

Comment Report

Project Name: 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards | Templates
Comment Period Start Date: 1/10/2018
Comment Period End Date: 2/23/2018
Associated Ballots:

There were 21 sets of responses, including comments from approximately 77 different people from approximately 59 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. The SME stakeholder team has completed its review of INT-004-3.1 and concluded that all requirements may be retired due to their existing or proposed inclusion in the NAESB Business Practice Standards, the NERC Pseudo-Tie Coordination Reference Document, and NERC Reliability Standard IRO-010-2; and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.**
- 2. The SME stakeholder team has completed its review of INT-006-4 and concluded that Requirement R3, Part 3.1, Requirement R4, and Requirement R5 may be retired under Paragraph 81 criteria. Do you agree? If not, please provide your comments and rationale.**
- 3. The SME stakeholder team has completed its review of INT-006-4 and concluded that the undefined and ambiguous terms “emergency” and “on-time” in Requirements R1 and R2 be removed from the requirements as they bring no reliability benefit to the requirements. In addition, the INT PRT recommends that the term “Reliability Assessment” be reintegrated into the requirements as it is the reliability task being performed in these requirements, as noted in the Purpose, not merely the task of approving or denying the Arranged Interchange. Do you agree? If not, please provide your comments and rationale.**
- 4. The SME stakeholder team has completed its review of INT-009-2.1 and concluded that Requirement R2 can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. Do you agree? If not, please provide your comments and rationale.**
- 5. The SME stakeholder team has completed its review of INT-009-2.1 and concluded, as the SME stakeholder team is recommending the retirement of INT-010-2.1, that Requirement R1 would need to be revised to remove references to INT-010-2.1. Do you agree? If not, please provide your comments and rationale.**
- 6. The SME stakeholder team has completed its review of INT-010-2.1 and concluded that all requirements may be retired due to their inclusion in the NAESB Business Practice Standards and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.**
- 7. The SME stakeholder team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Exelon	Chris Scanlon	1,3,5,6		Exelon Utilities	Chris Scanlon	BGE, ComEd, PECO TO's	1	RF
					John Bee	BGE, ComEd, PECO LSE's	3	RF
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Midcontinent ISO, Inc.	Ed Skiba	2	MRO,RF,SERC,SPP RE	ISO RTO Council's Standard Review Committee	Ali Miremadi	California ISO	2	WECC
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	ISONE	2	NPCC
					Nathan Bigbee	ERCOT	2	Texas RE
					Terry Bilke	MISO	2	RF
					Al DiCaprio	PJM	2	RF
					Ben Li	IESO	2	NPCC
					Charles Yeung	SPP	2	SPP RE
ACES Power Marketing	Jodirah Green	6	NA - Not Applicable	ACES Standard Collaborations	Shari Heino	Brazos Electric Power Cooperative, Inc.	5	Texas RE
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	6	Texas RE
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Paul Mehlhaff	Sunflower Electric Power Corporation	1	SPP RE
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO

					Susan Sosbe	Wabash Valley Power Association	3	RF
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no ISO-NE	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
Laura Mcleod	NB Power	1	NPCC					

					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Shari Brown	Southwest Power Pool Inc.	2	SPP RE

PPL - Louisville Gas and Electric Co.	Shelby Wade	3,5,6	RF,SERC	Louisville Gas and Electric Company and Kentucky Utilities Company	Charles Freibert	PPL - Louisville Gas and Electric Co.	3	SERC
					Dan Wilson	PPL - Louisville Gas and Electric Co.	5	SERC
					Linn Oelker	PPL - Louisville Gas and Electric Co.	6	SERC

1. The SME stakeholder team has completed its review of INT-004-3.1 and concluded that all requirements may be retired due to their existing or proposed inclusion in the NAESB Business Practice Standards, the NERC Pseudo-Tie Coordination Reference Document, and NERC Reliability Standard IRO-010-2; and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

R1:

- RFI is needed for the IDC to work correctly
- NAESB does not have authority over all entities (governmental entities such as TVA, BPA)
- e-Tags are a critical part of congestion management in east
- SOCO recommends keeping R1 and changing PSE to each BA that facilitates energy transaction on behalf of a distribution provider to serve load...
- Not all entities in North America are obligated to follow NAESB Standards

R2:

- SOCO recommends keeping R2 and changing PSE to each BA that facilitates energy transaction on behalf of a distribution provider to serve load...
- RFI needed for the IDC to work correctly
- NAESB does not have authority over all entities (governmental entities such as TVA, BPA); e-Tags are a critical part of congestion management in the east
- Not all entities in North America are obligated to follow NAESB Standards

R3:

- SOCO recommends modifying from BA to RC, BA, and TSP shall only...
- NERC Pseudo-Tie Coordination document is not binding and does not cover all concerns with modeling of Pseudo-Ties
- The Data Specification was never meant to be used to govern the modelling of Pseudo-Ties; it governs modelling for reliability assessment but not congestion management
- Pseudo-Ties are important to congestion management, must be modeled in IDC correctly
- EIR is used for transparency into Pseudo-Ties

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

PJM agrees with the PRT's recommendation to retire this standard and each of its associated requirements. However, PJM recommends that the retirement of R3 be contingent upon the implementation of a new NAESB WEQ-004 requirement which necessitates the coordination of Pseudo-ties between impacted entities prior to implementation. This coordination is important for accurate accounting of interchange and ensuring that any related congestion can be properly managed. Without this coordination, the reliability of the system could be impacted.

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Duke Energy generally agrees with the SME stakeholder team's conclusions that the requirements in INT-004-3.1 should be retired. However, we believe that the retirement of those requirements should be contingent upon the adoption of the corresponding NAESB standards.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

BPA agrees that the requirement 'R1' can be retired although the NAESB WEQ 004-1 and/or WEQ 004-5 need modifications to capture the intent of INT-004.3.1.R1.

Measurement 1: The Purchasing-Selling Entity shall have evidence (such as dated and time-stamped electronic logs or other evidence) that a Request for Interchange was submitted for Dynamic Schedules and Pseudo-Ties as an on-time Arranged Interchange to the Sink Balancing Authority for the Dynamic Schedule or Pseudo-Tie. For Pseudo-Ties included in congestion management procedure(s) via an alternate method, the Purchasing-Selling Entity shall have evidence such as Interchange Distribution Calculator model data or written / electronic agreement with a Balancing Authority to include the Pseudo-Tie in the congestion management procedure(s).

BPA agrees that the requirement 'R2' can be retired after FERC approves and adopts the language into the CFRs. As this language has not been adopted by FERC, compliance applications are missing.

BPA agrees that the requirement 'R3' can be retired assuming that the NERC Pseudo Tie Coordination Reference Document is retained and IRO-010 Applicability Entities remain unchanged.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

We thank the SDT for their due diligence in identifying supportive reasons for retiring this standard and all its requirements.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

2. The SME stakeholder team has completed its review of INT-006-4 and concluded that Requirement R3, Part 3.1, Requirement R4, and Requirement R5 may be retired under Paragraph 81 criteria. Do you agree? If not, please provide your comments and rationale.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

R3:

- SOCO does not agree that R3 should be retired since not all Reliability Coordinators are notified because not all Reliability Coordinators have access to the e-Tagging software (can be validated by a survey)
- If R3 is retired then it is recommended to ensure that NERC requires all Reliability Coordinators to have access to e-Tagging software

R4:

- The NAESB e-Tag Specifications are not FERC approved
- All entities in North America are not obligated to follow NAESB Standards

R5:

- SOCO is ok with removal of R5 5.4 and R5 5.5 but R5 5.1-5.3 should be kept, Balancing Authorities are required to checkout on composite value so if R5 5.1-5.3 is removed then INT-009-2.1 R1 could not be met
- The NAESB e-Tag Specifications are not FERC approved
- All entities in North America are not obligated to follow NAESB Standards

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer No

Document Name

Comment

Louisville Gas and Electric Company and Kentucky Utilities Company (LKE) agrees that INT-006-4 Requirement R3, Part 3.1, Requirement R4, and Requirement R5 should be retired under Paragraph 81 criteria. Additionally, LKE proposes retirement of INT-006-4 Requirements R1 and R2, and full retirement of R3 because the timing requirements outlined in INT-006-4 Attachment 1 are captured in the NAESB WEQ004 Business Practice Standard. The ability to manage Interchange should be considered as part of a BA certification process, not a reliability standard.

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

ERCOT signs on to the following comments of the ISO/RTO Council (IRC) Standards Review Committee (SRC):

We support the retirement of these requirements. However, we do question the rationale implying that the NAESB e-Tagging Specification is FERC approved. The NAESB e-Tagging Specification is not submitted to FERC for approval. Additionally, it should be noted that some entities which are required to follow the NERC reliability standards are not required to follow the NAESB standards.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer

Yes

Document Name

Comment

We thank the SDT for their due diligence in identifying supportive reasons to retire the identified requirement of this standard

Likes 0

Dislikes 0

Response

Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee

Answer

Yes

Document Name

Comment

We support the retirement of these requirements. However, we do question the rationale implying that the NAESB e-Tagging Specification is FERC approved. The NAESB e-Tagging Specification is not submitted to FERC for approval. Additionally, it should be noted that some entities which are required to follow the NERC reliability standards are not required to follow the NAESB standards.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer

Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer

Yes

Document Name

Comment

PJM agrees with the PRT's recommendation to retire requirements R3.1, R4 and R5. The compliance obligations of these requirements, particularly R4 and R5, are currently assigned to the sink Balancing Authority. This is not appropriate, as this is not the entity actually fulfilling the requirement. However, it should be noted that the e-Tag specification is not an enforceable document, and is therefore not an ideal justification for retirement of these requirements. It should also be noted that the retirement of these requirements could create a situation whereby a reliability event resulting from a failure to follow the e-Tag specifications has no responsible party.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michael Puscas - ISO New England, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

3. The SME stakeholder team has completed its review of INT-006-4 and concluded that the undefined and ambiguous terms “emergency” and “on-time” in Requirements R1 and R2 be removed from the requirements as they bring no reliability benefit to the requirements. In addition, the INT PRT recommends that the term “Reliability Assessment” be reintegrated into the requirements as it is the reliability task being performed in these requirements, as noted in the Purpose, not merely the task of approving or denying the Arranged Interchange. Do you agree? If not, please provide your comments and rationale.

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer No

Document Name

Comment

The PRT’s recommendation of removing the terms ‘on-time’ and ‘emergency’ would actually expand the intended scope of the requirements to include non-emergency RFIs with a Time Classification of ‘Late’ as defined by INT-006-4 Attachment 1. PJM does not feel the requirements should cover these RFIs. PJM would prefer to retain these terms, and better define them within the standard, including references to Attachment 1 as needed. PJM would also prefer not to incorporate the term Reliability Assessment as this would require further definition. Although it is true that the act of approving or denying an RFI does not directly serve a reliability purpose, the sub-requirements of R1.1, R1.2 and R2.1 do, in fact, define reliability criteria upon which the approval or denial must be issued.

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

Duke Energy generally agrees with the stakeholder team that ambiguity does exist with the use of the terms “emergency” and “on-time”, however, we feel that complete removal may create more confusion than currently exists. We recommend considering revising the current language, rather than a complete removal. Also, it is unclear how the team plans to reintegrate the term “Reliability Assessment” into the standard. More information is needed before we can agree with this proposal.

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer No

Document Name**Comment**

Louisville Gas and Electric Company and Kentucky Utilities Company (LKE) agrees that the terms “emergency” and “on-time” in Requirements R1 and R2 should be removed from INT-006-4; however, we do not agree that the term “Reliability Assessment” is the reliability task being performed in Requirements R1 and R2 and thus, should not be reintegrated into the requirements. The purpose of performing a “Reliability Assessment” is to ensure that the Arranged Interchange (i.e., tag) is filled out properly and that there is enough available transmission capacity (ATC) on the system for the tag to flow. As stated in the Guidelines and Technical Basis (GTB), this is supported by a software application (absent from any operator involvement) and is rarely done manually by an operator. The important reliability task is not running the “Reliability Assessment” – it is ensuring that each of the entities have agreed on the Composite Confirmed Interchange (Net Scheduled Interchange) before it is used in the ACE equation (INT-009-2.1 R1). The term “Reliability Assessment” is not defined in the NERC glossary. Additionally, the term is ambiguous when used in the purpose statement of INT-006-4 (e.g., “To ensure that responsible entities conduct a reliability assessment of each Arranged Interchange before it is implemented”) and relies on clarification from the GTB to understand what is meant by the term. As NERC and FERC have communicated in regards to other reliability standards, the GTB are not part of a reliability standard and will be considered for removal in future versions.

Likes 0

Dislikes 0

Response**Richard Vine - California ISO - 2****Answer**

No

Document Name**Comment**

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response**Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee****Answer**

No

Document Name**Comment**

The term “Reliability Assessment” does not need to be added into the standard requirement because Part 1.1 and 1.2 of Requirement 1 already make clear the conditions under which a BA must deny or curtail an Arranged Interchange—namely, when the BA determines that it cannot support the Approved Interchange or that the schedule path is invalid. Inserting new language in R1 requiring a “Reliability Assessment” could create confusion as to whether the BA’s analysis must consider conditions beyond those specified in Parts 1.1 and 1.2. We would prefer to avoid that confusion.

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

No

Document Name

Comment

R1:

- SOCO believes that reliability assessment should be not reintegrated here, rather R2
- SOCO agrees with removing emergency but not on-time (clean up the arranged interchange wording since there would be two instances)

R2:

- SOCO believes that reliability assessment should be reintegrated
- Agreement with removing emergency but not on-time (clean up the arranged interchange wording since there would be two instances)

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer

No

Document Name

Comment

ERCOT signs on to the following comments of the ISO/RTO Council (IRC) Standards Review Committee (SRC), and also provides additional supplemental comments, below:

The term “Reliability Assessment” does not need to be added into the standard requirement because Part 1.1 and 1.2 of Requirement 1 already make clear the conditions under which a BA must deny or curtail an Arranged Interchange—namely, when the BA determines that it cannot support the Approved Interchange or that the schedule path is invalid. Inserting new language in R1 requiring a “Reliability Assessment” could create confusion as to whether the BA’s analysis must consider conditions beyond those specified in Parts 1.1 and 1.2. We would prefer to avoid that confusion.

ERCOT submits the following additional comments:

ERCOT is concerned that removing the terms “emergency” and “on-time” would necessarily imply that all Arranged Interchanges—including late, non-emergency, Arranged Interchanges—must be approved by the BA. ERCOT, like at least some other ISOs, does not allow approval of late Arranged Interchanges (i.e., those submitted within 15 minutes of ramp start). BAs should not be subject to penalties for failing to approve or deny late

submissions within ten minutes, which would be the result of the revised language. Moreover, for ISOs that do not permit late Arranged Interchange submissions, requiring denial of a late Arranged Interchange serves no purpose. Although one might argue that requiring a BA to deny the Arranged Interchange serves the purpose of notifying the PSE that the Arranged Interchange was late and will not be permitted, the PSE already receives notification of the late status via the OATI interface. Consistent with these comments, ERCOT would also suggest that the first two rows (corresponding to ATF and Late submission) in Attachment 1 should be deleted.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer

Yes

Document Name

Comment

We concur that the undefined and ambiguous terms “emergency” and “on-time” can be removed, as they do not provide additional clarity or add reliability benefit to the requirements. We believe the reference to “Reliability Assessment” listed within the purpose of the standard is sufficient, as it establishes that the requirements as a whole provide the parameters necessary to constitute the reliability assessment during interchange processing.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

4. The SME stakeholder team has completed its review of INT-009-2.1 and concluded that Requirement R2 can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. Do you agree? If not, please provide your comments and rationale.

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

We thank the SDT for their due diligence in identifying supportive reasons to retire the identified requirement of this standard.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Michael Puscas - ISO New England, Inc. - 2****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Rachel Coyne - Texas Reliability Entity, Inc. - 10****Answer****Document Name****Comment**

Texas RE appreciates the good work that the SME stakeholder team has undertaken in evaluating these standards and does not disagree with the recommendations. However, Texas RE would like to respectfully request that more details related to the analysis be included in the “rationale” section for each recommendation. Specifically, the rationale currently includes conclusory assertions that a requirement is redundant or duplicative and the allegedly comparable regulation/rule. Texas RE recommends that the rationale also include the specific language from the comparable regulation/rule that was considered to be redundant or duplicative in contrast to the requirement language under review and also the specific reliability tasks that the team has determined to be redundant or duplicative. The ERO Enterprise relies heavily on these documents and Texas RE believes that these types of details if included in the record would increase the value of these documents. If by chance, these types of details or analysis are located in a different document, please advise.

Likes 0

Dislikes 0

Response

5. The SME stakeholder team has completed its review of INT-009-2.1 and concluded, as the SME stakeholder team is recommending the retirement of INT-010-2.1, that Requirement R1 would need to be revised to remove references to INT-010-2.1. Do you agree? If not, please provide your comments and rationale.

Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee

Answer No

Document Name

Comment

We recommend keeping INT010-2.1. See Comments under #6. California ISO and ERCOT have not signed on to this comment.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

SOCO agrees to the revision of R1 however, if INT-010-2.1 is not retired the reference needs to remain.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

We thank the SDT for their due diligence in identifying supportive reasons to retire the identified requirement of this standard.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

6. The SME stakeholder team has completed its review of INT-010-2.1 and concluded that all requirements may be retired due to their inclusion in the NAESB Business Practice Standards and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

R1:

- In the absence of this requirement entities may choose to not tag after 60 minutes
- Not all entities in North America are obligated to follow NAESB Standards

R2:

- Not all entities in North America are obligated to follow NAESB Standards

R3:

- Removal of R3 would cause a reliability concern because this new transaction needs to be included in the IDC (congestion management) thus it must be tagged, thus there needs to be a NERC requirement
- Not all entities in North America are obligated to follow NAESB Standards

Likes 0

Dislikes 0

Response

Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee

Answer No

Document Name

Comment

We are concerned that the removal of INT010-2.1 removes the ability for an RC to direct a change to the interface flow before an Arranged Interchange is approved under the INT-006 Standard. Removal of INT-010-2.1 and the reference in INT-009-2.1 creates an issue with the requirement to submit tags, after the fact, for reliability adjusted Confirmed Interchanges and those that are required for reliability reasons such as emergency. Additionally,

any changes to INT010-2.1 R1 should be coordinated with NAESB . NAESB Business Practice Standard WEQ-004-1.7 specifically references INT010-2.1 R1. California ISO and ERCOT have not signed on to these comments.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer

Yes

Document Name

Comment

We thank the SDT for their due diligence in identifying supportive reasons for retiring this standard and all its requirements.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer

Yes

Document Name

Comment

PJM agrees with the PRT's recommendation to retire this standard and each of its associated requirements. However, PJM recommends that the retirement of the standard be contingent upon the a new NAESB WEQ-004 requirement becoming effective, which allows interchange fitting the current

INT-010-2.1 criteria to be implemented without an RFI. Such a requirement is currently published as WEQ-004-1.7 under the NAESB WEQ version 3.2 standards. However, the WEQ-004-1.7 requirement would need to be revised. Without this NAESB requirement, a Balancing Authority would not be able to implement interchange transactions described in INT-010-2.1 without an associated RFI which could jeopardize the reliability of the transmission system.

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

7. The SME stakeholder team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer Yes

Document Name

Comment

Yes Seminole-Electric agrees

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2

Answer Yes

Document Name

Comment

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee

Likes 0

Dislikes 0

Response

Ed Skiba - Midcontinent ISO, Inc. - 2 - MRO,SERC,SPP RE,RF, Group Name ISO RTO Council's Standard Review Committee

Answer Yes

Document Name

Comment

We also recommend that as part of the INT periodic review effort that INT011-1.1 be formally retired. We understand the standard is list as inactive. However, it is still a FERC approved standard.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations

Answer Yes

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

ERCOT signs on to the following comments of the ISO/RTO Council (IRC) Standards Review Committee (SRC):

We also recommend that as part of the INT periodic review effort that INT011-1.1 be formally retired. We understand the standard is list as inactive. However, it is still a FERC approved standard.

Likes 0

Dislikes 0

Response

Michael Puscas - ISO New England, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Scanlon - Exelon - 1,3,5,6, Group Name Exelon Utilities

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shelby Wade - PPL - Louisville Gas and Electric Co. - 3,5,6 - SERC, Group Name Louisville Gas and Electric Company and Kentucky Utilities Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response