

## COMMENT FORM FOR COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE ASSOCIATED IMPLEMENTATION PLAN

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.  
**Do** use punctuation and capitalization as needed (except quotations).  
**Do** use more than one form if responses do not fit in the spaces provided.  
**Do** submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
**Do not** use numbering or bullets in any data field.  
**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Ray Morella</b>
Organization:	<b>FirstEnergy Corp</b>
Telephone:	<b>330.384.5686</b>
Email:	<b>morellar@firstenergycorp.com</b>
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
- Implementation Plan
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- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

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1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Ed Davis</b>
Organization:	<b>Entergy Services</b>
Telephone:	<b>504-495-2635</b>
Email:	<b>edavis@entergy.com</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Robert Williams</b>
Organization:	<b>PacifiCorp</b>
Telephone:	<b>(503) 251-5197</b>
Email:	<b>robert_l.williams@pacificorp.com</b>
NERC Region	Registered Ballot Body Segment
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Yes

No

Comments: The TSP is currently responsible for this task in the WECC. The Reliability Coordinator does not have the ability to perform the task. This change in the standard aligns more with current practices.

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

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Yes

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Comments:

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Yes

No

Comments: The Interchange Authority Function has not been established in the WECC. Once it is established, some amount of time should be allowed to implement and settle into this new process (at least one year). For the most part, coordination of interchange meets the current policies and RMS (Reliability Management Systems) requirements, which are not far removed from the proposed standards and compliance measures.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

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**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:     **Do** enter text only, with no formatting or styles added.  
**Do** use punctuation and capitalization as needed (except quotations).  
**Do** use more than one form if responses do not fit in the spaces provided.  
**Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
**Do not** use numbering or bullets in any data field.  
**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Kathleen A. Davis</b>
Organization:	<b>Tennessee Valley Authority</b>
Telephone:	<b>423-751-6172</b>
Email:	<b>kadavis@tva.gov</b>
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

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INT-005	New - Interchange Authority Distributes Arranged Interchange
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INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

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- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments: in R1.2 the word "system" should be replaced with the word "scheduling" to clear up any confusion

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

R1.1 should be "less" losses

R1.2 insert the word "adjacent" before Balancing Authority. Not sure what is meant by "registered"

R1.4 Instead of the word "defined" use the word "verified" or "confirmed"

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: R1 should be rewritten and simplified. It'd hard to understand it's meaning..

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

Comments:

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: R 3 is too broad and ambiguous to determine meaning.

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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           **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>John Horakh_10-14-2005</b>
Organization:	<b>MAAC</b>
Telephone:	<b>609-625-6014</b>
Email:	<b>john.horakh@pepcoholdings.com</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments: Agree this should be retained (with changes suggested) to cover internal BA transactions

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments: Agree this should be completely deleted because it mandates a specific tool

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments: This should be completely deleted and any relevant parts placed into INT-009-1. Otherwise there are two separate standards covering the same subject

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments: This should be completely deleted and any relevant parts placed into INT-010-1. Otherwise there are two separate standards covering the same subject

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Mike Pfeister</b>
Organization:	<b>SRP</b>
Telephone:	<b>602-236-3970</b>
Email:	<b>mjpfeist@srpnet.com</b>
NERC Region	Registered Ballot Body Segment
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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: The reliability assessment period for WECC should be at least 10 minutes; the same as all other interconnections. There does not appear to be a reliability related reason to prescribe less assessment time for WECC.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: A requirement pertaining to the specified source's ability to

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments: Definition of Implemented Interchange in INT-009 may be clearer if "ramps" is used in place of "enters". If the start of the ramp is not the intent of this definition, the point in time where "enters" occurs should be better defined.

INT-007 - I could not get a whole row of text entered into question 6. A requirement pertaining to the specified source's ability to accommodate should be added. Proposed - "R1.6 The specified source is available to supply megawatts at the magnitude and ramp rate documented in the Request For Interchange". This is important to ensure that the RFI is an accurate depiction of interchange from source to sink, which is key to calculate scheduled path flows in order to implement mitigation measures when appropriate.

### **Questions About Implementation Plan**

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments: Reliability Standards pertaining to any entity submitting a RFI should remain in tact, regardless of what is characterized as a "Business Practice".

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Shirley Buckmier</b>
Organization:	<b>Bonneville Power Administration (Transmission)</b>
Telephone:	<b>360-418-2583</b>
Email:	<b>smbuckmier@bpa.gov</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input checked="" type="checkbox"/> WECC	<input checked="" type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA - Not Applicable	



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## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments: The numbering is not consistent between all documents. under Section D. Compliance. INT-005 through 007 has one set of numbering and INT 008 through 009 has another numbering system. Not a big deal, but it should be consistent.

Also the NERC and NAESB definitions glossary should match up and they don't.

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

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Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

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Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Jeff Baker</b>
Organization:	<b>Cinergy</b>
Telephone:	<b>513-287-3368</b>
Email:	<b>jeff.baker@cinergy.com</b>
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

## COMMENT FORM FOR COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE ASSOCIATED IMPLEMENTATION PLAN

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:       **Do** enter text only, with no formatting or styles added.  
           **Do** use punctuation and capitalization as needed (except quotations).  
           **Do** use more than one form if responses do not fit in the spaces provided.  
           **Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
           **Do not** use numbering or bullets in any data field.  
           **Do not** use quotation marks in any data field.  
           **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision
- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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### Please Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

### Questions About Proposed Coordinate Interchange Standards

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1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: This standard is applicable to a yet to be defined entity called the Interchange Authority. There are some statements in the supporting documents that this is the sink until it is determined who or what the IA is. If the sink is responsible, why make things confusing? The sink BA can always delegate the task to another entity (or the standard can be revised) if one evolves. This standard, as well as the others in this set, appear to allow ad hoc audits of up to 3 months' RFIs to look for cases where an entity didn't get a request on time or failed to implement a schedule properly. Every standard in this set has the same levels of non-compliance (level 1 for 1 missing, level 2 for 2 missing, etc.) with no regard to MW amount or impact on frequency or security. This appears to be pulled out of the air as opposed to being based on analysis of history or true impact on reliability. Since the Interconnections are months behind in energy accounting, there must be cases of schedules not being communicated entirely. Level 3 and 4 compliance violations should be reserved for things that have significant impact on reliability.

We are also concerned that this standard requires expeditious processing of a form adopted and managed by another standards-setting organization. What safeguards are in place to ensure the industry has the infrastructure in place to process "new and improved" versions of the RFI?

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: See earlier comments on Interchange Authority.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: See comments above regarding compliance for INT 005.

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: While the intent is fine and we agree with the need for balanced transactions, see earlier comments regarding Interchange Authority.

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: See comments above regarding compliance for INT 005.

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: While we agree with the need for sink and source BA coordination, see earlier comments regarding the Interchange Authority.

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: See comments above regarding compliance for INT 005.

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: See comments above regarding compliance for INT 005.

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: This standard deals with some unclear exceptions (energy sharing agreements, an undefined term, of which Reserve Sharing Agreements appear to be a subset along with other "local" transactions). If the intent is to allow Reserve Sharing or redispatch to be done for a limited time (such as for up to a clock hour subsequent to a resource loss) and not be tagged, say so. Such an exemption should only be allowed if alternate notification of the transaction exists (such as through a regional messaging systems or RCIS)

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: See comments above regarding compliance for INT 005.

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments: We are concerned about the general confusion building standards around an entity that doesn't exist today (Interchange Authority) and how coordination will be done with NAESB such that their future business changes will be accommodated within the NERC infrastructure and timelines.

16. Do you agree with the proposed changes to INT-002? If no, please comment.

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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Yes

No

Comments: See response to item 15.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments: See response to item 15.

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments: See response to item 15.

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: The proposed standards deal with an entity that doesn't exist today, a "request for interchange" format or mechanism that is defined outside the scope of the standard, and an untested expectation of what performance should be.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

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**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Melinda Montgomery</b>
Organization:	<b>Entergy Services Inc</b>
Telephone:	<b>870-541-4578</b>
Email:	<b>mmontg3@entergy.com</b>
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
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The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

### Please Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

### Questions About Proposed Coordinate Interchange Standards

---

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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

– Comments:

– Question : What happens if the IA fails to meet the requirement to distribute the interchange to all parties within the prescribed time? Does the IA try again? Does the interchange just get dropped (become dead).

– Throughout the coordinate interchange standards, definitions for terms used in the NERC standards and the NAESB Business Practices should be the same. If the NERC term needs to have a different definition, perhaps it should be a different term.

– For this standard the defined term Confirmed Interchange should be the NAESB defined term. Conversely, if the NAESB term is changed to match the NERC definition, the definition of both terms should include the phrase "has been reviewed and approved by all required entities with approval rights."

– R1-Include who the "reliability entities involved in the transaction" are for clarity. The NAESB business practice includes a term called Approval Entity that includes TSPs, Bas and the PSEs involved in the transaction. TOPs and Scheduling Entities should also be included as an involved reliability entity.

M1-What would constitute evidence that the sink BA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled complaints from customers that I failed to meet standard INT-005, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

record of any instance in which the IA failed to send the transaction to the required entities in the required time must be created. Details of what information that record must contain should be provided.

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.
- Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to distribute the interchange to the required parties, or is the self-certification based upon the most recent 3 months of data? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.
- I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.
- Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to IA failure, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.
- There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.
- The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 1 minute outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag authority, which is that the tag authority must be available 99.5% of the time each month. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: IA experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: IA experienced an unplanned outage in excess of 2 hours AND more than 20 transactions were affected.

The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

Yes

No

– Comments: Throughout the coordinate interchange standards, definitions for terms used in the NERC standards and the NAESB Business Practices should be the same. If the NERC term needs to have a different definition, perhaps it should be a different term.

For this standard the defined term Confirmed Interchange should be the NAESB defined term. Conversely, if the NAESB term is changed to match the NERC definition, the definition of both terms should include the phrase “has been reviewed and approved by all required entities with approval rights.”

The TSP and the BA are limited in their approval criteria from those in the version 0 standards, presumably because the IA is performing those functions. This is a departure from the way these functions are performed today. The IA does not know the loss provision requirements of each TSP included on the tag, nor do they know all the interconnections for each TSP and BA to test for contiguousness of the transmission and scheduling entity arrangements for each transaction. These are properly the responsibility of the TSPs and BAs on the tag. Therefore, I suggest adding back the deleted language in R1 (by acknowledging that the Arranged Interchange is acceptable and reliable with respect to their functional responsibilities), adding to R1.1 verification of scheduling path and adding to R1.2, connectivity of adjacent TSPs and adequacy of loss accounting provided. Also, the Transmission Operator should be the one to evaluate the tag to ensure that the transaction will not violate prevailing system limits. The TSP is evaluating the tag to ensure that the transmission reservation information is appropriate to the tag, and that losses are supplied, if required.

M1-What would constitute evidence that the BA and TSP for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the approval entities in any reporting form. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled complaints from customers that I failed to meet standard INT-006, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the BA or TSP failed to respond to the IA request must be created. Details of what information that record must contain should be included.

The creation of reports and records of instances when we failed to meet this standard is not something that has been done to this point, and there would be time needed to develop the tools needed to show that an entity meets this standard. This is not consistent with the implementation plan which indicates that compliance with this standard is already an expectation and that no time is needed to comply with the standard.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TSP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the BA or TSP complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.
- The initial self-certification seems to be necessary in INT-005 because the IA is not an entity that is certified today. However, the BA is, and will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4.
- Rather than require all data and system logs (which the BAs and TSPs currently do not have) be made available for inspection (which would be a lot of data for three months), require them to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to BA or TSP failure to approve, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.
- There should be a way for the BA/TSP or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.
- The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 10 minute outage of the entity's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the entity had gotten its act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag approval service, which is that the tag approval service must not have more than 1% of its tags for a month in the COMM\_Fail state. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: Entity experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: Entity experienced an unplanned outage in excess of 2 hours AND more than 20 transactions were affected...

The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: The implementation plan indicates that the IA will be, in essence, the sink BA for the transaction, acting as the tag authority, and that all of these functions are already being performed. The sink BA in the current tagging environment does not have the responsibility to check to ensure that appropriate losses are provided for each transmission provider, or that there are contiguous transmission

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

service arrangements from the source to sink. The approval entities perform those necessary checks. The IA function should only check for R1.4, that required elements of the transaction are defined and R1.5, that all reliability entities have provided approval. The appropriate reliability entities should continue to perform the other checks as they do under current policy. Those sections of current policy should not be removed as proposed in the implementation plan. R 1.1, 1.2, and 1.3 should be deleted from this standard.

M1-What would constitute evidence that the IA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled times I failed to verify Arranged Interchange information, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the IA failed to verify the Arranged Interchange information, must be created and retained. Details of what information that record must contain should be provided.

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: Question: What does a failure of this measure look like? How can an observer tell that a transaction was not verified, that the required elements were defined, and all entities approved? Is the outcome that a flawed, or unapproved tag becomes Confirmed Interchange? Or could the failure, look just like any other valid, approved tag, which was not properly evaluated, but would have passed the evaluation had it occurred? If so, this may be a difficult measure to implement.
- 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.
- Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to verify arranged interchange data, or is the self-certification based upon the most recent 3 months of data showing that the verification was performed? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.
- I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.
- Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that the IA

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

failed to verify based upon the requirements of this standard, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.

- There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.
- The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, any outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The levels of non-compliance should include an element of time, and one of tags impacted, as suggested for some other standards.

The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

- Comments: Question : What happens if the IA fails to meet the requirement to distribute the confirmed interchange to all parties within the prescribed time? Does the IA try again? Does the interchange just get dropped (become dead). What does a failure of the IA to meet this standard look like?

- TOPs and Scheduling Entities should also be included as an involved reliability entity to whom the Confirmed Interchange is distributed.

M1-What would constitute evidence that the sink BA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the IA to provide this evidence. In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the IA failed to send the confirmed interchange to the required entities in the required time must be created. Details of what information that record must contain should be provided.

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

- Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to distribute the interchange to the required parties, or is the self-certification based upon the most recent 3 months of data? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.
- I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.
- Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to IA failure, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.
- There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.
- The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 1 minute outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag authority, which is that the tag authority must be available 99.5% of the time each month. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: IA experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: IA experienced an unplanned outage in excess of 2 hours AND more than 20 transactions were affected...

The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: Although the language related to "evidence" is a bit vague, I believe that I understand how a Balancing Authority could demonstrate that it met the standard.

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TSP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

certification that the BA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.

- The initial self-certification seems to be necessary in INT-005 because the IA is not an entity that is certified today. However, the BA is certified, and will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4.
- Rather than require all data and system logs (which the BAs and TSPs currently do not have) be made available for inspection (which would be a lot of data for three months), require them to provide an exception report as a part of the quarterly self-certification that details the times for which the net confirmed interchange received from the IA did not equal the net scheduled interchange component of the entity's ACE, and an explanation of why the difference occurred. The compliance monitor will determine whether the difference represents an error (non-compliance) or an appropriate response to an emergency situation (emergency transaction implemented with other BA prior to tag being submitted to IA).
- The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. I suggest that the levels of non-compliance be based upon the impact upon the interconnected systems. For instance, Level 1: BA made scheduling error in the amount of 50 MW AND there was no noticeable effect upon the Interconnection. Level 2: BA made scheduling error in the amount of 100 MW or greater AND there was no noticeable effect upon the Interconnection. Level 3: BA made scheduling error in the amount of 200 MW or greater AND there was minor impact on the Interconnection. Level 4: BA made scheduling error of greater than 250 MW OR there was noticeable negative impact on the Interconnection.

The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: The Reliability Coordinator should not be made responsible for having the tag or change to a tag submitted within the required time period. It should be the responsibility of the party that was directed to make the change. For instance, if a Reliability Coordinator directs a TOP to cut schedules, it would be the TOPs responsibility to submit the curtailment to the tag. If the Reliability Coordinator directs a BA to cut sales or implement an emergency transaction to get his system balanced, the BA would be responsible for getting those changes made with the source or sink on the other end and for submitting the tag changes.

M1-3: What would constitute evidence that the BA or TOP for the transaction met the requirement? To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the RC gave a direction that required an Interchange Transaction to be created or modified must be created, as well as a record of any time that an entity implemented an interchange transaction whose duration exceeded 60 minutes for an energy sharing agreement. For each such record, the entity would have to show that a corresponding interchange transaction or modification of an existing interchange transaction was done that met the standard. It is possible to be very specific without specifying the tool used.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

- Comments: 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TOP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the BA or TOP complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.
- The BA and TOP will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4.
- Rather than require all data and system logs be made available for inspection (which would be a LOT of data), require them to provide a report as a part of the quarterly self-certification that details when one of the initiating events for this standard occurred and the interchange transactions created or modified to meet the requirements of the standard, including the proposed start time for the ramp, and the time created or modified.

The compliance reset period should be 1 calendar quarter with no violation.

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments: There are gaps between what is required by INT-002 and what is being implemented in INT-005 and INT-008. For instance, while it is true that the intermediate balancing authorities are not

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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currently included on the tag, they are represented by the scheduling entities between the source and sink balancing authorities. This communication of the interchange with the scheduling entities needs to be included in INT-005 and INT-008. See comments for INT-005 and INT-008 for additional comments about gaps that exist between how the tag authority service works today and what the IA is expected to do in the near future. If these functions are not specified in the new standards, they should not be removed from the INT-002. For example, INT-007 indicates that appropriate loss provisions will be assessed by the IA, and INT-006 does not include the validation of loss provision as a responsibility of the TSP, but the verification of loss accounting is being removed as a provision of INT-002.

Also, connectivity of transmission path is being verified by the IA, which is inconsistent with current practice. That portion of INT-002 should remain with the TSP, not with the IA, which may not have sufficient information to make that assessment.

Likewise, in INT-002 R3.4, the Balancing Authorities are responsible for determining if the BAs and Scheduling Entities on the path are contiguous. In INT-006, the IA is responsible for that verification. I am concerned that the sink BA may not know all necessary BAs, scheduling entities, or TSPs between a given source and sink, whereas each BA knows its own neighboring areas.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments: There is language in INT-004 that refers to how interchange modification in response to a loss of generation will be handled. While I agree that a portion of this standard is replaced by INT-010, there is still a portion of INT-004 that is not. Specifically, the fact that if a loss of generation occurs, the host BA for the source has the ability to modify the transaction, and that for a loss of load, the host BA for the sink has the ability to modify the transaction. These are special situations that do not require an emergency change with a retroactive interchange transaction under INT-010. I think that INT-004 R2, 2.1, 2.2 should remain in the standard.

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: As discussed above, I don't believe that a lot of the evidence is currently in the hands of the IA, BA, TSP. Reports, and possibly user interfaces to the tagging systems may have to be created. I suspect that displays, and reports would initially be provided by the vendor, so I don't have an idea of how long it would take to develop.

In the cases where the new standards differ from the existing standards in who is performing which validation, business rules may need to be developed, training may need to be developed and provided to operators, or automated validation checks built into software. I would estimate it would take on the order of 4-6 months to complete those activities.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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No

Comments: I am concerned that there is a disconnect between who has the responsibility for compliance with these measures (the reliability entities) and who has control over the communication of the information (in most cases, a third party vendor). If the IA fails to send the data within the required time, how will the sink BA performing that function be able to mitigate the problem? By breaking a service contract, finding a new vendor? And in the time it takes to effect these solutions, more non-compliances would be mounting.

While I do not expect that our vendor would fail these standards, unless it were because of planned outages necessary for the maintenance of the systems, I am concerned that we will have to comply with standards we have little direct influence upon.

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:       **Do** enter text only, with no formatting or styles added.  
             **Do** use punctuation and capitalization as needed (except quotations).  
             **Do** use more than one form if responses do not fit in the spaces provided.  
             **Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
             **Do not** use numbering or bullets in any data field.  
             **Do not** use quotation marks in any data field.  
             **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Kristy Humphrey</b>
Organization:	<b>Bonneviller Power Administration Power Business Line</b>
Telephone:	<b>503-230-5780</b>
Email:	<b>kjhumphrey@bpa.gov</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input checked="" type="checkbox"/> WECC	<input checked="" type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA - Not Applicable	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision
- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments: Formatting is not consistent for Section D. Compliance. INT-005 through 007 has one set of numbering and INT 008 through 009 has another numbering format. NERC Standards and NAESB Coordinate Interchange Business Practices need to utilize the same dictionary or glossary to avoid confusion. See attached word document for additional comments

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:



**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:       **Do** enter text only, with no formatting or styles added.  
              **Do** use punctuation and capitalization as needed (except quotations).  
              **Do** use more than one form if responses do not fit in the spaces provided.  
              **Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
              **Do not** use numbering or bullets in any data field.  
              **Do not** use quotation marks in any data field.  
              **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>John Simonelli</b>
Organization:	<b>ISO New England</b>
Telephone:	<b>413 535-4157</b>
Email:	<b>jsimonelli@iso-ne.com</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

**Group Comments (Complete this page if comments are from a group.)**  
Group Name:  
Lead Contact:  
Contact Organization:  
Contact Segment:  
Contact Telephone:  
Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
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INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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### Please Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

### Questions About Proposed Coordinate Interchange Standards

---

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments: ISO New England believes that the TSP is more aligned with the commercial aspects of transmission service, e.g., the computation of forward looking TTC and ATC, the sale of transmission service, etc. Based on our understanding of the latest version of the functional model, the TSP should be involved in the NAESB standard as part of commercial approval process. The reliability aspect of transmission system falls on the TOP who is responsible for operation of the grid. We believe the TOP should be the entity performing the reliability assessment of transmission system as part of transaction validation.

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: - ISO New England believes that the data validation items which are prescribed in the INT-007 standard are more suitable to be included in the INT-005 standard. The Arranged Interchange should not be distributed for reliability assessment unless the fundamental data within the RFI is validated. However, these validations must be automated in order to be performed in the timeline shown in Table A. In addition, the new registry must be designed to accommodate the specific validation requirements from the IA.

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on the standards, we cannot comment on the compliance items at this time

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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No

– Comments: Please see note on Question 1 regarding the use of TSP vs TOP. Requirement 1.2 should be rephrased to eliminate the reference to “confirming transmission service arrangements”. The validation of the transmission service arrangements should occur on the commercial side before the RFI is submitted as an Arranged Interchange for a reliability assessment.

– The BA should be looking at the previous requirements defined in INT-002 R3. R3.1.Transaction start and end time. R3.2.Energy profile (ability to support the magnitude of the transaction). R3.3.Ramp (ability of generation maneuverability to accommodate).

– The phrase in Requirement 1.2 that indicates that approval of Arranged Interchange confirms 'prevailing transmission system limits will not be violated' should be reconsidered. We recognize that this requirement is consistent with the current standard. However, various business practices for both physical and financial systems may currently allow approval of a tag (when submission time is well in advance of a start time) regardless of the system limits. Nevertheless, all Tags are re-evaluated an hour prior to the start in order to determine real time conditions of the system and which Tags will flow and which tags are curtailed. We believe this practice should be allowed to continue – in which case this requirement needs to be rephrased.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on the standards, we cannot comment on the compliance items at this time

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

– Comments: As commented in INT-005, we believe the data validations on the Arranged Interchange should be performed before the Arranged Interchange is distributed for reliability assessment. The scope of the INT-007 standard should describe the IA steps to compile the statuses from various reliability entities and generate the overall interchange status.

– In addition, the current prescribed Requirement 1.3 should be performed in the market based evaluation. However, as a reliability check, the IA should confirm that an Interchange is physically contiguous. T- A requirement should be added to INT-007 that defines how the IA should determine the overall interchange status when an entity with approval rights has not responded in accordance with Section C of the timing table. The current passive approval concept is not described in any standard.

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

– Comments: The text of Requirement 1 should be modified to describe the general action of the IA when distributing the final status of the Interchange.

– Requirement 1.1 should define what to distribute, and to who, for a Confirmed Interchange. The TOP and RC must also be notified of a transaction that has transitioned to a Confirmed Interchange.

– A new Requirement 1.2 should be added to define what to distribute, and to who, for a denied interchange. The current measures in this standard describe that the IA must notify parties if the overall status is not confirmed, however this action is not described in the current requirement.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

– Measure 1.1 contains additional requirements for distribution of a Confirmed Interchange related to DC ties that is not originally mentioned in the Requirements section. The measures section should ask the entity to provide evidence that the requirements have been met, not define additional requirements.

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on the standards, we cannot comment on the compliance items at this time

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: There should be additional clarification on the definition of Implemented Interchange. The definition provided in the Reference Document is "the state where the BA enters the Confirmed Interchange into its ACE equation". This definition seems to indicate that a Confirmed Interchange is converted hour-by-hour (or scheduling period-by-scheduling period) to an Implemented Interchange. Is this the correct interpretation, or is the entire Confirmed Interchange converted to an Implemented Interchange after the first hour of the transaction has begun to flow? This clarification is requested because the use of the term Implemented in the current e-Tag is applied to the entire e-Tag once the Tag has been approved by all entities.

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on the standards, we cannot comment on the compliance items at this time

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

– Comments: The content removed from INT-004 is not fully translated into INT-010. For example, changes for reliability may be initiated by entities other than the Reliability Coordinator and Requirement 2 in INT-010 only covers modifications by the Reliability Coordinator.

– Requirement 2 in this standard should be promoted to a separate standard. It is essential to clearly describe the required communications and approval actions that are involved in modification of an Interchange by a reliability entity.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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– It seems that R3 is trying to be general to cover various types of transactions; but other than emergency and shared reserves, in what other instances can an RC arrange for transactions? If this is intended to cover emergency energy and the desire is to leave the text general, can a reference to emergency energy be added as an example of when this would be used?

– It is not clear how the submittals under R1 and R3 would be handled. If the transactions are submitted as Arranged Interchange, will these transactions go through the normal approval process? Is there a different approval process for these 'exempt' transactions, and if so then this special approval process should be specified. Or perhaps these type of transaction are submitted after-the-fact as an Implemented Interchange?

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on the standards, we cannot comment on the compliance items at this time

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

– Comments: - The IA is included in Column B of the timing table, but does the IA really perform any Reliability Assessment? The data validations the IA performs should be prior to distributing the Arranged Interchange for reliability assessment.

– Since the phrase "BA Prepares Confirmed Interchange for Implementation" as included in the timing table introduces new concept in the industry, we believe that it would be helpful to clearly describe the expected actions of the BA in this step. If the action is to enter the Confirmed Interchange in the ACE then why would a BA do that 1:58 minutes before the ramp?

– Reiterating a question in INT-009 – Does Implemented Interchange refer to only those hours of the transaction that have flowed or does the entire Confirmed Interchange become Implemented Interchange after the first hour of the transaction has started to flow?

– There was a question on the corresponding NAESB CIBP that implied the timing for submittal to ERCOT was not included in the NERC standards. Review of the NERC Timing table would imply that the table does apply to ERCOT, via the note in the first row that says it applies 'for all Interconnections except WECC'. If that is not true, then we believe the specific ERCOT timing table should be included in the NERC document.

### **Questions About Implementation Plan**

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

No

- Comments: What is "the NERC identified reliability analysis service"? Isn't the purpose of this standard to define transactions that can impact reliability and have to be submitted to the IA?
- It is not clear why the NERC standard removed the requirement that ALL Interchange transactions between Bas must be submitted to the IA.
- It is not clear they where NERC standards retained the requirement for transfers within a BA to be submitted. These do not meet the NERC definition of interchange. We understand that in some regions require these transactions, but they would be analyzed solely from a commercial perspective, not by the BA, TOP or RC and should be in the NAESB CIBP.
- We recommend that the information in INT-004 regarding dynamic schedules be included in the INT-001 standard

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments: It seems that the entire content of INT-002 has been deleted. We concur that the deleted content has been covered elsewhere.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

- Comments: INT-003 should be retired. Requirement R1 on INT-003 is contradictory to INT-009, where the BA is required to implement the Confirmed Interchange as directed by the IA.
- R1.2 in INT-003 is covered in INT-008 but could also be reiterated in INT-009 for completeness.
- We do not agree that standard ramping times are a business practice

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

- Comments: We do not believe that the information from the original standard was fully carried forward. For example, see comments on INT-010.
- We recommend that the dynamic schedule information be moved into INT-001
- With the above two recommendation, INT-004 could be retired

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments: Now that there several different stages of the "Interchange", the use of the term in the functional model and any other NERC standard should be reviewed for consistency with these defintions.

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: The implementation date of these standards should be coordinated with the development and implmentation of the NAESB Coordinate Interchange Business Practice document. Together, these documents may impact the way the industry currently does business and the implmentation date of these changes should consider what entities would have to change in their current day-to-day business to be compliant

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

No

Comments:

**COMMENT FORM FOR  
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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Carter B. Edge</b>
Organization:	<b>Southeastern Power Administration</b>
Telephone:	<b>706-213-3863</b>
Email:	<b>cartere@sepa.doe.gov</b>
NERC Region	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

## COMMENT FORM FOR COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE ASSOCIATED IMPLEMENTATION PLAN

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
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- Red Line version of Version 0 Standards recommended for retirement or revision
- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
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INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

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While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
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- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: I may be helpful if Measure M1.1 had more specific detail on what would be acceptable evidence that confirms implemented interchange matched confirmed interchanged.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments: As currently written the existing INT standards applicability would remain with the Balancing Authority or the Purchasing-Selling Entity and the new INT standards would apply to the Interchange Authority. The FRCC believes all INT standards should either use the Interchange Authority applicability or all should use the Balancing Authority / Purchasing-Selling Entity applicability but should not mix the two. If the choice is made to use the Interchange Authority the implementation of the Interchange Authority for the first time needs to be addressed in the Implementation Plan.

## COMMENT FORM FOR COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE ASSOCIATED IMPLEMENTATION PLAN

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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.  
**Do** use punctuation and capitalization as needed (except quotations).  
**Do** use more than one form if responses do not fit in the spaces provided.  
**Do** submit any formatted text or markups in a separate WORD file.

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**Do not** use numbering or bullets in any data field.  
**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		



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The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

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Yes

No

Comments:

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

Comments:

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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Yes

No

Comments:

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Yes

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No

Comments:

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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<b>Individual Commenter Information</b>		
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Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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**COMMENT FORM FOR  
 COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
 SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
 ASSOCIATED IMPLEMENTATION PLAN**

**Group Comments (Complete this page if comments are from a group.)**

Group Name:               **Operating Reliability Working Group (ORWG)**

Lead Contact:             Robert Rhodes, Secretary

Contact Organization:    Southwest Power Pool

Contact Segment:        2

Contact Telephone:      501-614-3241

Contact Email:            rrhodes@spp.org

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Mike Anderson	AEP	SPP	1
Bob Cochran	SPS	SPP	1
Mike Gammon	KCP&L	SPP	1
Don Hargrove	OG&E	SPP	1
Allen Klassen	Westar	SPP	1
Pete Kuebeck	OG&E	SPP	1
Bill Nolte	SECI	SPP	1
Robert Rhodes	SPP	SPP	2

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

### Please Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

### Questions About Proposed Coordinate Interchange Standards

---

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Yes

No

Comments: The intent of this change is to make the standard right with 'today's world' when in fact today's world may not be where we need to be. In today's world the TSP makes a validation check to ensure that the proposed interchange is consistent with the service that was sold. When the transmission service was sold to support this interchange, no transmission system limit violations were anticipated or else the service would not have been sold. However, this occurred sometime in the past and system conditions have more than likely changed since then. A true reliability assessment of whether the interchange should be allowed to be implemented now is a much more rigorous analysis than the current validation. The question for the SDT is does the industry want a true reliability assessment or are we satisfied with the current validation check.

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments: Refer to the comment provided in Question 1.

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: We concur with the proposed compliance provided a historical record of approval status is available from the e-tag vendor and can be used as evidence that the BA and TSP responded as required.

The formatting of the references to INT-005-1 R1 in 1.4.5 and 1.4.6 is not consistent.

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:



## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments: Level 4 Non-Compliance for each of the proposed standards is for four occurrences of not fulfilling the requirements/measures of the specific standard. This should be changed to four or more occurrences.

The definition of Confirmed Interchange in INT-006-1 is not consistent with that given in INT-005-1.

### ***Questions About Implementation Plan***

---

15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

16. Do you agree with the proposed changes to INT-002? If no, please comment.

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

Yes

No

Comments: There is nothing left in INT-002. Why isn't it totally removed?

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: It would be advantageous for entities to have a trial compliance period following implementation of the Standard where compliance would be monitored but penalties would not be administered.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

## COMMENT FORM FOR COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE ASSOCIATED IMPLEMENTATION PLAN

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO:       **Do** enter text only, with no formatting or styles added.  
           **Do** use punctuation and capitalization as needed (except quotations).  
           **Do** use more than one form if responses do not fit in the spaces provided.  
           **Do** submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
           **Do not** use numbering or bullets in any data field.  
           **Do not** use quotation marks in any data field.  
           **Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

**Group Comments (Complete this page if comments are from a group.)**  
 Group Name: **NPCC CP9, Reliability Standards Working Group**  
 Lead Contact: Guy Zito  
 Contact Organization: Northeast Power Coordinating Council  
 Contact Segment: 2  
 Contact Telephone: 212-840-1070  
 Contact Email: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Kathleen Goodman	ISO-New England	NPCC	2
Guy Zito	Northeast Power Coord. Council	NPCC	2
Al Adamson	New York State Reliability Cncl.	NPCC	2

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision
- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments: TSP is more aligned with the commercial aspects of transmission service, e.g., the computation of forward looking TTC and ATC, the sale of transmission service, ext. Based on our understanding of the latest version of the functional model, the TSP should be involved in the NAESB standard as part of commercial approval process. The reliability aspect of transmission system falls on the TOP who is responsible for operation of the grid. We believe the TOP should be the entity performing the reliability assessment of transmission system as part of transaction validation.

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

-See previous comments regarding the TSP and TOP concerns. Confirming transmission service arrangements are not within the scope of the reliability assessment

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

-The BA should be reviewing more than ramp; transaction start/stop and energy profile were previously part of INT-002 and have been deleted.

-The phrase in Requirement 1.2 that indicates that approval of Arranged Interchange confirms 'prevailing transmission system limits will not be violated' should be discussed relative to current business practices throughout the industry. If there are there entities that today approve e-Tags up front and then re-consider them prior to real-time to meet system limits, this requirement should be modified.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

- We believe the data validations described in INT-007 here should be performed before the Arranged Interchange is distributed for reliability assessment.

-This standard does not address what would happen if any entity did not provide their response within the designated time.

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

- We recommend changing the title to "Interchange Authority Compiles and Distributes Status" (consistent with the title of Column C in the Timing Table) – which would incorporate the remaining scope of INT-007.

- The Measures in this standard define actions that must be performed that have not been mentioned in the requirements section. Such as notification of transaction denial and special notification regarding DC ties. Measures should be asking for evidence that the requirements have been met, not defining additional requirements.

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

- We have a question on the definition of Implemented Interchange. Does the entire Confirmed Interchange become an Implemented Interchange after the first hour has been entered into the ACE? Or, are only the hours of the transaction that have flowed or are flowing considered an Implemented Interchange and the remaining hours of that transaction still a Confirmed Interchange? This question is asked because the use of the term "Implemented" in the current e-Tag is applied to the entire e-Tag once it has been approved by all entities

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

- Comments:

- - INT-010 indicates only an RC can modify a transaction. INT-004 previously allowed TSP/TOP and BA entities to initiate a modification. Please explain why the ability for these entities to initiate a modification was eliminated?

- - The required communications and approval involved in a modification made by a reliability entity should be covered in a separate, stand-alone standard. Requirement 2 should be pulled out, expanded and made its own standard.

- - It seems that R3 is trying to be general to cover various types of transactions; but other than emergency and shared reserves, in what other instances can an RC arrange for transactions? If R3 this is intended to cover emergency energy and the text was chosen to be more general, we suggest adding text status that emergency energy is an example of this would be used?

- - The timing table would not apply to the submittals under R1 and R3 would be handled. If these are submitted as Arrange Interchange, please explain how they would become Implemented Interchange.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments: Due to comments on content of standards, we cannot comment on compliance at this time

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

- - The relationship between INT-005, INT-006 and INT-007 should be reconsidered. We would recommend that the IA review the Arranged Interchange for all data validations, as defined in INT-007, prior to distributing the Arrange Interchange for reliability assessment. This change would also influence the column headings in the Timing Table, where the IA should be removed from Column B.
- There is no description of what actions Column D of the timing Table includes.
- It seems that the changes to INT-001 through INT-004 were made earlier in the editing process than INT-005 through INT-009 as there are some inconsistencies in language between the two sets of standards.

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

- Comments: - We recommend changing the purpose to say "To ensure that an Arranged Interchange is submitted for energy transfers that cross Balancing Authority boundaries". Requirement R1 would need to be modified accordingly.
- - The remaining requirements in this standard do not seem consistent with the purpose of the standard. For example, INT-001 now requires that transactions within a BA must submit an Arranged Interchange, but no longer requires transactions between BAs to submit an Arranged Interchange.
- We recommend that the information in INT-004 regarding dynamic schedules be included in this INT-001 standard instead.

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

No

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

Comments: - We agree that the content that was deleted has been covered elsewhere – with comments as noted in other sections.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

- Comments: - INT-003 should be retired. Requirement R1 on INT-003 is contradictory to INT-009, where the BA is to implement the Confirmed Interchange as directed by the IA.
- R1.2 in INT-003 is covered in INT-008 but could also be reiterated in INT-009 for completeness.

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

- Comments: - We do not believe that all the information within this original standard was carried forward; see comments on INT-010.
- - We recommend that the dynamic schedule information be moved into INT-001
- With the above two recommendation, INT-004 could be retired.

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments: Any standards that refer to the phrases interchange or tagging or transaction should be reviewed once these Coordinate Interchange standards are nearly final

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments: The impact of these standards, in conjunction with the NAESB CIBP could require changes throughout the industry in documentation, business practices and/or software to put these new standards into practice. An evaluation should be done after the NERC and NAESB standards are approved to establish that impact and a reasonable time table for implementation.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

Please use this form to submit comments on the Coordinate Interchange Drafting Team's proposed Standards and Implementation Plan including recommendations for retirement or revision to the Coordinate Interchange Version 0 Standards. Comments must be submitted by **October 15, 2005**. You must submit the completed form by emailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Implementation Plan Coord Int Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO:     **Do** enter text only, with no formatting or styles added.  
**Do** use punctuation and capitalization as needed (except quotations).  
**Do** use more than one form if responses do not fit in the spaces provided.  
**Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
**Do not** use numbering or bullets in any data field.  
**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	<b>Ron Falsetti</b>
Organization:	<b>Independent Electricity System Operator (IESO), Ontario</b>
Telephone:	<b>905 855-6187</b>
Email:	<b>ron.falsetti@ieso.ca</b>
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
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<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**COMMENT FORM FOR  
COORDINATE INTERCHANGE DRAFTING TEAM'S PROPOSED  
SECOND DRAFT OF THE COORDINATE INTERCHANGE STANDARDS AND THE  
ASSOCIATED IMPLEMENTATION PLAN**

**Group Comments (Complete this page if comments are from a group.)**

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.



## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Background:**

The Coordinate Interchange Drafting Team considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 2<sup>nd</sup> draft of the Coordinate Interchange Standards
- Red line version to show the changes between the 1<sup>st</sup> and 2<sup>nd</sup> drafts of the Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision
- Technical Reference that explains the concepts supporting the standard

When comparing the first and second versions of the draft standards, there are several significant changes made based on stakeholder comments and made based on changes to the format for reliability standards. Two new standards were added and the overall sequence of the standards was re-sorted so that the standards are numbered in a more logical sequence, using the latest numbering system:

INT-005	New - Interchange Authority Distributes Arranged Interchange
INT-006	Revised from 403 - Response to Interchange Authority
INT-007	Revised from 402 - Interchange Confirmation
INT-008	Revised from 404 - Interchange Authority Distributes Confirmation
INT-009	Revised from 401 - Implementation of Interchange
INT-010	New - Interchange Coordination Exemptions

The Standards Authorization Committee (SAC) directed the drafting team to take an “evolutionary” approach to the implementation of the Functional Model in this set of standards. The SAC directed the drafting team to change the Functional Model term, ‘Reliability Authority’ to ‘Reliability Coordinator’ throughout this set of proposed standards. This change should make the standards easier to implement because they don’t require changes from the way interchange is handled today.

Similarly, the Drafting Team has also taken an “evolutionary” approach to the implementation of the Interchange Authority. A precise implementation of Version 2 of the Functional Model would require entities to change current practices, and there is no indication that the industry is ready to support these changes. As an interim step, the Drafting Team took the approach that the Interchange Authority in the foreseeable future would provide a ‘coordinating’ role rather than an ‘authoritative’ role.

While there have been numerous minor modifications to the standards, the following major changes were made:

- Definitions were modified to better align with the definitions used by NAESB
- A ‘Timing Table’ was added to provide some guidance on the amount of time allocated for specific steps in the process. (INT-005, INT-006, INT-008)
- WECC’s Regional Difference was removed (INT-007)
- Language was added to address DC ties (INT-008, INT-009)
- Compliance was modified to give the Compliance Monitor more latitude in selecting appropriate compliance monitoring methods
- Levels of non-compliance were modified to focus more on the potential reliability impact of non-compliance. The reliability impact of a single incident can have a significant impact on reliability. The revised Standards all use the ‘number of incidents’ as a basis for determining the appropriate sanction rather than percentages.
- The term, ‘responsible entities’ was replaced with the names of the applicable functions
- A standard (INT-010) was added to address changes made based on an imminent reliability risk

The SDT coordinated its work with NAESB to ensure that the timing table and definitions support the associated Business Practices for coordination of interchange.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

### **Please Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

### **Questions About Proposed Coordinate Interchange Standards**

1. INT-006 Requirement 1.2 assigns the Transmission Service Provider (TSP) the task of confirming that the transmission service arrangements associated with the Arranged Interchange are valid and prevailing transmission system limits will not be violated. The Functional Model assigns this to the Reliability Authority. In following the directive of the Standards Authorization Committee, the drafting team changed 'Reliability Authority' to 'Reliability Coordinator.' Assigning this requirement to the Reliability Coordinator does not align with 'today's world.' No entity is required to conduct this analysis during the assessment period before the Arranged Interchange is approved and becomes a Confirmed Interchange. By assigning INT-006 R1.2 to the TSP, the standard aligns with today's practices. Do you agree that the TSP should be responsible for INT-006 R1.2?

Yes

No

Comments:

Although the IESO does not deal with this issue per se since transmission access is available for any transaction that clears the IESO market we disagree with this assignment to the TSP. It is the IESO's view the task of ensuring transmission system limits are not violated, resides with the TOP through its approval of the transaction. The TSP, as part of the NAESB business standard, should be responsible for ensuring transmission service is sold up to the ATC limit and to confirm the transaction number is valid.

2. Do you agree with the requirements and measures in INT-005? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

The IESO has concerns with the < 1 minute time frame referred to in column A in the Timing Table. Although no reference could be found, we assume that the intention is to perform this process electronically. In the event of a computer hardware/software problem that results in a delay of greater than 1 minute the requirement as written would render an entity non-compliant due to its inability to manually distribute the arranged Interchanges in such a short time.

3. Do you agree with the compliance in INT-005? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

4. Do you agree with the requirements and measures in INT-006? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

Yes

No

Comments:

The BA should be reviewing at least ramp, transaction start/stop and energy profile.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

5. Do you agree with the compliance in INT-006? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

6. Do you agree with the requirements and measures in INT-007? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

The IESO believes the data validations described in INT-007 should be performed before the Arranged Interchange is distributed for reliability assessment. This will eliminate the need for BA and TOP to do reliability assessments on Arranged Interchange that eventually will not be validated.

We have concerns with the < 1 minute time frame referred to in column C in the Timing Table. Although no reference could be found, we assume that the intention is to perform this process electronically. In the event of a computer hardware/software problem that causes a delay of greater than 1 minute, the requirement as written would render an entity as non-compliant due to its inability to manually distribute Arranged Interchanges in such a short time.

7. Do you agree with the compliance in INT-007? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

8. Do you agree with the requirements and measures in INT-008? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

The IESO recommends changing the title to "Interchange Authority Compiles and Distributes Status" (consistent with the title of Column C in the Timing Table) – which would incorporate the remaining scope of INT-007.

The Measures in this standard define actions that must be performed that have not been outlined in the requirements section, such as notification of transaction denial. Measures should be asking for evidence that the requirements have been met, not defining additional requirements.

We have concerns with the < 1 minute time frame referred to in column C in the Timing Table. pliant  
See comment above

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

---

9. Do you agree with the compliance in INT-008? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

10. Do you agree with the requirements and measures in INT-009? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

We are requesting clarification regarding the definition of the term Implemented Interchange. Does the entire's Confirmed Interchange become an Implemented Interchange after the first hour has been entered into the ACE? Or, are only the hours of the transaction that have flowed or are flowing considered an Implemented Interchange and the remaining hours of that transaction still a Confirmed Interchange? This clarification is being requested because the use of the term "Implemented" in the current e-Tag is applied to the entire e-Tag once it has been approved by all entities.

11. Do you agree with the compliance in INT-009? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

12. Do you agree with the requirements and measures in INT-010? If no, provide specific suggestions that would make the requirements and measures acceptable to you.

Yes

No

Comments:

INT-010 indicates only an RC can modify a transaction. INT-004 previously allowed TSP/TOP and BA entities to initiate a modification. Please explain why the ability for these entities to initiate a modification was eliminated?

The required communications and approval involved in a modification made by a reliability entity should be covered in a separate, stand-alone standard. Requirement 2 should be pulled out, expanded and made its own standard.

It appears that R3 is written to be general to cover various types of transactions; but apart from emergency energy and shared reserves, in what other instances can an RC arrange for a transaction? If R3 this is intended to cover emergency energy and the text was intentionally written to be general, we suggest adding text indicating emergency energy is an example where this would be used?

The timing table would not apply to the submittals under R1 and R3 would be handled. If these are submitted as Arrange Interchange, please explain how they would become Implemented Interchange.

## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

---

13. Do you agree with the compliance in INT-010? If no, provide specific suggestions that would make the compliance sections acceptable to you.

Yes

No

Comments:

14. Do you have any other comments on the proposed standards that haven't already been provided above?

Yes

No

Comments:

The overall assesment and approval time of 15 minutes seems reasonable, but the individual intervals are overly prescriptive and may prove impossible to meet other than electronically. Although much of this process is handled electronically, and the time lines are acceptable most of the time, a standard that requires the time lines to be met that cannont be accomplished manually may not be in the industry best interest. Also no reference is made that these processes are to be normally carried out electronically.

The relationship between INT-005, INT-006 and INT-007 should be reconsidered. We would recommend that the IA review the Arranged Interchange for all data validations, as defined in INT-007, prior to distributing the Arrange Interchange for reliability assessment. This change would also influence the column headings in the Timing Table, where the IA should be removed from Column B.

There is no description of what actions Column D of the timing Table includes.

### ***Questions About Implementation Plan***

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15. Do you agree with the proposed changes to INT-001? If no, please comment.

Yes

No

Comments:

We recommend changing the purpose to say "To ensure that an Arranged Interchange is submitted for energy transfers that cross Balancing Authority boundaries". Requirement R1 would need to be modified accordingly.

The remaining requirements in this standard do not seem consistent with the purpose of the standard. For example, INT-001 now requires that transactions within a BA must submit an Arranged Interchange, but no longer requires transactions between BAs to submit an Arranged Interchange.

We recommend that the information in INT-004 regarding dynamic schedules be included in this INT-001 standard instead.

16. Do you agree with the proposed changes to INT-002? If no, please comment.

Yes

**Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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No

Comments:

We agree that the content that was deleted has been covered elsewhere – with comments as noted in other sections.

## Coordinate Interchange Standard and Associated Implementation Plan Comment Form

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17. Do you agree with the proposed changes to INT-003? If no, please comment.

Yes

No

Comments:

INT-003 should be retired. Requirement R1 on INT-003 is contradictory to INT-009, where the BA is to implement the Confirmed Interchange as directed by the IA.

R1.2 in INT-003 is covered in INT-008 but could also be reiterated in INT-009 for completeness.

18. Do you agree with the proposed changes to INT-004? If no, please comment.

Yes

No

Comments:

19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Yes

No

Comments:

Any standards that refer to the phrases interchange or tagging or transaction should be reviewed once these Coordinate Interchange standards are close to being finalized .

20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption? If no, please identify any requirement or measure that you feel will require more preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

The impact of these standards, in conjunction with the NAESB CIBP could require changes throughout the industry in documentation, business practices and/or software to put these new standards into practice. An evaluation should be done after the NERC and NAESB standards are approved to establish that impact and a reasonable time table for implementation.

21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

Yes

No

Comments:



## **Coordinate Interchange Standard and Associated Implementation Plan Comment Form**

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It appears that the tagging requirements have been transferred to NAESB, which seems appropriate. However, some of the requirements retained in the standard will be met via the electronic system. Some reference to this fact should be included. Additionally, with the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.