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OIR-18-01 Operational Balancing Authority definition

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Perhaps "Operational Balancing Authority" should replace "Control Area Operator"?

As it becomes more difficult to manage power sources, the notion of "Control Areas" become less relevant.

EIA document 2__Plant_Y2019.xlsx lists transmission and distribution owners that have power plants balanced by a entity responsible for the operation of a different control area.

There will be many more power plants requiring balancing by different Balancing Authorities for a Balancing Authority that is not capable of balancing all power plants in their control area. This lack of balancing capability will cause reductions of renewable energy sources available, if the current paradigm remains.

The term "Operational Balancing Authority" is taken from Public Utilities Code - PUC 399.17. (a) (1) (B) that says "Was located in a control area that is not under the operational balancing authority of the Independent System Operator or other California balancing authority and receives the majority of its electrical requirements from generating facilities located outside of California."

Please replace "Control Area Operator" definition with the following.

"Operational Balancing Authority" means the entity responsible for the balancing power plants in one or more control areas. May also be referred to simply as "Balancing Authority".

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