Unofficial Comment Form

Project 2022-01 Reporting ACE Definition and Associated Terms

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2022-01 Reporting ACE Definition and Associated Terms**. Comments must be submitted by **8 p.m. Eastern, Thursday, March, 16, 2023.**
**m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2022-01-Reporting-ACE-Definition-and-Associated-Terms.aspx). If you have questions, contact Standards Developer, Josh Blume (via email), or at 404-446-2593.

## Background Information

Project 2022-01 Reporting ACE Definition and Associated Terms was initiated in February 2022 to address an issue, identified by the Resources Subcommittee (RS) of the NERC Reliability and Security Technical Committee, regarding the current definition of the NERC defined term Reporting ACE. Specifically, the RS identified a conflict in the current definition of Reporting ACE with the Western Interconnection’s Automatic Time Error Correction (ATEC) process. The RS recommended making the ATEC term generic to allow all Interconnections to implement an ATEC process and also revising related defined terms for consistency and clarity.

**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:

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

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

[ ]  Leave ADI undefined.

Comments:

1. 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.

[ ]  Yes

[ ]  No

Comments:

1. 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?

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

1. 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?

[ ]  Yes

[ ]  No

Comments:

1. 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.

[ ]  Yes

[ ]  No

Comments:

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

Comments: