

Comment Report

Project Name: 2022-01 Reporting ACE Definition and Associated Terms | Initial and Additional Posting
Comment Period Start Date: 9/14/2023
Comment Period End Date: 10/30/2023
Associated Ballots: 2022-01 Reporting ACE Definition and Associated Terms Modified - Reporting Area Control Error (Reporting ACE) AB 2 DEF
2022-01 Reporting ACE Definition and Associated Terms New - ACE Diversity Interchange (ADI) IN 1 ST
2022-01 Reporting ACE Definition and Associated Terms New - Inadvertent Interchange Management (IIM) AB 2 DEF

There were 38 sets of responses, including comments from approximately 113 different people from approximately 83 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do industry members have any comments regarding new modifications to the Inadvertent Interchange Management (IIM) definition? If so, please state in the comments section.

Please select one of the two options:

2. Do industry members have any comments regarding the new modifications to the Reporting ACE definition? If so, please state in the comments section.

Please select one of the two options:

3. Do industry members have any comments regarding the proposed ACE Diversity Interchange (ADI) definition? If so, please state in the comments section.

Please select one of the two options:

4. Please provide any additional comments for the drafting team to consider, if desired.

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
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Marc Gomez	Southwestern Power Administration (SWPA)	1	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					George Brown	Pattern Operators LP	5	MRO
					Larry Heckert	Alliant Energy (ALTE)	4	MRO
					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Bryan Sherrow	Board Of	1	MRO

						Public Utilities (BPU)		
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Michael Ayotte	ITC Holdings	1	MRO
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
					John Pearson	ISO New England, Inc.	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Kennedy Meier	ERCOT	2	Texas RE
					Ali Miremadi	California ISO	2	WECC
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
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
					Ryan Strom	Buckeye Power, Inc.	1,4	RF
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
					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
					Leslie Burke	Southern Company - Southern Company Generation	5	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
					Alain Mukama	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
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	Vermont Electric Power	1	NPCC

	Company		
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
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
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
Vijay Puran	New York	6	NPCC

						State Department of Public Service		
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
Stephen Whaite	Stephen Whaite			ReliabilityFirst Ballot Body Member and Proxies	Lindsey Mannion	ReliabilityFirst	10	RF
					Stephen Whaite	ReliabilityFirst	10	RF
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
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC

1. Do industry members have any comments regarding new modifications to the Inadvertent Interchange Management (IIM) definition? If so, please state in the comments section.

Please select one of the two options:

Ben Hammer - Western Area Power Administration - 1

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
PNM and TNMP do not object to the proposed modifications to the proposed term Inadvertent Interchange Management (IIM) or have any suggested modifications to the definition.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	

N/A

Likes 0

Dislikes 0

Response

Rebecca Zahler - Public Utility District No. 1 of Chelan County - 5

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

C. A. Campbell - LS Power Development, LLC - 5

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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 suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

FirstEnergy has no objection to the modifications to the Inadvertent Interchange Management (IIM) definition.

Likes 0

Dislikes 0

Response

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

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Ameren agrees with and supports MISO's comments.

Likes 0

Dislikes 0

Response	
Helen Lainis - Independent Electricity System Operator - 2	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 1, 6, 5; Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
No suggestions.	
Likes	0
Dislikes	0

Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Ken Habgood - Seminole Electric Cooperative, Inc. - 4	

Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
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 suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer No suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer Yes, there are suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

Please consider modifying the IIM definition as follows: A term used in Reporting ACE to allow for management of Inadvertent Interchange and correction of Time Error. The IIM value is not used for unilateral paybacks and is “zero (0)” unless there is a regional procedure in place to coordinate an inadvertent control methodology for an Interconnection.

Likes 0

Dislikes 0

Response	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	Yes, there are suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
Southern Company supports the EEI comment and agrees that the language as written in the Inadvertent Interchange Management definition could allow for an interpretation that could indirectly obligate a BA to participate in a program that has not gone through an industry feedback and voting process.	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes, there are suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
FPL supports comments submitted by EEI for project 2022-01.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes, there are suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.
Document Name	
Comment	
EEI is generally supportive of the intent of the proposed definition and draft 2 modifications, however, as written the proposed definition could be understood to indirectly obligate a BA to participate in a program that has not gone through an industry feedback and voting process. To address this concern, we offer the following edits in boldface.	

A term used in Reporting ACE to allow for management of Inadvertent Interchange and correction of Time Error. The IIM value is not used for unilateral paybacks and is null unless there is a regional procedure **the Balancing Authority has agreed to implement, otherwise is null and does not need to be included in the Balancing Authority's Reporting ACE.**

Likes 0

Dislikes 0

Response

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

Answer

Yes, there are suggestions for the new modifications to the Inadvertent Interchange Management (IIM) definition.

Document Name

Comment

ITC supports EEI submitted comments

Likes 0

Dislikes 0

Response

2. Do industry members have any comments regarding the new modifications to the Reporting ACE definition? If so, please state in the comments section.

Please select one of the two options:

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

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

ITC supports EEI submitted comments

Likes 0

Dislikes 0

Response

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

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

EEI is generally supportive of the intent of the proposed definition and draft 2 modifications, however, as written the proposed definition could be understood to indirectly obligate a BA to participate in a program that has not gone through an industry feedback and voting process. To address this concern, we offer the following edits in boldface.

The scan rate values of a Balancing Authority Area's Area Control Error (ACE) measured in MW, which includes the error in scheduled interchange adjusted for Frequency Bias obligation, known meter error, and inadvertent management. Reporting ACE is calculated as follows:

Reporting ACE = (NIA − NIS) − 10B (FA − FS) – IME + IIM Where:

- NIA = Actual Net Interchange.
- NIS = Scheduled Net Interchange.
- B = Frequency Bias Setting.
- FA = Actual Frequency.
- FS = Scheduled Frequency.
- IME = Interchange Meter Error.

IIM = Inadvertent Interchange Management. (Term is expressed if a regional procedure **the Balancing Authority has agreed to implement, otherwise is null and does not need to be included in the Balancing Authority's Reporting ACE.**)

- In the Western

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

SPP recommends that the Reporting ACE definition revision insertion regarding ADI be modified from, *“This includes effects of ACE Diversity Interchange (ADI) implementations”* to ***“Implementations of ACE Diversity Interchange (ADI) must collectively include or exclude the effect of ADI in Reporting ACE to avoid unbalancing this principle.”***

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

FPL supports comments submitted by EEI for project 2022-01.

Likes 0

Dislikes 0

Response

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

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Southern Company supports the EEI comments and agrees that the language in the Reporting Ace definition could be understood to indirectly obligate a BA to participate in a program that has not gone through an industry feedback and voting process.

Likes 0

Dislikes 0

Response

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

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

BC Hydro appreciates the drafting team's efforts and the opportunity to comment, and offers the following comments and suggestions.

1. The description of the term IIM should be a bulleted item, similar to the other descriptions of the other terms of the Reporting ACE equation.
2. The wording accompanying the IIM term description should state "otherwise is null and is not to be included in the BA's Reporting ACE" instead of "does not need to be included" as the current wording might be misinterpreted that the inclusion of the IIM term is optional even if a regional procedure exists.
3. There appears to be typos in the revised draft definition.
 - "expresssed" within the brackets following the IIM definition should read "expressed".
 - "Interchnage" in the last sentence under item 2 should read "Interchange".
 - "TieLine" in the paragraph following the Reporting ACE equation should read "Tie Line" to reflect the defined term in the NERC Glossary (Tie Line Bias).
4. In reviewing the second draft of the Reporting ACE definition, BC Hydro notes that the use of "error in scheduled interchange" in the first sentence of the definition may create confusion. BC Hydro suggests that the wording in the first sentence of the current Reporting ACE definition is better describing the calculation formula, and therefore could be retained as is and only include the additional term proposed in this project 2022-01.

BC Hydro recommends that the first sentence of the proposed Reporting ACE definition be as follows:

"The scan rate values of a Balancing Authority Area's (BAA) Area Control Error (ACE) measured in MW includes the difference between the BAA's Actual Net Interchange and its Scheduled Net Interchange, adjusted for its Frequency Bias obligation, known meter error, and inadvertent interchange management."

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Yes, there are suggestions for the new modifications to the Reporting ACE definition.

Document Name	
Comment	
<p>Please consider modifying the ACE definition as follows: The scan rate values of a Balancing Authority Area's Area Control Error (ACE) measured in MW, which includes the error in scheduled interchange adjusted for Frequency Bias "minimum", known meter error, and inadvertent management...</p> <p>IIM = Inadvertent Interchange Management. (Term is "expressed" if a regional procedure exists, otherwise is "zero (0)" and does not need to be included in the Balancing Authority "Area's" Reporting ACE.)</p>	
Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
<p>ACES agrees with the proposed changes to the Reporting ACE definition.</p> <p>We would however like to point out a minor typo in principle 2 of Tie Line Bias control. The word Interchange is inadvertently misspelled in the 2nd sentence.</p>	
Likes	0
Dislikes	0
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	

Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
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 suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ken Habgood - Seminole Electric Cooperative, Inc. - 4	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	

Likes 0

Dislikes 0

Response

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

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

No suggestions.

Likes 0

Dislikes 0

Response

Helen Lainis - Independent Electricity System Operator - 2

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Ameren agrees with and supports MISO's comments.

Likes 0

Dislikes 0

Response	
Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
FirstEnergy has no objection to the modifications to the new modifications to the Reporting ACE definition.	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foug 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 suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Micah Runner - Black Hills Corporation - 1	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
C. A. Campbell - LS Power Development, LLC - 5	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No suggestions for the new modifications to the Reporting ACE definition.
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Rebecca Zahler - Public Utility District No. 1 of Chelan County - 5

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

There is a typo on page 4, in section #2; it should read "interchange"

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

PNM and TNMP do not object to the proposed modifications to the term Reporting ACE or have any suggested modifications to the definition.

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC

Answer No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer

No suggestions for the new modifications to the Reporting ACE definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

3. Do industry members have any comments regarding the proposed ACE Diversity Interchange (ADI) definition? If so, please state in the comments section.

Please select one of the two options:

Ben Hammer - Western Area Power Administration - 1

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
PNM and TNMP do not object to the proposed new term (ACE Diversity Interchange (ADI)) or have any suggested modifications to the proposed definition.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	

N/A

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

C. A. Campbell - LS Power Development, LLC - 5

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott McGough - Georgia System Operations Corporation - 3,4

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Note: Draft 1 included the ADI definition but was deleted from the Draft 2 Clean and Redline versions that requested comments. No comments for this term as stated in Draft 1.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

FirstEnergy has no objection to the proposed ACE Diversity Interchange (ADI) definition.

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the proposed ADI definition.

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	

Likes 0

Dislikes 0

Response

Helen Lainis - Independent Electricity System Operator - 2

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Ken Habgood - Seminole Electric Cooperative, Inc. - 4

Answer

No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
EEI does not object to the proposed new term (ACE Diversity Interchange (ADI)) or have any suggested modifications to the proposed definition.	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
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 suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	

Likes 0

Dislikes 0

Response

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

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Rebecca Zahler - Public Utility District No. 1 of Chelan County - 5

Answer Yes, there are suggestions for the proposed ADI definition.

Document Name

Comment

The definition should more explicitly say that the sum of exchanges or offsets should sum to zero rather than simply saying frequency neutral.

Likes 0

Dislikes 0

Response

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, there are suggestions for the proposed ADI definition.

Document Name

Comment

SMUD appreciates the Standards Drafting Team creating a new definition for ADI but this definition requires additional changes to address the following concerns: 1) ADI is not a program but a pseudo interchange term added in the ACE calculation, and 2) ADI term should be defined only in the Net Actual Interchange term to make it standardized.

We propose the following new definition to addresses those concerns – “A frequency neutral pseudo interchange added into the Reporting ACE calculation as a part of the Actual Net Interchange component through offsetting all ADI program participating Balancing Authorities’ ACE to bring the Reporting ACE values closer to zero for each participant and achieving reductions in their generation control.”

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer Yes, there are suggestions for the proposed ADI definition.

Document Name

Comment

FPL supports comments submitted by EEI for project 2022-01.

Likes 0

Dislikes 0

Response

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

Answer Yes, there are suggestions for the proposed ADI definition.

Document Name

Comment

SRP supports SMUD and BANC comments for the ADI definition.

Likes 0

Dislikes 0

Response

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

Answer

Yes, there are suggestions for the proposed ADI definition.

Document Name

Comment

ITC supports EEI submitted comments

Likes 0

Dislikes 0

Response

4. Please provide any additional comments for the drafting team to consider, if desired.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own. ERCOT also notes that there appears to be a typographical error in the definition for **Reporting Area Control Error (Reporting ACE)**, on page 4, Tie-Line Bias control principle #2, where the definition refers to "Interchnage" instead of "Interchange"

Likes 0

Dislikes 0

Response

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

We support the modified definitions.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Document Name

Comment

With the modifications to Reporting Area Control Error (Reporting ACE), has the SDT considered the impacts to the industry and policies that would come through The Personnel Certification Governance Committee (PCGC) with regards to the NERC System Operator Certification Program?

SPP also supports NSRF comments to fix a typographical error in the definition for **Reporting Area Control Error (Reporting ACE)**, on page 4, in Tie-Line Bias control principle #2: "Interchnage" should be "Interchange."

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

none.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Ameren agrees with and supports MISO's comments.

Likes 0

Dislikes 0

Response

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

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

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer

Document Name

Comment

NV Energy appreciates the work done by the Standard Drafting Team to incorporate recommendations submitted.

The only suggestion we have is to fix a typographical error in the definition for **Reporting Area Control Error (Reporting ACE)**, on page 4, in Tie-Line Bias control principle #2: "Interchange" should be "Interchange."

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

Document Name

Comment

The MRO NSRF appreciates the work done by the Standard Drafting Team to incorporate recommendations submitted.

The only suggestion we have is to fix a typographical error in the definition for **Reporting Area Control Error (Reporting ACE)**, on page 4, in Tie-Line Bias control principle #2: "Interchnage" should be "Interchange."

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer

Document Name

Comment

AZPS does not have any additional comments and supports the proposed definitions.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - 1,3 - WECC, Texas RE

Answer

Document Name

Comment

No Additional Comments for PNM and TNMP.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

WECC supports both revised definitions and the proposed new definition.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer

Document Name

Comment

typo in the definition for **Reporting Area Control Error (Reporting ACE)**, on page 4, in Tie-Line Bias control principle #2: "Interchnage" should be "Interchange."

Likes 0

Dislikes 0

Response