

Coordinate Interchange

<i>SAR Commenter Information</i>			
Name	David H. McMillan		
Organization	Calpine		
Telephone	713-830-8710	Fax	713-830-2001
E-mail	dmcmillan@calpine.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: a lack of coordination will not directly impact grid reliability. Reliability is only threatened when a grid operator reacts inappropriately when coordination is lacking. (e.g. Operating limits)			
Other comments: This is NOT a reliability standard. It is purely commercial and should be the subject of a NAESB action. NERC, in its participation in the NAESB process can manage the indirect reliability issues as a part of that process.			

<i>SAR Commenter Information</i>	
Name	Bill Carr
Organization	Dynegy, Inc.
Telephone	713-7657-8723
Fax	713-767-5986
E-mail	bill.carr@dynegy.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The purpose/industry need section should start with: The purpose of this standard is to ensure that a consistent, uniformly applied standard is developed for ...</p>	

<i>SAR Commenter Information</i>			
Name	John Anderson and John Hughes		
Organization	Electricity Consumers Resource Council (ELCON)		
Telephone	202-682-1390	Fax	202-289-6370
E-mail	jhughes@elcon.org/janderson@elcon.org		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The establishment of this SAR is premature. All commercial implications of the SAR should be identified and mitigated prior to the drafting.			

<i>SAR Commenter Information</i>			
Name	Phil Park		
Organization	Powerex		
Telephone	604 891 5020	Fax	604 895 7012
E-mail	phil.park@powerex.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: Eliminate elements that overlap with the ESC.			

<i>SAR Commenter Information</i>			
Name	MAAC Region		
Organization	MAAC		
Telephone	610-666-8854	Fax	610-666-2297
E-mail	dicapram@pjm.com		
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <p>There is a need to coordinate 'basic' transaction information (magnitude, start/end times, ramping duration) and those can be handled as part of the standard to Coordinate Operations.</p> <p>Leaving this as an ad hoc proposal will lead to the creation of Business procedures and tools that should be outside the scope of Organization Standards.</p>			

<i>SAR Commenter Information</i>			
Name	Mike Miller		
Organization	Southern Company		
Telephone	205 257 7755	Fax	6663
E-mail	mbmiller@southernco.com		
None			

<i>SAR Commenter Information</i>			
Name	Alan Johnson		
Organization	Mirant Americas Energy Marketing		
Telephone	678-579-3108	Fax	678-579-5760
E-mail	alan.r.johnson@mirant.com		
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: references to commercial/business processes.</p> <p>Other comments:</p> <p>The standard should only define the requirement to be met to maintain reliability. How the affected entities comply with the standard are business process issues that should be addressed by NAESB.</p>			

April 23, 2002

SRP Comments on NERC 11 SAR sent out on April 2, 2002.

All 11 SAR's (this group of 10 plus the one sent out earlier) don't contain enough information to make the kind of judgments requested on the forms. Therefore the forms are not filled out.

We recommend all the SAR's be advanced to the next step to develop the specific standards and associated measurements for each standard so that we can evaluate and comment on them.

All of these SAR's are needed for reliable planning and operation of the bulk electric transmission system and meet the principle requirements.

Comments on the White paper:

1. The paper fails to state what standards are supposed to be. This seems so basic; one has to assume that those drafting the white paper want to redefine the definition contained in the Organizational Standards Manual. This leads to a lot of confusion and is not the place to do that.
2. The Planning Standards were written in a different time period than the Operating Policies with different objectives. Thus they are different and that should be recognized. For instance the development of a Planning Functional model has absolutely nothing to do with whether control areas exist or not and whether companies have restructured or not. The statement about control areas may be true for the Operating Policies but it is not true for the Planning Standards.

The Planning Standards (Templates) were written to meet the definition of a standard in the Organizational Standards Manual, to meet at least one of the Reliability Principles, to comply with all the Market Interface Principles and to contain the compliance administration elements. This is very different than what is contained in the Operating Policies. The Planning Standards need to go through the new process so that both the Operating elements and Planning elements of the Organizational Standards are consistent, are not duplicative and are needed for reliability.

3. The term "core reliability requirement" is used in the white paper but is never mentioned in the Organizational Standards Manual. Using an undefined term is very misleading and should be avoided.
4. The paper in several places address "what performance must be achieved". As noted above, an Organizational Standard can be broader than that and this write up is misleading.
5. The process has been lengthened because of the multiple posting of the SAR's. NERC has a body of reliability requirements written up into Compliance Templates. With very little effort these could be written up into SAR's that would provide sufficient detail for NERC to evaluate them. It is very hard to comprehend why one does not use this work to expedite the process. Instead SAR's are sent out with insufficient information. The process is long enough. We should be looking for all ways possible to speed it up.

Comments on the SAR write-up:

1. The SAR write-up only contains the purpose and brief description of a standard. Where is the Standard? I thought that is what the SAR is for?
2. The descriptions are in most cases extremely vague. The write-ups contain words like "such as" or "as defined in the standard". These are big enough to cover a MAC truck. Once again there is insufficient information to make a good judgment.



April 29, 2002

Guy V. Zito
Manager, Planning
Northeast Power Coordinating Council
1515 Broadway Floor 43
New York, NY 10036

RE: NEPOOL Compliance Working Group (NCWG) comments pertaining to the 10 Standard Authorization Requests (SARs) posted for open comment

The NCWG has reviewed the 10 SARs posted for open comment and has agreed they are core standards, which serve a purpose in support of reliability.

Standard Title:

Prepare for and Respond to Abnormal or Emergency Conditions
Prepare for and Respond to Blackout or Island Conditions
Coordinate Interchange
Coordinate Operations
Monitor and Analyze Disturbances, Events and Conditions
Operate Within Limits – Monitor and Assess Short-term Transmission
Define (Physical) Connection Requirements
Design, Install, and Coordinate Control Protection Systems
Assess Transmission Future Needs and Develop Transmission Plans
Determine Facility Ratings, Operating Limits, and Transfer Capabilities

We do not agree that the **SAR Type** is a new standard. We suggest that at a minimum the SAR should indicate the existing standard and whether or not it will be withdrawn when the revised standard is adopted. We suggest that NERC stop the open process of reviewing existing policies and standards if these Organizational Standards will replace them. NERC should clearly indicate that one purpose of the Organizational Standards Process is to replace existing standards.

Sincerely,
Daniel L. Stosick

Chairman, NEPOOL Compliance Working Group
C/o ISO New England, Inc.
One Sullivan Road
Holyoke MA 01040-2841

Cc: NEPOOL Compliance Working Group
CP9 Working Group
Paul Shortly
Richard Burke
Richard Kowalski

<i>SAR Commenter Information</i>			
Name	Robert D. Smith		
Organization	Arizona Public Service		
Telephone	(602) 250-1144	Fax	(602) 250-1155
E-mail	robert.smith@aps.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Mr. Charles Moser (Northborough, MA) and Mr. Ronald Halsey (Syracuse, NY)
Organization	National Grid USA
Telephone	508 421 7600 315 428 3181
Fax	508 421 7520 315 428 5615
E-mail	charles.moser@us.ngrid.com ronald.halsey@us.ngrid.com
None	

<i>SAR Commenter Information</i>			
Name	Vern Colbert		
Organization Dominion Virginia Power			
Telephone	(804) 273-3399	Fax	(804) 273-2405
E-mail	vern_colbert@dom.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Detail comments will be provided later.			

<i>SAR Commenter Information</i>			
Name	Greg Gideon		
Organization	TXU Energy		
Telephone	214-875-9483	Fax	214-875-9246
e-mail	ggideon1@txu.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Paul Rocha		
Organization	Reliant Energy HL&P		
Telephone	713-207-2768	Fax	713-207-2281
e-mail	paul-rocha@reliantenergy.com		
HL&P supports ERCOT's comments regarding the appropriate scope and characteristics of this standard, if a standard is developed.			

<i>SAR Commenter Information</i>			
Name	Brant Eldridge		
Organization	ECAR		
Telephone	330-580-8005	Fax	330-456-3648
E-mail	brante@ecar.org		
<p>ECAR has conducted a survey of its member companies regarding the eleven SARs, which NERC has initiated to-date. We recognize that the comment period for the first SAR issued ("Balance Resources and Demand") has already closed. However, considering that the first SAR was issued earlier than the other ten primarily just to get the process started, and further considering that all 11 SARs are viewed by NERC as a possible complete set of Organization Standards (re: the "White Paper"), ECAR believes that comments on the first SAR should still be considered along with those on the other ten.</p> <p>11 of the 18 ECAR Full Members, along with two Associate Members, submitted responses to the SAR survey. Some of the responses were submitted using the NERC "SAR Comment Form", while others were contained in narrative e-mails, and one was faxed to us. Therefore, a complete set of the ECAR member company responses will be sent to the Standards Process Manager at NERC via Fed Ex to arrive at NERC by May 3rd. The Fed Ex package will include a copy of this e-mail. FYI, NERC may also receive some of the ECAR member company responses directly from the companies. Some of the individual company responses will be identical to what will be in the Fed Ex package and some will contain more detailed comments.</p> <p>The ECAR member company responses contain numerous and wide-ranging comments about the need for each of the 11 proposed Organization Standards, as well as comments regarding the scope and applicability of the SARs. As your review of these responses will show, there is general ECAR consensus – but not unanimity -- that the 11 SARs as a set cover the scope of performance needed to ensure reliability of the interconnected North American bulk power systems. Some ECAR members feel that there are performance areas not covered in the proposed set of Organization Standards, and they have provided what they think is missing. Others believe that some of the proposed Organization Standards are not needed, and they explain why they feel that way. Numerous comments were directed at the scope and applicability of the SARs. Several ECAR companies questioned the inclusion of the "Distribution Provider" function in the applicability section of the SARs, believing that NERC should stick to its traditional focus on the bulk power systems and stay out of the distribution arena.</p> <p>The recent call for nominees to serve on SAR Drafting Teams is the appropriate next step. ECAR believes that all 11 SARs need to be refined to reflect industry comments and then posted again for another round of industry comments. Before proceeding into actual development of Organization Standards based on these 11 SARs, NERC must have clear industry consensus on the need for each of the Organization Standards outlined in the 11 SARs, as well as consensus on the scope and applicability of those SARs.</p> <p>If the wide-ranging comments received from ECAR members are any indication, there is still some serious work to be done to achieve the needed clear industry consensus on how to proceed.</p>			

<i>SAR Commenter Information</i>			
Name	David L. Hart		
Organization	Ohio Valley Electric Corporation		
Telephone	614/223-1090	Fax	614/223-1094
E-mail	dlhart3@aep.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Lew Gray, Mike Holtsclaw, Steve Clouse		
Organization	Indianapolis Power & Light		
Telephone	317-261-8126	Fax	317-261-8996
E-mail	lew.gray@aes.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	David W. Sandefur		
Organization	Hoosier Energy REC, Inc.		
Telephone	812-876-0267	Fax	812-876-3139
E-mail	dsandefur@hepn.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Verne B. Ingersoll, II		
Organization Progress Energy - Carolina Power & Light Company and Florida Power Corp.			
Telephone	919-546-7534	Fax	919-546-7558
E-mail	verne.ingersoll@pgnmail.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments:			
This is a process that should be part of Coordinate Operation. Even if this is kept as a SAR, additional entities such as the Generator and LSE should be included.			

<i>SAR Commenter Information</i>	
Name	Charles Yeung
Organization	Reliant Resources
Telephone	713-207-2935
	Fax
E-mail	cyeung@reliant.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Specific measurable boundary conditions. The SAR lacks a description of the objective of this standard - only refers to "maintain system reliability". What are the aspects of reliability it is intended for? Real-time balance? Frequency? System stability?</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: The description assumes a solution to a problem that is not clearly defined. "...requirements for defining, assessing, confirming, and implementing interchange transactions.." are possible means to achieve some reliability objective. They are not the reliability objectives themselves and should not be presumed to be the only solutions to achieving an underlying reliability objective that is not clearly stated in this SAR. This standard as proposed will be difficult to measure and enforce. There are numerous procedures and requirements that may be required to facilitate the reliability needs, however, not all of them fall under the definition of a core Organization Standard that is measurable. NERC must distinguish these requirements from core Organization Standards and apply an appropriate standards development process for them.</p> <p>Other comments: The existing NERC standard Policy 3 includes procedures for market participants to identify commercial transactions for reliability information. These procedures have profound impacts on market activity and should be developed with the NAESB process and filed at FERC for approval.</p>	

<i>SAR Commenter Information</i>			
Name	Kirit S. Shah		
Organization	Ameren Services -Energy Delivery Technical Services		
Telephone	314 554 3542	Fax	314 554 3260
E-mail	kirit_s_shah@ameren.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: The scope is too general. Interchange information should be coordinated at multiple levels including planning, scheduling, and balancing.			

<i>SAR Commenter Information</i>			
Name	Dan Wheeler		
Organization	NorthWestern Energy		
Telephone	(406) 497-2234	Fax	(406) 497-3002
E-mail	dan.wheeler@northwestern.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	John K. Loftis, Jr.		
Organization	Dominion Virginia Power		
Telephone	804 - 273 - 3897	Fax	804 - 273 - 3259
E-mail	john_loftis@dom.com		
Other comments: I do not work in this area, and have no comments on this SAR			

<i>SAR Commenter Information</i>			
Name	Terri Grabiak		
Organization Allegheny Power			
Telephone	724-838-6748	Fax	724-838-6156
E-mail	tgrabia@alleghenypower.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	George Bartlett
Organization	Entergy Services
Telephone	504-310-5801
	Fax
E-mail	gbartle@entergy.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments:</p> <p>This SAR is to "ensure that the implementation of transactions are coordinated" by establishing requirements for defining, assessing, confirming and implementing interchange transactions. This shall include items such as data, communications, and timing requirements among Reliability Functions." This SAR is really the details for "how" to coordinate interchange and will define a "process" through business rules, E-Tag, data needs and timing requirements. This SAR is really part of "how" the industry will meet the SARs "Balance Resources and Demand" or "Coordinate Operations". However, we believe this is not a "core reliability" Organization Standard.</p>	

<i>SAR Commenter Information</i>			
Name	Michael Desselle		
Organization	American Electric Power		
Telephone	214-777-1826	Fax	214-777-1831
E-mail	mddesselle@aep.com		
Other comments: To the extent that this SAR is transitioning an existing standard from the old world to the new world (Functional Model), then the standard should not go beyond the original scope. Consistent with our general comments, once the clarity is achieved on Standard Market Design and RTO formations, then this standard should be revisited and reevaluated.			

<i>SAR Commenter Information</i>			
Name	Ed Kirschner		
Organization	Cinergy		
Telephone	317-838-1455	Fax	317-838-6846
E-mail	ekirschner@cinergy.com		
None			

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
Organization Bulk Power Operations Southern Company			
Telephone	205-257-6892	Fax	205-257-6663
E-mail	jsgriffi@southernco.com		
None			

<i>SAR Commenter Information</i>	
Name	Peter Burke (submitting comments provided by numerous ATC contributors)
Organization	American Transmission Company
Telephone	262-506-6863
Fax	262-506-6709
E-mail	PBurke@atcllc.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: (1) The requirements in this standard should not conflict with the timing requirements, etc, in the FERC approved tariffs.</p> <p>This standard should also apply to the Generator and Load-Serving Entities functions since those functions are the ultimate source and sink on interchange transactions.</p> <p>Reliability Principle #6, "Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified and have the responsibility and authority to implement actions," should be applied to this standard. (2) Emphasize developing coordinated methods for determining how to handle roll-over rights and partial path reservations in planning models.</p>	

<i>SAR Commenter Information</i>			
Name	Bob Pierce		
Organization	Duke Power		
Telephone	(704) 373-6480	Fax	(704) 382-7887
E-mail	rwpierce@duke-energy.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: Clarify in description that this applies to tagging and scheduling in the real time environment.			

<i>SAR Commenter Information</i>	
Name	David Little
Organization	Nova Scotia Power Inc.
Telephone	902 428-7580
Fax	902 428-7550
E-mail	david.little@nspower.ca
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic? Yes</p> <p>Is the Scope of the SAR fine as it is? Yes</p> <p>Other Comments Specification of data, communications, data could go beyond principles and expected results. Avoid descriptions on "how to do it". Caution should be taken to define the principles, but not describe the operation of the ESC system.</p>	

<i>SAR Commenter Information</i>	
Name	Art Giardino
Organization	Public Service Electric & Gas
Telephone	973 430-6374
Fax	973 242-6074
E-mail	arthur.giardino@pseg.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: It is premature to continue development of this SAR until FERC has specified the organization to be responsible for the development of wholesale electric standards.</p>	

<i>SAR Commenter Information</i>	
Name	Compliance Subcommittee
Organization	SERC (Contact = Nancy Fallon)
Telephone	704-892-6026
	Fax
E-mail	nfallon@serc1.org
Is there a reliability-related need for an Organization Standard to be developed on this topic?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is	
<input type="checkbox"/> The scope of the SAR should be expanded to include:	
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:	
Other comments: This is a process that should be part of Coordinate Operation. Even if this is kept as a separate SAR, additional entities such as the Generator and LSE should be included.	

<i>SAR Commenter Information</i>		
Name	OPWG	
Organization SERC (Contact = Nancy Fallon)		
Telephone	704-892-6026	Fax
E-mail	nfallon@serc1.org	
None		

<i>SAR Commenter Information</i>		
Name	Planning Standards Working Group (PSWG)	
Organization	SERC (Contact = Nancy Fallon)	
Telephone	704-892-6026	Fax
E-mail	nfallon@serc1.org	
None		

<i>SAR Commenter Information</i>	
Name	Gary Won and Don Tench Comments submitted on behalf of the Independent Electricity Market Operator (IMO)
Organization	Independent Electricity Market Operator (IMO)
Telephone	905-855-6427
Fax	905-855-6372
E-mail	gary.won@theimo.com and don.tench@theimo.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Coordinating interchange should consider Automatic Generation Control (AGC) and Generation Rejection Schemes and their impact on interconnected systems. This indicates that in the Reliability Functions matrix, this Standard should also apply to generators.</p>	

<i>SAR Commenter Information</i>	
Name	David Scarpignato
Organization	Baltimore Gas & Electric
Telephone	410-597-7593
	Fax
E-mail	scarp@bge.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The promulgation for comment of these SARs is premature. The industry "standard making process" is in a transition phase and it is overly burdensome to devote resources at this time. Once legislation or FERC firmly determines which entity(ies) is responsible for standards it will make sense to move forward with said entity.</p> <p>Even if NERC wants to cover reliability standards, almost all standards have a reliability and commercial impact; thereby, necessitating developing a single process that incorporates both commercial and reliability aspects of standards development. The current NERC process risks being changed soon, discounts commercial aspects, and is not part of a finalized overall industry process.</p> <p>Waiting a short while to move forward on a new standards setting process is acceptable and prudent given that NERC standards are currently in place and the industry can continue to use these standards until the new process and standards setting organization(s) are firmly set.</p>	

<i>SAR Commenter Information</i>	
Name	R. Scott Henry, Chairman
Organization	Interconnected Operations Services Subcommittee, NERC
Telephone	(704) 382-6182
Fax	
E-mail	rshenry@duke-energy.com
Is there a reliability-related need for an Organization Standard to be developed on this topic?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is	

<i>SAR Commenter Information</i>			
Name	Jim Cyrulewski Manager -Michigan Electric Power Coordination Center		
Organization	Michigan Electric Coordinated Systems (MECS)		
Telephone	734-665-3628	Fax	734-665-3480
E-mail	cyrulewskij@dteenergy.com		
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The Planning Authority has a role in that long term transactions factor into the planning for the transmission system.</p>			

<i>SAR Commenter Information</i>	
Name	Kent Saathoff
Organization	Kent Saathoff
Telephone	(512)225-7011
Fax	(512)225-7020
E-mail	ksaathoff@ercot.com
<p>This SAR and the other posted SARs provide an appropriate framework for transitioning existing NERC Operating Policies and Planning Standards into new, NERC Organization Standards. Multiple compliance measures may be defined and developed for each of the eleven proposed Organization Standards. The Organization Standards and related compliance measures should focus on what functions must be performed for reliability, on who is responsible for each compliance measure for each required function and not, on how the compliance measure is achieved. The compliance measure must be measurable or demonstrable to ensure compliance.</p> <p>It is necessary that there be a standard addressing interchange between Source and Sink Balancing Authorities. Interchange must be controlled and coordinated so that unscheduled flows are minimized to facilitate balancing of resources and demand (ref. SAR ID# BAL_RES_&_DEMND_01_01).</p> <p>The Standard developed should recognize the different characteristics of interchange over free flowing synchronous ties and those over controlled interfaces (i.e. DC ties) between Balancing Authorities. These differences may justify different requirements for interchange over these interfaces.</p>	

<i>SAR Commenter Information</i>	
Name	Ronald Gunderson
Organization	MAPP Reliability Council
Telephone	(402)845-5252
Fax	(402)845-5205
E-mail	rogunde@nppd.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: This SAR and its scope should be clarified as to the extent to which it addresses "Interchange." It appears that its purpose is to address SCHEDULED Interchange only, but it is simply not clear. We would like to have the title clarified to express the intent of the purpose of the SAR. The resulting scope of measures will be greatly affected by this clarification.</p>	

<i>SAR Commenter Information</i>	
Name	Linda Clarke
Organization	Exelon Corporation
Telephone	(610) 765-6698
Fax	(610) 765-6698
E-mail	lclarke@pwrteam.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The SAR needs to focus strictly on setting reliability measures related to coordinating interchange. The effort must be coordinated with any commercial standards which are developed.</p>	

<i>SAR Commenter Information</i>			
Name	Carter B. Edge		
Organization	Southeastern Power Administration		
Telephone	706-213-3855	Fax	706-213-3884
E-mail	cartere@sepa.doe.gov		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

<i>SAR Commenter Information</i>			
Name	Warren Schaefer		
Organization Dairyland Power Cooperative			
Telephone	608/787-1252	Fax	608/787/1327
E-mail	wjs@dairynet.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: This SAR and its scope should be clarified as to the extent to which it addresses "Interchange." It appears that its purpose is to address SCHEDULED Interchange only, but it is simply not clear. We would like to have the title clarified to express the intent of the purpose of the SAR. The resulting scope of measures will be greatly affected by this clarification.			

<i>SAR Commenter Information</i>			
Name	Mike Miller		
Organization	Southern Company		
Telephone	205 257 7755	Fax	6663
E-mail	mbmiller@southernco.com		
None			

<i>SAR Commenter Information</i>			
Name	Jim Griffith		
Organization	Bulk Power Operations Southern Company		
Telephone	205-257-6892	Fax	205-257-6663
E-mail	jsgriffi@southernco.com		
None			

<i>SAR Commenter Information</i>	
Name	Southern Company
Organization	
Telephone	(205) 257-4222
	Fax (205) 257-1040
E-mail	DGPIATT@southernco.com
<p><i>Is there a reliability-related need for an Organization Standard to be developed on this topic?</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>The scope of the SAR is fine as it is</i></p> <p><input checked="" type="checkbox"/> <i>The scope of the SAR should be expanded to include:</i></p> <p><input checked="" type="checkbox"/> <i>The scope of the SAR should be reduced to eliminate:</i></p> <p>Other comments:</p> <p>Many of the aspects discussed in SAR#7 seem to involve commercial business practices associated with scheduling transactions (or requesting transactions to be scheduled). We agree that there is a need to standardize the process by which interchange authorities implement interchange schedules. However, any attempt to standardize scheduling requirements to be imposed upon market participants would have significant commercial implications and should be vetted through the NAESB commercial business practice standards process. Hence, the standard should be modified to limit its scope to the purely reliability aspects of implementation of interchange schedules between interchange authorities.</p>	

<i>SAR Commenter Information</i>			
Name	Jon. Loesch		
Organization	FirstEnergy Solutions		
Telephone	330-315-7313	Fax	330-315-6773
E-mail	LoeschJ@FirstEnergyCorp.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Ray Morella
Organization	FirstEnergy Corp
Telephone	330.336.9831
Fax	330.336.9024
E-mail	morellar@firstenergycorp.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: The creation of a standard for the effective coordination of the interconnection is needed to address the way transmission business is conducted in our industry. Currently NERC policy 3 defines the interchange protocol that most of the industry subscribes to. But this protocol is not followed, defined, and implemented uniformly throughout the interconnection. This leads to isolated areas of confusion when balancing the interconnection and conducting business. We need consistent criteria that can be applied to large geographical areas, such as the three basic interconnections. Standards that address the implementation of One-Stop-Shop business, common timing requirements, products, and operational time need to be reviewed.</p>	

<i>SAR Commenter Information</i>			
Name	Scott Helyer		
Organization	Tenaska		
Telephone	817-462-1512	Fax	817-462-1510
E-mail	shelyer@tnsk.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Kenneth A. Githens		
Organization	Allegheny Energy Supply		
Telephone	412-858-1635	Fax	412-856-2912
E-mail	kgithen@alleghenyenergy.com		
The scope of the SAR should be reduced to eliminate: Items such as data, communications and timing requirements should be defined in this SAR. However, establishing requirements for defining, assessing, confirming and implementing interchange transactions standards be developed in a process which takes into account market and reliability interests.			

<i>SAR Commenter Information</i>			
Name	Chifong Thomas		
Organization Pacific Gas and Electric Company			
Telephone	(415) 973-7646	Fax	(415) 973-8804
E-mail	clt7@pge.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Vahid Madani		
Organization WECC Remedial Action Scheme Reliability Task Force			
Telephone	(510) 874-2300	Fax	(510) 874-2442
E-mail	vxm6@pge.com		
None			

<i>SAR Commenter Information</i>			
Name	Ed Riley		
Organization California ISO			
Telephone	(916) 351-4463	Fax	(916) 608-5906
E-mail	eriley@caiso.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: Re-write description to include "..and timing requirements among Reliability and Balancing Functions."			

<i>SAR Commenter Information</i>			
Name	Mr Paul Tremblay, Mr. Mike Penstone, and Mr Ajay Garg		
Organization	Hydro One Networks Inc.		
Telephone	416 345-5420	Fax	416 345-5422
E-mail	ajay.garg@HydroOne.com; mike.penstone@HydroOne.com		
None			

<i>SAR Commenter Information</i>			
Name	Marv Landauer		
Organization BPA			
Telephone	360-619-6602	Fax	360-619-6945
E-mail	mjlandauer@bpa.gov		
None			

<i>SAR Commenter Information</i>			
Name	Francis J Halpin		
Organization Bonneville Power Administration - Power Business Line			
Telephone	503 230 3000	Fax	503 230 5669
E-mail	fjhalpin@BPA		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			
<input type="checkbox"/> The scope of the SAR should be expanded to include:			
<input type="checkbox"/> The scope of the SAR should be reduced to eliminate:			
Other comments: This one needs a lot of work. Don't ignore the E-tag documentation nor the work of the ESC. Also must stay on top of the upcoming work of NAESB.			

<i>SAR Commenter Information</i>	
Name	Edward Stoneburg
Organization	Illinois Power Company
Telephone	(217) 362 6363
	Fax
E-mail	edward_stoneburg@illinoispower.com
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input checked="" type="checkbox"/> The scope of the SAR should be reduced to eliminate: All references to HOW this standard would be met such as data, communications, and timing. These tend to be issues as to HOW to achieve the standard not what the standard should be.</p> <p>Other comments: There is inadequate detail in the SAR to determine if the scope of the SAR is appropriate and adequate. What is the reliability objective of coordinating interchange? The description of this Standard presumes the HOW without clearly defining the WHAT.</p>	

<i>SAR Commenter Information</i>			
Name	Saif Mogri		
Organization WECC Technical Studies Subcommittee			
Telephone	(213)367-0447	Fax	(213)367-0457
E-mail	smogri@email.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>	
Name	Gerald N. Rheault
Organization	Manitoba Hydro
Telephone	(204) 487-5423
Fax	(204) 487-5360
E-mail	gnrheault@hydro.mb.ca
<p>Is there a reliability-related need for an Organization Standard to be developed on this topic?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is</p> <p><input type="checkbox"/> The scope of the SAR should be expanded to include:</p> <p><input type="checkbox"/> The scope of the SAR should be reduced to eliminate:</p> <p>Other comments: Manitoba Hydro believes that the scope of this SAR as defined above, although required, is not a reliability requirement but a Business Standard one. The main concern here is inadvertent flows which is a Business Standards issue. We believe a SAR is required to address reliability requirements related to SCHEDULED Interchange; any monitoring and data requirements related to this function.</p> <p>The Industry Need has not been defined for this SAR.</p>	

<i>SAR Commenter Information</i>			
Name	Donald D. Taylor, PE		
Organization	Westar Energy		
Telephone	785-575-6430	Fax	785-575-1798
E-mail	don_taylor@wr.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The scope of the SAR is fine as it is			

<i>SAR Commenter Information</i>			
Name	Frank A. Venhuizen		
Organization	NIPS (Northern Indiana Public Service Co.)		
Telephone	(219) 647-5630	Fax	(219) 647-5663
E-mail	favenhuizen@nisource.com		
Is there a reliability-related need for an Organization Standard to be developed on this topic?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The scope of the SAR is fine as it is			
<input checked="" type="checkbox"/> The scope of the SAR should be expanded to include: specific reliability-based rules governing tagging energy to exactly match energy flow (i.e. not allowing "gaming" the integrated MW-value for the hour).			

