

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Thad K. Ness	
Organization:	American Electric Power	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> <b>RFC</b>	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### You do not have to answer all questions.

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments: 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

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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.

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.

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

Yes

No

Comments: 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.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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?

Yes

No

Comments: 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

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

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.

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

Yes

No

Comments: 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.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities





## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### You do not have to answer all questions.

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments: 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.

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

Yes

No

Comments: Same comments as Q3



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments: Same comments as Q3

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

Yes

No

Comments: Same comments as Q3

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments: 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.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

**Group Name:** IRC Standards Review Committee

**Lead Contact:** Charles Yeung

**Contact Organization:** SPP

**Contact Segment:** 2

**Contact Telephone:** 832-724-6142

**Contact E-mail:** cyeung@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Calimano	NYISO	NPCC	2
Alicia Daugherty	PJM	RFC	2
Ron Falsetti	IESO	NPCC	2
Matt Goldberg	ISO-NE	NPCC	2
Brent Kingsford	CAISO	WECC	2
Steve Myers	ERCOT	ERCT	2
Anita Lee	AESO	WECC	2
Bill Phillips	MISO	RFC+	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.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

**You do not have to answer all questions.**

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

**You do not have to answer all questions.**

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities





## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

**You do not have to answer all questions.**

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	NERC/NAESB Joint Interchange Scheduling Working Group	
Organization:		
Telephone:		
E-mail:	james.hansen@seattle.gov, robert.harshbarger@pse.com, Chairs of the JISWG	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

**You do not have to answer all questions.**

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments: 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.

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

Yes



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments: Attached table has a replacement row that is <1 hour and >10 minutes prior to ramp start.

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

Yes

No

Comments: 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.

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

Yes

No

Comments: Ramp duration and ramp start are different for the WECC.

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?

Yes

No

Comments: 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.

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

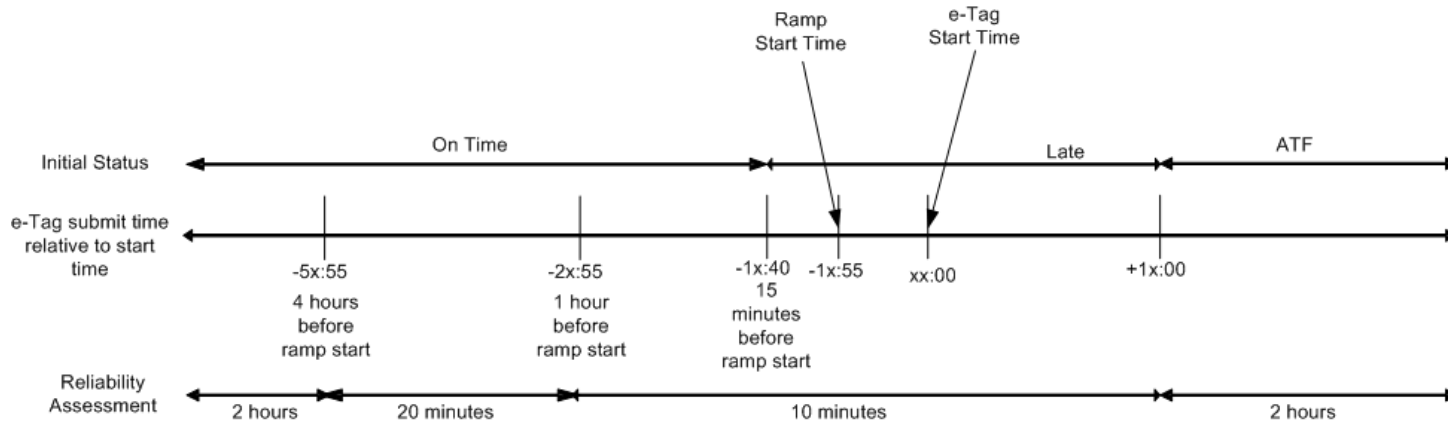
Yes

No

Comments:

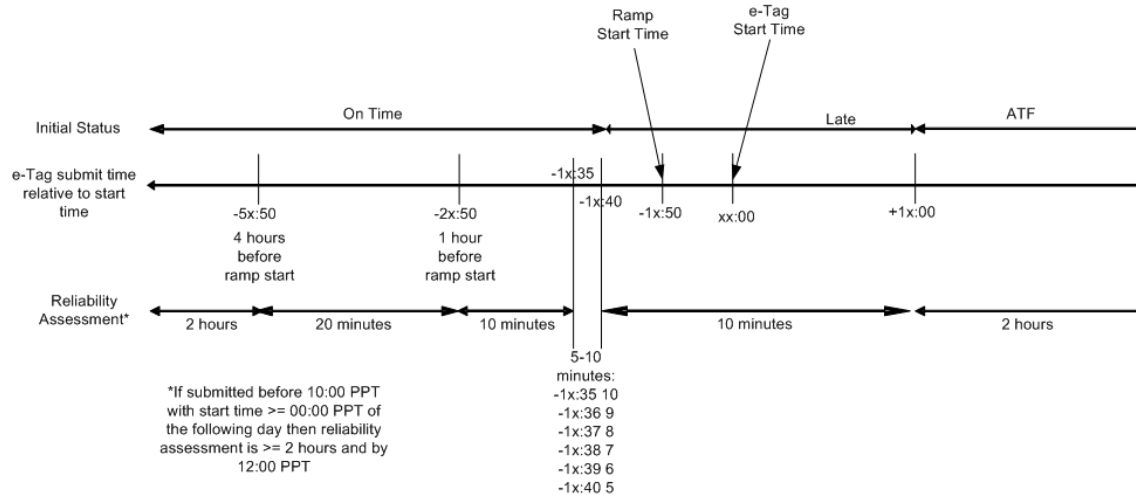
### Timing Requirements for all Interconnections except WECC

		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



### 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



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

**You do not have to answer all questions.**

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

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.

Yes

No

Comments:

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.

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	David Lemmons	
Organization:	Xcel Energy	
Telephone:	303-308-6120	
E-mail:	david.f.lemmons@xcelenergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

The new SAR proposes to make the above changes permanent, and also proposes to add the following to the timing table to 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).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### You do not have to answer all questions.

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

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.

Yes

No

Comments:

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.

Yes

No

Comments: 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.

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

Yes

No

Comments: 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

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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.

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

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

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

Yes

No

Comments:

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

Yes

No

Comments: There is no definition available to review that I have seen. Without a definition, it is impossible to support this designation.

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

Yes

No

Comments:

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?

Yes

No

Comments:

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

Yes

No

Comments: 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.