OVEC)	No	Given that these standards must function in a market environment, market incentives should address the requirements. If they do not, we should not be fostering a market-driven system.	Thank you for your comment.  The BAL-502-RF-03 standards does not require the Planning Coordinator to "fill the planning reserve requirement", rather it establishes common criteria,

			<p>based on “one day in ten year” loss of Load expectation principles, for the analysis, assessment and documentation of Resource Adequacy for Load in the ReliabilityFirst Corporation region.</p> <p>NERC’s ability to require the building or acquisition of new generating capacity, is prohibited by section 215(a)(3) of the FPA and thus no corresponding requirement is proposed.</p>
Sean Bodkin (Dominion)	Yes		Thank you.

<b>Question 6</b>	Do you agree with the BAL-502-RF-03 Implementation Plan? If not, please provide specific comments on why you do not agree with the BAL-502-RF-03 Implementation Plan.
-------------------	---

<b>Consideration of Comments</b>	One commenter agreed with the Implementation Plan. One commenter reiterated comments submitted for question 1 and 5. No changes made.
----------------------------------	---

Answers	Frequency
Yes	1
No	1
Abstain	0

Commenter	Answer	Comment	Response
Scott Cunningham (OVEC)	No	See responses to questions 1 and 5.	See responses to questions 1 and 5.
Sean Bodkin (Dominion)	Yes		