**NCPA Comments**

***New telemetry requirements due to NERC standard BAL-003-1.1***

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NCPA supports “no changes” with the possible exception of the discrete status of “governor blocking status (on/off)”.

Droop settings, deadband and ramp rates are typically not “operator configurable” settings for any governor, and require intervention by a trained technician followed by test verification which would include an outage. The only exception is the very limited number of machines configured to allow for isochronous operation (none owned by NCPA), and their operation in this mode would be restricted to the period where the BA is not in control of the grid anyway, so in a sense there is no “real time” ability to modify these settings. Further, machines > 10 MVA within WECC are already required to submit dynamic data including these parameters for use in base case studies, so the data is available to CAISO from another source for use in their modeling studies.

The addition of these suggested telemetered values will not provide any significant improvement in the BA’s ability to assure grid reliability, but will add increased costs for implementation and maintenance of the telemetering infrastructure.