

Comment Report

Project Name: 2022-01 Reporting ACE Definition and Associated Terms | First Posting

Comment Period Start Date: 1/31/2023

Comment Period End Date: 3/16/2023

Associated Ballots:

- 2022-01 Reporting ACE Definition and Associated Terms Modified - Actual Net Interchange (NIA) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Area Control Error (ACE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Automatic Time Error Correction (ATEC) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Balancing Authority Area (BAA) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Balancing Contingency Event (BCE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Control Performance Standard (CPS) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Disturbance IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Dynamic Interchange Schedule or Dynamic Schedule IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Frequency Bias Setting (FBS) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Frequency Error IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Implemented Interchange IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Inadvertent Interchange IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Interchange Meter Error -(IME) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Operating Reserve – Spinning IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Operating Reserve – Supplemental IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Overlap Regulation Service IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Pseudo-Tie IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Ramp Rate or Ramp IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Regulation Service IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reportable Balancing Contingency Event (RBCE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reporting Area Control Error (Reporting ACE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reserve Sharing Group (RSG) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Reserve Sharing Group Reporting ACE IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Scheduled Frequency IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Scheduled Net Interchange (NIS) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Supplemental Regulation Service IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Tie Line Bias (TLB) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Time Error (TE) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Modified - Time Error Correction (TEC) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms New - Inadvertent Interchange Management (IIM) IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Disturbance Control Standard IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Actual Interchange IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Interchange Schedule IN 1 DEF
- 2022-01 Reporting ACE Definition and Associated Terms Retirement - Net Scheduled Interchange IN 1 DEF

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

Questions

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

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

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

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

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

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

- 7. Please provide any additional comments for the SDT to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Elizabeth Davis	Elizabeth Davis		RF,SERC	ISO/RTO Standards Review Committee	Mike Del Viscio	PJM	2	RF
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Helen Lainis	IESO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Kennedy Meier	ERCOT	2	Texas RE
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Ryan Strom	Buckeye Power, Inc.	5	RF

					Dave Hartman	Arizona Electric Power Cooperative	1	WECC
					Scott Brame	NC Electric Membership Corporation	3,4,5	SERC
MRO	Jou Yang	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Chris Bills	City of Independence, Power and Light Department	5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bryan Sherrow	Board of Public Utilities	1	MRO
					Terry Harbour	Berkshire Hathaway Energy - MidAmerican Energy Co.	1	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO

					Shonda McCain	Omaha Public Power District	6	MRO
					George E Brown	Pattern Operators LP	5	MRO
					George Brown	Acciona Energy USA	5	MRO
					Jaimin Patel	Saskatchewan Power Cooperation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company -	5	SERC

						Southern Company Generation		
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Sheraz Majid	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
					Dan Kopin	Vermont Electric Power Company	1	NPCC
					James Grant	NYISO	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
					Nicolas Turcotte	Hydro-Quebec TransEnergie	1	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC					

					Dermot Smyth	Con Ed - Consolidated 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 State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
Western Electricity	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC

Coordinating Council								
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
Santee Cooper	Vicky Budreau	3		Santee Cooper	Diana Scott	Santee Cooper	1,3,5,6	SERC
					Heugnette Bostic	Santee Cooper	1,3,5,6	SERC
					Cindy Corson	Santee Cooper	1,3,5,6	SERC
					Clarke McKenzie	Santee Cooper	1,3,5,6	SERC
					Adam Taylor	Santee Cooper	1,3,5,6	SERC
					Jason Smith	Santee Cooper	1,3,5,6	SERC
					Lachelle Brooks	Santee Cooper	1,3,5,6	SERC

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

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

Answer Yes

Document Name

Comment

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

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

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

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5

Answer

Document Name

Comment

CHPD does not participate in ADI but believes entities in an ADI group should all be consistent with how they include ADI in Reporting ACE.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT has no position on this question.

Likes 0

Dislikes 0

Response

Holly Mitchell - NorthWestern Energy - 1,2,3,4,5,6,7,8,9,10 - WECC

Answer

Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer

Leave ADI undefined

Document Name

Comment

No impact to Hydro One.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1

Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

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

Answer Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Leave ADI undefined

Document Name

Comment

Define ACE Sharing Group and require the relevant sharing component to be included in Reporting ACE

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Leave ADI undefined
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	Leave ADI undefined
Document Name	
Comment	
Treatment of ADI is different for BAL-001 and BAL-002 compliance per the NERC Technical Reference.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Leave ADI undefined
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer

Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Leave ADI undefined

Document Name

Comment

APS is unaware of any reliability need or justification to require this term to be defined. For this reason, we support ADI remaining undefined.

Likes 0

Dislikes 0

Response

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

Answer

Leave ADI undefined

Document Name

Comment

: EEI is unaware of any reliability need or justification to require this term to be defined. For this reason, we support ADI remaining undefined.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Leave ADI undefined

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

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

Document Name

Comment

Ameren agrees with and supports MISO comments.

Likes 0

Dislikes 0

Response

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

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

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Manitoba Hydro supports the addition of ACE Diversity Interchange (ADI) to the NERC Glossary of terms. However, there is concern over the further impact to Reporting ACE and BAL standards that are not identified in Project 2022-01. BA's that do not make use of the ADI should not be required to report on ADI as part of the BAL standards. As such, ADI is only required to be part of a BA's AGC program and reporting if this feature is utilized.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
WEC Energy supports MISOs comments.	
Likes 0	
Dislikes 0	
Response	

Claudine Bates - Black Hills Corporation - 6

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

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

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

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

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

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
A definition of ADI needs to be added to the NERC Glossary of Terms and it needs to be defined and made clear where the ADI term should be added into Reporting ACE for ADI participants. For the Balancing Authorities who are not participating in ADI, no ADI term needs to be added into Reporting ACE.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	

Comment

A definition of ADI needs to be added to the NERC Glossary of Terms and it needs to be defined and made clear where the ADI term should be added into Reporting ACE for ADI participants. For the Balancing Authorities who are not participating in ADI, no ADI term needs to be added into Reporting ACE.

Likes 0

Dislikes 0

Response

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

Answer

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

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer

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

Document Name**Comment**

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

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

Answer

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

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Rajesh Geevarghese - Rajesh Geevarghese On Behalf of: Daniel Gacek, Exelon, 1, 3; - Rajesh Geevarghese	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kinte Whitehead - Exelon - 3	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Add a definition of ADI to the NERC Glossary of terms with a statement that ADI must be included in Reporting ACE
Document Name	
Comment	

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

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

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

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

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

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

Sandra Ellis - Pacific Gas and Electric Company - 3

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

Document Name

Comment

Since the term is documented in NERC technical reference documents, ADI should be defined in the NERC Glossary of terms.

Likes 0

Dislikes 0

Response

David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman

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

Document Name

Comment

AEPCO signs on to the comments by ACES Power Marketing.

It is our opinion that adding ADI to the NERC Glossary of terms will provide all participants with an easy reference source for this term; however, we believe that the individual entities should have the flexibility to choose whether they should implement the ADI methodology.

Likes 0

Dislikes 0

Response

Karrie Schuldt - Dairyland Power Cooperative - 1

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

Document Name

Comment

MRO/NSRF

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

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

Document Name

Comment

MISO supports adding the definition of ADI to the NERC Glossary of Terms to ensure equal inclusion of ADI in participants' Reporting ACE if and only if the addition makes clear that any requirement to include ADI in Reporting ACE applies only to Balancing Authorities participating in an ADI program. Since ADI is null for Balancing Authorities not participating in an ADI program, there should be no obligation for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC, or EMS merely to report a null value.

MISO recognizes the reliability impact, such as diminishing the CPS1 metric, that results when only some participants in an ADI program include the ADI adjustment in their Reporting ACE, and would therefore support language requiring all Balancing Authorities participating in a specified ADI program to uniformly include or exclude ADI from their Reporting ACE. MISO proposes the following definition for ADI:

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

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

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

Document Name

Comment

It is our opinion that adding ADI to the NERC Glossary of terms will provide all participants with an easy reference source for this term; however, we believe that the individual entities should have the flexibility to choose whether they should implement the ADI methodology.

Likes 0

Dislikes 0

Response

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

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

Answer No

Document Name

Comment

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

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

Document Name

Comment

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

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

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer No

Document Name

Comment

MISO supports comments filed by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and proposes the following non-substantive modifications to the definition of Automatic Generation Control.

Automatic Generation Control (AGC): A process designed and used to adjust a Balancing Authority Areas' Area's Demand and resources to help maintain the Reporting ACE in that of a Balancing Authority Area within the bounds required by applicable NERC Reliability Standards.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

See Response #7 below.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EI agrees that the NERC Glossary Terms (i.e., Automatic Generation Control, Interchange Schedule, and Pre-Reporting Contingency Event ACE Value) do not need to be changed.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response**Karrie Schuldt - Dairyland Power Cooperative - 1****Answer**

Yes

Document Name**Comment**

MRO/NSRF

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer**

Yes

Document Name**Comment**

PNM agrees.

Likes 0

Dislikes 0

Response**Sheila Suurmeier - Black Hills Corporation - 5****Answer**

Yes

Document Name**Comment**

No impact to BHP.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

No impact to BHP.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Yes

Document Name

Comment

No impact to BHP.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Yes

Document Name

Comment

No impact to BHP.

Likes 0

Dislikes 0

Response

Sandra Ellis - Pacific Gas and Electric Company - 3

Answer Yes

Document Name

Comment

Concur with SDT since the fundament definitions for AGC, Interchange Schedule, and Pre-Reporting Contingency Event Ace did not change.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer Yes

Document Name

Comment

No impact to Hydro One.

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	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
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	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Carl Pineault - Hydro-Qu?bec Production - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

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

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer Yes

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 Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Julie Hall - Entergy - 6, Group Name Entergy****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

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

Document Name

Comment

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

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

Alain Mukama - Hydro One Networks, Inc. - 1

Answer No

Document Name

Comment

No impact to Hydro One.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Nothing other than the definition of PII and its components are readable.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

No other changes proposed.

Likes 0

Dislikes 0

Response

Karrie Schuldt - Dairyland Power Cooperative - 1

Answer No

Document Name

Comment

MRO/NSRF

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
EEl does not offer any changes to the NERC Glossary of Terms.	
Likes 0	
Dislikes 0	
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5

Answer

No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Micah Runner - Black Hills Corporation - 1

Answer No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer No

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Anna Todd - Southern Indiana Gas and Electric Co. - 1,3,5,6 - RF	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Nicolas Turcotte - Hydro-Quebec TransEnergie - 1	
Answer	No

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

Response

Kinte Whitehead - Exelon - 3

Answer No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer**

No

Document Name**Comment**

Likes 0

Dislikes 0

Response**Bobbi Welch - Midcontinent ISO, Inc. - 2****Answer**

No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

See Response #7 below.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

BC Hydro appreciates the opportunity to review and offers comments on the revised definitions for Area Control Error (ACE), Automatic Time Error Correction (ATEC), Control Performance Standard (CPS), Frequency Bias Setting (FBS) and Interchange Meter Error (IME) as follows.

- ACE – Recommend “Frequency Bias” be changed to “entity’s Frequency Bias”, to remove any ambiguities (e.g. might be interpreted as interconnection bias, etc.)
- ATEC – The “that modifies the control point” wording should be removed, as the “control point” is undefined; the intent of the definition is sufficiently clear without this phrase. Additionally, for “IATEC shall be zero when operating in any other AGC mode.”: it is unclear what other “AGC modes” there are, as the applicable AGC mode has not been specified. Recommend changing to “IATEC shall be zero when operating in any AGC mode other than TLBC (Tie Line Bias Control)”
- CPS – It is not a methodology nor a control; rather, BC Hydro suggests that CPS is a method for relating Reporting ACE to Frequency Error to provide objective indication whether sufficient secondary AGC control has been applied to maintain energy balance and Scheduled Frequency.
- FBS – Please confirm if this is to the same as the “Frequency Bias” term mentioned in ATEC. If it is, recommend matching the terms for consistency (e.g. change this to “Frequency Bias”).
- IME – Recommend replacing “any other components” with “... to compensate for data or equipment errors affecting the Actual Net Interchange component”

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

See response to question #4.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

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

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

Answer No

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

Comment

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

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

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

• I(IM) = Inadvertent Interchange Management.

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

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

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

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

Answer No

Document Name

Comment

EEI is unaware of any problems with the proposed changes to the NERC Glossary of Terms under this project (as proposed in Draft 1) that might negatively impact enforceable requirements in any of the NERC Reliability Standards that are currently mandatory and subject to enforcement.

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer No

Document Name

Comment

Following review, no changes to standards was identified.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Changes proposed have no impact to FirstEnergy.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer No

Document Name	
Comment	
No impact to Hydro One.	
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
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsey Mannion - ReliabilityFirst - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jessica Cordero - Unisource - Tucson Electric Power Co. - NA - Not Applicable - WECC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carl Pineault - Hydro-Quebec Production - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Vicky Budreau - Santee Cooper - 3, Group Name Santee Cooper	
Answer	No
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
Document Name	
Comment	
Likes	0
Dislikes	0

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

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Diana Torres - Imperial Irrigation District - 6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

No

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

Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Anna Lavik - Puget Sound Energy, Inc. - 1	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.	
Likes	0
Dislikes	0
Response	
Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee	
Answer	Yes

Document Name**Comment**

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

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

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

• I(IM) = Inadvertent Interchange Management.

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

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

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

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Yes

Document Name**Comment**

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

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

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

• I(IM) = Inadvertent Interchange Management.

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

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

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

While the modified definition of Area Control Error (ACE) includes the language “if operating in the Inadvertent Interchange Management mode”, the “Reporting Area Control Area Error – (Reporting ACE)” definition and subsequent equation infers the component should be included in the Balancing Authority’s Reporting ACE. This addition would modify the requirements of the existing standards. One possible solution would be to clarify in the Reporting ACE definitions: IIM = Inadvertent Interchange Management *if utilized*.

Likes 0

Dislikes 0

Response

Karrie Schuldt - Dairyland Power Cooperative - 1

Answer

Yes

Document Name

Comment

MRO/NSRF

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

SPP supports the comments of the MRO NSRF

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

WEC Energy Group supports MISO's comments.

Likes 0

Dislikes 0

Response

Sandra Ellis - Pacific Gas and Electric Company - 3

Answer

Yes

Document Name

Comment

BAL Standards

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

Manitoba Hydro supports the addition of the new Inadvertent Interchange Management (IIM) component within Reporting ACE. However, the IIM term within the RACE calculation will impact BAL standards, incur significant enhancements to EMS AGC applications and require an external regional system to deploy proper use within each interconnect. This change, although appearing small in nature, is quite significant for those EMS vendors that do not allow such a feature. As such, industry will require additional time, design, and vetting prior to moving ahead with IIM. Manitoba Hydro recommends that wording in the definition of RACE and/or BAL standards address the following:

- 1) IIM should be considered as null for those interconnects/BA's that do not deploy this term within RACE for their system.
- 2) IIM should not be required as part of a BA's AGC system calculation or accounting unless deployed within the interconnect/BA.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports MISO comments.

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

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

Alain Mukama - Hydro One Networks, Inc. - 1

Answer No

Document Name

Comment

No proposed changes to NERC Glossary of Terms.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

No proposed changes to NERC Glossary of Terms.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EEl does not oppose any of the proposed changes to the NERC Glossary Terms modified and as proposed in this Draft 1 posting.

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Sandra Ellis - Pacific Gas and Electric Company - 3

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer	No
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
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Response

Micah Runner - Black Hills Corporation - 1

Answer	No
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
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Response

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

Answer	No
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Document Name	
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Comment

Likes 0	
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Dislikes 0	
------------	--

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer	No
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Document Name	
----------------------	--

Comment

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3**Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer** No**Document Name****Comment**

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer No

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

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports MISO comments.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**Answer** Yes**Document Name****Comment**

See Response #7 below.

Likes 0

Dislikes 0

Response**Nazra Gladu - Manitoba Hydro - 1****Answer** Yes**Document Name****Comment**

As discussed in question 4, the new Inadvertent Interchange Management (IIM) component within Reporting ACE may incur impact to BAL standards, RACE and EMS AGC applications. While

Manitoba Hydro supports the inclusion of IIM, we request that NERC provide wording to address IIM as listed in question 4:

- 1) IIM should be considered as null for those interconnects/BA's that do not deploy this term within RACE for their system.
- 2) IIM should not be required as part of a BA's AGC system calculation or accounting unless deployed within the interconnect/BA.

Likes 0

Dislikes 0

Response**Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group****Answer** Yes**Document Name****Comment**

WEC Energy Group supports MISOs comments.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

BC Hydro appreciates the opportunity to review and offers comments on the revised definitions for Area Control Error (ACE), Automatic Time Error Correction (ATEC), Control Performance Standard (CPS), Frequency Bias Setting (FBS) and Interchange Meter Error (IME) as follows.

- ACE – Recommend “Frequency Bias” be changed to “entity’s Frequency Bias”, to remove any ambiguities (e.g. might be interpreted as interconnection bias, etc.)
- ATEC – The “that modifies the control point” wording should be removed, as the “control point” is undefined; the intent of the definition is sufficiently clear without this phrase. Additionally, for “IATEC shall be zero when operating in any other AGC mode.”: it is unclear what other “AGC modes” there are, as the applicable AGC mode has not been specified. Recommend changing to “IATEC shall be zero when operating in any AGC mode other than TLBC (Tie Line Bias Control)”
- CPS – It is not a methodology nor a control; rather, BC Hydro suggests that CPS is a method for relating Reporting ACE to Frequency Error to provide objective indication whether sufficient secondary AGC control has been applied to maintain energy balance and Scheduled Frequency.
- FBS – Please confirm if this is to the same as the “Frequency Bias” term mentioned in ATEC. If it is, recommend matching the terms for consistency (e.g. change this to “Frequency Bias”).
- IME – Recommend replacing “any other components” with “... to compensate for data or equipment errors affecting the Actual Net Interchange component”

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name	
Comment	
<p>As mentioned in our response to Question 4, MRO NSRF is concerned that the proposed changes to Reporting ACE <i>may</i> result in new EMS requirements (in terms of the Reporting ACE calculation) and <i>may</i> result in new administrative requirements in the form of compliance reporting.</p> <p>To the extent this is not the intent of the SDT, MRO NSRF requests the SDT clarify what the intent is of the I sub “IM” variable; e.g. “The I(IM) value is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection.” See proposed language below:</p> <p>Reporting ACE = (NIA &minus; NIS) &minus; 10B (FA &minus; FS) – IME + I(IM);</p> <ul style="list-style-type: none"> &bull; I(IM) = Inadvertent Interchange Management. &bull; In the Western Interconnection this term is I(ATEC) &bull; The I(IM) value is not used for unilateral paybacks and is null unless there is a Regional Procedure in place to coordinate an inadvertent control methodology for an Interconnection. Where I(IM) is null, there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value. <p>Similarly, as noted in MRO NSRF’s response to Question 1, our support for adding a definition of ADI to the NERC Glossary is contingent upon the SDT clarifying reporting applicability; i.e. only entities participating in an ADI program must report ADI; for non-participating Balancing Authorities, ADI is null so there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE, AGC or EMS merely to report a null value.</p>	
Likes 1	Lincoln Electric System, 1, Johnson Josh
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
SPP supports the comments of the MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Karrie Schuldt - Dairyland Power Cooperative - 1	
Answer	Yes

Document Name	
Comment	
MRO/NSRF	
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
Document Name	
Comment	
The terms "Actual Net Interchange (NIA)" and "Scheduled Net Interchange (NIS)" used in the proposed ACE definition don't match the revised terms where the terms and acronyms are separated by a hyphen.	
Likes 0	
Dislikes 0	
Response	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	Yes
Document Name	
Comment	
ITC is in support of the NSRF response	
Likes 0	
Dislikes 0	
Response	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	

Comment

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

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

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

• I(IM) = Inadvertent Interchange Management.

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

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

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

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

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

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

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

• I(IM) = Inadvertent Interchange Management.

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

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

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

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE generally agrees with the proposed revisions to the NERC Glossary of terms. Texas RE is concerned, however, that the definition of Reportable Balancing Contingency Event (RBCE) continues to use the term Regional Reliability Organization (RRO). This term has not been used in some time and Texas RE recommends removing it as it has already been removed from older Reliability Standards that contained the term.

Texas RE also noticed the following in certain definitions:

- Area Control Error (ACE) – Texas RE recommends keeping the term Balancing Authority, rather than “entity” as it will always be the Balancing Authority. If the term Reporting ACE is to be used for compliance, then that is the term that should be used in the Requirements. Texas RE notes that BAL-005-1 does use the term Reporting ACE, rather than ACE.
- Balancing Authority Area - EOP-011-2 is effective as of April 1, 2023, and EOP-011-1 is being retired. Texas RE recommends updating the version.

- Reporting ACE - The term “equation” was struck from one sentence but not from another when discussing the Reporting ACE (“will provide a valid alternative to this Reporting ACE equation”. Was this the SDT’s intent?
- The term Adjacent Balancing Authority Area is not defined, though Adjacent Balancing Authority and Balancing Authority Area are defined terms. This phrase appears in the definitions of Actual Net Interchange, where it is capitalized, and in the definition of Scheduled Net Interchange, where area is not capitalized. Texas RE recommends being consistent with the use of the term.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

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

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

No

Document Name

Comment

As stated in our responses to questions 1, 4 and 5, Manitoba Hydro does not support the proposed timeline if EMS Vendors are required to update their AGC applications to meet the new IIM and ADI terms. As such, the 12 month timeline will need to be extended to 36 months to allow a reasonable amount of time for design, development and testing of the new functionality within AGC.

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

No

Document Name

Comment

Prior to confirming the implementation timeframe, Entergy recommends that utilities contact their control system software vendors to ensure that any potential coding modifications required to support these changes can be completed within the proposed 12-month implementation timeframe.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response	
Sandra Ellis - Pacific Gas and Electric Company - 3	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the joint ISO/RTO Council Standards Review Committee (SRC) comments on this response.	
Likes	0
Dislikes	0

Response	
Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
The SRC's "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their AGC merely to report a null value. If this is not the case, a longer implementation plan would be necessary.	
Likes	0
Dislikes	0

Response	
-----------------	--

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer Yes

Document Name

Comment

MISO supports comments filed by the SRC and its "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC or EMS merely to report a null value. If this is not the case, a longer implementation plan would be necessary.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EI does not oppose the 12 month implementation plan.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

Karrie Schuldt - Dairyland Power Cooperative - 1

Answer Yes

Document Name

Comment

MRO/NSRF

Likes 0

Dislikes 0

Response

Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC

Answer Yes

Document Name

Comment

PNM agrees with the timeframe of 12 months for implementation.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

MRO NSRF's "Yes" response is contingent upon the SDT clarifying that the Reporting ACE definition will indicate the I(IM) value is null for non-participating Balancing Authorities and that there is no requirement for non-participating Balancing Authorities to make changes to their Reporting ACE calculation, AGC or EMS merely to report a null value. If this is not the case, a longer implementation plan would be necessary.

Likes 1 Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer Yes

Document Name

Comment

No impact to BHP.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

No impact to BHP.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer Yes

Document Name	
Comment	
No impact to BHP.	
Likes 0	
Dislikes 0	
Response	
Claudine Bates - Black Hills Corporation - 6	
Answer	Yes
Document Name	
Comment	
No impact to BHP.	
Likes 0	
Dislikes 0	
Response	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
WEC Energy Group supports MISOs comments.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	

Comment

FirstEnergy offers no comments toward this question.

Likes 0

Dislikes 0

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

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 3**

Answer

Yes

Document Name

Comment

Ameren agrees with and supports MISO comments.

Likes 0

Dislikes 0

Response**Alain Mukama - Hydro One Networks, Inc. - 1**

Answer

Yes

Document Name

Comment

No impact to Hydro One.

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

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Israel Perez - Israel Perez On Behalf of: Jennifer Bennett, Salt River Project, 3, 5, 1, 6; Mathew Weber, Salt River Project, 3, 5, 1, 6; Sarah Blankenship, Salt River Project, 3, 5, 1, 6; Timothy Singh, Salt River Project, 3, 5, 1, 6; - Israel Perez****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

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

Likes 0

Dislikes 0

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Meaghan Connell - Public Utility District No. 1 of Chelan County - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Anna Lavik - Puget Sound Energy, Inc. - 1**Answer** Yes**Document Name****Comment**

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**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC****Answer****Document Name****Comment**

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

Likes 0

Dislikes 0

Response

7. Please provide any additional comments for the SDT to consider, if desired.

Alain Mukama - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Ameren agrees with and supports MISO comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

See general comment and definition updates below:

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

The following changes to certain proposed definitions are recommended.

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

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

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

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

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

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

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

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

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

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer	
Document Name	
Comment	
Pages 22 and 23, Redline - "Contingency Event" should be capitalized within the "Currently Approved Definition" and "SDT Proposed New or Revised REDLINE TO Currently Approved" columns for the NERC Glossary Terms "Operating Reserve - Spinning" and "Operating Reserve - Supplemental".	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	
Document Name	
Comment	
<p>In the redline for Operating Reserve - Spinning, it appears that the intent was to capitalize Contingency Event, but all that is shown is the deletion of the small c and small e.</p> <p>In the reline for Ramp Rate or Ramp it appears that the intent was to capitalize Interchange and Schedule. The small i and small s are stricken, but the large I and Large S are not shown as changes.</p> <p>In the Reportable Balancing Contingency Event definition, Most Severe Single Contingency (MSSC) is included. MSSC is already a defined term, so MSSC would be adequate (without spelling it out).</p>	
Likes 0	
Dislikes 0	

Response

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

Answer

Document Name

Comment

WEC Energy Group supports MISOs additional comments as written.

Likes 0

Dislikes 0

Response

Diana Torres - Imperial Irrigation District - 6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

NERC System Operator Certification training and testing will need to incorporate these new definitions in a timely manner. ACE definitions are fundamental to NERC Certification training for new and existing System Operators.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

SIGE supports comments submitted by MISO.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Document Name

Comment

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

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

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

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

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Document Name

Comment

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

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

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

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

Likes 0

Dislikes 0

Response

Answer

Document Name

Comment

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

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

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

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

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

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

Likes 1

Lincoln Electric System, 1, Johnson Josh

Dislikes 0

Response

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

Answer

Document Name	
Comment	
Actual Net Interchange: Adjacent Balancing Authority Areas is not a defined term. It should read either Adjacent Balancing Authority areas or adjacent Balancing Authority Areas.	
Control Performance Standard (CPS) : remove “Daniel, please help” from the Notes column.	
Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2 and BAL-004-WECC-3.	
Net Actual Interchange: standards effected” indicates “none”, however this term is found in BAL-003-2.	

Likes 0	
Dislikes 0	

Response

David Hartman - David Hartman On Behalf of: Jennifer Bray, Arizona Electric Power Cooperative, Inc., 1; - David Hartman

Answer

Document Name

Comment

The proposed changes are largely clarifications of existing terms with a few new terms added for additional clarification and/or flexibility. We appreciate these types of changes. However, there is one issue with the proposed changes that we believe should be corrected. The notes column for “Control Performance Standard – (CPS)” state “Daniel, please help.” We believe the notes column for this term should be updated to reflect the changes made and why they were made as in the other proposed changes. Obviously, this is a minor oversight; however, we believe that correcting the notes column would provide additional clarification for this term.

Thank you for the opportunity to comment.

Likes 0	
Dislikes 0	

Response

Karrie Schuldts - Dairyland Power Cooperative - 1

Answer

Document Name

Comment

MRO/NSRF

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

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

Answer

Document Name

Comment

ITC is in support of the NSRF response

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments.

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

Comment

MISO supports comments filed by the SRC.

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

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

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

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

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

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

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

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

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

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

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

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

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

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

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

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

he proposed changes are largely clarifications of existing terms with a few new terms added for additional clarification and/or flexibility. We appreciate these types of changes. However, there is one issue with the proposed changes that we believe should be corrected. The notes column for "Control Performance Standard – (CPS)" state "Daniel, please help." We believe the notes column for this term should be updated to reflect the changes made and why they were made as in the other proposed changes. Obviously, this is a minor oversight; however, we believe that correcting the notes column would provide additional clarification for this term.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response