

Consideration of Comments

Project Name:	2022-01 Reporting ACE Definition and Associated Terms First Posting
Comment Period Start Date:	1/31/2023
Comment Period End Date:	3/16/2023
Associated Ballot(s):	<p>2022-01 Reporting ACE Definition and Associated Terms Modified - Actual Net Interchange (NIA) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Area Control Error (ACE) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Automatic Time Error Correction (ATEC) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Balancing Authority Area (BAA) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Balancing Contingency Event (BCE) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Control Performance Standard (CPS) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Disturbance IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Dynamic Interchange Schedule or Dynamic Schedule IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Frequency Bias Setting (FBS) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Frequency Error IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Implemented Interchange IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Inadvertent Interchange IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Interchange Meter Error -(IME) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Operating Reserve – Spinning IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Operating Reserve – Supplemental IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Overlap Regulation Service IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Pseudo-Tie IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Ramp Rate or Ramp IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Regulation Service IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Reportable Balancing Contingency Event (RBCE) IN 1 DEF</p> <p>2022-01 Reporting ACE Definition and Associated Terms Modified - Reporting Area Control Error (Reporting ACE) IN</p>

1 DEF

- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reserve Sharing Group (RSG) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reserve Sharing Group Reporting ACE IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Scheduled Frequency IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Scheduled Net Interchange (NIS) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Supplemental Regulation Service IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Tie Line Bias (TLB) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Time Error (TE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Time Error Correction (TEC) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms New - Inadvertent Interchange Management (IIM) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Disturbance Control Standard IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Actual Interchange IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Interchange Schedule IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Scheduled Interchange IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Reportable Disturbance IN 1 DEF

There were 47 sets of responses, including comments from approximately 138 different people from approximately 97 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, 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, contact Director, Standards Development, [Latrice Harkness](#) (via email) or at (404) 858-8088.

Questions

1. Participating Balancing Authorities achieve reductions in their generation control and Reporting ACE by utilizing a frequency neutral form of ACE exchange, called ACE Diversity Interchange (ADI). Current implementations of ADI use offsets to either Actual Net Interchange or Scheduled Net Interchange ACE components to create an ACE value closer to zero for each participant. Guidance for implementing ADI processes is documented in a NERC technical reference document; however, concerns have been raised that not all participants may choose to include ADI in their Reporting ACE, which would result in the sum of Reporting ACE not being equal to zero for that interconnection. Since ADI is not currently a defined term, the standard drafting team (SDT) would like to poll industry. Please select one of the three options.
2. The SDT acknowledges that the NERC Glossary Terms: Automatic Generation Control, Interchange Schedule, and Pre-Reporting Contingency Event ACE Value are connected to the ACE definition and associated definitions, but did not find modifications needed. Does the entity agree that no changes are needed to the three NERC Glossary of Terms stated above? If not, please provide a proposal and justification as to why changes are necessary.
3. Does the entity propose any other specific changes to the NERC Glossary of Terms that were not changed and, if so, what specific term(s) are you in opposition to and why?
4. Does the entity believe that any proposed changes to the NERC Glossary of Terms modify any requirements in existing NERC reliability standards?
5. Does the entity oppose any specific proposed changes to the NERC Glossary of Terms and, if so, what specific term(s) are you in opposition to and why?
6. The SDT is proposing a 12-month implementation plan. Would this proposed timeframe give enough time to implement the proposed changes? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.
7. Please provide any additional comments for the SDT to consider, if desired.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Elizabeth Davis	Elizabeth Davis		RF,SERC	ISO/RTO Standards Review Committee	Mike Del Viscio	PJM	2	RF
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Helen Lainis	IESO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Kennedy Meier	ERCOT	2	Texas RE
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Ryan Strom	Buckeye Power, Inc.	5	RF
					Dave Hartman	Arizona Electric Power Cooperative	1	WECC
					Scott Brame	NC Electric Membership Corporation	3,4,5	SERC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Dan Kopin	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Nicolas Turcotte	Hydro-Quebec TransEnergie	1	NPCC
					Randy MacDonald	New Brunswick Power Corporation	2	NPCC
					Dermot Smyth	Con Ed - Consolidated	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Edison Co. of New York		
					David Burke	Orange and Rockland	3	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Tracy MacNicoll	Utility Services	5	NPCC
					Shivaz Chopra	New York Power Authority	6	NPCC
					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Santee Cooper	Vicky Budreau	3		Santee Cooper	Diana Scott	Santee Cooper	1,3,5,6	SERC
					Heugnette Bostic	Santee Cooper	1,3,5,6	SERC
					Cindy Corson	Santee Cooper	1,3,5,6	SERC
					Clarke McKenzie	Santee Cooper	1,3,5,6	SERC
					Adam Taylor	Santee Cooper	1,3,5,6	SERC
					Jason Smith	Santee Cooper	1,3,5,6	SERC
					Lachelle Brooks	Santee Cooper	1,3,5,6	SERC

1. Participating Balancing Authorities achieve reductions in their generation control and Reporting ACE by utilizing a frequency neutral form of ACE exchange, called ACE Diversity Interchange (ADI). Current implementations of ADI use offsets to either Actual Net Interchange or Scheduled Net Interchange ACE components to create an ACE value closer to zero for each participant. Guidance for implementing ADI processes is documented in a NERC technical reference document; however, concerns have been raised that not all participants may choose to include ADI in their Reporting ACE, which would result in the sum of Reporting ACE not being equal to zero for that interconnection. Since ADI is not currently a defined term, the standard drafting team (SDT) would like to poll industry. Please select one of the three options.

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

MRO NSRF supports adding the definition of ADI to the NERC Glossary of Terms to ensure equal inclusion of ADI in participants' Reporting ACE. MRO NSRF recognizes the reliability impact caused by not having all participants in an ADI program uniformly include the ADI adjustment in their Reporting ACE, such as diminishing the CPS1 metric. MRO NSRF proposes the following definition for ADI:

ACE Diversity Interchange (ADI): A frequency neutral form of exchange that participating Balancing Authorities utilize to achieve reductions in their generation control and Reporting ACE through offsets to either Actual Net Interchange or Scheduled Net Interchange ACE components to create an ACE value closer to zero for each participant. To ensure uniformity in reporting, all participating Balancing Authorities in a specified ADI program must either include or exclude the impact of ADI in their Reporting ACE collectively.

MRO NSRF also supports the intent of check box #2; however, the language "as is" is problematic. MRO NSRF would be open to supporting check box #2 if it was clarified such that ADI must be included in the Reporting ACE of participating BAs only. In addition, MRO NSRF's support of adding a definition of ADI to the NERC Glossary is contingent upon the SDT clarifying reporting applicability, i.e. only entities participating in an ADI program must report ADI; for non-participating Balancing Authorities, ADI is null so there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC or EMS merely to report a null value.

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0	
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	
Document Name	
Comment	
CHPD does not participate in ADI but believes entities in an ADI group should all be consistent with how they include ADI in Reporting ACE.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	
ERCOT has no position on this question.	
Likes 0	
Dislikes 0	
Response	

Thank you for the response.	
Holly Mitchell - NorthWestern Energy - 1,2,3,4,5,6,7,8,9,10 - WECC	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Leave ADI undefined
Document Name	
Comment	
No impact to Hydro One.	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Leave ADI undefined
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer Leave ADI undefined

Document Name

Comment	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Leave ADI undefined
Document Name	
Comment	
Define ACE Sharing Group and require the relevant sharing component to be included in Reporting ACE	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes	0

Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Leave ADI undefined
Document Name	
Comment	
Treatment of ADI is different for BAL-001 and BAL-002 compliance per the NERC Technical Reference.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The difference between BAL-001 and BAL-002 treatment of ADI should be handled in the ADI guideline document, not in the NERC Glossary of Terms.	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's considerations	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Leave ADI undefined
Document Name	
Comment	

<p>APS is unaware of any reliability need or justification to require this term to be defined. For this reason, we support ADI remaining undefined.</p>	
Likes	0
Dislikes	0
<p>Response</p>	
<p>The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.</p>	
<p>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</p>	
Answer	Leave ADI undefined
Document Name	
<p>Comment</p>	
<p>: EEI is unaware of any reliability need or justification to require this term to be defined. For this reason, we support ADI remaining undefined.</p>	
Likes	0
Dislikes	0
<p>Response</p>	
<p>Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2.</p>	
<p>Constantin Chitescu - Ontario Power Generation Inc. - 5</p>	
Answer	Leave ADI undefined
Document Name	
<p>Comment</p>	
<p></p>	
Likes	0

Dislikes	0
Response	
The SDT has interpreted the majority of the responses received to this question as favoring a definition of ADI to be added to the Glossary and has proposed a definition for industry's consideration.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Ameren agrees with and supports MISO comments.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO comment.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
None.	
Likes	0
Dislikes	0
Response	

Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.

Nazra Gladu - Manitoba Hydro - 1

Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
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Document Name	
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Comment

Manitoba Hydro supports the addition of ACE Diversity Interchange (ADI) to the NERC Glossary of terms. However, there is concern over the further impact to Reporting ACE and BAL standards that are not identified in Project 2022-01. BA's that do not make use of the ADI should not be required to report on ADI as part of the BAL standards. As such, ADI is only required to be part of a BA's AGC program and reporting if this feature is utilized.

Likes	0
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Dislikes	0
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Response

Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
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Document Name	
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Comment

Likes	0
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Dislikes	0
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Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
WEC Energy supports MISOs comments.	
Likes	0
Dislikes	0
Response	
Thank you for the comment please see response to MISO's comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	

Micah Runner - Black Hills Corporation - 1	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	
Diana Torres - Imperial Irrigation District - 6	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
A definition of ADI needs to be added to the NERC Glossary of Terms and it needs to be defined and made clear where the ADI term should be added into Reporting ACE for ADI participants. For the Balancing Authorities who are not participating in ADI, no ADI term needs to be added into Reporting ACE.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO comment.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.s	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
A definition of ADI needs to be added to the NERC Glossary of Terms and it needs to be defined and made clear where the ADI term should be added into Reporting ACE for ADI participants. For the Balancing Authorities who are not participating in ADI, no ADI term needs to be added into Reporting ACE.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
SIGE supports comments submitted by MISO.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see the response to MISO's comment.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes	0
Dislikes	0

Response

Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.

Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese

Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
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Document Name	
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Comment

Likes	0
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Dislikes	0
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Response

Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.

Kinte Whitehead - Exelon - 3

Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
---------------	---

Document Name	
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Comment

Likes	0
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Dislikes	0
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Response

Thank you for your comment. The SDT agrees with adding the definition. Concerns were brought up by entities who participate in ADI regarding requirements to include ADI in Reporting ACE. The SDT decided to include language in Reporting ACE in principle number 2.

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
<p>SPP supports adding the definition of ADI to the NERC Glossary of Terms to ensure equal inclusion of ADI in participants' Reporting ACE. SPP recognizes the reliability impact caused by not having all participants in an ADI program uniformly include the ADI adjustment in their Reporting ACE, such as diminishing the CPS1 metric. SPP proposes the following definition for ADI:</p> <p style="padding-left: 40px;">ACE Diversity Interchange (ADI): A frequency neutral form of exchange that participating Balancing Authorities utilize to achieve reductions in their generation control and Reporting ACE through offsets to either Actual Net Interchange or Scheduled Net Interchange ACE components to create an ACE value closer to zero for each participant. To ensure uniformity in reporting, all participating Balancing Authorities in a specified ADI program must either include or exclude the impact of ADI in their Reporting ACE collectively</p>	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	

Southern Company believes that any values affecting the ACE calculation should be included in the NERC Glossary of terms. This would require a definition to maintain consistency. However, we also believe that ADI should only be included in a BA's ACE equation if the BA is part of an ADI process and similar comments to questions #3 and #4 would apply as to how this should be treated.

Likes 0

Dislikes 0

Response

Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

Thank you for the comment. Please see the response to NSRF.

Sandra Ellis - Pacific Gas and Electric Company - 3

Answer Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE

Document Name

Comment

Since the term is documented in NERC technical reference documents, ADI should be defined in the NERC Glossary of terms.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE
Document Name	
Comment	
<p>AEPCO signs on to the comments by ACES Power Marketing.</p> <p>It is our opinion that adding ADI to the NERC Glossary of terms will provide all participants with an easy reference source for this term; however, we believe that the individual entities should have the flexibility to choose whether they should implement the ADI methodology.</p>	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see the response to MISO comment.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE
Document Name	
Comment	

MRO/NSRF	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see the response to MRO/NSRF comment.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE
Document Name	
Comment	
<p>MISO supports adding the definition of ADI to the NERC Glossary of Terms to ensure equal inclusion of ADI in participants' Reporting ACE if and only if the addition makes clear that any requirement to include ADI in Reporting ACE applies only to Balancing Authorities participating in an ADI program. Since ADI is null for Balancing Authorities not participating in an ADI program, there should be no obligation for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC, or EMS merely to report a null value.</p> <p>MISO recognizes the reliability impact, such as diminishing the CPS1 metric, that results when only some participants in an ADI program include the ADI adjustment in their Reporting ACE, and would therefore support language requiring all Balancing Authorities participating in a specified ADI program to uniformly include or exclude ADI from their Reporting ACE. MISO proposes the following definition for ADI:</p> <p>ACE Diversity Interchange (ADI): A frequency neutral form of exchange that participating Balancing Authorities utilize to achieve reductions in their generation control and Reporting ACE through offsets to either Actual Net Interchange or Scheduled Net Interchange ACE components to create an ACE value closer to zero for each participant. To ensure uniformity in reporting, all participating Balancing Authorities in a specified ADI program must either include or exclude the impact of ADI in their Reporting ACE collectively.</p>	
Likes	0
Dislikes	0
Response	

Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE
Document Name	
Comment	
It is our opinion that adding ADI to the NERC Glossary of terms will provide all participants with an easy reference source for this term; however, we believe that the individual entities should have the flexibility to choose whether they should implement the ADI methodology.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. The SDT decided to include a specification on ADI in Reporting ACE in principle number 2. The SDT did not have the intent to require participation in an ADI group. The intent was to provide clarity on the inclusion or exclusion in Reporting ACE by those who do participate.	

2. The SDT acknowledges that the NERC Glossary Terms: Automatic Generation Control, Interchange Schedule, and Pre-Reporting Contingency Event ACE Value are connected to the ACE definition and associated definitions, but did not find modifications needed. Does the entity agree that no changes are needed to the three NERC Glossary of Terms stated above? If not, please provide a proposal and justification as to why changes are necessary.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No
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Document Name	
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Comment

ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.

Likes 0	
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Dislikes 0	
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Response

Please see response to PJM.

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee

Answer	No
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Document Name	
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Comment

The SRC proposes the following non-substantive modifications to the definition of Automatic Generation Control: A process designed and used to adjust a Balancing Authority *Areas' Area's* Demand and resources to help maintain the Reporting ACE **in that of a** Balancing Authority Area within the bounds required by applicable NERC Reliability Standards.

Please note: the request is to replace Areas' with Area's; and include the words 'in that!'; and remove the words 'of a'.

Likes	0
Dislikes	0
Response	
Thank you for the comment, the new definition list reflects this non substantive change.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	No
Document Name	
Comment	
<p>MISO supports comments filed by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and proposes the following non-substantive modifications to the definition of Automatic Generation Control.</p> <p>Automatic Generation Control (AGC): A process designed and used to adjust a Balancing Authority Areas' Area's Demand and resources to help maintain the Reporting ACE in that of a Balancing Authority Area within the bounds required by applicable NERC Reliability Standards.</p>	
Likes	0
Dislikes	0
Response	
Please see response to PJM.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
See Response #7 below.	
Likes	0

Dislikes	0
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that the NERC Glossary Terms (i.e., Automatic Generation Control, Interchange Schedule, and Pre-Reporting Contingency Event ACE Value) do not need to be changed.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to NSRF.	
Karrie Schuldt - Dairyland Power Cooperative - 1	

Answer	Yes
Document Name	
Comment	
MRO/NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MRO/NSRF.	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	Yes
Document Name	
Comment	
PNM agrees.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	

No impact to BHP.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	Yes
Document Name	
Comment	
Concur with SDT since the fundament definitions for AGC, Interchange Schedule, and Pre-Reporting Contingency Event Ace did not change.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes

Document Name	
Comment	
FirstEnergy offers no comments toward this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	
No impact to Hydro One.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for the comment.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes	0
Response	
Thank you for the comment.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Jendras Sr - Ameren - Ameren Services - 3	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Add a definition of ADI to the NERC Glossary of terms with no specification that ADI is to be included in Reporting ACE
Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Thank you for the comment.	

3. Does the entity propose any other specific changes to the NERC Glossary of Terms that were not changed and, if so, what specific term(s) are you in opposition to and why?

Alain Mukama - Hydro One Networks, Inc. - 1

Answer No

Document Name

Comment

No impact to Hydro One.

Likes 0

Dislikes 0

Response

Thank you for the comment.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

Response

Thank you for the comment.

Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC

Answer	No
Document Name	
Comment	
Nothing other than the definition of PII and its components are readable.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	No
Document Name	
Comment	
No other changes proposed.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	No
Document Name	
Comment	

MRO/NSRF	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	No
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not offer any changes to the NERC Glossary of Terms.	
Likes	0
Dislikes	0

Response	
Thank you for the comment.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Nazra Gladu - Manitoba Hydro - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Diana Torres - Imperial Irrigation District - 6	

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for the comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Kinte Whitehead - Exelon - 3	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for the comment.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes

Document Name	
Comment	
See Response #7 below.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
<p>BC Hydro appreciates the opportunity to review and offers comments on the revised definitions for Area Control Error (ACE), Automatic Time Error Correction (ATEC), Control Performance Standard (CPS), Frequency Bias Setting (FBS) and Interchange Meter Error (IME) as follows.</p> <ul style="list-style-type: none"> • ACE – Recommend “Frequency Bias” be changed to “entity’s Frequency Bias”, to remove any ambiguities (e.g. might be interpreted as interconnection bias, etc.) • ATEC – The “that modifies the control point” wording should be removed, as the “control point” is undefined; the intent of the definition is sufficiently clear without this phrase. Additionally, for “IATEC shall be zero when operating in any other AGC mode.”: it is unclear what other “AGC modes” there are, as the applicable AGC mode has not been specified. Recommend changing to “IATEC shall be zero when operating in any AGC mode other than TLBC (Tie Line Bias Control)” • CPS – It is not a methodology nor a control; rather, BC Hydro suggests that CPS is a method for relating Reporting ACE to Frequency Error to provide objective indication whether sufficient secondary AGC control has been applied to maintain energy balance and Scheduled Frequency. • FBS – Please confirm if this is to the same as the “Frequency Bias” term mentioned in ATEC. If it is, recommend matching the terms for consistency (e.g. change this to “Frequency Bias”). 	

<ul style="list-style-type: none"> IME – Recommend replacing “any other components” with “... to compensate for data or equipment errors affecting the Actual Net Interchange component” 	
Likes	0
Dislikes	0
Response	
Thank you for the suggestions. The team will use these as guides during this drafting period.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
See response to question #4.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Thank you for the comment.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Thank you for the comment.	

4. Does the entity believe that any proposed changes to the NERC Glossary of Terms modify any requirements in existing NERC reliability standards?

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name [ACE-4.PNG](#)

Comment

MRO NSRF is concerned that the proposed changes to Reporting ACE *may* result in new EMS requirements (in terms of the Reporting ACE calculation) and *may* result in new administrative requirements in the form of compliance reporting.

To the extent this is not the intent of the SDT, MRO NSRF requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + I(IM);

• I(IM) = Inadvertent Interchange Management.

• In the Western Interconnection this term is I(A TEC)

• The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection. Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Thank you for the comment. The team made changes to reflect these comments.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer	No
Document Name	
Comment	
EEI is unaware of any problems with the proposed changes to the NERC Glossary of Terms under this project (as proposed in Draft 1) that might negatively impact enforceable requirements in any of the NERC Reliability Standards that are currently mandatory and subject to enforcement.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	No
Document Name	
Comment	
Following review, no changes to standards was identified.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	

Changes proposed have no impact to FirstEnergy.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
None.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	No
Document Name	
Comment	
No impact to Hydro One.	
Likes	0
Dislikes	0

Response	
Thank you for the comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Kinte Whitehead - Exelon - 3	

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for the comment.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. a	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	

Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez

Answer	No
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for the comment.	
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Rachel Coyne - Texas Reliability Entity, Inc. - 10	
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Answer	No
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Document Name	
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Comment	
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Likes 0	
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Dislikes 0	
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Response	
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Thank you for the comment.	
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Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
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Answer	No
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Document Name	
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Comment	
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Likes 0	
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Dislikes	0
Response	
Thank you for the comment.	
Diana Torres - Imperial Irrigation District - 6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	No
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for the comment.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	

Comment

ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.

Likes 0

Dislikes 0

Response

Thank you for the comment. Please see response to ISO/RTO council.

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee

Answer

Yes

Document Name

Comment

The SRC is concerned that the proposed changes *may* result in new EMS requirements (in terms of the Reporting ACE calculation) and *may* result in new administrative requirements in the form of compliance reporting.

To the extent this is not the intent of the SDT, the SRC requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + I(IM);

• I(IM) = Inadvertent Interchange Management.

• In the Western Interconnection this term is I(A TEC)

• The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.

Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC, or EMS merely to incorporate or report a null value.

Likes 0

Dislikes 0

Response

Thank you for this comment. The team has taken this into consideration and made the necessary changes.

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Yes

Document Name

Comment

MISO supports comments filed by the SRC and is concerned that the proposed changes to Reporting ACE *may* result in new EMS requirements (in terms of the Reporting ACE calculation) and *may* result in new administrative requirements in the form of compliance reporting.

To the extent this is not the intent of the SDT, MISO requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + I(IM);

• I(IM) = Inadvertent Interchange Management.

• In the Western Interconnection this term is I(A TEC)

• The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.

Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Likes	0
Dislikes	0
Response	
Thank you for the comment. These changes were acknowledged and the definition was modified.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
While the modified definition of Area Control Error (ACE) includes the language “if operating in the Inadvertent Interchange Management mode”, the “Reporting Area Control Area Error – (Reporting ACE)” definition and subsequent equation infers the component should be included in the Balancing Authority’s Reporting ACE. This addition would modify the requirements of the existing standards. One possible solution would be to clarify in the Reporting ACE definitions: IIM = Inadvertent Interchange Management <i>if utilized</i> .	
Likes	0

Dislikes	0
Response	
Thank you for the comment. The team has taken this into to consideration when drafting the new defintions.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	Yes
Document Name	
Comment	
MRO/NSRF	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
SPP supports the comments of the MRO NSRF	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	

Answer	Yes
Document Name	
Comment	
SIGE supports comments submitted by MISO.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MISO.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MISO.	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	Yes
Document Name	
Comment	

BAL Standards	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
<p>Manitoba Hydro supports the addition of the new Inadvertent Interchange Management (IIM) component within Reporting ACE. However, the IIM term within the RACE calculation will impact BAL standards, incur significant enhancements to EMS AGC applications and require an external regional system to deploy proper use within each interconnect. This change, although appearing small in nature, is quite significant for those EMS vendors that do not allow such a feature. As such, industry will require additional time, design, and vetting prior to moving ahead with IIM. Manitoba Hydro recommends that wording in the definition of RACE and/or BAL standards address the following:</p> <ol style="list-style-type: none"> 1) IIM should be considered as null for those interconnects/BA's that do not deploy this term within RACE for their system. 2) IIM should not be required as part of a BA's AGC system calculation or accounting unless deployed within the interconnect/BA. 	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The modifications to the I(im) term addresses these changes with regards to the null term.	
There is no expectation of an EMS change to be made for null variables of the reporting ace definition.	

David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports MISO comments.	
Likes	0
Dislikes	0
Response	
Thank you for the comment response. Please see response to MISO.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	

5. Does the entity oppose any specific proposed changes to the NERC Glossary of Terms and, if so, what specific term(s) are you in opposition to and why?

Alain Mukama - Hydro One Networks, Inc. - 1

Answer No

Document Name

Comment

No proposed changes to NERC Glossary of Terms.

Likes 0

Dislikes 0

Response

Thank you for the comment.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

Response

Thank you for the comment.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer	No
Document Name	
Comment	
No proposed changes to NERC Glossary of Terms.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not oppose any of the proposed changes to the NERC Glossary Terms modified and as proposed in this Draft 1 posting.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for the comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Micah Runner - Black Hills Corporation - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	No
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Diana Torres - Imperial Irrigation District - 6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for the comment.	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	

Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Kinte Whitehead - Exelon - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for the comment.	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports MISO comments.	
Likes	0
Dislikes	0
Response	

Thank you for the comment.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
See Response #7 below.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
As discussed in question 4, the new Inadvertent Interchange Management (IIM) component within Reporting ACE may incur impact to BAL standards, RACE and EMS AGC applications. While	
Manitoba Hydro supports the inclusion of IIM, we request that NERC provide wording to address IIM as listed in question 4:	
1) IIM should be considered as null for those interconnects/BA's that do not deploy this term within RACE for their system.	
2) IIM should not be required as part of a BA's AGC system calculation or accounting unless deployed within the interconnect/BA.	
Likes	0
Dislikes	0
Response	

Thank you for the comment. The team elaborated on the IIM definition and addressed these concerns.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports MISOs comments.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO.	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
<p>BC Hydro appreciates the opportunity to review and offers comments on the revised definitions for Area Control Error (ACE), Automatic Time Error Correction (ATEC), Control Performance Standard (CPS), Frequency Bias Setting (FBS) and Interchange Meter Error (IME) as follows.</p> <ul style="list-style-type: none"> • ACE – Recommend “Frequency Bias” be changed to “entity’s Frequency Bias”, to remove any ambiguities (e.g. might be interpreted as interconnection bias, etc.) • ATEC – The “that modifies the control point” wording should be removed, as the “control point” is undefined; the intent of the definition is sufficiently clear without this phrase. Additionally, for “IATEC shall be zero when operating in any other AGC mode.”: it is unclear what other “AGC modes” there are, as the applicable AGC mode has not been specified. Recommend changing to “IATEC shall be zero when operating in any AGC mode other than TLBC (Tie Line Bias Control)” 	

- CPS – It is not a methodology nor a control; rather, BC Hydro suggests that CPS is a method for relating Reporting ACE to Frequency Error to provide objective indication whether sufficient secondary AGC control has been applied to maintain energy balance and Scheduled Frequency.
- FBS – Please confirm if this is to the same as the “Frequency Bias” term mentioned in ATEC. If it is, recommend matching the terms for consistency (e.g. change this to “Frequency Bias”).
- IME – Recommend replacing “any other components” with “... to compensate for data or equipment errors affecting the Actual Net Interchange component”

Likes 0

Dislikes 0

Response

Thank you for the comment. The team modified the definitions.

Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF

Answer

Yes

Document Name

Comment

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

Thank you for the comment.

Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Yes

Document Name

Comment

As mentioned in our response to Question 4, MRO NSRF is concerned that the proposed changes to Reporting ACE *may* result in new EMS requirements (in terms of the Reporting ACE calculation) and *may* result in new administrative requirements in the form of compliance reporting.

To the extent this is not the intent of the SDT, MRO NSRF requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + I(IM);

- I(IM) = Inadvertent Interchange Management.

- In the Western Interconnection this term is I(A TEC)

- The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection. Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Similarly, as noted in MRO NSRF’s response to Question 1, our support for adding a definition of ADI to the NERC Glossary is contingent upon the SDT clarifying reporting applicability; i.e. only entities participating in an ADI program must report ADI; for non-participating Balancing Authorities, ADI is null so there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Likes	1	Lincoln Electric System, 1, Johnson Josh
Dislikes	0	
Response		
Thank you for the comment. The definitions have been updated.		
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO, WECC		
Answer	Yes	
Document Name		
Comment		

SPP supports the comments of the MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	Yes
Document Name	
Comment	
MRO/NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
The terms "Actual Net Interchange (NIA)" and "Scheduled Net Interchange (NIS)" used in the proposed ACE definition don't match the revised terms where the terms and acronyms are separated by a hyphen.	
Likes 0	

Dislikes	0
Response	
Thank you for the comment. The changes have been made.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	
Comment	
<p>MISO supports comments filed by the SRC and is concerned that the proposed changes to Reporting ACE <i>may</i> result in new EMS requirements (in terms of the Reporting ACE calculation) and <i>may</i> result in new administrative requirements in the form of compliance reporting.</p> <p>To the extent this is not the intent of the SDT, MISO requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:</p> <p>Reporting ACE = (NIA &minus; NIS) &minus; 10B (FA &minus; FS) – IME + I(IM);</p>	

- I(IM) = Inadvertent Interchange Management.

- In the Western Interconnection this term is I(ATEC)

- The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.

Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Similarly, as noted in MISO’s response to Question 1, our support for adding a definition of ADI to the NERC Glossary is contingent upon the SDT clarifying reporting applicability; i.e. only entities participating in an ADI program must report ADI; for non-participating Balancing Authorities, ADI is null so there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.

Likes	0
Dislikes	0

Response

Thank you for this comment. The team updated the definitions.

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee

Answer	Yes
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Document Name	
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Comment

As mentioned in our response to Question 4, the SRC is concerned that the proposed changes *may* result in new EMS requirements (in terms of the Reporting ACE calculation) and *may* result in new administrative requirements in the form of compliance reporting.

To the extent this is not the intent of the SDT, the SRC requests the SDT clarify the intent of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + I(IM);

• I(IM) = Inadvertent Interchange Management.

• In the Western Interconnection this term is I(ATEC)

• The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.

Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC, or EMS merely to incorporate or report a null value.

Likes	0
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Dislikes	0
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Response

Thank you for this comment. The team updated definitions.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
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Document Name	
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Comment

ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.

Likes	0
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Dislikes	0
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Response

Thank you for the comment.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
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Document Name	
Comment	
<p>Texas RE generally agrees with the proposed revisions to the NERC Glossary of terms. Texas RE is concerned, however, that the definition of Reportable Balancing Contingency Event (RBCE) continues to use the term Regional Reliability Organization (RRO). This term has not been used in some time and Texas RE recommends removing it as it has already been removed from older Reliability Standards that contained the term.</p> <p>Texas RE also noticed the following in certain definitions:</p> <ul style="list-style-type: none"> • Area Control Error (ACE) – Texas RE recommends keeping the term Balancing Authority, rather than “entity” as it will always be the Balancing Authority. If the term Reporting ACE is to be used for compliance, then that is the term that should be used in the Requirements. Texas RE notes that BAL-005-1 does use the term Reporting ACE, rather than ACE. • Balancing Authority Area - EOP-011-2 is effective as of April 1, 2023, and EOP-011-1 is being retired. Texas RE recommends updating the version. • Reporting ACE - The term “equation” was struck from one sentence but not from another when discussing the Reporting ACE (“will provide a valid alternative to this Reporting ACE equation”. Was this the SDT’s intent? • The term Adjacent Balancing Authority Area is not defined, though Adjacent Balancing Authority and Balancing Authority Area are defined terms. This phrase appears in the definitions of Actual Net Interchange, where it is capitalized, and in the definition of Scheduled Net Interchange, where area is not capitalized. Texas RE recommends being consistent with the use of the term. 	
Likes	0
Dislikes	0
Response	
Thank you for this comment. The team updated the definitions.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	

NA	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	

6. The SDT is proposing a 12-month implementation plan. Would this proposed timeframe give enough time to implement the proposed changes? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

If the EI were to implement IIM, at least 24 months would be needed. 12 months to discuss the details and 12 months to implement.

Likes 0

Dislikes 0

Response

Thank you for the comment. If a regional entity does implement the IIM term, it will be done through a process separate from this drafting team. Implementation timeline will be addressed then. Please refer to the updated definition of Reporting ACE.

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer No

Document Name

Comment

Eighteen months would be a better time frame to allow all operating procedures to be modified by the BA's to reflect the definition changes.

Likes 0

Dislikes	0
Response	
Thank you for this comment. The drafting team will take it into consideration when finalizing the Implementation Plan.	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
18 months would be a better time frame to allow all operating procedures to be modified by the BA's to reflect the definition changes.	
Likes	0
Dislikes	0
Response	
Thank you for this comment. The drafting team will take it into consideration when finalizing the Implementation Plan.	
Nazra Gladu - Manitoba Hydro - 1	
Answer	No
Document Name	
Comment	
As stated in our responses to questions 1, 4 and 5, Manitoba Hydro does not support the proposed timeline if EMS Vendors are required to update their AGC applications to meet the new IIM and ADI terms. As such, the 12 month timeline will need to be extended to 36 months to allow a reasonable amount of time for design, development and testing of the new functionality within AGC.	
Likes	0
Dislikes	0

Response	
The intent is that no EMS software change be necessary. Please refer to the updated definition of Reporting ACE. ADI is not currently included in the NERC Glossary.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	No
Document Name	
Comment	
Prior to confirming the implementation timeframe, Entergy recommends that utilities contact their control system software vendors to ensure that any potential coding modifications required to support these changes can be completed within the proposed 12-month implementation timeframe.	
Likes	0
Dislikes	0
Response	
The intent is that no EMS software change be necessary. Please refer to the updated definition of Reporting ACE.	
Diana Torres - Imperial Irrigation District - 6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Sandra Ellis - Pacific Gas and Electric Company - 3	

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to ISO/RTO SRC.	
Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	

<p>The SRC's "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their AGC merely to report a null value. If this is not the case, a longer implementation plan would be necessary.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for the comment. The drafting team has taken this comment into consideration when drafting the updated version of the definitions.</p>	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	
Comment	
<p>MISO supports comments filed by the SRC and its "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC or EMS merely to report a null value. If this is not the case, a longer implementation plan would be necessary.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for the comment. This has been addressed in the IIM term in Reporting ACE. There is no requirement for non-participating balancing authorities to make changes to Reporting ACE calculations.</p>	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	

Comment	
EEI does not oppose the 12 month implementation plan.	
Likes	0
Dislikes	0
Response	
Thank you for the comment and support.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to NSRF.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	Yes
Document Name	
Comment	
MRO/NSRF	
Likes	0

Dislikes	0
Response	
Thank you for the comment. Please see response to MRO/ NSRF.	
Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC	
Answer	Yes
Document Name	
Comment	
PNM agrees with the timeframe of 12 months for implementation.	
Likes	0
Dislikes	0
Response	
Thank you for the comment and support.	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
MRO NSRF's "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC or EMS merely to report a null value. If this is not the case, a longer implementation plan would be necessary.	
Likes	1 Lincoln Electric System, 1, Johnson Josh
Dislikes	0
Response	

Thank you for the comment. Please see response to MISO.	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	
Answer	Yes
Document Name	
Comment	
SIGE supports comments submitted by MISO.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	Yes
Document Name	

Comment	
No impact to BHP.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Micah Runner - Black Hills Corporation - 1	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes	0

Dislikes	0
Response	
Thank you for the comment.	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports MISOs comments.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy offers no comments toward this question.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	

Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports MISO comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MISO.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	Yes
Document Name	
Comment	

No impact to Hydro One.	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the response.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the response.	

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the response.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the support.	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for the support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Kinte Whitehead - Exelon - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the support.	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the support.	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for the support.	

Carl Pineault - Hydro-Quebec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes	0
Response	
Thank you for the support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Meaghan Connell - Public Utility District No. 1 of Chelan County - 5	
Answer	Yes
Document Name	

Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for the support.	

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Thank you for the support.

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer

Document Name

Comment

WECC leaves the input on implementing the proposed changes to those entities that are required to implement the changes.

Likes 0

Dislikes 0

Response

Thank you for the comment.

7. Please provide any additional comments for the SDT to consider, if desired.	
Alain Mukama - Hydro One Networks, Inc. - 1	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren agrees with and supports MISO comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MISO.	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	

Document Name

Comment

See general comment and definition updates below:

General Comment: Inclusion of acronyms is inconsistent. Some use a hyphen to separate, others do not.

The following changes to certain proposed definitions are recommended.

Area Control Error (ACE): The instantaneous difference between an entity’s Actual Net Interchange (NIA) and Scheduled Net Interchange (NIS), incorporating the effects of Frequency Error, Frequency Bias Setting (FBS), of Interchange Meter Error (IME), and of Inadvertent Interchange Management (IIM). For compliance usage, refer to the term Reporting ACE.

Automatic Generation Control (AGC): A process designed and used to adjust a Balancing Authority Area’s resource to help maintain the Reporting ACE within the Balancing Authority Area bounds required by applicable NERC Reliability Standards.

Balancing Authority Area (BAA): The collection of generation and loads within the metered boundary. The Balancing Authority Area maintains load-resource balance within this area.

Control Performance Standard (CPS): Methodology of controlling Reporting ACE relative to Frequency Error, expressed as a moving average. It is used as an indicator of sufficient secondary AGC or DSM to maintain energy balance and Scheduled Frequency.

Dynamic Interchange Schedule or Dynamic Schedule: A time-varying energy transfer that is updated in Real-time and included in the Scheduled Net Interchange (NIS) term in the same manner as an Interchange Schedule in the affected Balancing Authorities’ Reporting ACE.

Frequency Bias Setting (FBS): A negative number, either fixed or variable, expressed in MW/0.1 Hz, included in a Balancing Authority Area’s Reporting ACE to account for the Balancing Authority Area’s Frequency Response to the Interconnection Frequency Error, and discourage additional secondary control response.

Overlap Regulation Service: A method of providing Regulation Service in which the Balancing Authority Area providing the Regulation Service incorporates into its Reporting ACE a receiving Balancing Authority Area’s Actual Net Interchange (NIA), Scheduled Net Interchange (NIS), and Frequency Bias Setting (FBS).

Reporting Area Control Error (Reporting ACE): The scan-rate value of a Balancing Authority Area’s (BAA) Area Control Error (ACE) measured in MW, which includes the difference between actual and scheduled interchange adjusted for Frequency Error, known meter error, and inadvertent management.

Time Error (TE): The difference between the Interconnection time measured at the Balancing Authority Area(s) and the time specified by the National Institute of Standards and Technology. Time Error difference is caused by the accumulation of Frequency Error over a given period.

Likes 0

Dislikes 0

Response

Thank you for the comment and suggestion.

Julie Hall - Entergy - 6, Group Name Entergy

Answer

Document Name

Comment

The scope of this project appears to be largely administrative and, while worthwhile to pursue, may not be the most prudent allocation of resources given the more immediate reliability/risk-related efforts such as IBR performance standards. Entergy recommends deferring any further action on this project to a later date.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Nazra Gladu - Manitoba Hydro - 1

Answer

Document Name

Comment	
Pages 22 and 23, Redline - "Contingency Event" should be capitalized within the "Currently Approved Definition" and "SDT Proposed New or Revised REDLINE TO Currently Approved" columns for the NERC Glossary Terms "Operating Reserve - Spinning" and "Operating Reserve - Supplemental".	
Likes	0
Dislikes	0
Response	
Thank you for your comment. "contingency event" is not a NERC Glossary defined term; so it will not be capitalized.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	
Document Name	
Comment	

In the redline for Operating Reserve - Spinning, it appears that the intent was to capitalize Contingency Event, but all that is shown is the deletion of the small c and small e.

In the reline for Ramp Rate or Ramp it appears that the intent was to capitalize Interchange and Schedule. The small i and small s are stricken, but the large I and Large S are not shown as changes.

In the Reportable Balancing Contingency Event definition, Most Severe Single Contingency (MSSC) is included. MSSC is already a defined term, so MSSC would be adequate (without spelling it out).

Likes	0
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Dislikes	0
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Response

Thank you for comment. Contingency event is not a NERC defined term so it will not be capitalized.
 Thank you for the comment. NERC will review this before the next posting.

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer	
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Document Name	
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Comment

WEC Energy Group supports MISOs additional comments as written.

Likes	0
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Dislikes	0
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Response

Thank you for the comment. Please see response to MISO.

Diana Torres - Imperial Irrigation District - 6

Answer	
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Document Name	
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Comment	
None	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NERC System Operator Certification training and testing will need to incorporate these new definitions in a timely manner. ACE definitions are fundamental to NERC Certification training for new and existing System Operators.	
Likes	0
Dislikes	0
Response	
Thank you, this comment will be passed to the proper NERC groups.	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	
Document Name	
Comment	

The schedule Interchange is not a defined term in NERC glossary currently which is used in new definition of Reporting ACE. Even though the equation remains the same, the new terminology should be defined.

Likes 0

Dislikes 0

Response

Thank you for your comment. This term was intentionally not capitalized to address the general concept of error in scheduled interchange. This general concept of error in scheduled interchange is the difference between Actual Net Interchange and Scheduled Net Interchange.

Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper

Answer

Document Name

Comment

With the retirement of Disturbance Control Standard (DCS), will the SDT make changes be made to forms that reference DCS? The SDT needs to provide more details about Inadvertent Interchange Management, especially how it effects the Eastern Interconnection.

Likes 0

Dislikes 0

Response

Thank you for the comment. This change would be necessary and would occur regarding the DCS form. The drafting team made revisions and additions to the IIM definition since last ballot.

Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF

Answer

Document Name

Comment

SIGE supports comments submitted by MISO.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to MISO.	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	
Document Name	
Comment	
Actual Net Interchange: Adjacent Balancing Authority Areas is not a defined term. It should read either Adjacent Balancing Authority areas or adjacent Balancing Authority Areas.	
Control Performance Standard (CPS) : remove “Daniel, please help” from the Notes column.	
Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2 and BAL-004-WECC-3.	
Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2.	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The new Actual Net Interchange definition has the word "adjacent" not capitalized. This comment has been removed.	
The team has updated the column of standards affected by these two definitions.	
The two standards that are currently under revision will not be using the term that is scheduled to be retired. This drafting team will consider the status of the other drafting team before moving to final ballot.	
Carl Pineault - Hydro-Quebec Production - 5	

Answer	
Document Name	
Comment	
<p>Actual Net Interchange: Adjacent Balancing Authority Areas is not a defined term. It should read either Adjacent Balancing Authority areas or adjacent Balancing Authority Areas.</p> <p>Control Performance Standard (CPS) : remove “Daniel, please help” from the Notes column.</p> <p>Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2 and BAL-004-WECC-3.</p> <p>Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Thank you for the comment. The new Actual Net Interchange definition has the word "adjacent" not capitalized. This comment has been removed.</p> <p>The team has updated the column of standards affected by these two definitions. These two standards that are currently under revision will not be using the term that is scheduled to be retired. This drafting team will consider the status of the other drafting team before moving to final ballot.</p>	
Jou Yang - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	
Comment	
<p>The SAR for this project states that its goal is to: “improve long-term average frequency performance as well as give other Interconnections the ability to pursue automatic correction approaches.” MRO NSRF recognizes this as a laudable goal; however, it is not one that will result in improved reliability near-term nor address an immediate need as the Eastern Interconnection is not currently pursuing the implementation of an automated time error correction process. MRO NSRF recognizes that the first ballot for this project</p>	

will be finalized coincident to the submission of these comments and that the ballot results may contemplate an efficient and timely close of this project.

However, and contingent on the ballot outcome, in light of the growing number of standards development projects and the NERC Board of Trustees’ recent solicitation for industry input regarding the **Prioritization of Activities and Effective Engagement** (questions provided below), MRO NSRF recommends that NERC and industry defer action on this project at this time and reallocate resources to standards development projects that have a greater potential to mitigate risks and provide industry with more immediate reliability benefits; e.g. IBR performance standards.

1. What efforts underway at NERC do you believe do not provide value or are driving a disproportionate use of resources relative to the risk being mitigated?

2. What steps can NERC and industry take to achieve a better balance of resources relative to the risks being mitigated?

Comments re: [Reporting ACE Definition Master List Red-line](#)

- To minimize confusion, MRO NSRF recommends the hyphens between the term and the acronym be removed in column, “NERC Glossary Term.” Reason being the hyphen prior to the acronym has the potential of being mistaken as a negative sign. For example, “Actual Net Interchange - (NIA)” should be revised to “Actual Net Interchange (NIA).”
- MRO NSRF notes an error of omission in the red-lined text for **Reportable Balancing Contingency Event (RBCE)** in the column entitled, “SDT Proposed New or Revised REDLINE TO Currently Approved” on page 31. To reflect the proposed changes accurately, the new definition should indicate the following as new text: “...decline in the responsible entity’s Reporting ACE...”

Likes	1	Lincoln Electric System, 1, Johnson Josh
Dislikes	0	
Response		
Please see response to MISO.		
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC		
Answer		
Document Name		
Comment		

Actual Net Interchange: Adjacent Balancing Authority Areas is not a defined term. It should read either Adjacent Balancing Authority areas or adjacent Balancing Authority Areas.

Control Performance Standard (CPS) : remove “Daniel, please help” from the Notes column.

Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2 and BAL-004-WECC-3.

Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2.

Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to Hydro Qubec.	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	
Document Name	
Comment	
<p>The proposed changes are largely clarifications of existing terms with a few new terms added for additional clarification and/or flexibility. We appreciate these types of changes. However, there is one issue with the proposed changes that we believe should be corrected. The notes column for “Control Performance Standard – (CPS)” state “Daniel, please help.” We believe the notes column for this term should be updated to reflect the changes made and why they were made as in the other proposed changes. Obviously, this is a minor oversight; however, we believe that correcting the notes column would provide additional clarification for this term.</p> <p>Thank you for the opportunity to comment.</p>	
Likes	0
Dislikes	0
Response	

Thank you for the comment. The notes column has been updated.	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	
Document Name	
Comment	
MRO/NSRF	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment. Please see response to MRO NSRF.	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for the comment.	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	
Document Name	

Comment	
ITC is in support of the NSRF response	
Likes	0
Dislikes	0
Response	
Thank you for the comment. Please see response to NSRF.	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	
Document Name	
Comment	
None	
Likes	0
Dislikes	0
Response	
Thank you for the comment.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	
Document Name	
Comment	
OPG supports NPCC Regional Standards Committee's comments.	
Likes	0

Dislikes	0
Response	
Thank you for the comment. Please see response to NPCC.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	
Document Name	
Comment	
<p>MISO supports comments filed by the SRC.</p> <p>The SAR for this project states that its goal is to: “improve long-term average frequency performance as well as give other Interconnections the ability to pursue automatic correction approaches.” MISO recognizes this as a laudable goal; however, it is not one that will result in improved reliability near-term, nor will it address an immediate need as the Eastern Interconnection is not currently pursuing the implementation of an automated time error correction process. MISO recognizes that the first ballot for this project will be finalized coincident to the submission of these comments and that the ballot results may indicate that the remainder of this project can be completed in an efficient and timely manner.</p> <p>However, in light of the growing number of standards development projects and the NERC Board of Trustees’ recent solicitation for industry input regarding the Prioritization of Activities and Effective Engagement (questions provided below), if the ballot results indicate that the remainder of the development process for this project is likely to be extensive, then MISO recommends that NERC and industry defer action on this project at this time and reallocate resources to standards development projects that have a greater potential to mitigate risks and provide industry with more immediate reliability benefits; e.g. IBR performance standards.</p> <p>1. What efforts underway at NERC do you believe do not provide value or are driving a disproportionate use of resources relative to the risk being mitigated?</p> <p>2. What steps can NERC and industry take to achieve a better balance of resources relative to the risks being mitigated?</p> <p>Comments re: Reporting ACE Definition Master List Red-line</p>	

To minimize confusion, MISO recommends the hyphens between the term and the acronym be removed in column, “NERC Glossary Term.” This is to avoid the risk of the hyphen prior to the acronym being mistaken for a negative sign. For example, “Actual Net Interchange - (NIA)” should be revised to “Actual Net Interchange (NIA).”

MISO notes an error of omission in the red-lined text for **Reportable Balancing Contingency Event (RBCE)** in the column entitled, “SDT Proposed New or Revised REDLINE TO Currently Approved” on page 31. To reflect the proposed changes accurately, “the responsible entity’s Reporting” should be underlined in red-font as follows: “...decline in the responsible entity’s Reporting ACE...”

Likes 0

Dislikes 0

Response

Thank you for the comment. The standard drafting team will consider this if the remaining level of effort becomes too extensive. These two questions are outside the scope of this drafting team and will be forwarded to NERC Subject Matter Experts.

The drafting team will forward to the Quality Review team for consistency in formatting.

The error has been corrected.

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee

Answer

Document Name

Comment

The SRC would like to take this opportunity to thank the Standard Drafting Team for all their work and dedication to this Project.

The SAR for this project states that its goal is to: “improve long-term average frequency performance as well as give other Interconnections the ability to pursue automatic correction approaches.” The SRC recognizes this as a laudable goal; however, it is not one that will result in improved reliability near-term nor will it address an immediate need as the Eastern Interconnection is not currently pursuing the implementation of an automated time error correction process. The SRC recognizes that the first ballot for this project will be finalized coincident to the submission of these comments and that the ballot results may indicate that the remainder of this project can be completed in an efficient and timely manner.

However, in light of the growing number of standards development projects and the NERC Board of Trustees’ recent solicitation for industry input regarding the **Prioritization of Activities and Effective Engagement** (questions provided below), if the ballot results indicate that the remainder of the development process for this project is likely to be extensive, then the SRC recommends that NERC and industry defer action on this project at this time and reallocate resources to standards development projects that have a greater potential to mitigate risks and provide industry with more immediate reliability benefits; e.g. IBR performance standards.

1. What efforts underway at NERC do you believe do not provide value or are driving a disproportionate use of resources relative to the risk being mitigated?

2. What steps can NERC and industry take to achieve a better balance of resources relative to the risks being mitigated?

Comments re: [Reporting ACE Definition Master List Red-line](#)

- To minimize confusion, SRC recommends the hyphens between the term and the acronym be removed in column “NERC Glossary Term.” This is to avoid the risk of the hyphen prior to the acronym being mistaken for a negative sign. For example, “Actual Net Interchange - (NIA)” should be revised to “Actual Net Interchange (NIA).”
- The SRC notes an error of omission in the red-lined text for **Reportable Balancing Contingency Event (RBCE)** in the column entitled, “SDT Proposed New or Revised REDLINE TO Currently Approved” on page 31. To reflect the proposed changes accurately, the new definition should indicate the following as new text: “...decline in *the responsible entity’s Reporting ACE...*”

(Please note: PJM is not a party to the requested changes per Question #7)

Likes	0
Dislikes	0
Response	
Please see response to MISO.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.	
Likes	0
Dislikes	0
Response	
Thank you for the comment	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	
Document Name	
Comment	
<p>he proposed changes are largely clarifications of existing terms with a few new terms added for additional clarification and/or flexibility. We appreciate these types of changes. However, there is one issue with the proposed changes that we believe should be corrected. The notes column for “Control Performance Standard – (CPS)” state “Daniel, please help.” We believe the notes column for this term should be updated to reflect the changes made and why they were made as in the other proposed changes. Obviously, this is a minor oversight; however, we believe that correcting the notes column would provide additional clarification for this term.</p> <p>Thank you for the opportunity to comment.</p>	
Likes	0
Dislikes	0
Response	
Thank you for the comment. The notes column has been updated.	

End of Report