

March 20, 2015

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: Informational Filing, Frequency Response Annual Analysis
Docket No. RM13-11-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits its 2014 Frequency Response Annual Analysis report for the administration and support of proposed Reliability Standard BAL-003-1 – Frequency Response and Frequency Bias Setting (“Report”). The Report attached hereto provides an update to the statistical analyses and calculations contained in the 2012 Frequency Response Initiative Report included as Exhibit F to the March 29, 2013 NERC petition for approval of proposed Reliability Standard BAL-003-1.

Specifically, the Report contains the analysis and annual recommendations for the calculation of the Interconnection Frequency Response Obligations (IFROs). The Report also analyzes: (i) the frequency events occurring between January 1, 2011, and May 31, 2014, and the interconnection frequency characteristics for the period January 1, 2011 through December 31, 2013, to determine appropriate adjustment factors for calculating the IFROs; (ii) the trends in primary Frequency Response sustainability or withdrawal throughout the frequency events; and (iii) frequency anomalies discovered in the 1-second frequency data used as the basis for calculating starting frequencies.

Dynamic simulations of the Eastern, Western, and ERCOT Interconnections for the recommended IFROs showed those levels of primary Frequency Response to be adequate to avoid tripping of the first stage of the interconnection UFLS systems. Light-load cases were used for the analyses, as proposed in Paragraph 41 of the NOPR. Evaluation of field trial data regarding the use of a linear regression method for calculating the Balancing Authority Frequency Response Measure is not included in the Report, but is currently ongoing.

The Frequency Response performance for all four interconnections from 2011 through 2013 exhibits stable trends. No changes are proposed to the procedures recommended in the 2012 Frequency Response Initiative Report.

NERC is not requesting any Commission action on the instant filing. NERC respectfully requests that the Commission accept this filing for informational purposes only.

Respectfully submitted,

/s/ Holly A. Hawkins
Holly A. Hawkins

*Counsel for North American Electric Reliability
Corporation*

cc: Official service list in Docket No. RM13-11-000