

## Comment Report

**Project Name:** 2022-01 Reporting ACE Definition and Associated Terms | Standard Authorization Request  
Comment Period Start Date: 2/9/2022  
Comment Period End Date: 3/10/2022  
Associated Ballots:

There were 23 sets of responses, including comments from approximately 96 different people from approximately 73 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## **Questions**

- 1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.**
- 2. Provide any additional comments for the drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Santee Cooper	Chris Wagner	1,3,5,6		Santee Cooper	Jennifer Richards	Santee Cooper	1,3,5,6	SERC
					Clarke Mckenzie	Santee Cooper	1,3,5,6	SERC
					Diana Scott	Santee Cooper	1,3,5,6	SERC
					LaChelle	Brooks	1,3,5,6	SERC
PJM Interconnection, L.L.C.	Elizabeth Davis	2	RF,SERC	ISO/RTO Council (IRC) Standards Review Committee (SRC)	Mike Del Viscio	PJM	2	RF
					Becky Davis	PJM	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Helen Lainis	IESO	2	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Al Miremadi	CAISO	2	WECC
					Dana Showalter	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Kathleen Goodman	ISO-NE	2	NPCC
Entergy	Julie Hall	1,3,6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO

					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					LaTroy Brumfield	American Transmission Company, LLC	1	MRO
					Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
					George Brown	Acciona Energy North America	5	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama	3	SERC

						Power Company		
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Jim Howell	Southern Company - Southern Company Services, Inc. - Gen	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Helen Lainis	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC

Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYS PS	6	NPCC
ALAN ADAMSON	New York State Reliability Council	10	NPCC
Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
Brian Robinson	Utility Services	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Jim Grant	NYISO	2	NPCC
John Pearson	ISONE	2	NPCC
Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
Chantal Mazza	Hydro-Quebec	2	NPCC

					Michele Tondalo	United Illuminating Co.	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc.	2	MRO
					Bryan Wood	Southwest Power Pool Inc.	2	MRO
					Jim Williams	Southwest Power Pool Inc.	2	MRO
					Derek Hawkins	Southwest Power Pool Inc.	2	MRO
					Yasser Bahbaz	Southwest Power Pool Inc.	2	MRO
					Scott Aclin	Southwest Power Pool Inc.	2	MRO

**1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.**

**Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

AZPS recognizes the need to clarify the current definition of Reporting Area Control Error (ACE) as it presents conflict with the Western Interconnection's Automatic Time Error Correction (ATEC) process and the proposed change would reduce any confusion, however, AZPS agrees with EEI's comments in that greater specificity in detail and technical justification is needed.

AZPS supports the following commented submitted by EEI:

EEI notes that the SAR may have merit but presently it lacks sufficient detail and technical justification to support its approval. The SAR states that "Reporting ACE and Area Control Error (ACE (standalone term)) are both used over 100 times in the set of standards, guidelines, and reference documents" and therefore any change will have substantial impacts. Therefore, EEI believes that any project that proposes to make change of this magnitude should be backed with a technical whitepaper explaining the need and containing a proposed solution.

Among the questions that should be addressed in the whitepaper include the following:

1. Please explain in greater detail the current accumulated time error issues within the Eastern Interconnection, and its cause.
2. Please provide details to the proposed solution that the Resources Committee (RS) has developed to address the issue within the Eastern Interconnection, and other interconnections should it be needed.
3. Please provide details and analysis on the impact of the proposed change; noting the expansive use of the terms Reporting ACE and ACE (standalone term) in Reliability Standards and Guidelines.
4. The project also proposes to change the ATEC definition used by WECC within their BAL-004-WECC-03 Reliability Standard. How will the SDT ensure that any change made to this defined term will not have negative impacts on WECC processes and their BAL-004 Reliability Standard? If this has already been done, those details should be included in the whitepaper.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

EI notes that the SAR may have merit but presently it lacks sufficient detail and technical justification to support its approval. The SAR states that “Reporting ACE and Area Control Error (ACE (standalone term)) are both used over 100 times in the set of standards, guidelines, and reference documents” and therefore any change will have substantial impacts. Therefore, EEI believes that any project that proposes to make change of this magnitude should be backed with a technical whitepaper explaining the need and containing a proposed solution.

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Likes 0

Dislikes 0

**Response**

**Alan Kloster - Evergy - 1,3,5,6 - MRO**

**Answer**

No

**Document Name**

**Comment**

Evergy supports and incorporates by reference Edison Electric Institute’s (EEI) response to Question 1.

Likes 0

Dislikes 0

**Response**

**Nazra Gladu - Manitoba Hydro - 1,3,5,6**

**Answer**

No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Texas RE supports the purpose of the SAR to better align common terms across Interconnections.

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer** Yes

**Document Name**

**Comment**

The ATEC component should be available to all interconnections and will allow for better management of interconnection time error and inadvertent.

Likes 0

Dislikes 0

**Response**

**Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC**

**Answer** Yes

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
No comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
We support the proposed scope as described in the SAR.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Chris Wagner - Santee Cooper - 1,3,5,6, Group Name Santee Cooper</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
While Santee Cooper supports the intent of this SAR to allow Automatic Time Error Correction in any Interconnection that chooses to implement it, we believe that the scope should be revised to clarify the proposed new definitions and how the impacted standards will be addressed.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Likes 0

Dislikes 0

**Response****Steven Rueckert - Western Electricity Coordinating Council - 10****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Glenn Barry - Los Angeles Department of Water and Power - 1,3,5,6****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Julie Hall - Entergy - 1,3,6, Group Name Entergy****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Casey Perry - PNM Resources - Public Service Company of New Mexico - NA - Not Applicable - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**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**

**Marc Donaldson - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Elizabeth Davis - PJM Interconnection, L.L.C. - 2 - SERC,RF, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

<b>Bobbi Welch - Midcontinent ISO, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Darcy O'Connell - California ISO - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee	
Likes 0	
Dislikes 0	
<b>Response</b>	

**2. Provide any additional comments for the drafting team to consider, if desired.**

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

**Answer**

**Document Name**

**Comment**

MISO supports the comments submitted by the MRO NERC Standards Review Forum (MRO NSRF). Thank you.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO**

**Answer**

**Document Name**

**Comment**

SPP recommends that the SAR Drafting Team consider adding a list of the applicable documents (Standards, Reliability Guideline, and Technical Reference Documents) which are impacted by the proposed definitions to the Detailed Description on page 2. Such action is an efficient way to ensure industry's situational awareness of the various NERC documents that are impacted by these proposed definition revisions; and will aid registered entities in its compliance goals.

Likes 0

Dislikes 0

**Response**

**Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

To ensure industry awareness, the MRO NSRF recommends the Standard Drafting Team (SDT) consider providing the list of applicable NERC documents (i.e. Standards, Reliability Guidelines and/or Technical Reference Documents) which have the potential to be impacted by proposed changes to the existing definitions as part of the Detailed Description on page 2. This is an efficient way to inform industry of potential impacts, thereby enhancing situational awareness which will aid entities in ensuring all compliance obligations are met.

Likes 0

Dislikes 0

**Response**

**Casey Perry - PNM Resources - Public Service Company of New Mexico - NA - Not Applicable - WECC**

**Answer**

**Document Name**

**Comment**

No additional comments.

Likes 0

Dislikes 0

**Response**

**Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer**

**Document Name**

**Comment**

No additional comments.

Likes 0

Dislikes 0

**Response**

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response