

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

The Coordinate Interchange Standards Drafting Team thanks all commenters who submitted comments on the 2nd draft of the INT-005, INT-006, and INT-008 standards, permanent changes to Coordinate Interchange Timing Tables. These standards were posted for a 45-day public comment period from May 12, 2008 through June 10, 2009. The stakeholders were asked to provide feedback on the standards through an electronic Standard Comment Form. There were 21 sets of comments, including comments from more than 90 different people from more than 50 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on stakeholder comments, the drafting team made some clarifying modifications to one requirement and its measure in INT-006, moved one definition from INT-006 to INT-005, and made some clarifications to the other two definitions.

Modification to INT-006 R1 and M1:

In the first posting of this set of standards, the drafting team had included language to the timing table to clarify that for some types of requests, no response is required. Several stakeholders indicated that in some Regions, a response is required for all requests, and the drafting team removed the qualifying language from the timing tables. In the second posting of this set of standards, stakeholders indicated that some clarification is needed to ensure that the Balancing Authority and Transmission Service Provider know that, under INT-006, they are not required to respond to requests other than those that are on-time or needed for either an emergency or for a reliability adjustment. To provide this clarity the drafting team elected to modify R1 by adding some more words to R1 and a footnote to clarify which RFIs require a timely response and which RFIs do not require a response. The team clarified R1 as follows:

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 each On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹

¹ The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

This modification is not an expansion of the requirement, but should remove the ambiguity that would otherwise exist.

The drafting team changed the term, "Emergency Request" to "Emergency Request for Interchange (RFI)" and clarified that this is for either Emergency or Energy Emergency conditions.

The drafting team changed the term, "Reliability Adjustment Request" to "Reliability Adjustment Request for Interchange"

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

The drafting team did not make any other changes to the standards or to the implementation plan and recommends that the Standards Committee authorize moving the set of standards forward to the balloting stage of the standards process.

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 Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Index to Questions, Comments, and Responses

1. The drafting team made the following change to INT-006-3, Requirement R1. Do you agree with the proposed revisions to INT-006-3, Requirement R1? If not, please explain in the comment area..... 7

2. The drafting team made the following change to INT-006-3, Measure M1. Do you agree with the proposed revisions to INT-006-3, Measure M1? If not, please explain in the comment area. 12

3. The drafting team developed the following definition of “Emergency Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Emergency Request”? If not, please provide specific language for its improvement. 16

4. The drafting team developed the following definition of “Reliability Adjustment Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Reliability Adjustment Request”? If not, please provide specific language for its improvement..... 19

5. The drafting team developed the following definition of “After-the-fact (ATF). Do you agree with the proposed definition of “ATF”? If not, please provide specific language for its improvement..... 22

6. If you have any other comments on the modifications made to the standards that you haven’t made in response to the first five questions, please provide them here. 25

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

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.	Joy Barton	Tucson Electric Power - Marketing		x		x		x						x	
2.	Patrick Brown, Manager	PJM Interconnection			x										
Additional Member		Additional Organization		Region		Segment Selection									
1.	Leanne Harrison	PJM	RFC			2									
3.	Guy Zito	NPCC — NPCC Standards Review Committee													x
Additional Member		Additional Organization		Region		Segment Selection									
1.	Ralph Rufrano	New York Power Authority		NPCC		5									
2.	Michael Gildea	Constellation Energy		NPCC		6									
3.	William DeVries	New York Independent System Operator		NPCC		2									
4.	Randy MacDonald	New Brunswick System Operator		NPCC		2									
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC		1									
6.	Ron Hart	Dominion Resources, Inc.		NPCC		5									
7.	Ed Thompson	Consolidated Edison Co. of New York, Inc.		NPCC		1									
8.	Don Nelson	Massachusetts Dept. of Public Utilities		NPCC		9									
9.	David Kiguel	Hydro One Networks, Inc.		NPCC		1									
10.	Michael Schiavone	National Grid US		NPCC		1									
11.	Ron Falsetti	Independent Electricity System Operator		NPCC		2									
12.	Kathleen Goodman	ISO - New England		NPCC		2									
13.	Brian Gooder	Ontario Power Generation, Inc.		NPCC		5									
14.	Ben Li	Independent Electricity System Operator		NPCC		2									
15.	Lee Pedowicz	Northeast Power Coordinating Council		NPCC		10									
4.	Gary Nolan	Puget Sound Energy Transmission		x		x		x							
5.	Kris Manchur	Manitoba Hydro		x		x		x	x						
6.	Robert Rhodes	SPP — Operating Reliability Working Group (ORWG)		x	x	x		x							
Additional Member		Additional Organization		Region		Segment Selection									
1.	Mike Gammon	Kansas City Power & Light		SPP		1, 3, 5									
2.	Don Hargrove	Oklahoma Gas & Electric		SPP		1, 3, 5									
3.	Allen Klassen	Westar Energy		SPP		1, 3, 5									
4.	Kyle McMenamin	Southwestern Public Service		SPP		1, 3, 5									

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Commenter		Organization			Industry Segment										
					1	2	3	4	5	6	7	8	9	10	
5.	Robert Rhodes	Southwest Power Pool	SPP				2								
7.	Sam Ciccone	FirstEnergy		x		x		x	x						
Additional Member		Additional Organization	Region	Segment Selection											
1.	Doug Hohlbaugh	FE	RFC	1, 3, 5, 6											
8.	Alessia Dawes	Hydro One Networks		x		x									
9.	Raj Hundal	BC Transmission Corp		x										x	
10.	Rick White	Northeast Utilities		x											
11.	MARILYN FRANZ	SPPC		x											
12.	Marie Knox	MISO — Midwest ISO Standards Collaboration			x										
Additional Member		Additional Organization	Region	Segment Selection											
1.	Nicholas Browning	Midwest ISO		2											
13.	Denise Koehn	Bonneville Power Administration		x		x		x	x						
Additional Member		Additional Organization	Region	Segment Selection											
1.	Troy Simpson	Tx Business Process & Implementation				WECC		1							
2.	Wes Hutchison	Tx Operational Analysis & Support				WECC		1							
3.	Kristey Humphrey	Power Scheduling Coordination				WECC		3, 5, 6							
14.	Jim Griffith	Southern Co. — SERC OC Standards Review Group		x		x		x							
Additional Member		Additional Organization	Region	Segment Selection											
1.	Phil Creech	Progress Energy - Carolinas	SERC	1, 3, 5											
2.	Louis Slade	Dominion Virginia Power	SERC	1, 3, 5											
3.	Randal Haynes	Tennessee Valley Authority	SERC	1, 3, 5, 9											
4.	Sam Holeman	Duke energy - Carolinas	SERC	1, 3, 5											
5.	Jim Case	Entergy	SERC	1, 3, 5											
6.	Rene Free	Santee Cooper	SERC	1, 3, 5, 9											
7.	Kristi Boland	Santee Cooper	SERC	1, 3, 5, 9											
8.	Scott Homburg	Tennessee Valley Authority	SERC	1, 3, 5, 9											
9.	Jim Barnes	Tennessee Valley Authority	SERC	1, 3, 5, 9											
10.	Mike Oatts	Southern	SERC	1, 3, 5											
15.	Steve Dietrich	PUD NO. of Grant County				x		x							
16.	Terry L. Blackwell	Santee Cooper		x											
Additional Member		Additional Organization	Region	Segment Selection											
1.	S. T. Abrams	Santee Cooper	SERC	1											
2.	Glenn Stephens	Santee Cooper	SERC	1											
3.	Rene' Free	Santee Cooper	SERC	1											
4.	Kristi Boland	Santee Cooper	SERC	1											
17.	Carol Gerou	Minnesota Power — MRO Standards Review Subcommittee		x		x		x	x						
Additional Member		Additional Organization	Region	Segment Selection											
1.	Neal Balu	WPS	MRO	3, 4, 5											

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Commenter	Organization	Industry Segment																		
		1	2	3	4	5	6	7	8	9	10									
2.	Terry Bilke	MISO	MRO	2																
3.	Jim Haigh	WAPA	MRO	1, 6																
4.	Ken Goldsmith	ALTW	MRO	4																
5.	Tom Mielnik	MEC	MRO	1, 3, 5, 6																
6.	Pam Oreschnick	XCEL	MRO	1, 3, 5, 6																
7.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6																
8.	Eric Ruskamp	LES	MRO	1, 3, 5, 6																
9.	Joseph Knight	GRE	MRO	1, 3, 5, 6																
10.	Joe DePoorter	MGE	MRO	3, 4, 5, 6																
11.	Larry Brusseau	MRO	MRO	10																
12.	Michael Brytowski	MRP	MRO	10																
18.	Kathleen Goodman	ISO New England				x														
19.	Charles Yeung	Southwest Power Pool — ISO RTO Council				x														
	Additional Member	Additional Organization	Region	Segment Selection																
1.	Anita Lee	AESO	WECC	2																
2.	Patrick Brown	PJM	RFC	2																
3.	Brent Kingsford	CAISO	WECC	2																
4.	Steve Myers	ERCOT	ERCOT	2																
5.	Jim Castle	NYISO	NPCC	2																
6.	Matt Goldberg	ISO NE	NPCC	2																
7.	Bill Phillips	MISO	RFC	2																
8.	Ron Falsetti	IESO	NPCC	2																
20.	Ron Falsetti	Ontario IESO				x														
21.	Kathryn Downey	PacifiCorp			x															

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

1. The drafting team made the following change to INT-006-3, Requirement R1. Do you agree with the proposed revisions to INT-006-3, Requirement R1? If not, please explain in the comment area.

Summary Consideration: The CITT SDT reviewed comments received from stakeholders regarding R1. Many stakeholders suggested edits that improved clarity. The SDT could either add more rows to the timing table, or add clarifying language to Requirement R1. Based on stakeholder feedback, the CITT SDT revised R1 for further clarity as follows:

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 each On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange¹.

¹ The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

Organization	Question 1:	Question 1 Comments:
NPCC	No	R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests. However, there are no response times associated with these requests. We interpret that the word "on-time" in R1 does not qualify these two types of requests and hence the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and After The Fact (ATF) requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Hydro One Networks	No	We do not see the need for the additional words "Emergency and Reliability Adjustment", as any On-time requests must be assessed within the timeframe specified in Table 1 Column B. If there is an attempt to create a special response time for "Late" or ATF requests which are labeled "Emergency and Reliability Adjustment" requests, then add another row in the table to describe this scenario.
<p>Response: The CITT SDT Thanks you for your comment. The drafting team decided to clarify the Requirement rather than insert new rows into the already busy tables. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Northeast Utilities	No	R1 now clarifies that the BA and TSP shall respond to Emergency and Reliability Adjustment requests. However,

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 1:	Question 1 Comments:
		<p>there are no response times associated with these requests. We interpret that the word "on-time" in R1 does not qualify these two types of requests and hence, the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the intended clarification instead creates confusion.</p>
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
Midwest ISO Standards Collaboration	No	<p>Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a BA/TP should result in a passive denial of the request by the entity.</p>
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		
Bonneville Power Administration	No	<p>Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time, Emergency and Reliability Adjustment requests. Late requests may have a reliability impact and should require assessment as well. Additionally, After-the-Fact (ATF) requests may have an impact on a Balancing Authority's (BA) ability to confirm net interchange balances with adjacent BA's for WECC/NERC reporting requirements. Requirement R1 (and the associated Measure M1) should be modified to include Late and ATF requests.</p>
<p>Response: The CITT SDT Thanks you for your comment. Discussions within the drafting team have shown that not all entities agree that all requests should be actively responded to by BAs and TSPs. As a matter of cooperation, the proposed timing tables relieve BAs and TSPs from active responses within a specified time period for Late and ATF requests – except when the request is an Emergency RFI or Reliability Adjustment RFI. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 1:	Question 1 Comments:
MRO NERC Standards Review Subcommittee	No	There should be an "or" between the text "Emergency" and "Reliability" to be consistent with possible requests and the measure M1. We are assuming Reliability Adjustment requests don't happen that often but we believe it's reasonable to assume that a reliability adjustment request could be made and no emergency condition could be present. We would prefer not to single out Emergency and Reliability Adjustments as the only adjustments requiring response. We would suggest keeping the current requirements of all the requests of the interchange authority, because every request affects reliability. Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a Balancing Authority/Transmission Service Provider should result in a passive denial of the request by the entity.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment requests. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment requests must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 to clarify our intent. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		
ISO New England	No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
IRC Standards Review Committee	No	If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests that the BA and TSP must respond to, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for the usual On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the clarification intent turns into creating confusion.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Ontario IESO	No	R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests.

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 1:	Question 1 Comments:
		However, there is not response times associated with these requests. We interpret that the word "on-time" in R1 does not also qualify these two types of requests and hence the BAs and TSPs will have not time frame as a target to respond to these requests, particularly if these requests are submitted late.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
SERC OC Standards Review Group	Yes	We assume, from the placement of the comma after "On-time" in R1, that the drafting team intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on time or late.
<p>Response: The CITT SDT Thanks you for your comment. Your assumption is correct. We have modified R1 and M1 to clarify these points.</p>		
Santee Cooper	Yes	We assume, from the placement of the comma after "On-time" in R1, that the SDT intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on-time or late.
<p>Response: The CITT SDT Thanks you for your comment. Your assumption is correct. We have modified R1 and M1 to clarify these points.</p>		
Puget Sound Energy Transmission	Yes	I would prefer there to be some requirement that Reliability Adjustments must be approved unless there were a legitimate reliability concern - not just scheduling or market issues.
<p>Response: The CITT SDT Thanks you for your comment. Your comment is beyond the scope of the team's charge.</p>		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
PUD NO. of Grant County	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 1:	Question 1 Comments:
PacifiCorp	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

2. The drafting team made the following change to INT-006-3, Measure M1. Do you agree with the proposed revisions to INT-006-3, Measure M1? If not, please explain in the comment area.

Summary Consideration: The CITT SDT reviewed comments received from stakeholders regarding M1. Several stakeholders disagreed with M1 because they did not agree with R1. Edits to R1 (see question 1) have addressed those concerns. Based on stakeholder feedback, the CITT SDT revised M1 for further clarity as follows:

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 RFI, Emergency RFI or Reliability Adjustment RFI 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.

Organization	Question 2:	Question 2 Comments:
NPCC	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
Response: The CITT SDT Thanks you for your comment. The drafting team has clarified the M1 wording (see above).		
Operating Reliability Working Group (ORWG)	No	We suggest deleting the last sentence in M1 because it doesn't add anything.
Response: The CITT SDT Thanks you for your comment. The drafting team believes that this statement is integral to the interpretation of the requirement and subsequent compliance with it.		
FirstEnergy	No	The last sentence is only informational and does not add any anything to the measure. It should be removed.
Response: The CITT SDT Thanks you for your comment. The drafting team believes that this statement is integral to the interpretation of the requirement and subsequent compliance with it.		
Hydro One Networks	No	The measure implies that column B in Table 1 is not enforceable unless the request is labeled as "Emergency and Reliability Adjustment". We recommend, not modifying R1 and M1 at this time and focusing on the initial intent of the Urgent Action SAR, increasing the reliability assessment time from 5 min. to 10 min. for the WECC system.
Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in		

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 2:	Question 2 Comments:
Column B of the timing tables. We have modified R1 and M1 to clarify these points.		
Northeast Utilities	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as an Emergency RFI or as a Reliability Adjustment RFI. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.		
Midwest ISO Standards Collaboration	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to provide evidence that responses for all requests were communicated.
Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.		
Bonneville Power Administration	No	Please see comment provided in #1 above that addresses R1 and M1 statements. Further, Bonneville Power Administration believes the last sentence in M1 above which does not require evidence nor even response to "any other requests" be deleted. Bonneville Power Administration believes responses and evidence of response should be provided for all request types.
Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.		
MRO NERC Standards Review Subcommittee	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to provide evidence that responses for all requests were communicated.
Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases,		

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 2:	Question 2 Comments:
		LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.
ISO New England	No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
		Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.
IRC Standards Review Committee	No	Because we disagree with the proposed revision in Requirement R1, we are unable to agree with the Measure M1 as drafted
		Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.
Ontario IESO	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
		Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points. (see above)
SERC OC Standards Review Group	Yes	We assume, from the placement of the comma after "On-time" in R1, that the drafting team intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on time or late.
		Response: The CITT SDT Thanks you for your comment. Your assumption is correct and the requirement is to respond to all Emergency RFIs and Reliability Adjustment RFIs.
Santee Cooper	Yes	We assume, from the placement of the comma after "On-time" in R1, that the SDT intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on-time or late.
		Response: The CITT SDT Thanks you for your comment. Your assumption is correct and the requirement is to respond to all Emergency RFIs

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 2:	Question 2 Comments:
and Reliability Adjustment RFIs.		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
PUD NO. of Grant County	Yes	
PacifiCorp	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

- The drafting team developed the following definition of “Emergency Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Emergency Request”? If not, please provide specific language for its improvement.

Summary Consideration: The CITT SDT reviewed comments received from stakeholders regarding the definition of “Emergency Request”. Many stakeholder comments began with “We agree with the definition but ...”. These comments were based on issues with R1 and the inclusion of this definition. Revisions to R1 and this definition were made to address the concerns. Some stakeholders suggested utilizing defined terms from the NERC Glossary of Terms. The team agreed with these comments and refined the definition to:

Emergency Request for Interchange (RFI) – Request for Interchange to be initiated for Emergency or Energy Emergency conditions.

Organization	Question 3:	Question 3 Comments:
NPCC	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
Response: The CITT SDT Thanks you for your comment. It was the drafting team’s intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.		
Puget Sound Energy Transmission	No	"Abnormal" is too broad of a term. Would recommend using the NERC defined term "Emergency" in its place.
Response: The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
FirstEnergy	No	The definition could be further clarified by adding "NERC registered" before "reliability entities".
Response: The CITT SDT Thanks you for your comment. We have revised the definition (see above and it no longer includes any reference to the entities requesting the RFI.		
Midwest ISO Standards Collaboration	No	For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".
Response: The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
MRO NERC Standards	No	What's an abnormal operating condition? Is an abnormal condition other than previously studied? We would like the SDT to define the term abnormal. For clarity, we suggest the name of the definition be changed from

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 3:	Question 3 Comments:
Review Subcommittee		"Emergency Request" to "Emergency Interchange Request".
Response: The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
Response: The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.		
IRC Standards Review Committee	No	For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".
Response: The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
Ontario IESO	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
Response: The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.		
PacifiCorp	No	In order to maintain the flexibility of requesting our merchant to create Emergency tags, PacifiCorp suggests the following language: Request for Arranged Interchange to be initiated or modified at the request of, or by, reliability entities under abnormal operating conditions.
Response: The CITT SDT Thanks you for your comment. We have modified the definition to address your comment (see above).		
Northeast Utilities	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
Response: The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.		
SPPC	Yes	Could be modified to state "Request for Arranged Interchange to be initiated or modified at the request of or by reliability entities under abnormal operating conditions."
Response: The CITT SDT Thanks you for your comment. We have modified the definition to address your comment (see above).		
SERC OC Standards Review Group	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification of the term "reliability entities" by including: (RC, BA, TOP). With these suggested changes the definition would read as "Emergency Request - Request for Arranged Interchange to be initiated by reliability entities (RC, BA, TOP) under abnormal operating conditions."
Response: The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above).		
Santee Cooper	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 3:	Question 3 Comments:
		initiation of new requests. We suggest further clarification of the term "reliability entities" by including "(RC, BA, TOP)" behind the term. With these suggested changes the definition would read as "Emergency Request - Request for Arranged Interchange to be initiated by reliability entities (RC, BA, TOP) under abnormal operating conditions."
Response: The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above).		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
Hydro One Networks	Yes	
BC Transmission Corp	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

4. The drafting team developed the following definition of “Reliability Adjustment Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Reliability Adjustment Request”? If not, please provide specific language for its improvement.

Summary Consideration: The CITT SDT reviewed comments received from stakeholders regarding the definition of “Reliability Adjustment Request” Many stakeholder comments began with “We agree with the definition but ...”. These comments were based on issues with R1 and the inclusion of this definition. Revisions to R1 and this definition were made to address the concerns. Some stakeholders suggested improvements to the term for clarification. The team agreed with these comments and refined the definition to:

Reliability Adjustment Request for Interchange (RFI) – Request to modify an Implemented Interchange Schedule for reliability purposes.

Organization	Question 4:	Question 4 Comments:
NPCC	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted on-time, then the timing for on-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the intended clarification instead creates confusion.
<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team’s intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.</p>		
Midwest ISO Standards Collaboration	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".
<p>Response: The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the “who” that can perform these actions. We have revised the defined term to “Reliability Adjustment RFI” per stakeholder comments.</p>		
MRO NERC Standards	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 4:	Question 4 Comments:
Review Subcommittee		Adjustment Request".
Response: The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the “who” that can perform these actions. We have revised the defined term to “Reliability Adjustment RFI” per stakeholder comments.		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
Response: The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.		
IRC Standards Review Committee	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".
Response: The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the “who” that can perform these actions. We have revised the defined term to “Reliability Adjustment RFI” per stakeholder comments.		
Ontario IESO	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests that the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for the usual On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific responses time, it leaves the BA and the TSP without a timing target, and the clarification intent turns into creating confusions.
Response: The CITT SDT Thanks you for your comment. Please see our response to Q1. It was the drafting team’s intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.		
Northeast Utilities	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
Response: The CITT SDT Thanks you for your comment. Please see our response to Q1.		
SERC OC Standards Review Group	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification to the definition of "Reliability Adjustment Request" by adding the following: "by reliability entities (RC, BA, TOP)" to the end of the existing definition.
Response: The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other		

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 4:	Question 4 Comments:
		stakeholders (see above). We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments. The CITT SDT does not feel that we need to include the "who" that can perform these actions.
Santee Cooper	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification to the definition of "Reliability Adjustment Request" by adding the following: "by reliability entities (RC, BA, TOP)" to the end of the existing definition.
		Response: The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above). We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments. The CITT SDT does not feel that we need to include the "who" that can perform these actions.
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
Hydro One Networks	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	
PacifiCorp	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

5. The drafting team developed the following definition of “After-the-fact (ATF). Do you agree with the proposed definition of “ATF”? If not, please provide specific language for its improvement.

Summary Consideration: The CITT SDT reviewed comments received from stakeholders regarding the definition of “After-the-fact (ATF)”. Several stakeholders suggested that we move the definition to INT-005 since the term is first used there. We concur and made this revision. Two stakeholders had concerns that the timing table imposed additional requirements not specified in the timing tables. The revisions to R1 address these concerns.

Organization	Question 5:	Question 5
NPCC	No	<p>The title of this block should be Question 5 Comments. We agree with the definition. However, we have two comments:</p> <p>(1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?</p> <p>(2) Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-compliant.</p>
<p>Response: The CITT SDT Thanks you for your comment. (1) We moved the definition to INT-005. (2) The CITT SDT has revised the wording in R1 to:</p> <p>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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹</p> <p>¹The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p> <p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>		
SERC OC Standards Review Group	No	ATF specifically does not include Emergency Requests or Reliability Adjustment Requests.
<p>Response: The CITT SDT Thanks you for your comment. The definition does not limit the types of requests that are included as an after-the-fact</p>		

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 5:	Question 5
RFI. Emergency Requests and Reliability Adjustment Requests can be classified as on-time, late or after-the-fact.		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
Response: The CITT SDT Thanks you for your comment. Please see our response to IESO's comments.		
Ontario IESO	No	We agree with the definition. However, we have two comments: (1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)? (2) Table 1 is a part of the standard and the timing stipulated therein are also regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frame stipulated in Column B of the Timing Table, the wording in the Timing Table, now that with the words "Response not required" and "if they choose" deleted, hold the BA and TSP responsible for responding to ATF and Late requests that time frame. This will make them both non-compliant.
Response: The CITT SDT Thanks you for your comment. (1) We moved the definition to INT-005. (2) The CITT SDT has revised the wording in R1 to: 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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange. ¹ ¹ The Balancing Authority and Transmission Service Provider need not provide responses to any other requests. This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.		
Hydro One Networks	Yes	INT-005 uses this term in the timing table. We suggest defined the term in that standard as it appears there first.
Response: The CITT SDT Thanks you for your comment. We moved the definition to INT-005.		
Northeast Utilities	Yes	We agree with the definition. However, INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?
Response: The CITT SDT Thanks you for your comment. We moved the definition to INT-005.		
IRC Standards Review	Yes	Yes we agree with the proposed definition.

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 5:	Question 5
Committee		
Response: The CITT SDT Thanks you for your comment.		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
Midwest ISO Standards Collaboration	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	
Santee Cooper	Yes	
MRO NERC Standards Review Subcommittee	Yes	
PacifiCorp	Yes	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

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

Summary Consideration: Several of the comments received on this question relate to WECC specific issues that have arisen since the SAR was developed for this project. The original SAR, at the request of the WECC, was for a 10 minute assessment period. The CITT SDT has suggested that these proposals are outside the scope of the drafting team and that a new SAR be developed to address these concerns at either the NERC level or in the WECC Region. It was also pointed out to stakeholders that a new SAR (Project 2008-12) has been initiated to provide a thorough review of all INT standards. The CITT SDT encourages stakeholders to participate by providing their comments to that team.

Organization	Question 6 Comments:
Puget Sound Energy Transmission	Thanks to the Drafting Team for their hard work on this very important issue.
Response: The CITT SDT Thanks you for your comment.	
FirstEnergy	R1 & M1- "Timing Table" is not a defined term and should be in lower case; "request" should be capitalized, but "On-Time" should not be capitalized since it is not a defined term.R1.2 - "transmission" and "system" are defined terms and should be capitalized.
Response: The CITT SDT Thanks you for your comment. We have revised the standards based on your comments. We have chosen to leave On-time capitalized because it is shown that way in the table and the far left column of the table defines what is considered On-time. While we agree that "transmission" and "system" can be defined terms, these terms as well as "transmission system limits" are not being used as defined terms in this standard.	
Hydro One Networks	We recommend not changing R1 and M1 at this time. Instead, when deleting the phases "Response not required" and "? if they choose" in Table 1, insert the words "should" and "shall" into the appropriate rows in Column B. Example: Row 2, Column B should read "If responding, entities should respond within 2 hours.", and Row 3, Column B should read "Entities shall respond <= 10 minutes from Arranged Interchange receipt from IA."
<p>Response: The CITT SDT Thanks you for your comment. The CITT SDT chose a different approach to clarify the tables and requirements. We have revised the wording in R1 to:</p> <p>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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹</p> <p>¹The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>	

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 6 Comments:
	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>
BC Transmission Corp	<p>Thank you to the drafting team for their hard work in revising the standards and responding to the comments that were received</p>
	<p>Response: The CITT SDT Thanks you for your comment.</p>
Northeast Utilities	<p>Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. While ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table, with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-compliant.</p>
	<p>Response: The CITT SDT Thanks you for your comment. We have revised the wording in R1 to:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹</p> <p style="padding-left: 40px;">¹The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>
	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>
SPPC	<p>Approval of late or intra-hour curtailment/reload, emergency, and (WECC) Spinning/Non-Spinning requests should require only a 5 minute assessment time due the nature and urgency for action of late and intra-hour transactions. This item was discussed on the WECC Interchange Scheduling and Accounting conference call to discuss comments on the CITT.</p>
	<p>Response: The CITT SDT thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. We suggest that a new SAR be developed to address your concerns at either the NERC level or in the WECC Region.</p>
Bonneville Power Administration	<p>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 3 minutes for the BA and TSP to conduct Reliability Assessments. We do not believe 3 minutes is sufficient time for Balancing Authorities with many adjacencies and a complex hydro system to confirm interchange AND set generator base points. For that reason, we recommend requests with <10 minutes prior to the ramp start and < 1 hour after the start time ("Late" tags) allow the BA and TSP reliability assessments 3 minutes. Requests 10 minutes prior to ramp start time, should also be provided 3 minutes for the BA and TSP to conduct reliability assessments. Requests 11 minutes prior to ramp start time, should be provided 4 minutes for the BA and TSP to conduct reliability assessments; etc. The changes proposed by Bonneville Power Administration will result in a new graduated</p>

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 6 Comments:
	assessment period allowing 3 minutes to assess an on-time request submitted 10minutes prior to the ramp start time, 4 minutes to assess an on-time request submitted 11 minutes prior to the ramp start time, etc? The proposed change does not include changing the definition of On Time. The current version provides up to 10 minutes for response to Late requests as well as two additional minutes for each request that is less than 15 minutes prior to ramp through requests received 10 minutes prior to ramp. This additional time leaves potential for further delay in agreeing to Interchange and setting generator base points.
<p>Response: The CITT SDT Thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. Stakeholder consensus supports the proposed revisions to the timing tables.</p>	
SERC OC Standards Review Group	On the Timing Table, for Column B of Row "ATF", suggest adding the words "if desired" to the end of the text. On the Timing Table, for Column B of Row "Late", suggest adding the words "per Requirement 1" to the end of the text.
<p>Response: The CITT SDT Thanks you for your comment. We have revised the wording in R1 rather than change the wording in the timing table. R1 now says:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹</p> <p style="padding-left: 40px;">¹The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p> <p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "if desired" from the tables.</p>	
Santee Cooper	On each of the Timing Requirements tables, we suggest adding the words "if they choose" back to the end of the text in Column B for the ATF classifications. As currently stated, it is not explicitly clear that the BA and TSP do not have to respond to ATF interchange. With this suggestion, the text for Column B would read: "Entities have up to 2 hours to respond if they choose."
<p>Response: The CITT SDT Thanks you for your comment. We have revised the wording in R1 rather than change the wording in the timing table. R1 now says:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.¹</p> <p style="padding-left: 40px;">¹The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>	

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	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "if they choose" from the tables.</p>
<p>MRO NERC Standards Review Subcommittee</p>	<p>No comments to the modifications other than answered above. OTHER COMMENTS RELATED TO THE SET OF STANDARDS BUT NOT TO THE MODIFICATIONS:</p> <ol style="list-style-type: none"> 1. These standards (INT-005, 006, & 008) should be consolidated; they reference the same tables and the only thing that changes are the measures and the requirements. We believe that the SAR titled "Modify Coordinate Interchange Standards for Applicability and General Upgrade" dated May 27, 2008 will address this issue and fully support it. 2. These standards need the following items assigned before these standards are approved for ballot even though these assigned items may not be within the scope of the SDT. It seems impractical to have these standards go through the Standard Development Process when the resulting standards have serious deficiencies. The following items need to be assigned: Violation Severity Levels (VSL), Violation Risk Factors (VRF), and Time Horizons. Without these items and if these standards are violated, penalties and mitigation plans may be applied inconsistently. We believe that the SAR titled "Modify Coordinate Interchange Standards for Applicability and General Upgrade" dated May 27, 2008 will address this issue and fully support it. 3. We have a question concerning the distribution of the information concerning the arranged interchange. In the standard INT-008-3 R1 & M1.1, all entities involved in the confirmed arranged interchange are communicated to. In the standard INT-005-03 R.1.1, only the sink and source balancing authorities for the arranged interchange are given the reliability assessment. Shouldn't all entities like the intermediate balancing authorities between the source and sink balancing authorities be given the reliability assessment associated with the proposed arranged interchange? These intermediate balancing authorities may have reliability related issues caused by this proposed arranged interchange such as thermal or stability ratings being exceeded or additional voltage support being required.
	<p>Response: The CITT SDT Thanks you for your comment. These suggestions / issues are outside the scope of the CITT SDT. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR. Note that VRFs for these standards were developed and approved – as were VSLs. Since there have been no modifications to the scope or intent of the requirements, these VRFs and VSLs should not need immediate modification.</p>
<p>IRC Standards Review Committee</p>	<p>The proposed terms for questions 3, 4, and 5 have value to the INT-006-3 requirements only if the intent is for Balancing Authorities and Transmission Service Providers to respond in some expedited manner beyond the timing requirements posed in the existing timing tables.</p>
	<p>Response: The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B</p>

Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14

Organization	Question 6 Comments:
	<p>of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR.</p>
PacifiCorp	<p>PacifiCorp believes that a 10-minute assessment period for reliability adjustments is too long. The assessment period should be no more than 5 minutes. We suggest the 5-minutes assessment period for the all LATE requests, but more specifically reliability adjustments. If the argument is that there isn't enough time to process LATE tags, then we suggest those parties need to adjust their auto processes to improve their ability to act in a timely manner.</p>
	<p>Response: The CITT SDT Thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. We suggest that a new SAR be developed to address your concerns at either the NERC level or in the WECC Region. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR.</p>
Tucson Electric Power - Marketing	
PJM Interconnection	
Midwest ISO Standards Collaboration	
Manitoba Hydro	
Operating Reliability Working Group (ORWG)	No
Ontario IESO	
ISO New England	
PUD NO. of Grant County	
NPCC	