

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

Please use this form to submit comments on the of BAL-006-1, Inadvertent Interchange Data Drafting Team’s initial draft of the SAR. Comments must be submitted by **June 30, 2006**. You must submit the completed form by e-mail to sarcomm@nerc.com with the words “BAL-006-1” in the subject line. If you have questions please contact Barbara Bogenrief at barbara.bogenrief@nerc.net or 609-452-8060.

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Do submit any formatted text or markups in a separate WORD file.

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Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Howard F. Illian	
Organization:	Energy Mark, Inc.	
Telephone:	847-913-5491	
E-mail:	howard.illian@energymark.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

Please read the BAL-006-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

This standard should be applied to the BA, not the RC. Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

It is already included in version zero. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Charles Yeung
Organization:	Southwest Power Pool
Telephone:	832-724-6142
E-mail:	cyeung@spp.org
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
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1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

SRC does not find enough explanation for the reliability-related need in the explanation for the proposed SAR. All standards proposals should provide more substantive reasons as to why a new reliability standard (or change to a standard) is important to reliability. The requestor should explain what reliability issue is addressed with the use this standard. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Why is the Balancing Authority not affected by this BAL standard? Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

It is unclear in the SAR whether the intent is to reflect only the MISO and SPP scheduling arrangements for their Balancing Authorities into the standard or whether there will be a more universal approach in the language to be incorporated into the standard. The SRC prefers to see a more universal approach as the MISO and SPP market designs may change in the future and thus will require either a revision to the language or a waiver. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

SRC would like to understand how NERC and NAESB will proceed with these complementary standards going forward. Is the intent that each organization will retain standards with identical requirements? Or will each organization have distinct requirements those for reliability and those for business in their respective document? The SRC does not believe these requirements are readily distinguishable between reliability and business. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

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Yes

No

If the language specifically refers to MISO and SPP, then this should be considered a regional difference. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

NERC should hold a high level of expectations in the language put into SARs. The purpose statements should be specific in identifying root causes to problems and justify that these problems if left unaddressed are risks to interconnected grid reliability. Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Inadvertent payback, improperly implemented, could conceivably affect reliability.
Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

The SPP Urgent Action Regional Difference necessitated a need for a BAL-006-1. This SAR should be BAL-006-2?? Also it was noted that the BAL-006-1 which is

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currently in effect was adopted by the BOT on May 2 yet there is an effective date listed of May 1 (before the adopted BOT date).

In R1, the phrase "for any jointly owned generating units or remote load" should be dropped from the NIa and NIs definitions. Supplemental regulation should be included in either term.

R1.4 and R1.5 have redundancy in referring to the NERC OC designated electronic tool.

In R.2, it is not clear what hourly adjustments are, but it seems like a replacement for the end of the month meter correction presently performed when one reads the strikeout language.

In R2.4, replace intermediate with intermediary.

R2.5 and R2.6 are changing the present rules (currently, Balancing Authorities give their data to their regional representative by the 15th, who then cross-checks and resolves differences by the 22nd when it is forwarded to NERC via entry into the SPP Inadvertent Tool). The due date has been changed by one day to the 21st. It is not clear what benefit there is to decreasing the process by one day, and, re-education and changing of business processes are required (small tweaks, it is true) to support it.

All objections to ATEC in BAL-004-1 apply here, and are not repeated for brevity.

R7 needs some additional work. Bilateral payback is a method to reduce accumulated inadvertent, and it is not a type of accumulated energy. Given the extreme difficulty in doing sufficient bilateral payback to keep inadvertent levels at low values, it is impractical to suggest that all past accumulated energy will be paid back bilaterally.

R1.1.6's first sentence should replace the phrase "removed from" with "removed from and added to." Also, it is suggested that its final sentence be modified to read: "The net of these "settlement" schedules equal zero in the absence of scheduling errors."

R1.1.7 refers to a seemingly non-existent section F. Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jim Cyrulewski	
Organization:	ITCTransmission	
Telephone:	248-374-7130	
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

If there is to be a standard, then the standard applies to Balancing Authority, Interchange Authority, Generation Owner, Generation Operator, Purchase Selling Entity, Market Operator and Load Serving Entity. Does not apply to Reliability Authority. Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Only a NAESB Business Practice is needed. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

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Comments

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Comments

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Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

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Comments

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Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

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currently in effect was adopted by the BOT on May 2 yet there is an effective date listed of May 1 (before the adopted BOT date).

The following consensus comments were developed by NPCC Task Forces and Working Groups;

In R1, the phrase "for any jointly owned generating units or remote load" should be dropped from the NIa and Nis definitions. Supplemental regulation should be included in either term.

R1.4 and R1.5 have redundancy in referring to the NERC OC designated electronic tool.

In R.2, it is not clear what hourly adjustments are, but it seems like a replacement for the end of the month meter correction presently performed when one reads the strikeout language.

In R2.4, replace intermediate with intermediary.

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Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Typo in PURPOSE Section: Delete second right parenthesis. Typo in INDUSTRY NEED Section: Unbold "Provide". Case does not agree in BRIEF DESCRIPTION Section: Point 3 - since Inadvertent Interchange payback affects frequency and IS considered A reliability REQUIREMENT... Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Pfeister	
Organization:	Salt River Project	
Telephone:	mjpfeist@srpnet.com	
E-mail:	602-236-3970	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

Please read the BAL-006-1 SAR and draft standard and then respond to the following questions. You do not need to answer all questions.

Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Developing measurable requirements for reliability should be the focus. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	David Hawkins	
Organization:	California ISO	
Telephone:	916-351-4465	
E-mail:	dhawkins@caiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

WECC hs implement a procedure for automatic hourly payback of primary inadvertent energy that should be included as a regional difference Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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E-mail:		
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Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

Group Comments (Complete this page if comments are from a group.)
Group Name: Midwest Reliability Organization
Lead Contact: Todd Gosnell
Contact Organization: Omaha Public Power District
Contact Segment: 2
Contact Telephone: 402-552-5670
Contact E-mail: wgosnell@oppd.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Robert Coish	MHEB	MRO	2
Alan Boesch	NPPD	MRO	2
Dennis Florom	LES	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPSC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XCEL	MRO	2
Dave Rudolph	BEPC	MRO	2
Tom Mielnik	MEC	MRO	2
Dick Pursley	GRE	MRO	2
Ken Goldsmith	ALT	MRO	2
Terry Bilke	MISO	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 additional MRO members	Companies not named above		

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

SAR requestor did not do a good job in explaining the reliability related implications for this SAR. The MRO would like the SAR requestor to explain the reliability implications. Are these requirements going to have high, medium or lower violation risk factors assigned to them? The MRO does not see any impact on reliability unless inadvertant payback criteria is incorporated into the standard. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

See comment #1. Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

See comment #1 Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

The NERC process is open so there is nothing precluding the drafting team working with NAESB. However, there should be only one standard. Having more than one standard maintained by different organizations is bound to cause confusion and process problems as things change. We would expect NAESB to cooperate in this effort as well. Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

**Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data,
Appendix B**

Yes

No

If there is a coordinated effort between NERC and NAESB on this standard it would be helpful if this information would be posted on the NERC standards page associated with this SAR with a link to the NAESB page. Comments

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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Name:		
Organization:		
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E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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NERC Region		Registered Ballot Body Segment
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

The waivers for "Scheduling Agent", "Enhanced Scheduling Agent", "Financial Inadvertent Settlement" and "RTO Inadvertent Interchange Accounting" should be incorporated into this standard. Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

Comments

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

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Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

The proposed SAR does not address any reliability issues. Inadvertent Interchange by definition is an after-the-fact measure. It can not "affect frequency". It can show whether or not a BA DID affect frequency but then again so will Area Control Error show whether or not the BA affected frequency. The idea that because unilateral paybacks can be made then "it (Inadvertent) reflects reliability implications" is a round about way of dropping the 'reliability' word. Yes, unilateral payback changes generation levels. But as long as the real reliability standards (CPS, IROL, EOP) are followed why (other than for commercial reasons) should anyone payback II? If II is a reliability issue why would the requestor continue the concept of on and off peak II? The only reason for On peak / Off peak exists is to reflect the difference average COSTS of those hours. It's a commercial activity. It has nothing to do with frequency. The II requirements were properly assigned to NAESB. It is a Market issue and should stay with NAESB. Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

The Reliability Coordinator has nothing to do with II, it is the entity that computes ACE that would have II - i.e. only the BA is affected.

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

It is unclear in the SAR what the scope of this SAR is. It appears that the SAR wants to duplicate a NAESB requirement. Why should the Industry be subjected to the same requirement two times? FERC mandates that NEASB Business Practices be included in our tariffs. What added reliability benefits will come from this SAR? The scope of this SAR seems to revolve around data definitions and data collection. It is not clear why data definitions and data collection are viewed as reliability issues. Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

**Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data,
Appendix B**

Yes

No

PJM would prefer that this SAR be dropped from NERC and left with NAESB.
Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

NERC should hold a high level of expectations in the language put into SARs. The purpose statements should be specific in identifying root causes to problems and justify that these problems if left unaddressed are risks to interconnected grid reliability. NERC SAR requestors must also recognize that one standard on any topic is enough, particularly if FERC is mandating those standards in both (NERC and NAESB) venues.

Comments

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services, Inc	
Telephone:	985-902-2508	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Enter All Comments in Simple Text Format.

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

1. Do you believe there is a reliability-related need for the proposed SAR?

Yes

No

Comments

2. Do you agree with the applicability of the proposed SAR?

Yes

No

BAs are responsible for interchange and need to be added to the applicability of the SAR.

Comments

3. Do you agree with the scope of the proposed SAR?

Yes

No

Based on the SAR we do not understand the expected scope of the SAR. We would appreciate the SAR authors adding to the SAR detail about the additional calculations and requirements expected to be added to the Standard BAL-006.

Adding measures to the standard will be very helpful to the industry.

Comments

4. Do you agree with the SAR drafting team working cooperatively with NAESB to revise this standard to ensure it is developed in harmony with NAESB business practices standards?

Yes

No

Comment Form for Initial Posting of BAL-006-1, Inadvertent Interchange Data, Appendix B

In general we agree with this philosophy. However, we are not sure what is meant by working in harmony with NAESB in the context of this SAR. Please see our response to Question 6.

Comments

5. Are you aware of any regional differences that should be included in the proposed SAR?

Yes

No

Comments

6. Do you have any other comments on the proposed SAR?

Yes

No

We agree that there are reliability concerns with the Inadvertent Interchange payback process. We have several concerns with some of the details of this SAR including: existing and future coordination with NAESB standards and the scope of work contained in the SAR.

The authors state they intend to include the NAESB WEQBPS-005 standard into this NERC standard. A continuing concern of the industry and Entergy is how NERC and NAESB will coordinate changes to standards. In this SAR, it is not clear how that NERC/NAESB coordination for this standard is expected to occur. Will NAESB delete all of the requirements in its WEQBPS-005, except the definitions of on-peak and off-peak hours? Will the NAESB and NERC standards, at least initially, contain the same requirements? Will there be a coordination development requirement be placed on the NERC and NAESB standards for all future changes to either the NERC or NAESB Inadvertent Interchange standards?

In this particular case FERC jurisdictional utilities are required by FERC in Order 676 to comply with NAESB business practice standard WEQBPS-005. Therefore, NAESB can not just delete WEQBPS-005. NAESB must petition FERC to somehow unapprove WEQBPS-005.

Until FERC unapproves WEQBPS-005 the industry will have ongoing issues concerning the coordination, modification, and compliance with two possibly uncoordinated and mandatory sets of standards concerning the same process.

The scope of work has been discussed in the response to Question 3 above.

Comments