

Consideration of Comments on Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)

The Coordinate Interchange Timing Table Standard Drafting Team (CITT SDT) thanks all commenters who submitted comments on the additional modifications to the timing tables. These standards were posted for a 45-day public comment period from January 24 through March 8, 2008. The standard drafting team asked stakeholders to provide feedback on the proposed timing table modifications through a special Comment Form. There were 15 sets of comments, including comments from 27 different people from more than 21 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team made the following significant modifications:

- Some stakeholders indicated that these standards should all be implemented at the same time throughout the continent. In response, the drafting team changed the proposed effective date so that the revised standards will become effective in all regulatory jurisdictions at the same time.
- Some stakeholders indicated that in some regions, a response is required for all Arranged Interchanges. In response, the drafting team modified both timing tables in all three standards to remove the language (for Arranged Interchange classified as either “After-the-fact” or “Late”) that indicated that Transmission Service Provider and Balancing Authority did not have to respond. This modification allows regions to require a response, if needed, but does not mandate a response throughout the continent.
- Some stakeholders expressed a concern that, without clarifying language, the timing classifications in the timing table have introduced ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. In response, the drafting team modified INT-006 R1 and M1 to add some clarifying language that specifically identifies the types of reliability-related requests for Arranged Interchange that require active approval. This is not an expansion of the requirement, but should remove the ambiguity that would otherwise exist.

The drafting team is reposting the documents for an additional comment period.

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 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 Vice President and 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 Process Manual: <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.	Thad K. Ness	American Electric Power	x		x		x	x					
2.	Troy Simpson	Bonneville Power Administration	x		x		x	x					
3.	Raj Hundal	British Columbia Transmission Corp.		x									
4.	Paul Lampe (G3)	City Power & Light (Independence, MO)	x		x		x						
5.	Jeanne Kurzynowski (G1)	Consumers Energy Company			x	x	x						
6.	Greg Rowland	Duke Energy Corporation	x		x								
7.	Brian Berkstresser (G3)	Empire District Electric	x		x		x						
8.	Edward J. Davis	Entergy Services, Inc.	x										
9.	Linda Campbell	Florida Reliability Coordinating Council											x
10.	Ron Falsetti	Independent Electricity System Operator		x									
11.	Scott Frink (G3)	Kansas City Power & Light	x		x		x						
12.	Mike Lucas (G3)	Kansas City Power & Light	x		x		x						
13.	Craig McLean	Manitoba Hydro	x		x		x	x					
14.	Jason Marshall (G1)	Midwest ISO		x									
15.	Stan Southers/Ellis Rankin	Oncor Electric Delivery	x										
16.	Phil Riley	PS Commission of South Carolina										x	
17.	Jim Hansen	Seattle City Light			x	x	x	x					
18.	Rich Salgo	Sierra Pacific Resources	x										
19.	Roman Carter (G2)	Southern Transmission	x										
20.	Mike Oatts (G2)	Southern Transmission	x										

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Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
21.	Dan Baisdan (G2)	Southern Transmission	x										
22.	JT Wood (G2)	Southern Transmission	x										
23.	Jim Busbin (G2)	Southern Transmission	x										
24.	Marc Butts (G2)	Southern Transmission											
25.	Robert Rhodes (G3)	Southwest Power Pool		x									
26.	Kyle McMenamin (G3)	Southwestern Public Service	x		x		x						
27.	Allen Klassen (G3)	Westar Energy	x		x		x						

G1 – Midwest ISO Stakeholders

G2 – Southern Transmission

G3 – SPP Operating Reliability Working Group

Index to Questions, Comments, and Responses

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2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area. 8
3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area. 12
4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here. 17

Consideration of Comments on 1st Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)

1. Do you agree with the proposed timing table “Timing Requirements for all Interconnections except WECC”? If not, please explain in the comment area.

Summary Consideration: While most commenters agreed with the proposed timing table, there were some comments indicating that the proposed language, “response not required” and “if they choose” for the BA and TSP when an Arranged Interchange is submitted either Late or After the Fact should be removed from the timing table. This language was removed from the timing tables. There was also concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. We have modified INT-006-3, R1 and M1 as shown below to identify the specific types of reliability-related requests for Arranged Interchange that require active approval.

R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to **an each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to **each On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#1 – Commenter	Yes	No	Comment
British Columbia Transmission Corp.		x	The following statement in BA and TSP Conduct: Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.
<p>Response: The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The drafting team disagrees with your assessment regarding passive approval / denial. The approval entity is not precluded from actively responding to all requests.</p> <p>We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p>			

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#1 – Commenter	Yes	No	Comment
<p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p> <p>Regarding the WECC Interchange tool: The drafting team concurs with your statement, however we recommend that you pursue regional standards to address WECC specific concerns.</p>			
Entergy Services, Inc.		x	<p>The following comment applies only to the details of the Late row in the "Timeline Requirements for all Interconnections Except WECC" table in each of the three standards. Column B of the new Late requirement contains the entry that "Response not required" and "Entities have up to 10 minutes to respond if they choose".</p> <p>The new standard should also explicitly state that the RFI defaults to EXPIRED, as defined and used in Electronic Tagging Functional Specification Version 1.8.0, if a response has not been received within the 10 minutes.</p> <p>Please add to Column B of Late: "The RFI will default to EXPIRED, as defined and used in Electronic Tagging Functional Specification, if a response has not been received within the 10 minutes".</p>
<p>Response: The CITT SDT thanks you for your comment. The drafting team discussed your concern and believes that the concern is that the Compliance Enforcement Authority may request evidence to support an Arranged Interchange that is Late, and the responsible entity may not have this evidence because the E-Tag system has automatically rejected the request. The drafting team made revisions to the measure of INT-006-3, M1 to address this concern by clarifying that evidence is only needed for responses to those Arranged Interchanges that are On-time or related to either Emergencies or Reliability Adjustments.</p> <p>The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to an each On-time, Emergency or Reliability Adjustment request from an</p>			

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#1 – Commenter	Yes	No	Comment
Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.			
Independent Electricity System Operator	x		We notice that while the revisions are intended to address the RFI timing for WECC, changes have been made to the timing table for other Interconnections as well. We agree with these latter changes as we believe this to be corrections to the timing relationship to ramp start times since it is always 20 minutes to the top of the hour before the tags were considered late.
Response: The CITT SDT thanks you for your comment.			
Oncor Electric Delivery	x		Oncor endorses the changes as made by the standards drafting team.
Response: The CITT SDT thanks you for your comment.			
American Electric Power	x		
Bonneville Power Administration	x		
Duke Energy Corporation	x		
Manitoba Hydro	x		
Midwest ISO	x		
PS Commission of South Carolina	x		
Southern Transmission	x		
SPP ORWG	x		

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2. Do you agree with the proposed timing table “Timing Requirements for WECC”? If not, please explain in the comment area.

Summary Consideration: While most commenters agreed with the proposed timing table requirements for WECC, none of the commenters from entities within the WECC Interconnection agreed with these timing requirements. The comments received indicated that the proposed language, “response not required” and “if they choose” for the BA and TSP when an Arranged Interchange is submitted either Late or After the Fact should be removed from the timing table. This language was removed from the timing tables. There was also concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. The requirement and measure of INT-006-3, R1 and M1 were revised to address these concerns.

R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to **an each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each **On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#2 – Commenter	Yes	No	Comment
Bonneville Power Administration		X	Bonneville Power Administration believes that all requests for interchange should be confirmed with at least 5 minutes available for the BA to Prepare Confirmed Interchange for Implementation with a minimum of 3 minutes for the BA and TSP to conduct Reliability Assessments. For that reason, we recommend requests with <10 minutes prior to the ramp start and < 1 hour after the start time allow the BA and TSP reliability assessments 3 minutes. For requests 10 minutes prior to ramp start time, should also provide 3 minutes for the BA and TSP to conduct reliability assessments. For request 11 minutes prior to ramp start time, should provide 4 minutes for the BA and TSP to conduct reliability assessments; etc.
<p>Response: The CITT SDT thanks you for your comment. Your request to increase the time in Column D from three minutes to five minutes is outside the scope of this standard drafting team. The type of changes that you are requesting are more appropriately addressed in a new SAR through the Standards Development process. The SAR for this project limited the scope</p>			

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#2 – Commenter	Yes	No	Comment
<p>of the project to modifications of the timing tables. There is a project in the work plan to address the bigger set of modifications to the entire set of INT standards (Project 2009-03). We recommend that you actively participate in that project.</p>			
<p>British Columbia Transmission Corp.</p>		<p>x</p>	<p>The following statement in BA and TSP Conduct: Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.</p>
<p>Response: The CIT TSDT thanks you for your comment. The phrases "Response not required" and "if they choose" were removed from the timing table. The drafting team disagrees with your assessment regarding passive approval / denial. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p> <p>Regarding the WECC Interchange tool: The drafting team concurs with your statement, however we recommend that you pursue regional standards to address WECC specific concerns.</p>			
<p>Seattle City Light</p>		<p>x</p>	<p>The table states that entities are not required to respond to Requests for Interchange which represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes</p>

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#2 – Commenter	Yes	No	Comment
			<p>to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.</p> <p>This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.</p> <p>In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.</p>
<p>Response: The CITT SDT thanks you for your comment. The standard drafting team has made revisions to INT-006-3 and the timing tables to address your concerns. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Sierra Pacific Resources		x	<p>Tags not considered "On-Time" encompass two different transaction type tags, ATF tags and LATE tags, and those transaction types need to be broken down further than simply not "On-Time". We agree ATF tags generally are not a reliability issue and do not warrant penalties yet because Dynamic Schedule Adjustments are treated as ATF tag</p>

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#2 – Commenter	Yes	No	Comment
			adjustments there is a need for this type of tag to be acted on every hour for reliability reasons. LATE tag requests should always require action within up to 10 minutes as shown on the proposed timing table particularly if marked Emergency Tags.
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. that require active approval. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Duke Energy Corporation	x		
American Electric Power	x		
Independent Electricity System Operator	x		
Manitoba Hydro	x		
Midwest ISO	x		
Oncor Electric Delivery	x		
PS Commission of South Carolina	x		
Southern Transmission	x		
SPP ORWG	x		

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3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Summary Consideration: There was concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response.. The requirement and measure of INT-006-3, R1 and M1 were revised to clarify that active approval is only required for reliability-related requests for Arranged Interchange.

R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to ~~an~~ **each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each **On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#3 – Commenter	Yes	No	Comment
Bonneville Power Administration		x	Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time requests. Late requests may have a reliability impact and should require assessment as well. The Timing Requirements for WECC tables in all three standards should be modified to remove the "Response not required" and "if they choose" language. Requirement R1 (and the associated Measure M1) should be modified to include Late requests.
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p>			

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#3 – Commenter	Yes	No	Comment
<p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p> <p>The phrases “Response not required” and “if they choose” were removed from the timing table.</p>			
British Columbia Transmission Corp.		x	All requests should be processed in the same manner and should be actively approved or denied. There is not reason to have Late and ATF tags not be processed within required timelines.
<p>Response: The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Seattle City Light		x	This new exemption represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It

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#3 – Commenter	Yes	No	Comment
			<p>is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.</p> <p>This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.</p> <p>In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.</p>
<p>Response: The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Sierra Pacific Resources		x	<p>Again tags not considered "On-Time" need to be treated differently depending on whether they are ATF Dynamic Schedule Adjustment tags or LATE tags. The INT-006-3 R1 and the associated Measure M1 could apply to ATF tags that are not Dynamic Schedule Adjustments and not to</p>

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#3 – Commenter	Yes	No	Comment
			Late tags but this could be confusing. In the WECC Late Emergency Tags are required to be acted on and we believe this requirement should continue.
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Southern Transmission		x	<p>INT-006 – Requirement 1 – The Drafting Team is to be commended for ensuring the Requirement 1 that references the revised timing table has been modified to correct possible reliability assessment issues with the inclusion of the ATF, Late and On-time Time Classifications to the table. The application of the requirement to respond to a request from the IA to transition an Arranged Interchange was correctly limited only to “On-time” interchange, an appropriate change to keep the timing table implications in line with reliability assessment capabilities and needs.</p> <p>It is recommended, however, that the application to respond also be expanded slightly to include Late reliability curtailments. The importance of the timely processing of reliability-based curtailments/adjustments was reflected in the fact that in INT-005, R1.1 was expressly broken out to limit the distribution to necessary assessment entities so that processing could take place with limited delay and unnecessary or inappropriate Denials. This same importance to actively process a reliability curtailment should be extended to the requirement to respond on INT-006.</p>

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#3 – Commenter	Yes	No	Comment
			Suggested wording would be "...shall respond to all On-time and any Late reliability-based Curtailment request from an Interchange Authority to transition...". Omission of "Late" curtailments from the requirement to respond could adversely impact reliability due to the intentional or unintentional failure to respond (with no resulting compliance implications) and the resulting IA action to not confirm the Arranged Interchange requesting the curtailment.
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
American Electric Power	x		
Duke Energy Corporation	x		
Entergy Services, Inc.	x		
Independent Electricity System Operator	x		
Manitoba Hydro	x		
Midwest ISO	x		
Oncor Electric Delivery	x		
PS Commission of South Carolina	x		
SPP ORWG	x		

Consideration of Comments on 1st Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Summary Consideration: Many of the comments received were a duplication of comments received in questions 1 through 3. Additionally, there were a few suggestions regarding formatting and definitions that the team accommodated. The following definitions have been added to the standards:

Emergency Request – Request for Arranged Interchange to be initiated or modified by reliability entities under abnormal operating conditions.

Reliability Adjustment Request – Request to modify an Implemented Interchange or Interchange Schedule for reliability purposes.

After-the-fact (ATF) – A time classification assigned to an Arranged Interchange (also called a Request for Interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

#4 – Commenter	Yes	No	Comment
American Electric Power			It is inappropriate to say an ATF classification for the RFI has a reliability assessment period for applicable BAs and TSPs in the timing table. There is no point because the ATF submittal is merely there for accounting and settlement purposes in the inadvertent interchange process. If the RFI was for extended hours, then it would there for identification in reliability assessment/monitoring and the congestion management process. It must be understood that a ATF classification for RFI would only be valid if the affected reliability assessment entities had prior confirmation of interchange to be implemented prior to the time of implementation into the ACE equation, as stated in NERC Standard INT-003-2. The impact of reliability on the Bulk Electric System is pertinent to real-time and not ATF.
<p>Response: The CITT SDT thanks you for your comment. The drafting team recognizes that there are instances where ATF tags are reliability related (such as instances in INT-010) and as such, we have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. This requires reliability assessment periods in rows 1 and 2 of the timing tables.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing</p>			

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#4 – Commenter	Yes	No	Comment
<p>Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Bonneville Power Administration	x		The Timing Requirements for WECC Timeline chart ignores the IA response times. We recommend that the timeline be revised to incorporate the IA response times in the Submittal & Assessment Times.
<p>Response: The CITT SDT thanks you for your comment. The timeline was designed to show the relationship between the time classification, the RFI submittal time and the reliability assessment period. The IA response time was intentionally left off the timeline.</p>			
Florida Reliability Coordinating Council			The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.
<p>Response: The CITT SDT thanks you for your comment. The SAR limited the scope of the project to modifications of the timing tables. There is a project in the work plan to address the bigger set of modifications to the entire set of INT standards, and the changes in terminology for the compliance elements of the standard will be addressed as part of that larger project. (Project 2009-03)</p>			
Independent Electricity System Operator	x		The IESO continues to be concerned with the proposed “variable” implementation dates that will result in various jurisdictions having different effective dates for the standards. This is particularly important for arranged transaction (RFI) between neighbouring jurisdictions with different effective dates, resulting in different timing schedules for interchange transactions.
<p>Response: The CITT SDT thanks you for your comment. This is a global issue that NERC is working to address. The team agrees and modified the proposed effective date for implementation to be the same for all entities. We have changed the proposed effective date language to:</p> <p>The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.</p>			

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#4 – Commenter	Yes	No	Comment
Seattle City Light			<p>Despite their differences, there are a few common items in the two tables that should be aligned, such as the title to the first column and the status of the column to rights of Column D.</p> <p>Additionally, the proposed standard revision is beyond the scope of the original SAR. The SAR sought to 1) Reintroduce the timing classifications to the INT standards which were dropped in the transition from Policy 3 to NAESB/NERC split Coordinate Interchange (INT) standards, 2) to introduce the ATF timing classification and relaxed assessment requirements associated with it, and to 3) increase the reliability assessment period for the WECC timing tables up to the maximum possible while still meeting market needs. The SAR did not seek to remove requirements for active response to all but on-time requests.</p> <p>An argument has been made that “it is up to interpretation” on whether row 1 of the timing tables applies to anything other than on-time requests however it is a mathematical statement that has mathematic proof to back it up. Row 1 applies to any RFI that is submitted < 1 hour prior to ramp start. Just as -15 is < 60, an RFI submitted at 1010 with a ramp start of 955 is -15 minutes prior to ramp start -15 minutes is < 60 minutes, therefore row 1 applies. On a continuous time graph, if the RFI has a ramp start of 955, row 1 applies to the RFI for all submittal times from 855 and later (including all times past 955). This consistent application of row 1 was also adopted by all e-Tag vendors without ever raising the question with NERC or NERC members, committees, subcommittees, or working groups and is how the e-Tag calculation of reliability assessment periods works today.</p>
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. With these modifications, the scope of the SAR is unchanged. This also applies to the comment regarding the applicability of row 1.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p>			

Consideration of Comments on 1st Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)

#4 – Commenter	Yes	No	Comment
<p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Sierra Pacific Resources	x		<p>The impact of introducing "On-Time" to the Standards will be more detrimental than beneficial. There are too many variables in the ATF Tag Types for implementation and Late tags need to be assessed and acted on. The driving purpose to re-open the Timing Tables was to make permanent the changes requested for the West prior to expiration of the Urgent Action SAR and this needs to be completed as soon as possible.</p>
<p>Response: The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to an each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</p>			
Southern Transmission	x		<p>There is no explanation of the acronym "ATF" in the timing tables. Suggest that the first occurrence at a minimum be spelled out "After-the-Fact (ATF)". Also, RFI (Request for Interchange) is not defined</p> <p>Heading in 2nd column of timing table in INT-005 and INT-008 should be "IA Assigned" and not "IF Assigned...".</p> <p>The new timelines should be labeled as examples since specific times were used rather than a generic syntax such as xx:40, xx:00, etc. Recommend</p>

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#4 – Commenter	Yes	No	Comment
			using something like "Example Timing Requirements" in the timeline heading. This would help make sure there is no confusion about implied requirements such as a top-of-the hour start time or 10 minute ramp time.
<p>Response: The CITT SDT thanks you for your comment. The team is proposing to add the term ATF to the NERC Glossary. RFI is defined in the NERC Glossary. The column heading was revised based on your comment. The timelines titles were revised to indicate that they are examples.</p>			
SPP ORWG	x		We concur with the proposed changes which primarily affect WECC and appreciate the separation of the two tables for clarification.
<p>Response: The CITT SDT thanks you for your comment.</p>			
Midwest ISO	x		
British Columbia Transmission Corp.		x	
Entergy Services, Inc.		x	
Manitoba Hydro		x	
PS Commission of South Carolina		x	