

Consideration of Comments

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 Ballot(s):	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.

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. Do industry members have any comments regarding new modifications to the Inadvertent Interchange Management (IIM) definition? If so, please state in the comments section.
2. Do industry members have any comments regarding the new modifications to the Reporting ACE definition? If so, please state in the comments section.
3. Do industry members have any comments regarding the proposed ACE Diversity Interchange (ADI) definition? If so, please state in the comments section.
4. Please provide any additional comments for the drafting team 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
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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					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 Public Utilities (BPU)	1	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Michael Ayotte	ITC Holdings	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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 -	5	SERC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Southern Company Generation		
					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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Randy Buswell	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
					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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					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
					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

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

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.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your comment. The drafting team intentionally elected to utilize the term "null" vs. "zero" to recognize that a responsible entity may leave their Reporting ACE definition as it currently exists unless a regional procedure is in place. If the Reporting ACE definition required a "zero", every responsible entity outside of the Western Interconnection would need to modify their Reporting ACE term to include a "zero" value. The SDT believes this is not needed for any reasons related to reliable operation.	
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	

Thank you for your comment. See response to EEI.	
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	
Thank you for your comment. See response to EEI.	
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	
<p>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.</p> <p>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.</p>	
Likes	0

Dislikes	0
Response	
Thank you for your comment. The intent of this wording was to only require the IIM value in the Reporting ACE term when there exists an industry approved regional procedure. A BAA does not "agree" to these procedures if and when implemented but would require to participate when implemented. For the Western Interconnection, all BAAs must operate to the requirements within BAL-004-WECC-3. No other regional procedures are known at this time and as such would not be applicable to entities outside of the Western Interconnection.	
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	
Thank you for your comment. See response to EEI.	

2. Do industry members have any comments regarding the new modifications to the Reporting ACE definition? If so, please state in the comments section.	
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	
Thank you for your comment. See response to EEI.	
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	
<p>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.</p> <p>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:</p>	

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

Thank you for your comment. The intent of this wording was to only require the IIM value in the Reporting ACE term when there exists an industry approved regional procedure. A BAA does not "agree" to these procedures if and when implemented but would be required to participate when implemented. For the Western Interconnection, all BAAs must operate to the requirements within BAL-004-WECC-3. No other regional procedures are known at this time and as such would not be applicable to entities outside of the Western Interconnection.

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	
Thank you for your comment. The drafting team has reviewed the language and principle 2 of the Reporting ACE definition and determined the more explicit language is not only unnecessary, but might create more confusion since ADI is not a separate term used in the calculation.	
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	
Thank you for your comment. See response to EEI.	
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	
Thank you for your comment. See response to EEI.	
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	
<p>BC Hydro appreciates the drafting team’s efforts and the opportunity to comment, and offers the following comments and suggestions.</p> <ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • “expressed” 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. <p>BC Hydro recommends that the first sentence of the proposed Reporting ACE definition be as follows:</p>	

“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

Thank you for your comments.

1. The bullet will be added to the IIM term.
2. The drafting team has modified the IIM term description to clarify the wording.
3. The typographical errors will be corrected.
4. The SDT discussed your comment extensively and has decided not to modify the definition. The term as defined was intentionally left non-specific for general readability, but the SDT believes the remainder of the defined terms add necessary clarity.

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

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...

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.)

Likes 0

Dislikes 0

Response

Thank you for your comments. "Minimum" is only applicable to those BAAs which have a natural frequency response that is less than their actual frequency bias obligation that is calculated based upon .9% of their peak load values. Many BAAs have implemented a bias setting that is more negative than this value.	
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	
ACES agrees with the proposed changes to the Reporting ACE definition.	
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.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support. The team has corrected the typo.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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 Reporting ACE definition.

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support. The team has corrected the typo.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	

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	
Thank you for your support.	
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	
Thank you for your support.	
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

Thank you for your support.

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

Ben Hammer - Western Area Power Administration - 1

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

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

Thank you for your support.

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	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
C. A. Campbell - LS Power Development, LLC - 5	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Scott McGough - Georgia System Operations Corporation - 3,4	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
Diana Torres - Imperial Irrigation District - 6	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Sheila Suurmeier - Black Hills Corporation - 5	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
Claudine Bates - Black Hills Corporation - 6	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Micah Runner - Black Hills Corporation - 1	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	

Thank you for your comment. Draft one of the ACE Diversity Interchange (ADI) NERC Glossary of Term represents the initial comment and ballot period and is being balloted for the first time. The Inadvertent Interchange Management and Reporting Area Control Error NERC Glossary of Terms are on an additional comment and ballot period and being balloted for a second time.

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No suggestions for the proposed ADI definition.

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your support.

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

Thank you for your support.

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	
Thank you for your support.	
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	
Thank you for your support.	
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	

Thank you for your support.	
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	
Thank you for your support.	
Helen Lainis - Independent Electricity System Operator - 2	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
Ken Habgood - Seminole Electric Cooperative, Inc. - 4	
Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
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	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	

Answer	No suggestions for the proposed ADI definition.
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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

Thank you for your comment. The drafting team addressed the need for ADI exchanges to sum to zero in the reporting ACE definition.

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

Thank you for your comment. The SDT determined that due to current industry practices, explicitly defining where in the Reporting ACE term an ADI value is to be included may conflict with currently implemented programs. Explicitly defining where the ADI term is to be included in the Reporting ACE term would not have any enhancements to reliability when the principles of ADI are followed.

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	
Thank you for your support.	
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	
Thank you for your support.	
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

Thank you for your support.

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	
Thank you for your support.	
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	
Thank you for your comment. The team corrected the errors.	

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	
Thank you for your support.	
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	
Thank you for your comment. Regarding the Personnel Certification Governance Committee or PCGC, NERC staff will be coordinating with the PCGC committee.	

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

Thank you for your support.

David Jendras Sr - Ameren - Ameren Services - 3

Answer	
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	

Response

Thank you for your support.

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

Answer	
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Document Name	
Comment	
none	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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

Thank you for your comment. The team corrected these errors.

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

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thank you for your support.

Diana Torres - Imperial Irrigation District - 6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response	
Thank you for your support.	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	
Document Name	
Comment	
<p>The MRO NSRF appreciates the work done by the Standard Drafting Team to incorporate recommendations submitted.</p> <p>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.”</p>	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The team corrected these errors.	
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	
Thank you for your support.	

Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
NA	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your support.	
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	
Thank you for your comment. The team corrected these errors.	

End of Report