**Comment Form**

**SAR-013: Revisions to Regional Standard**

**BAL-001-TRE-2**

##### E-mail completed form to rsm@texasre.org

Comments must be submitted by **November 6, 2025**.

Commenter Information

**Name**: Click here to enter text.

**Registered Entity**: Click here to enter text.

**E-mail**: Click here to enter text.

**Telephone**: Click here to enter text.

Background

On June 28, 2024, ERCOT submitted a Regional Standard Authorization Request (SAR) to revise Texas RE’s Regional Standard BAL-001-TRE-2. The MRC accepted the SAR as a project during its September 18, 2024, meeting.

The SAR consisted of three objectives:

* Include a provision that allows any generation resource that is not qualified to provide Operating Reserves to widen the resource’s Governor deadband to +/- 0.036 Hz upon confirmation from the Balancing Authority (BA).
* Clarify the roles of the Generator Owner (GO), Compliance Enforcement Authority (CEA), and the BA as they pertain to the Compliance Monitoring Period and Reset Time Frame (Section C: 1.2) in regards to resetting the 12-month rolling average Primary Frequency Response (PFR) performance score.
* Define PFR performance requirements for Battery Energy Storage Systems (BESS).

The following documents are posted for review:

* Draft Regional Standard BAL-001-TRE-3 Clean
* Draft Regional Standard BAL-001-TRE-3 Redline
* BAL-001-TRE-3 Implementation Plan
* Description of Revisions

Comments

**1. Regional Standard BAL-001-TRE-3: Do you agree with the revisions to Requirement R6, to include a provision that allows any generation resource that is not qualified to provide Operating Reserves to widen the resource’s Governor deadband to +/- 0.036 Hz upon confirmation from the Balancing Authority (BA)?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**2. I Regional Standard BAL-001-TRE-3: In Regional Standard BAL-001-TRE-3 Requirement R6, what evidence should be provided for generating units to show they have obtained prior approval from the BA?**

Please provide justification for your answer.

Click here to enter text.

**3. Regional Standard BAL-001-TRE-3: Do you agree with the revised and/or added footnotes 2, 3, and 4?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**4. Regional Standard BAL-001-TRE-3: Do you agree with adding battery energy storage system (BESS) to section A. 6 and throughout BAL-001-TRE-3 and the attachments?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**5. Regional Standard BAL-001-TRE-3 Section C. 1.2: The drafting team revised the Compliance Monitoring Period and Reset Time Frame to clarify the roles and timing of when the GO should initiate the process to reset its rolling average. Do you agree with the change?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**6. Attachment 1: Primary Frequency Response Reference Document: Do you agree with the revised descriptions of Maximum Megawatt Governor Control System (MWGCS**) and **Design Settings versus real-time Evaluation?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

7. Attachment 1: Primary Frequency Response Reference Document: The drafting team changed HSL to MWGCs  throughout the Primary Frequency Response Reference Document. Do you agree with this change?

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**8. Implementation Plan - Do you agree Regional Standard BAL-001-TRE-3 should become effective on the first day of the first calendar quarter after the effective date of the applicable governmental authority’s order approving the standard?**

[ ]  Yes

[ ]  No

Please provide justification for your answer.

Click here to enter text.

**9. Do you have any additional comments for the standard drafting team?**

[ ]  Yes

[ ]  No

Comments:

Click here to enter text.