

Consideration of Comments for SAR for Permanent Changes to the Timing Tables in the Coordinate Interchange Standards

The SAR requester working on the Permanent Changes in the timing tables used in Coordinate Interchange standards INT-005, INT-006, and INT-008 thanks all commenters who submitted comments on Draft 1 of the SAR. This SAR was posted for a 30-day public comment period from April 20 through May 21, 2007. The requester asked stakeholders to provide feedback on the SAR through a special SAR Comment Form. There were 8 sets of comments, including comments from 32 different people from 20 companies representing 6 of the 10 Industry Segments as shown in the table on the following pages.

Based on the stakeholder comments received, the drafting team made some modifications to the recommended timing table and is asking the Standard Committee for authorization to proceed with changes to the standards. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/INT_Urgent_Action.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

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The Industry Segments are:

- 1 – Transmission Owners
- 2 – RTOs, ISOs
- 3 – Load-serving Entities
- 4 – Transmission-dependent Utilities
- 5 – Electric Generators
- 6 – Electricity Brokers, Aggregators, and Marketers
- 7 – Large Electricity End Users
- 8 – Small Electricity End Users
- 9 – Federal, State, Provincial Regulatory or other Government Entities
- 10 – Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee(G1)	AESO		✓										
2.	Thad K. Ness	American Electric Power	✓				✓	✓						
3.	Brent Kingsford(G1)	CAISO		✓										
4.	Clint Aymond (G3)	Entergy												
5.	Steve Myers(G1)	ERCOT		✓										
6.	Ron Falsetti (I) (G1)	IESO		✓										
7.	Matt Goldberg(G1)	ISO-NE		✓										
8.	Robert Coish	Manitoba Hydro	✓		✓		✓	✓						
9.	Bill Phillips(G1)	MISO		✓										
10.	Tom Vandervort (G3)	NERC												
11.	Mike Calimano(G1)	NYISO		✓										
12.	Paul Sorenson (G3)	OATI												
13.	Alicia Daugherty(G1)	PJM		✓										
14.	Phil Riley (G2)	PSC SC											✓	
15.	Mignon L. Clyburn (G2)	PSC SC											✓	
16.	Elizabeth B. Fleming (G2)	PSC SC											✓	
17.	G. O'Neal Hamilton (G2)	PSC SC											✓	
18.	John E. Howard (G2)	PSC SC											✓	
19.	Randy Mitchell (G2)	PSC SC											✓	
20.	C. Robert Moseley (G2)	PSC SC											✓	
21.	David A. Wright (G2)	PSC SC											✓	
22.	Bob Harshbarger (G3)	Puget Sound Energy												

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Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
23.	Jim Hansesn (G3)	Seattle City Light											
24.	Roman Carter (G4)	Southern Co. Transmission	✓										
25.	Marc Butts (G4)	Southern Co. Transmission	✓										
26.	JT Wood (G4)	Southern Co. Transmission	✓										
27.	Jim Busbin (G4)	Southern Co. Transmission	✓										
28.	Mike Oatts (G4)	Southern Co. Transmission	✓										
29.	Dan Baisden (G3)	Southern Company											
30.	Charles Yeung (G1)	SPP		✓									
31.	Andy Tritch (G3)	SunGard						✓					
32.	David Lemmons	Xcel Energy											

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – IRC Standards Review Committee (IRC SRC)

G2 – Public Service Commission of South Carolina (PSC South Carolina)

G3 – Joint NERC/NAESB Joint Interchange Scheduling Working Group (JISWG)

G4 – Southern Company Transmission

Index to Questions, Comments, and Responses

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also bring the timing table into alignment with the categories (On-time, Late, After-the-Fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.....5

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.6

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'8

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following: 10

5. Do you agree with the modification to the timing table that includes the addition of the row for the following: 12

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following: 13

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area. 14

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?..... 15

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Attachment 1 - Proposed Timing Table from JISWG 19

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1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also bring the timing table into alignment with the categories (On-time, Late, After-the-Fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Summary Consideration: All commenters agreed that there is a reliability-related need for the proposed standard action.

Question #1			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

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2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Summary Consideration: All commenters indicated agreement with the scope – and one commenter indicated that consideration should be given to further refining the scope to just the changes that were also in the Urgent Action SAR because of a concern that the changes made under the Urgent Action SAR could expire before a ballot pool approves the new set of modifications. The Reliability Standards Development Procedure manual includes the following language relative to the expiration of a modification to a standard that is made using the 'Urgent Action' process:

If a standard is adopted through an urgent or emergency action, one of the following three actions must occur:

- If the urgent or emergency action standard is to be made permanent without substantive changes, then the standard must proceed through the regular standards development process to be balloted by stakeholders within one year of the urgent or emergency action approval by stakeholders.
- If the urgent or emergency action standard is to be substantively revised or replaced by a new standard, then a request for the new or revised standard must be initiated as soon as practical after the urgent or emergency action ballot and the standard must proceed through the regular standards development process to be balloted by stakeholders as soon as practical within two years of the urgent or emergency action approval by stakeholders.
- The urgent or emergency action standard may be withdrawn through the regular process by a ballot of the stakeholders within two years.

It is our interpretation that the changes proposed with this SAR go beyond those in the Urgent Action SAR and fall under the second bullet above and need to be completed within two years. The Requester believes the proposed changes can be balloted within that two-year period.

Question #2			
Commenter	Yes	No	Comment
Xcel Energy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The scope is not limited to only the modifications made in the urgent action SAR earlier this year. There is the possibility that the urgent action standard will expire prior to this being approved due to issues unassociated with the urgent action items. Due to the time constraints, it might be better to separate the items related to the urgent action and the items related to the latest E-tag Specification.
<p>Response: As you suggested, the proposed changes go beyond those included in the Urgent Action SAR and therefore fall under the category of Urgent Action modifications that would expire two years from the date of ballot pool approval. The</p>			

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Question #2			
Commenter	Yes	No	Comment
Requester believes the proposed changes can be balloted within that two-year period.			
AEP	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		

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- 3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Summary Consideration: Based on stakeholder comments, the 'pre-late' designation has been removed.

Question #3			
Commenter	Yes	No	Comment
AEP		<input checked="" type="checkbox"/>	<p>AEP agrees with the IA assigning the initial status based on its receipt time of submittal for it to be identified to all reliability entities. AEP does not agree with the required action perception for the reliability entities of the stated assigned status classifications that are compromised by the lack of reliability assessment period due to the Creating PSE's failure to submit in a timely manner. The Timing Table implies that Late & ATF status are ok and are to still be acted upon. Any RFI that is submitted in less than 20 minutes prior to start, which is 15 minutes prior to ramp, should be marked as late, period. Reliability entities, not having the minimum full 15 minute reliability assessment period, should not be expected to be measured for non-compliance of a reliability standard, when the industry allows the intent of the reliability period to be compromised on the front-end by the late submittal without repercussion. A 15 minute reliability assessment period still only allows 10 actual minutes of assessment due to processing. AEP agrees that different regions may be able to perform reliability assessment in a smaller time frame, but when the transaction crosses different regions, the most limiting business practice to ensure reliability should be the applied minimum requirement. The real-time reliability assessment period should be expanded due to the dynamic nature of the system from changes, since the original posting of Available Transfer Capability, to perform true reliability assessment on the front-end, instead of backing out with the TLR process that may not be a timely response.</p> <p>Row 2 of the timing table indicates a "Late" status for less than or equal to an hour after the start time. How can a "Late" status be assigned to an E-Tag, when it can be up to an hour after-the-fact? The same row in the timing table implies there still is a 15 minute reliability assessment period, when submittal could actually be after-the-fact. The intent of the Standard is for entities to responsibly act in a timely manner, when performing reliability assessment, but the timing table contradicts this concept and intent. The last column heading should state Reliability Process Period, instead on Reliability Period.</p>
<p>Response: The label "Late" has no functionality within the e-Tag specification. In addition, the INT standards do not require any particular action by reliability entities for e-Tag that are assigned the Late status. The proposed timing tables do not represent a major change to existing e-Tag system regarding the Late status, they merely document current implementation.</p>			

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Question #3			
Commenter	Yes	No	Comment
JISWG		<input checked="" type="checkbox"/>	For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.
Response: The proposed changes from JISWG provide additional clarity to the tables. The SAR will utilize these tables.			
Xcel Energy		<input checked="" type="checkbox"/>	Looking at the NERC website under the JISWG, I reviewed the most recent version 1.7 and the second draft of version 1.8. Both of these documents had three definitions related to the submission time, On Time, Late and After The Fact. The proposed timing table should be limited to these three designations. The Pre-Late designation has no reliability reason for existence. If the WECC wishes to have a cut-off time for prescheduling purposes, set a time and do not include tags submitted after that time in the preschedule checkout. In fact, based upon the Western Interchange Tool, the increased automation of scheduling packages in general, and the E-tagging process, Xcel Energy does not see any value in continuing the historical practice of a preschedule checkout. If the WECC does feel a need to continue this practice, there is no need to assume that a tag should be denied due to missing an artificially imposed deadline for a checkout. Denials of these tags only causes duplication of effort later which is inefficient and time consuming for all parties for no reliability benefit.
Response: We agree, the pre-late designation will be removed.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	This is a SAR, not a draft standard. We don't think it is appropriate to ask a question on whether there is agreement on the content detail of the standard. We'll reserve our comment when the standard is drafted and posted for comment.
Response: The intent of this question was to see if the expanded scope of the SAR was acceptable to stakeholders before moving the SAR forward to standard drafting.			
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		

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4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:
- RFI submitted >1 hour after the start time
 - RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
 - RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Summary Consideration: Most commenters indicated agreement with the proposed modifications to the Timing Table.

Question #4			
Commenter	Yes	No	Comment
AEP		<input checked="" type="checkbox"/>	AEP agrees with the modifications to the Timing Table that include the additions for the initial IA assigned status and stated corresponding criteria. But, AEP does not agree with any reliability assessment time period designated to the reliability entities that is under 15 minutes for measuring non-compliance, because failure to submit on the front-end in a timely manner compromises the intent of the reliability assessment period. Any passive denials with less than a 15 minute reliability assessment period should not be counted against the reliability entities, when failing to assess in under 15 minutes. This does not mean that reliability entities cannot accommodate a RFI with a less than 15 minute reliability assessment period, but it should not be expected, so as to not compromise the intent of the reliability assessment period. It should be clearly stated that "passive denials" with the assigned status of Late or ATF are not considered a measurable event for non-compliance. This is the only way to encourage those creating PSEs to provide adequate time for reliability assessment, because of the present lack of measurability against the creating PSEs to perform to accommodate a full reliability assessment period.
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
<p>Response: We hope that AEP is able to participate in the standard development process to address this issue with other industry members. Regarding the comment on passive denials being treated as a compliant action for Late e-Tags, this is beyond the scope of this SAR. INT-006 clearly requires reliability assessment entities to actively respond to all assessment requests from the Interchange Authority.</p>			
IRC SRC	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

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Question #4			
Commenter	Yes	No	Comment
Manitoba Hydro			No comment.

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5. Do you agree with the modification to the timing table that includes the addition of the row for the following:
- RFI submitted <1 hour but >20 minutes prior to ramp start

Summary Consideration: Most commenters agreed with the proposed modification – the NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the modifications to the timing table provided a new update for this row and instead of the proposed language, the revised SAR adopts the language proposed by the JISWG: RFI submitted <1 hour and >10 minutes prior to ramp start. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #5			
Commenter	Yes	No	Comment
JISWG		<input checked="" type="checkbox"/>	Attached table has a replacement row that is <1 hour and >10 minutes prior to ramp start.
Response: The requester agrees with the JISWG changes.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
Response: Please see the response to your comments on Q3.			
AEP	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

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6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:
- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Summary Consideration: The NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the modifications to the timing table provided a new update to the timing table and this row is no longer included. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #6			
Commenter	Yes	No	Comment
JISWG		<input checked="" type="checkbox"/>	JISWG eliminated this row in their reformatted timing requirement tables. In its place, JISWG created a new row to focus on pre-scheduled tags for the WECC.
Response: The requester agrees with JISWG changes.			
Xcel Energy		<input checked="" type="checkbox"/>	There is no definition available to review that I have seen. Without a definition, it is impossible to support this designation.
Response: This row was removed from the revised SAR.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
Response: Please see the response to your comments on Q3.			
AEP	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		

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7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Summary Consideration: No regional variances were identified.

Question #7			
Commenter	Yes	No	Comment
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	
Xcel Energy		<input checked="" type="checkbox"/>	
AEP	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		Ramp duration and ramp start are different for the WECC.
Response: Agreed – and these have been built into the standard.			

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- 8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Summary Consideration: The NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the changes to the timing table indicated that the timing table modification is needed for both NERC and NAESB and the recommended changes have already been submitted to NAESB. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #8			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		Because the basis of the entire reliability assessment process begins with the submittal of RFI by the creating PSE, why are the creating PSEs not held to a higher standard measurable requirement for submitting E-Tags. The Timing Table appears to compromise the intent of the Standard for the reliability assessment period, and puts the burden on the reliability assessment entities to always comply and reliably assess with lack of proper notification. It should be clearly stated that these requirements are the absolute minimum, and reliability entities can require more time in their regions and markets. The table implies that a late & ATF designation still puts the burden of compliance on the reliability entities, even when submittal is allowed to be late. Late should only be allowed and approved, if prior communication and assessment was already being performed by the reliability entities involved during an emergency situation. Approval of a Late designation should not be permitted, unless the source and sink have prior notification that is then somehow identified on the E-Tag as an emergency. The transmission providers must also be able to accommodate this RFI, instead of the implied assumption. To truly meet the intent of the reliability standard assessment period, an absolute minimum of 15 minutes should be maintained; the only exception should be in an emergency situation that is flagged for identification on an E-Tag for later auditing verification. This concept would prevent the neglect to compromise the reliability assessment period on the front-end. The industry needs to make those submitting the RFI on the front-end more accountable, because of their impact on the reliability of the Bulk Electric System. Reliability entities are not allowed to have an excuse for non-compliance or compromise of the Electric System, but the standard compromises the need for the reliability assessment period with the perceived allowance of late submittals by the creating PSEs and requirement of the reliability entities act regardless of the submittal time. Additions to the Standard should be made to clarify the proper application of the status indications and to describe what scenarios the different statuses are for.

Response: To address concerns above, it should be pointed out that reliability entities that participate in the assessment of

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Question #8			
Commenter	Yes	No	Comment
<p>an e-Tag are required to actively respond to the Interchange Authority's request. That response can be either Approved or Denied. If there is insufficient time to properly assess a RFI, it seems prudent for the reliability entity to Deny the transaction. The proposed timing tables are meant to document parameters used in the e-Tag implementation. Regional and individual practices on processing Late tags are beyond the scope of this SAR.</p>			
JISWG	<input checked="" type="checkbox"/>		For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.
<p>Response: The requester agrees with the JISWG changes.</p>			
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	
Xcel Energy		<input checked="" type="checkbox"/>	

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9. Do you have any other comments on the SAR?

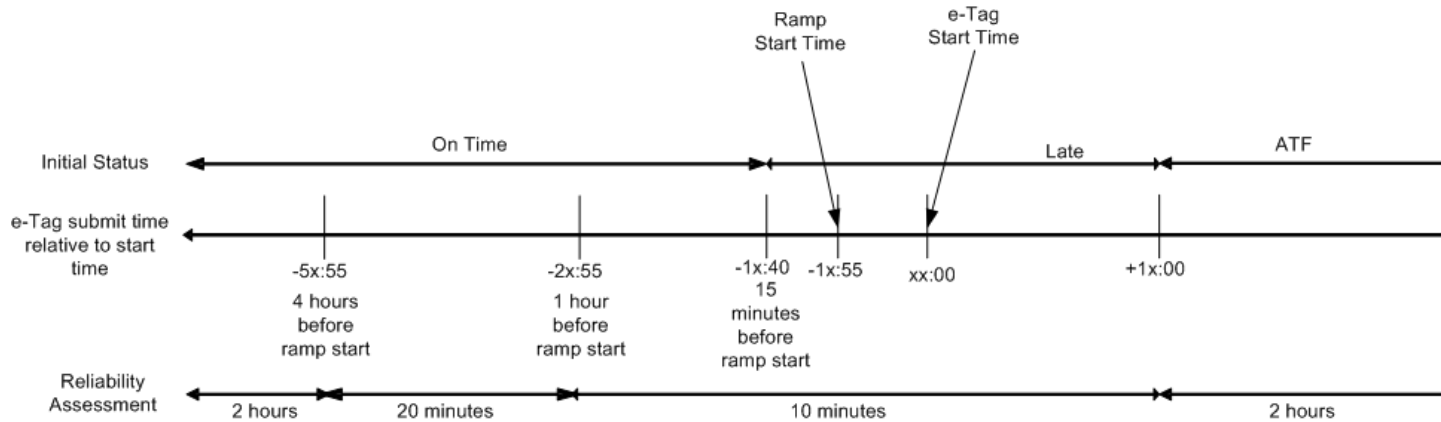
Question #9			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		ATF & Late submittals of RFI compromise the intent and stated Purpose of the Reliability Standard to make the information available for true reliability assessment. It is understood that the purpose of the ATF & Late designations imply that prior notification and reliability assessment should have occurred by other means with the affected reliability entities outside the E-Tag process in emergency situations, but how can this be clearly verified and communicated to all entities involved to approve during the stated reliability assessment time period? ATF designations might be needed for future hours to be captured in the reliability assessment tools, such as the NERC IDC, but isn't the ATF communication more for billing purposes, instead of reliability? Reliability entities should only be required to act upon Late or ATF designations, if an emergency is declared on E-Tag and is auditable for compliance by prior notification to the reliability entities of source, sink, and transmission provider.
Response: The primary purpose of the ATF designation is to uniquely identify e-Tags that do not impact reliability but do help support the after the fact communication of interchange scheduling data. The current e-Tag paradigm supports both commercial and reliability needs. Both NERC and NAESB standards for interchange communication and coordination need to use common timing tables and protocols. Assessment of compliance with INT-006 for late and ATF tags is beyond the scope of this SAR.			
Xcel Energy	<input checked="" type="checkbox"/>		Neither the current WECC Business Practices nor the NERC standards address the Pre-Late status and this status is not needed for the reliable operation of the electrical grid in the WECC. This line in the timing table should be removed from the SAR.
Response: Pre-Late has been removed.			
IESO	<input checked="" type="checkbox"/>		This appears to be a posting of the draft revision to a standard rather than describing the scope of standard changes. A number of questions asked in this Comment Form appear to be inappropriate.
Response: The intent in asking these questions was to see if there is support for expanding the scope of the SAR beyond the changes included in the Urgent Action SAR.			
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
JISWG		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	

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Attachment 1 - Proposed Timing Table from JISWG

Timing Requirements for all Interconnections except WECC

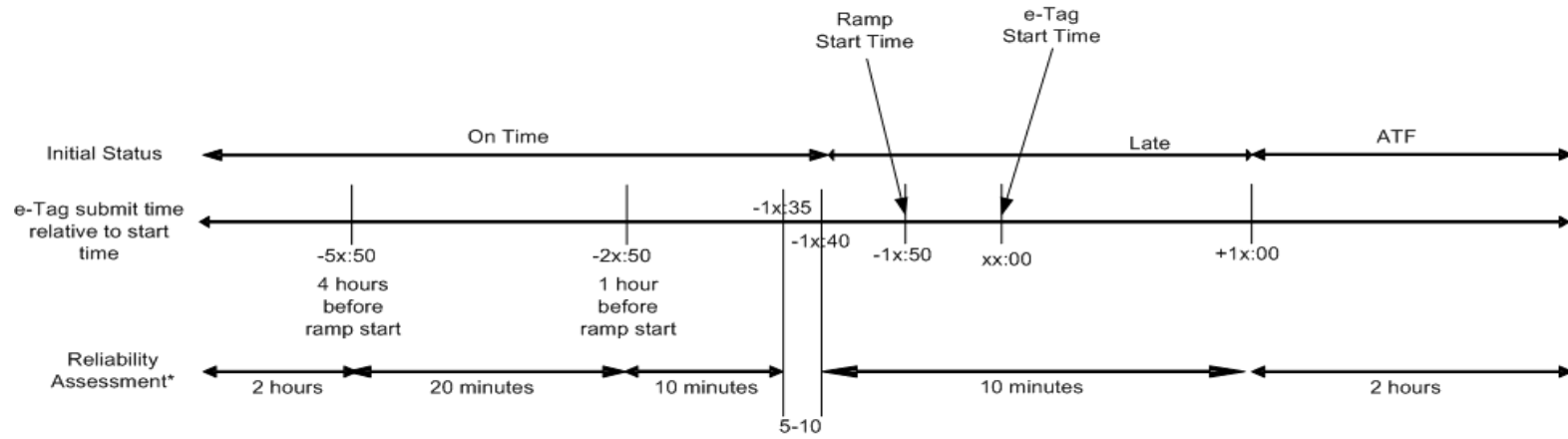
		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	NA	NA
<15 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 15 minutes prior to ramp start	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≥ 1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours



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Timing Requirements for WECC

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	NA	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA and ≥ 4 minutes prior to ramp start	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10-15 minutes
≥ 1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	Min 4 hours



*If submitted before 10:00 PPT with start time >= 00:00 PPT of the following day then reliability assessment is >= 2 hours and by 12:00 PPT