

Background

The Coordinate Interchange Standard Drafting Team thanks all those who submitted comments with the second posting of the standard. The Coordinate Interchange Standard was posted for its second public comment period from 9/1/05 - 10/15/05.

There were 19 sets of comments, including comments from 58 different people; 5 of the 9 Industry Segments; and 8 of the 9 NERC Regions as shown in the table on the following pages. You can view the comments in their original format at:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Coord_Int_D2_Comments.pdf

This document is organized to show each of the questions that asked during the second posting of the proposed standards, followed by the comments provided in response to that question, with the drafting team's consideration of each comment in blue text immediately following each comment.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual:
<http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

Legend:

Groups that submitted comments:
 (G1) Southern Company Generation
 (G2) Midwest Reliability Organization
 (G3) FRCC
 (G4) Southern Company Services
 (G5) SPP Operating Reliability Working Group
 (G6) NPCC CP9
 (G7) Tennessee Valley Authority

Industry Segments:

1 - Transmission Owners
 2 - RTOs, ISOs, Regional Reliability Councils
 3 - Load-serving Entities
 4 - Transmission-dependent Utilities
 5 - Electric Generators
 6 - Electricity Brokers, Aggregators, and Marketers
 7 - Large Electricity End Users
 8 - Small Electricity End Users
 9 - Federal, State, Provincial Regulatory or other Gv't Entities

Commenter	Organization	Industry Segment								
		1	2	3	4	5	6	7	8	9
Mike Anderson (G5)	AEP	X								
Ken Goldsmith (G2)	ALT		X							
Kristy Humphrey	BPA Power Business Line									X
Shirley Buckmier	BPA Transmission	X								
Jeff Baker	Cinergy	X								
Ed Davis	Entergy Services	X								
Melinda Montgomery	Entergy Services	X								
Ray Morella	FirstEnergy Corp	X								
Eric Senkowicz (G3)	FRCC		X							
Linda Campbell (G3)	FRCC		X							
Steve McCoy (G3)	FRCC		X							
Phil Winston (G4)	Georgia Power Company			X						
Ron Falsetti	IESO		X							
John Simonelli	ISO New England		X							
Kathleen Goodman (G6)	ISO-New England		X							
Mike Gammon	KCP&L	X								
Dennis Florom (G2)	LES		X							

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John Horakh	MAAC		X							
Tom Mielnik (G2)	MEC		X							
Robert Coish (G2)	MHEB		X							
Joe Knight (G2)	MRO		X							
Terry Bilke (G2)	MRO		X							
Guy Zito (G6)	NPCC		X							
Al Boesch (G2)	NPPD		X							
Al Adamson (G6)	NYSRC		X							
Don Hargrove (G5)	OG&E	X								
Pete Kuebeck (G5)	OG&E	X								
Todd Gosnell (G2)	OPPD		X							
Robert Williams	PacifiCorp	X								
Bill Nolte (G5)	SECI	X								
Carter Edge	SEPA					X	X			
Clifford Shepard (G1)	Southern Co Generation						X			
Roger Green (G1)	Southern Co Generation						X			
Roman Carter (G1)	Southern Co Generation						X			
Tom Higgins (G1)	Southern Co Generation									
Wayne Moore (G1)	Southern Co Generation						X			
Doug McLaughlin (G4)	Southern Co Services	X								
Jim Busbin (G4)	Southern Co Services	X								
Jim Griffith (G4)	Southern Co Services	X								
Jim Viikinsalo (G4)	Southern Co Services	X								
Keith Calhoun (G4)	Southern Co Services	X								

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Marc Butts (G4)	Southern Co Services	X								
Mike Oatts (G4)	Southern Co Services	X								
Raymond Vice (G4)	Southern Co Services	X								
Wade Pugh (G4)	Southern Co Services	X								
Terry Crawley (G1)	Southern Nuclear				X					
Wayne Guttormson (G2)	SPC		X							
Robert Rhodes (G5)	SPP		X							
Bob Cochran (G5)	SPS	X								
Mike Pfeister	SRP	X								
Alan Gale (G3)	TAL					X				
Kathleen A. Davis (G7)	TVA	X								
Rocky Roberts (G7)	TVA	X								
Larry Goins (G7)	TVA	X								
Randy Haynes (G7)	TVA	X								
Darrick Moe (G2)	WAPA		X							
Allen Klassen (G5)	Westar	X								
Jim Maenner (G2)	WPS		X							

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Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

1. Do you agree that the TSP should be responsible for INT-006 R1.2?

Commenters	Agree?	Comments
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1. Do you agree that the TSP should be responsible for INT-006 R1.2?

Summary Consideration: Most commenters agreed with the drafting team that the TSP should be responsible for INT-006 R1.2.

Most stakeholders who did not agree with assigning the responsibility to the TSP, cited the Functional Model as the reference for assignment of tasks. The drafting team’s intent was to modify the standards so they could be implemented without modification to the systems in place in ‘today’s world’. In ‘today’s world’, the TSP **does** perform this function. The drafting team agrees with the dissenting comments that the Functional Model does not assign this task to the TSP – the latest approved version of the Functional Model assigns this task to the Reliability Authority (not the TOP). Page 12 of the Functional Model includes the following as part of the description of the tasks assigned to the Reliability Authority:

4. Receives Interchange Transactions from Interchange Authorities for reliability analysis.

NPCC CP9, Reliability Standards Working Group (G6) ISO – NE John Simonelli	No No	ISO New England believes that the TSP is more aligned with the commercial aspects of transmission service, e.g., the computation of forward looking TTC and ATC, the sale of transmission service, etc. Based on our understanding of the latest version of the functional model, the TSP should be involved in the NAESB standard as part of commercial approval process. The reliability aspect of transmission system falls on the TOP who is responsible for operation of the grid. We believe the TOP should be the entity performing the reliability assessment of transmission system as part of transaction validation.
<p>Response: The TOP may set the limits, but the TSP is responsible for conducting the assessment to verify that the Arranged Interchange will not exceed those limits through its normal service posting and approval process. In real time, reliability entities (including the TOP) has responsibility for monitoring the status of the transmission system to determine if limits are exceeded. Please see the summary consideration for the response to the comment regarding the functional model.</p>		
IESO, Ontario Ron Falsetti	No	Although the IESO does not deal with this issue per se since transmission access is available for any transaction that clears the IESO market we disagree with this assignment to the TSP. It is the IESO’s view the task of ensuring transmission system limits are not violated, resides with the TOP through its approval of the transaction. The TSP, as part of the NAESB business standard, should be responsible for ensuring transmission service is sold up to the ATC limit and to confirm the transaction number is valid.
<p>Response: Selling is addressed by the NAESB BP, but scheduling needs to be addressed by NERC standards – as well as verifying that the</p>		

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1. Do you agree that the TSP should be responsible for INT-006 R1.2?

Commenters	Agree?	Comments
<p>limits won't be exceeded. In real time, reliability entities (including the TOP) has responsibility for monitoring the status of the transmission system to determine if limits are exceeded.</p>		
<p>SPP Operating Reliability Working Group (G5)</p>	<p>Yes</p>	<p>The intent of this change is to make the standard right with 'today's world' when in fact today's world may not be where we need to be. In today's world the TSP makes a validation check to ensure that the proposed interchange is consistent with the service that was sold. When the transmission service was sold to support this interchange, no transmission system limit violations were anticipated or else the service would not have been sold. However, this occurred sometime in the past and system conditions have more than likely changed since then. A true reliability assessment of whether the interchange should be allowed to be implemented now is a much more rigorous analysis than the current validation. The question for the SDT is does the industry want a true reliability assessment or are we satisfied with the current validation check.</p>
<p>Response: The reliability assessment is time-dependent and this standard addresses an assessment that takes place before the interchange is implemented, therefore it is doing a true reliability assessment for the appropriate time frame. A true reliability assessment requires consideration of all interchange, not individual interchanges; this process allows a wide area view in addition to a local view of reliability. Note that there are other standards that require real-time assessments.</p>		
<p>Tennessee Valley Authority (G7)</p>	<p>Yes</p>	<p>in R1.2 the word "system" should be replaced with the word "scheduling" to clear up any confusion</p>
<p>Response: System is the correct word; scheduling limits you to a path – the intent is to look at the entire system.</p>		
<p>PacifiCorp Robert Williams</p>	<p>Yes</p>	<p>The TSP is currently responsible for this task in the WECC. The Reliability Coordinator does not have the ability to perform the task. This change in the standard aligns more with current practices.</p>
<p>Response: Thank you for your comment.</p>		
<p>MAAC John Horakh</p>	<p>Yes</p>	
<p>SRP Mike Pfeister</p>	<p>Yes</p>	
<p>Southern Company Generation (G1)</p>	<p>Yes</p>	

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1. Do you agree that the TSP should be responsible for INT-006 R1.2?

Commenters	Agree?	Comments
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Midwest Reliability Organization (G2)	Yes	
Entergy Services Melinda Montgomery	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

2. Do you agree with the requirements and measures in INT-005?

Commenters	Agree?	Comments
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2. Do you agree with the requirements and measures in INT-005?

Summary Consideration: Most commenters agreed with the requirements and measures in INT-005. Some commenters were concerned that equipment outages or other extenuating circumstances may automatically cause an entity to be non-compliant. To prevent this, the drafting team added the following footnote to the levels of non-compliance:

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

IESO, Ontario Ron Falsetti	No	The IESO has concerns with the < 1 minute time frame referred to in column A in the Timing Table. Although no reference could be found, we assume that the intention is to perform this process electronically. In the event of a computer hardware/software problem that results in a delay of greater than 1 minute the requirement as written would render an entity non-compliant due to its inability to manually distribute the arranged Interchanges in such a short time.
<p>Response: Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification.</p>		
Entergy Services Melinda Montgomery	No	<ol style="list-style-type: none"> 1. Question: What happens if the IA fails to meet the requirement to distribute the interchange to all parties within the prescribed time? Does the IA try again? Does the interchange just get dropped (become dead). 2. Throughout the coordinate interchange standards, definitions for terms used in the NERC standards and the NAESB Business Practices should be the same. If the NERC term needs to have a different definition, perhaps it should be a different term. For this standard the defined term Confirmed Interchange should be the NAESB defined term. Conversely, if the NAESB term is changed to match the NERC definition, the definition of both terms should include the phrase “has been reviewed and approved by all required entities with approval rights.” 3. R1-Include who the “reliability entities involved in the transaction” are for clarity. The NAESB business practice includes a term called Approval Entity that includes TSPs, Bas and the PSEs involved in the transaction. TOPs and Scheduling Entities should also be included as an involved reliability entity. 4. M1-What would constitute evidence that the sink BA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward,

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2. Do you agree with the requirements and measures in INT-005?

Commenters	Agree?	Comments
		<p>I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled complaints from customers that I failed to meet standard INT-005, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the IA failed to send the transaction to the required entities in the required time must be created. Details of what information that record must contain should be provided.</p>
<p>Response:</p> <ol style="list-style-type: none"> The expectation is that the IA will continue with the process by distributing the Arranged Interchange for reliability consideration under INT-006. The fact that the IA missed the 1 minute deadline doesn't necessarily halt the process. The teams have been making a good faith effort to keep the definitions in alignment with one another. This standard is limited to requirements needed to support reliability. Distributions to entities that need the information for business reasons should be addressed in the NAESB BP. The reliability assessment is assigned to the TSP, not the TOP, therefore the TOP does not have a reliability-related need to be a recipient at this point in the process. The term, 'scheduling entity' is not a function for which NERC is writing reliability requirements. If the scheduling entity is performing a reliability task for the BA, then the BA is still responsible for ensuring that the task is accomplished, even though the BA is allowed to delegate the task to the scheduling entity. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service. 		
<p>ISO – NE John Simonelli</p>	<p>No</p>	<p>ISO New England believes that the data validation items which are prescribed in the INT-007 standard are more suitable to be included in the INT-005 standard. The Arranged Interchange should not be distributed for reliability assessment unless the fundamental data within the RFI is validated. However, these validations must be automated in order to be performed in the timeline shown in Table A. In addition, the new registry must be designed to accommodate the specific validation requirements from the IA.</p>
<p>Response: Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.4 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.</p>		
<p>MAAC</p>	<p>Yes</p>	

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2. Do you agree with the requirements and measures in INT-005?

Commenters	Agree?	Comments
John Horakh		
SRP Mike Pfeister	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Midwest Reliability Organization (G2)	Yes	
NPCC CP9, Reliability Standards Working Group (G6)	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	

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2. Do you agree with the requirements and measures in INT-005?

Commenters	Agree?	Comments
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

3. Do you agree with the compliance in INT-005?

Commenters	Agree?	Comments
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3. Do you agree with the compliance in INT-005?

Summary Consideration: Most commenters agreed with the compliance in INT-005, however, based on comments received on the requirements and measures, the drafting team modified the levels of non-compliance by adding the following footnote to exclude instances where Arranged Interchange information wasn't distributed due to extenuating circumstances:

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

NPCC CP9, Reliability Standards Working Group (G6)	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time
ISO – NE John Simonelli	Yes No	Due to comments on the standards, we cannot comment on the compliance items at this time
Midwest Reliability Organization (G2)	No	<p>This standard is applicable to a yet to be defined entity called the Interchange Authority. There are some statements in the supporting documents that this is the sink until it is determined who or what the IA is. If the sink is responsible, why make things confusing? The sink BA can always delegate the task to another entity (or the standard can be revised) if one evolves. This standard, as well as the others in this set, appear to allow ad hoc audits of up to 3 months' RFIs to look for cases where an entity didn't get a request on time or failed to implement a schedule properly. Every standard in this set has the same levels of non-compliance (level 1 for 1 missing, level 2 for 2 missing, etc.) with no regard to MW amount or impact on frequency or security. This appears to be pulled out of the air as opposed to being based on analysis of history or true impact on reliability. Since the Interconnections are months behind in energy accounting, there must be cases of schedules not being communicated entirely. Level 3 and 4 compliance violations should be reserved for things that have significant impact on reliability.</p> <p>We are also concerned that this standard requires expeditious processing of a form adopted and managed by another standards-setting organization. What safeguards are in place to ensure the industry has the infrastructure in place to process "new and improved" versions of the RFI?</p>

Response: As explained in the reference document, in today's world, the 'sink BA' is the IA. The drafting team added an element to the Implementation Plan to address registration of Interchange Authorities.

The drafting team did consider other ways of determining levels of non-compliance including MW level, and percentage of activity, but settled on the incident recognizing that any single incident can have an adverse impact on reliability. Most commenters seemed to agree with this.

While there is no guarantee that NAESB won't change its business practices, there is a 'joint' group (Joint Interchange Scheduling Work Group)

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

3. Do you agree with the compliance in INT-005?

Commenters	Agree?	Comments
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that provides coordination to standards developed by both NERC and NAESB.

<p>Entergy Services Melinda Montgomery</p>	<p>No</p>	<p>1. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.</p> <p>2. Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to distribute the interchange to the required parties, or is the self-certification based upon the most recent 3 months of data? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.</p> <p>3. I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.</p> <p>4. Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to IA failure, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.</p> <p>5. There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.</p> <p>6. The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 1 minute outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag authority, which is that the tag authority must be available 99.5% of the time each month. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: IA experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: IA experienced an unplanned outage in excess of 2 hours AND more than 20</p>
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3. Do you agree with the compliance in INT-005?

Commenters	Agree?	Comments
		<p>transactions were affected.</p> <p>7. The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.</p>
<p>Response:</p> <p>1. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check 'may' be conducted – they are not required.</p> <p>2. Self-certification in 1.4 is for the 1st time the entity commences operation or the 1st year the standard is in place. The details of the self-certification will be established by the Compliance Monitor.</p> <p>3. This standard does not address systems and tools and requiring self-certification for systems and tools is outside the scope of this standard.</p> <p>4. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service.</p> <p>5. Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification.</p> <p>6. The requirements in this standard are not linked to equipment performance, and levels of non-compliance need to be linked to the requirements.</p> <p>7. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the entire period before being reset.</p>		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

3. Do you agree with the compliance in INT-005?

Commenters	Agree?	Comments
Line Kristy Humphrey		
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

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4. Do you agree with the requirements and measures in INT-006?

Commenters	Agree?	Comments
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4. Do you agree with the requirements and measures in INT-006?

Summary Consideration: Several commenters suggested that some of the details in the V0 INT-002 recommended for deletion should be retained and moved into the verifications assigned to the BA and TSP under INT-006 and removed from INT-007. Based on these comments, the drafting team enhanced the BA's verification requirement by adding the following to its list of BA verifications:

- Energy profile (ability to support the magnitude of the transaction).
- Ramp (ability of generation maneuverability to accommodate).
- Scheduling path (proper connectivity of adjacent Balancing Authorities).

The TSP's verification requirement was modified by adding a requirement to verify that there is adjacent Transmission Service Provider connectivity.

SRP Mike Pfeister	No	The reliability assessment period for WECC should be at least 10 minutes; the same as all other interconnections. There does not appear to be a reliability related reason to prescribe less assessment time for WECC.
Response: Commenters indicated that WECC currently has a 20 minute ramp, and the 5 minute requirement facilitates keeping this process in place without change.		
IESO, Ontario Ron Falsetti	No	The BA should be reviewing at least ramp, transaction start/stop and energy profile.
Response: The start and stop times are implied in the ramp – the energy profile was added to the standard as suggested.		
NPCC CP9, Reliability Standards Working Group (G6)	No	<ol style="list-style-type: none"> 1. See previous comments regarding the TSP and TOP concerns. Confirming transmission service arrangements are not within the scope of the reliability assessment. 2. The BA should be reviewing more than ramp; transaction start/stop and energy profile were previously part of INT-002 and have been deleted. 3. The phrase in Requirement 1.2 that indicates that approval of Arranged Interchange confirms 'prevailing transmission system limits will not be violated' should be discussed relative to current business practices throughout the industry. If there are there entities that today approve e-Tags up front and then re-consider them prior to real-time to meet

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

4. Do you agree with the requirements and measures in INT-006?

Commenters	Agree?	Comments
		system limits, this requirement should be modified.
<p>Response:</p> <ol style="list-style-type: none"> The TOP may set the limits, but the TSP is responsible for conducting the assessment to verify that the Arranged Interchange will not exceed those limits through its normal service posting and approval process. In real time, reliability entities (including the TOP) have responsibility for monitoring the status of the transmission system to determine if limits are exceeded. The start and stop times are implied in the ramp – the energy profile was added to the list of BA verifications as suggested. The prevailing limit against which the Arranged Interchange is being considered is up to the discretion of the approver. The standard doesn't preclude this. The comment concerning reconsidering a tag, as stated, pertains to a curtailment, not an Arranged Transaction. In real time, reliability entities (including the TOP) have responsibility for monitoring the status of the transmission system to determine if limits are exceeded. 		
<p>Entergy Services Melinda Montgomery</p>	<p>No</p>	<ol style="list-style-type: none"> Throughout the coordinate interchange standards, definitions for terms used in the NERC standards and the NAESB Business Practices should be the same. If the NERC term needs to have a different definition, perhaps it should be a different term. For this standard the defined term Confirmed Interchange should be the NAESB defined term. Conversely, if the NAESB term is changed to match the NERC definition, the definition of both terms should include the phrase “has been reviewed and approved by all required entities with approval rights.” The TSP and the BA are limited in their approval criteria from those in the version 0 standards, presumably because the IA is performing those functions. This is a departure from the way these functions are performed today. The IA does not know the loss provision requirements of each TSP included on the tag, nor do they know all the interconnections for each TSP and BA to test for contiguousness of the transmission and scheduling entity arrangements for each transaction. These are properly the responsibility of the TSPs and BAs on the tag. Therefore, I suggest adding back the deleted language in R1 (by acknowledging that the Arranged Interchange is acceptable and reliable with respect to their functional responsibilities), adding to R1.1 verification of scheduling path and adding to R1.2, connectivity of adjacent TSPs and adequacy of loss accounting provided. Also, the Transmission Operator should be the one to evaluate the tag to ensure that the transaction will not violate prevailing system limits. The TSP is evaluating the tag to ensure that the transmission reservation information is appropriate to the tag, and that losses are supplied, if required. M1-What would constitute evidence that the BA and TSP for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

4. Do you agree with the requirements and measures in INT-006?

Commenters	Agree?	Comments
		<p>the approval entities in any reporting form. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled complaints from customers that I failed to meet standard INT-006, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the BA or TSP failed to respond to the IA request must be created. Details of what information that record must contain should be included.</p> <p>4. The creation of reports and records of instances when we failed to meet this standard is not something that has been done to this point, and there would be time needed to develop the tools needed to show that an entity meets this standard. This is not consistent with the implementation plan which indicates that compliance with this standard is already an expectation and that no time is needed to comply with the standard.</p>
<p>Response:</p> <ol style="list-style-type: none"> The teams have been making a good faith effort to keep the definitions in alignment with one another. Loss provision requirements are not in the scope of this reliability standard. Loss provision requirements are addressed within NAESB Business Practice and open access tariffs. The requirement to have the BAs check for Adjacent BA connectivity was added to the standard as INT-006 R1.1.3. The intent of your suggestions (verifying scheduling path and connectivity) was adopted - please see the revised standard. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service. The standard does not require the creation of reports and records of instances when entities fail to meet the standard. 		
<p>ISO – NE John Simonelli</p>	<p>No</p>	<ol style="list-style-type: none"> Please see note on Question 1 regarding the use of TSP vs. TOP. Requirement 1.2 should be rephrased to eliminate the reference to “confirming transmission service arrangements”. The validation of the transmission service arrangements should occur on the commercial side before the RFI is submitted as an Arranged Interchange for a reliability assessment. The BA should be looking at the previous requirements defined in INT-002 R3. R3.1. Transaction start and end time. R3.2. Energy profile (ability to support the magnitude of the transaction). R3.3. Ramp (ability of generation maneuverability to accommodate).

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

4. Do you agree with the requirements and measures in INT-006?

Commenters	Agree?	Comments
		<p>3. The phrase in Requirement 1.2 that indicates that approval of Arranged Interchange confirms 'prevailing transmission system limits will not be violated' should be reconsidered. We recognize that this requirement is consistent with the current standard. However, various business practices for both physical and financial systems may currently allow approval of a tag (when submission time is well in advance of a start time) regardless of the system limits. Nevertheless, all Tags are re-evaluated an hour prior to the start in order to determine real time conditions of the system and which Tags will flow and which tags are curtailed. We believe this practice should be allowed to continue – in which case this requirement needs to be rephrased.</p>
<p>Response:</p> <p>1. The TOP may set the limits, but the TSP is responsible for conducting the assessment to verify that the Arranged Interchange will not exceed those limits through its normal service posting and approval process. In real time, reliability entities (including the TOP) have responsibility for monitoring the status of the transmission system to determine if limits are exceeded. Please see the summary consideration for the response to the comment regarding the functional model.</p> <p>2. The start and stop times are implied in the ramp – the energy profile was added to the list of BA verifications as suggested.</p> <p>3. The drafting team recommended that the BA to BA checkout remain in place when the new INT standards are implemented.</p>		
Midwest Reliability Organization (G2)	Yes	See earlier comments on Interchange Authority.
<p>Response: See response to earlier comments.</p>		
SPP Operating Reliability Working Group (G5)	Yes	Refer to the comment provided in Question 1.
<p>Response: See response to comment on Question 1.</p>		
MAAC John Horakh	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

4. Do you agree with the requirements and measures in INT-006?

Commenters	Agree?	Comments
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

5. Do you agree with the compliance in INT-006?

Commenters	Agree?	Comments
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5. Do you agree with the compliance in INT-006?

Summary Consideration: Most commenters agreed with the compliance in INT-006, however, based on comments received on the requirements and measures, the drafting team modified the levels of non-compliance by adding the following footnote to exclude instances where a response wasn't provided due to extenuating circumstances:

¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

NPCC CP9, Reliability Standards Working Group (G6)	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time
ISO – NE John Simonelli	Yes No	Due to comments on the standards, we cannot comment on the compliance items at this time
SPP Operating Reliability Working Group (G5)	No	<p>We concur with the proposed compliance provided a historical record of approval status is available from the e-tag vendor and can be used as evidence that the BA and TSP responded as required.</p> <p>The formatting of the references to INT-005-1 R1 in 1.4.5 and 1.4.6 is not consistent.</p>
<p>Response: A historical record of approval status is available from the e-tag vendor and can be used as evidence.</p> <p>The format for cross referencing standards was established by the Director-Standards. We've asked him to post it for review.</p>		
Entergy Services Melinda Montgomery	No	<p>1. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TSP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the BA or TSP complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.</p> <p>2. The initial self-certification seems to be necessary in INT-005 because the IA is not an entity that is certified today. However, the BA is, and will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4.</p> <p>3. Rather than require all data and system logs (which the BAs and TSPs currently do not have) be made available for inspection (which would be a lot of data for three months), require</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

5. Do you agree with the compliance in INT-006?

Commenters	Agree?	Comments
		<p>them to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to BA or TSP failure to approve, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.</p> <p>4. There should be a way for the BA/TSP or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.</p> <p>5. The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 10 minute outage of the entity's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the entity had gotten its act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag approval service, which is that the tag approval service must not have more than 1% of its tags for a month in the COMM_Fail state. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: Entity experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: Entity experienced an unplanned outage in excess of 2 hours AND more than 20 transactions were affected...</p> <p>6. The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.</p>
<p>Response:</p> <ol style="list-style-type: none"> 1. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check 'may' be conducted – they are not required. 2. The list of entities that register as Balancing Authorities and Transmission Service Providers may not remain stagnant; therefore, the requirement to self-certify the first year the entity commences operation is appropriate. 3. The data retention was modified to require, 'relevant data and system logs'. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service. 4. Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification. 5. This standard does not address systems and tools so it would be inappropriate to link levels of non-compliance to system unavailability. 6. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the 		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

5. Do you agree with the compliance in INT-006?

Commenters	Agree?	Comments
entire period before being reset.		
Midwest Reliability Organization (G2)		See comments above regarding compliance for INT 005.
Response: Please see response to comments for INT-005.		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

5. Do you agree with the compliance in INT-006?

Commenters	Agree?	Comments
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

6. Do you agree with the requirements and measures in INT-007?

Commenters	Agree?	Comments
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6. Do you agree with the requirements and measures in INT-007?

Summary Consideration: Most commenters agreed with the requirements and measures in INT-007. The drafting team made the following minor changes:

- Changed the requirement to verify that Interchange is between registered BAs to require verification that all reliability entities involved in the Interchange are in the NERC registry.
- Moved the requirement to verify that there are contiguous transmission service arrangements from the generator source to the Load sink to INT-006

SRP Mike Pfeister	No	A requirement pertaining to the specified source's ability to accommodate should be added. Proposed - "R1.6 The specified source is available to supply megawatts at the magnitude and ramp rate documented in the Request For Interchange". This is important to ensure that the RFI is an accurate depiction of interchange from source to sink, which is key to calculate scheduled path flows in order to implement mitigation measures when appropriate.
Response: This is not a coordinate interchange reliability issue and is outside the scope of this set of standards.		
Midwest Reliability Organization (G2)	No	While the intent is fine and we agree with the need for balanced transactions, see earlier comments regarding Interchange Authority.
Response: Please see the response to earlier comments.		
IESO, Ontario Ron Falsetti	Yes No	<p>The IESO believes the data validations described in INT-007 should be performed before the Arranged Interchange is distributed for reliability assessment. This will eliminate the need for BA and TOP to do reliability assessments on Arranged Interchange that eventually will not be validated.</p> <p>We have concerns with the < 1 minute time frame referred to in column C in the Timing Table. Although no reference could be found, we assume that the intention is to perform this process electronically. In the event of a computer hardware/software problem that causes a delay of greater than 1 minute, the requirement as written would render an entity as non-compliant due to its inability to manually distribute Arranged Interchanges in such a short time.</p>
Response: Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.4 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

6. Do you agree with the requirements and measures in INT-007?

Commenters	Agree?	Comments
<p>Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification.</p>		
<p>ISO – NE John Simonelli</p>	<p>No</p>	<p>As commented in INT-005, we believe the data validations on the Arranged Interchange should be performed before the Arranged Interchange is distributed for reliability assessment. The scope of the INT-007 standard should describe the IA steps to compile the statuses from various reliability entities and generate the overall interchange status.</p> <p>In addition, the current prescribed Requirement 1.3 should be performed in the market based evaluation. However, as a reliability check, the IA should confirm that an Interchange is physically contiguous. T- A requirement should be added to INT-007 that defines how the IA should determine the overall interchange status when an entity with approval rights has not responded in accordance with Section C of the timing table. The current passive approval concept is not described in any standard.</p>
<p>Response: Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.4 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.</p> <p>Requirement 1.3 was moved to INT-006. If not approved explicitly or by prior agreement, then the Arranged Interchange is denied. Although the passive approval concept is not addressed in the standards, these standards do not preclude the use of the passive approval process. (See the CI Standard Reference Document for more details on passive approval.)</p>		
<p>NPCC CP9, Reliability Standards Working Group (G6)</p>	<p>No</p>	<p>- We believe the data validations described in INT-007 here should be performed before the Arranged Interchange is distributed for reliability assessment.</p> <p>-This standard does not address what would happen if any entity did not provide their response within the designated time.</p>
<p>Response: Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.4 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.</p> <p>If not approved explicitly or by prior agreement, then the Arranged Interchange is denied.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

6. Do you agree with the requirements and measures in INT-007?

Commenters	Agree?	Comments
Entergy Services Melinda Montgomery	No	<p>The implementation plan indicates that the IA will be, in essence, the sink BA for the transaction, acting as the tag authority, and that all of these functions are already being performed. The sink BA in the current tagging environment does not have the responsibility to check to ensure that appropriate losses are provided for each transmission provider, or that there are contiguous transmission service arrangements from the source to sink. The approval entities perform those necessary checks. The IA function should only check for R1.4, that required elements of the transaction are defined and R1.5, that all reliability entities have provided approval. The appropriate reliability entities should continue to perform the other checks as they do under current policy. Those sections of current policy should not be removed as proposed in the implementation plan. R 1.1, 1.2, and 1.3 should be deleted from this standard.</p> <p>M1-What would constitute evidence that the IA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the Balancing Authority to provide this evidence. Perhaps my evidence is a folder labeled times I failed to verify Arranged Interchange information, and the folder is empty. Is that sufficient? In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the IA failed to verify the Arranged Interchange information, must be created and retained. Details of what information that record must contain should be provided.</p>
<p>Response: R1.3 was moved to INT-006, but R1.1 and R1.2 were retained. These are actions that need to be performed by the IA. The drafting team believes that the existence of the data in R1 is retrievable data that could be used as 'evidence' that validation did/did not take place.</p>		
Tennessee Valley Authority (G7)	Yes	<p>R1.1 should be "less" losses R1.2 insert the word "adjacent" before Balancing Authority. Not sure what is meant by "registered" R1.4 Instead of the word "defined" use the word "verified" or "confirmed"</p>
<p>Response: The language was modified to use the phrase, ' . . . adjusted for losses'. The term, 'registered' means listed in the NERC Registry. Note that this requirement was expanded and applies to more than just 'Adjacent' BAs.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

6. Do you agree with the requirements and measures in INT-007?

Commenters	Agree?	Comments
The term, 'defined' is more appropriate than, 'verified' (which is in the leading sentence) or 'confirmed'.		
MAAC John Horakh	Yes	
Southern Company Generation (G1)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

6. Do you agree with the requirements and measures in INT-007?

Commenters	Agree?	Comments
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

7. Do you agree with the compliance in INT-007?

Commenters	Agree?	Comments
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7. Do you agree with the compliance in INT-007?

Summary Consideration: Most commenters agreed with the compliance in INT-007, however, based on comments received on the requirements and measures, the drafting team modified the levels of non-compliance by adding the following footnote to exclude instances where a verification wasn't provided due to extenuating circumstances:

¹ This does not include instances of not verifying due to extenuating circumstances approved by the Compliance Monitor.

Midwest Reliability Organization (G2)	No	See comments above regarding compliance for INT 005.
Response: See response to comments regarding compliance for INT-005.		
NPCC CP9, Reliability Standards Working Group (G6)	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time
Response: See response to comments on requirements for INT-005.		
Entergy Services Melinda Montgomery	No	<p>1. Question: What does a failure of this measure look like? How can an observer tell that a transaction was not verified, that the required elements were defined, and all entities approved? Is the outcome that a flawed or unapproved tag becomes Confirmed Interchange? Or could the failure, look just like any other valid, approved tag, which was not properly evaluated, but would have passed the evaluation had it occurred? If so, this may be a difficult measure to implement.</p> <p>2. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.</p> <p>3. Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to verify arranged interchange data, or is the self-certification based upon the most recent 3 months of data showing that the verification was performed? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.</p> <p>I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

7. Do you agree with the compliance in INT-007?

Commenters	Agree?	Comments
		<p>quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.</p> <p>4. Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that the IA failed to verify based upon the requirements of this standard, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.</p> <p>5. There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.</p> <p>6. The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, any outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The levels of non-compliance should be include an element of time, and one of tags impacted, as suggested for some other standards.</p> <p>7. The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.</p>
<p>Response:</p> <p>1. Information needed for the measure should be retrievable through the E-Tag system.</p> <p>2. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check 'may' be conducted – they are not required.</p> <p>3. Self-certification in 1.4 is for the 1st time the entity commences operation or the 1st year the standard is in place. The details of the self-certification will be established by the Compliance Monitor. This standard does not address systems and processes and requiring self-certification for systems and tools is outside the scope of this standard.</p> <p>4. The current tagging system includes the required information.</p> <p>5 and 6. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification.</p> <p>7. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the entire period before being reset.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

7. Do you agree with the compliance in INT-007?

Commenters	Agree?	Comments
SRP Mike Pfeister	Yes No	
ISO – NE John Simonelli	Yes No	
MAAC John Horakh	Yes	
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

7. Do you agree with the compliance in INT-007?

Commenters	Agree?	Comments
Ed Davis		
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

8. Do you agree with the requirements and measures in INT-008?

Commenters	Agree?	Comments
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8. Do you agree with the requirements and measures in INT-008?

Summary Consideration: Most commenters agreed with the requirements and measures in INT-008, however based on stakeholder comments, the drafting team modified the requirement to clarify that the final status must be communicated for instances when the Arranged Interchange is denied as well as instances where the Arranged Interchange is approved.

<p>IESO, Ontario Ron Falsetti</p>	<p>No</p>	<p>The IESO recommends changing the title to "Interchange Authority Compiles and Distributes Status" (consistent with the title of Column C in the Timing Table) – which would incorporate the remaining scope of INT-007.</p> <p>The Measures in this standard define actions that must be performed that have not been outlined in the requirements section, such as notification of transaction denial. Measures should be asking for evidence that the requirements have been met, not defining additional requirements.</p> <p>We have concerns with the < 1 minute time frame referred to in column C in the Timing Table. pliant See comment above</p>
<p>Response: The suggested title is not applicable since the IA is not compiling data in this standard, just communicating the status. The drafting team changed the title to, 'Interchange Authority Distributes Status.'</p> <p>R1 was modified to specify that entities must be notified, "... whether or not the Arranged Interchange has transitioned to a Confirmed Interchange." Now the measures link with the requirements.</p> <p>Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification.</p>		
<p>ISO – NE John Simonelli</p>	<p>No</p>	<p>The text of Requirement 1 should be modified to describe the general action of the IA when distributing the final status of the Interchange.</p> <p>~ Requirement 1.1 should define what to distribute, and to who, for a Confirmed Interchange. The TOP and RC must also be notified of a transaction that has transitioned to a Confirmed Interchange.</p> <p>A new Requirement 1.2 should be added to define what to distribute, and to who, for a denied interchange. The current measures in this standard describe that the IA must notify parties if the overall status is not confirmed, however this action is not described in the current requirement.</p> <p>~ Measure 1.1 contains additional requirements for distribution of a Confirmed Interchange related to DC ties that is not originally mentioned in the Requirements section. The measures section should ask the entity to provide evidence that the requirements have been met, not define additional requirements.</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

8. Do you agree with the requirements and measures in INT-008?

Commenters	Agree?	Comments
<p>Response: The standard was modified to clarify that the status must be communicated when the Arranged Interchange is denied as well as when it is approved. The RC and TOP will get this information as they do today, through the Reliability analysis service.</p>		
<p>NPCC CP9, Reliability Standards Working Group (G6)</p>	<p>No</p>	<p>- We recommend changing the title to "Interchange Authority Compiles and Distributes Status" (consistent with the title of Column C in the Timing Table) – which would incorporate the remaining scope of INT-007. - The Measures in this standard define actions that must be performed that have not been mentioned in the requirements section. Such as notification of transaction denial and special notification regarding DC ties. Measures should be asking for evidence that the requirements have been met, not defining additional requirements.</p>
<p>Response: The suggested title is not applicable since the IA is not compiling data in this standard, just communicating the status. The drafting team changed the title to, 'Interchange Authority Distributes Status.' R1 was modified to specify that entities must be notified, "... whether or not the Arranged Interchange has transitioned to a Confirmed Interchange." Now the measures link with the requirements.</p>		
<p>Midwest Reliability Organization (G2)</p>	<p>No</p>	<p>While we agree with the need for sink and source BA coordination, see earlier comments regarding the Interchange Authority.</p>
<p>Response: Please see the response to earlier comments.</p>		
<p>Entergy Services Melinda Montgomery</p>	<p>No</p>	<p>Question: What happens if the IA fails to meet the requirement to distribute the confirmed interchange to all parties within the prescribed time? Does the IA try again? Does the interchange just get dropped (become dead). What does a failure of the IA to meet this standard look like? ~ TOPs and Scheduling Entities should also be included as an involved reliability entity to which the Confirmed Interchange is distributed. M1-What would constitute evidence that the sink BA for the transaction performed the requirement? Entergy contracts with a third party to provide the tag authority function today. I am not aware that we have access to statistics or data related to performance of the vendor. While it may be assumed that this data would be made available if this standard goes forward, I do not know that there is a mechanism in place today for the IA to provide this evidence. In an attempt to avoid references to the tools currently in place, this standard, and the other interchange standards proposed appear to be reverting to vague language. To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the IA failed to send the confirmed interchange to</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

8. Do you agree with the requirements and measures in INT-008?

Commenters	Agree?	Comments
		the required entities in the required time must be created. Details of what information that record must contain should be provided.
<p>Response: If the final status is not distributed, then the Arranged Interchange is denied.</p> <p>The RC and TOP will get this information as they do today, through the Reliability analysis service. Scheduling Entities are not recognized as 'functions' under the Functional Model and requirements are not being written for them.</p> <p>The current tagging system includes the required information needed for M1.</p>		
Tennessee Valley Authority (G7)	Yes	R1 should be rewritten and simplified. It'd hard to understand it's meaning.
Response: Although R1 is a long sentence, it does seem to be understandable.		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
Southern Company Generation (G1)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Company Services (G4)	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

8. Do you agree with the requirements and measures in INT-008?

Commenters	Agree?	Comments
FRCC (G3)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

9. Do you agree with the compliance in INT-008?

Commenters	Agree?	Comments
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9. Do you agree with the compliance in INT-008?

Summary Consideration: Most commenters agreed with the compliance in INT-008, however, based on comments received on the requirements and measures, the drafting team modified the levels of non-compliance by adding the following footnote to exclude instances where the final status wasn't distributed due to extenuating circumstances:

¹ This does not include instances of not distributing final status due to extenuating circumstances approved by the Compliance Monitor.

Midwest Reliability Organization (G2)	NO	See comments above regarding compliance for INT 005.
Response: Please see the response to comments regarding compliance for INT-005.		
Entergy Services Melinda Montgomery	No	<p>1. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the IA to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the IA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.</p> <p>2. Clarify that the self-certification in 1.4 is for the first time that an entity is certified as an IA, not as an on-going annual self-certification such as is done with some of the other standards. Is the entity self-certifying based upon having the process in place to distribute the interchange to the required parties, or is the self-certification based upon the most recent 3 months of data? I think it is based upon having a process and the necessary systems in place to perform the function, but I am not sure that matches up with M1.</p> <p>I propose the following change to 1.4: Each IA shall demonstrate compliance within 1 calendar quarter after the standard becomes effective by self-certifying that they have the systems and processes in place to meet this standard. An entity that elects to become an IA after the standard is in effect should self-certify prior to commencing operation as an IA that they have the systems and processes in place to meet this standard.</p> <p>3. Rather than require all data and system logs (which the sink BA acting as the IA currently does not have) be made available for inspection (which would be a lot of data for three months), require the IA to provide a report as a part of the quarterly self-certification that details the interchange that went to a DEAD state due to IA failure, including the proposed start time for the ramp, the time received, the time sent, and an explanation of why the failure occurred.</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

9. Do you agree with the compliance in INT-008?

Commenters	Agree?	Comments
		<p>4. There should be a way for the IA or its service provider to take the system down for planned maintenance, without incurring a non-compliance. There should be some means for an outage that is properly noticed to the industry to not count as a non-compliance.</p> <p>5. The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. The way it is currently written, even a 1 minute outage of the IA's system would result in a non-compliance, and would require an audit if a complaint was provided, and another audit the next year to ensure that the IA had gotten his act together. The current Appendix B of the NAESB interchange business practice contains a much more lenient measure for the tag authority, which is that the tag authority must be available 99.5% of the time each month. I suggest that we set up the levels of non-compliance based upon some amount of time each month that service is unavailable, and the number of transactions affected. Level 1: IA experienced an unplanned outage in excess of 1 hour AND more than 10 transactions were affected. Level 2: IA experienced an unplanned outage in excess of 2 hours AND more than 20 transactions were affected...</p> <p>6. The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.</p>
<p>Response:</p> <p>1. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check, 'may' be conducted – they are not required.</p> <p>2. Self-certification in 1.4 is for the 1st time the entity commences operation or the 1st year the standard is in place. The details of the self-certification will be established by the Compliance Monitor. This standard does not address systems and processes and requiring self-certification for systems and tools is outside the scope of this standard.</p> <p>3. E-tag collects this information under distribution status.</p> <p>4 and 5. Stakeholders indicated they wanted a definite time constraint associated with this task. If there are extenuating circumstances, such as a computer problem, the expectation is that the compliance monitor would make allowances. If the compliance monitors findings are deemed unfair, then there is an appeals process. Note that the drafting team added a footnote to the standard to make this clarification. Note that modifying the levels of non-compliance to address system unavailability is not linked to the requirements.</p> <p>6. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the entire period before being reset.</p>		
ISO – NE John Simonelli	Yes No	Due to comments on the standards, we cannot comment on the compliance items at this time.
NPCC CP9, Reliability	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

9. Do you agree with the compliance in INT-008?

Commenters	Agree?	Comments
Standards Working Group (G6)		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

9. Do you agree with the compliance in INT-008?

Commenters	Agree?	Comments
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

10. Do you agree with the requirements and measures in INT-009?

Commenters	Agree?	Comments
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10. Do you agree with the requirements and measures in INT-009?

Summary Consideration: Most commenters agreed with the requirements and measures in INT-009 and these were not changed.

ISO – NE John Simonelli	No	There should be additional clarification on the definition of Implemented Interchange. The definition provided in the Reference Document is "the state where the BA enters the Confirmed Interchange into its ACE equation". This definition seems to indicate that a Confirmed Interchange is converted hour-by-hour (or scheduling period-by-scheduling period) to an Implemented Interchange. Is this the correct interpretation, or is the entire Confirmed Interchange converted to an Implemented Interchange after the first hour of the transaction has begun to flow? This clarification is requested because the use of the term Implemented in the current e-Tag is applied to the entire e-Tag once the Tag has been approved by all entities.
Response: As soon as the BA first enters the Confirmed Interchange into its ACE equation, the entire interchange profile is implemented and this is called an 'Implemented Interchange'.		
NPCC CP9, Reliability Standards Working Group (G6)	Yes No	- We have a question on the definition of Implemented Interchange. Does the entire Confirmed Interchange become an Implemented Interchange after the first hour has been entered into the ACE? Or, are only the hours of the transaction that have flowed or are flowing considered an Implemented Interchange and the remaining hours of that transaction still a Confirmed Interchange? This question is asked because the use of the term "Implemented" in the current e-Tag is applied to the entire e-Tag once it has been approved by all entities
Response: As soon as the BA first enters the Confirmed Interchange into its ACE equation, the entire interchange profile is implemented and this is called an 'Implemented Interchange'.		
IESO, Ontario Ron Falsetti	Yes	We are requesting clarification regarding the definition of the term Implemented Interchange. Does the entree's Confirmed Interchange become an Implemented Interchange after the first hour has been entered into the ACE? Or, are only the hours of the transaction that have flowed or are flowing considered an Implemented Interchange and the remaining hours of that transaction still a Confirmed Interchange? This clarification is being requested because the use of the term "Implemented" in the current e-Tag is applied to the entire e-Tag once it has been approved by all entities.
Response: As soon as the BA first enters the Confirmed Interchange into its ACE equation, the entire interchange profile is implemented and this is called an 'Implemented Interchange'.		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

10. Do you agree with the requirements and measures in INT-009?

Commenters	Agree?	Comments
Entergy Services Melinda Montgomery	Yes	Although the language related to "evidence" is a bit vague, I believe that I understand how a Balancing Authority could demonstrate that it met the standard.
Response: Thank you for your comment.		
FRCC (G3)	Yes	It may be helpful if Measure M1.1 had more specific detail on what would be acceptable evidence that confirms implemented interchange matched confirmed interchanged.
Response: The E-Tag system collects data that can be used as evidence. In the future another system may replace the E-Tag system, so the drafting team declined to specifically reference the E-Tag system in the measures.		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Midwest Reliability Organization (G2)	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

10. Do you agree with the requirements and measures in INT-009?

Commenters	Agree?	Comments
Shirley Buckmier		
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

11. Do you agree with the compliance in INT-009?

Commenters	Agree?	Comments
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11. Do you agree with the compliance in INT-009?

Summary Consideration: Most commenters agreed with the compliance in INT-009, however, based on comments received on the requirements and measures, the drafting team modified the levels of non-compliance by adding the following footnote to exclude instances where the Confirmed Interchange wasn't implemented due to extenuating circumstances:

¹ This does not include instances of not implementing due to extenuating circumstances approved by the Compliance Monitor.

<p>Entergy Services Melinda Montgomery</p>	<p>No</p>	<p>1. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TSP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the BA complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner.</p> <p>2. The initial self-certification seems to be necessary in INT-005 because the IA is not an entity that is certified today. However, the BA is certified, and will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4.</p> <p>~ 3. Rather than require all data and system logs (which the BAs and TSPs currently do not have) be made available for inspection (which would be a lot of data for three months), require them to provide an exception report as a part of the quarterly self-certification that details the times for which the net confirmed interchange received from the IA did not equal the net scheduled interchange component of the entity's ACE, and an explanation of why the difference occurred. The compliance monitor will determine whether the difference represents an error (non-compliance) or an appropriate response to an emergency situation (emergency transaction implemented with other BA prior to tag being submitted to IA).</p> <p>~ 4. The levels of non-compliance do not seem appropriate in comparison to the impact on reliability. I suggest that the levels of non-compliance be based upon the impact upon the interconnected systems. For instance, Level 1: BA made scheduling error in the amount of 50 MW AND there was no noticeable effect upon the Interconnection. Level 2: BA made scheduling error in the amount of 100 MW or greater AND there was no noticeable effect upon</p>
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Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

11. Do you agree with the compliance in INT-009?

Commenters	Agree?	Comments
		<p>the Interconnection. Level 3: BA made scheduling error in the amount of 200 MW or greater AND there was minor impact on the Interconnection. Level 4: BA made scheduling error of greater than 250 MW OR there was noticeable negative impact on the Interconnection.</p> <p>5. The compliance reset period should be 1 calendar quarter with no violation. Reporting for more than a quarter does not make sense, since data is only kept for three months.</p>
<p>Response:</p> <p>1. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check, 'may' be conducted – they are not required.</p> <p>2. The list of entities that register as Balancing Authorities and Transmission Service Providers may not remain stagnant, therefore the requirement to self-certify the first year the entity commences operation is appropriate.</p> <p>3. The data retention was modified to require, 'relevant data and system logs'. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service.</p> <p>4. The drafting team couldn't technically substantiate any particular MW level selected for various levels of non-compliance.</p> <p>5. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the entire period before being reset.</p>		
Midwest Reliability Organization (G2)	No	See comments above regarding compliance for INT 005.
<p>Response: Please see the response to your comments on INT-005.</p>		
NPCC CP9, Reliability Standards Working Group (G6) ISO – NE John Simonelli	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time
<p>Response: Please see the response to your comments on the requirements.</p>		
MAAC John Horakh	Yes	
SRP	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

11. Do you agree with the compliance in INT-009?

Commenters	Agree?	Comments
Mike Pfeister		
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

11. Do you agree with the compliance in INT-009?

Commenters	Agree?	Comments
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

12. Do you agree with the requirements and measures in INT-010?

Commenters	Agree?	Comments
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12. Do you agree with the requirements and measures in INT-010?

Summary Consideration: Most commenters agreed with the requirements and measures in INT-010. Some commenters suggested that the Reliability Coordinator should not be held responsible for the actions of others, and the drafting team modified the standard to clarify that the RC is only held accountable for issuing directives.

Midwest Reliability Organization (G2)	No	This standard deals with some unclear exceptions (energy sharing agreements, an undefined term, of which Reserve Sharing Agreements appear to be a subset along with other "local" transactions). If the intent is to allow Reserve Sharing or redispatch to be done for a limited time (such as for up to a clock hour subsequent to a resource loss) and not be tagged, say so. Such an exemption should only be allowed if alternate notification of the transaction exists (such as through a regional messaging systems or RCIS)
Response: The drafting team modified R1 to clarify the intent.		
Entergy Services Melinda Montgomery	No	<p>The Reliability Coordinator should not be made responsible for having the tag or change to a tag submitted within the required time period. It should be the responsibility of the party that was directed to make the change. For instance, if a Reliability Coordinator directs a TOP to cut schedules, it would be the TOPs responsibility to submit the curtailment to the tag. If the Reliability Coordinator directs a BA to cut sales or implement an emergency transaction to get his system balanced, the BA would be responsible for getting those changes made with the source or sink on the other end and for submitting the tag changes.</p> <p>M1-3: What would constitute evidence that the BA or TOP for the transaction met the requirement? To maintain focus on a crisp standard, the measurement should be clear as to what is expected. Such a measure might be that a record of any instance in which the RC gave a direction that required an Interchange Transaction to be created or modified must be created, as well as a record of any time that an entity implemented an interchange transaction whose duration exceeded 60 minutes for an energy sharing agreement. For each such record, the entity would have to show that a corresponding interchange transaction or modification of an existing interchange transaction was done that met the standard. It is possible to be very specific without specifying the tool used.</p>
<p>Response: Agreed. The standard was revised to hold the RC responsible for issuing the directive. Under R2, the RC could direct the TOP or the BA to submit the request for Arranged Interchange under the requirements as written. The E-Tag system collects data that can be used as evidence.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

12. Do you agree with the requirements and measures in INT-010?

Commenters	Agree?	Comments
NPCC CP9, Reliability Standards Working Group (G6)	No	<p>1. INT-010 indicates only an RC can modify a transaction. INT-004 previously allowed TSP/TOP and BA entities to initiate a modification. Please explain why the ability for these entities to initiate a modification was eliminated?</p> <p>2. The required communications and approval involved in a modification made by a reliability entity should be covered in a separate, stand-alone standard. Requirement 2 should be pulled out, expanded and made its own standard.</p> <p>3. It seems that R3 is trying to be general to cover various types of transactions; but other than emergency and shared reserves, in what other instances can an RC arrange for transactions? If R3 this is intended to cover emergency energy and the text was chosen to be more general, we suggest adding text status that emergency energy is an example of this would be used?</p> <p>4. The timing table would not apply to the submittals under R1 and R3 would be handled. If these are submitted as Arrange Interchange, please explain how they would become Implemented Interchange.</p>
<p>Response:</p> <p>1 and 2. This standard moves the industry a step towards implementing the Functional Model by assigning this task to the RC rather than the TSP/TOP and BA. These are exceptions associated with imminent reliability risk and are assigned to the RC to preserve the integrity of having the RC responsible for maintaining the wide area. (REF V0 STANDARD – tagging adjustments) The TOP and BA can still make reliability adjustments, including TLRs by following the INT-005 through INT-009 process.</p> <p>3. The exceptions listed are the only exceptions covered by R3.</p> <p>4. Once the Arranged Interchange is submitted, the AI is subject to the normal process described in INT-005 through INT-009.</p>		
ISO – NE John Simonelli	No	<p>The content removed from INT-004 is not fully translated into INT-010. For example, changes for reliability may be initiated by entities other than the Reliability Coordinator and Requirement 2 in INT-010 only covers modifications by the Reliability Coordinator.</p> <p>Requirement 2 in this standard should be promoted to a separate standard. It is essential to clearly describe the required communications and approval actions that are involved in modification of an Interchange by a reliability entity.</p>
<p>Response: This standard moves the industry a step towards implementing the Functional Model by assigning this task to the RC rather than the TSP/TOP and BA. These are exceptions associated with imminent reliability risk and are assigned to the RC to preserve the integrity of having the RC responsible for maintaining the wide area. (REF V0 STANDARD – tagging adjustments) The TOP and BA can still make reliability adjustments, including TLRs by following the INT-005 through INT-009 process.</p> <p>Once the Arranged Interchange is submitted, the AI is subject to the normal process described in INT-005 through INT-009.</p>		
IESO, Ontario Ron Falsetti	Yes	<p>INT-010 indicates only an RC can modify a transaction. INT-004 previously allowed TSP/TOP and BA entities to initiate a modification. Please explain why the ability for these entities to initiate a</p>

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

12. Do you agree with the requirements and measures in INT-010?

Commenters	Agree?	Comments
		<p>modification was eliminated?</p> <p>The required communications and approval involved in a modification made by a reliability entity should be covered in a separate, stand-alone standard. Requirement 2 should be pulled out, expanded, and made its own standard.</p> <p>It appears that R3 is written to be general to cover various types of transactions; but apart from emergency energy and shared reserves, in what other instances can an RC arrange for a transaction? If R3 this is intended to cover emergency energy and the text was intentionally written to be general, we suggest adding text indicating emergency energy is an example where this would be used?</p> <p>The timing table would not apply to the submittals under R1 and R3 would be handled. If these are submitted as Arrange Interchange, please explain how they would become Implemented Interchange.</p>
<p>Response: This standard moves the industry a step towards implementing the Functional Model by assigning this task to the RC rather than the TSP/TOP and BA. These are exceptions associated with imminent reliability risk and are assigned to the RC to preserve the integrity of having the RC responsible for maintaining the wide area. (REF V0 STANDARD – tagging adjustments) The TOP and BA can still make reliability adjustments, including TLRs by following the INT-005 through INT-009 process.</p> <p>Once the Arranged Interchange is submitted, the AI is subject to the normal process described in INT-005 through INT-009.</p>		
Tennessee Valley Authority (G7)	Yes	R3 is too broad and ambiguous to determine meaning.
<p>Response: R3 was modified and its intent should be more clear.</p>		
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
Southern Company Generation (G1)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

12. Do you agree with the requirements and measures in INT-010?

Commenters	Agree?	Comments
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

13. Do you agree with the compliance in INT-010?

Commenters	Agree?	Comments
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13. Do you agree with the compliance in INT-010?

Summary Consideration: Most commenters agreed with the compliance in INT-010.

<p>Entergy Services Melinda Montgomery</p>	<p>No</p>	<ol style="list-style-type: none"> 1. 1.4.2 should not be necessary since 1.4.4 is included. If any party finds the performance of the BA or TOP to be unsatisfactory, they can file a complaint. Spot checks should not be necessary, and imposes an increased burden on the organizations doing the compliance monitoring function. I recommend removing 1.4.2 and replacing it with the following: Quarterly self-certification that the BA or TOP complied with the standard over the last calendar quarter, to be submitted by the 15th day of the month following the end of the each calendar quarter. This will ensure that problems are presented and dealt with in a timely manner. 2. The BA and TOP will be expected to meet this standard upon its effective date. The initial self-certification should not be needed for this standard, but rather a quarterly self-certification should be included for the measure to ensure that all BAs and TSPs are meeting the requirement based upon the data they are required to have. Remove initial self-certification requirement from this measure in 1.4. 3. Rather than require all data and system logs be made available for inspection (which would be a LOT of data), require them to provide a report as a part of the quarterly self-certification that details when one of the initiating events for this standard occurred and the interchange transactions created or modified to meet the requirements of the standard, including the proposed start time for the ramp, and the time created or modified. 4. The compliance reset period should be 1 calendar quarter with no violation.
<p>Response:</p> <ol style="list-style-type: none"> 1. A spot check (1.4.2) is not the same as the triggered investigation addressed in 1.4.4. A triggered investigation only occurs if there is a specific complaint. A spot check can occur without a specific complaint. The language in this section indicates that a spot check, 'may' be conducted – they are not required. 2. The data retention was modified to require, 'relevant data and system logs'. E-Tag 1.7 has requirements that address data retention and these requirements include retention of the date and time of the agents and approvals for 90 days. This information has to be available to approval service and the agent service. 3. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the entire period before being reset. 4. Although data only needs to be kept for 90 days, there are several potential opportunities for a Compliance Monitor to review performance during a calendar year. The reset period allows sanctions to become greater for successive instances of non-compliant performance during the 		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

13. Do you agree with the compliance in INT-010?

Commenters	Agree?	Comments
entire period before being reset.		
Midwest Reliability Organization (G2)	No	See comments above regarding compliance for INT 005.
Response: Please see the response to comments on INT-005.		
ISO – NE John Simonelli	Yes No	Due to comments on the standards, we cannot comment on the compliance items at this time.
NPCC CP9, Reliability Standards Working Group (G6)	Yes No	Due to comments on content of standards, we cannot comment on compliance at this time
MAAC John Horakh	Yes	
SRP Mike Pfeister	Yes	
IESO, Ontario Ron Falsetti	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

13. Do you agree with the compliance in INT-010?

Commenters	Agree?	Comments
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

14. Do you have any other comments on the proposed standards you haven't already provided?

Commenters	Comments
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14. Do you have any other comments on the proposed standards that haven't already been provided above?

<p>SRP Mike Pfeister</p>	<p>Definition of Implemented Interchange in INT-009 may be clearer if "ramps" is used in place of "enters". If the start of the ramp is not the intent of this definition, the point in time where "enters" occurs should be better defined.</p> <p>INT-007 - I could not get a whole row of text entered into question 6. A requirement pertaining to the specified source's ability to accommodate should be added. Proposed - "R1.6 The specified source is available to supply megawatts at the magnitude and ramp rate documented in the Request For Interchange". This is important to ensure that the RFI is an accurate depiction of interchange from source to sink, which is key to calculate scheduled path flows in order to implement mitigation measures when appropriate.</p>
<p>Response: Most commenter seemed to support the definitions as presented. This is not a coordinate interchange reliability issue and is outside the scope of this set of standards.</p>	
<p>Bonneville Power Administration Power Business Line Kristy Humphrey</p>	<p>Formatting is not consistent for Section D. Compliance. INT-005 through 007 has one set of numbering and INT 008 through 009 has another numbering format. NERC Standards and NAESB Business Practices need to use or reference the same dictionary or glossary. If this is not possible, then each term should be defined ONLY ONCE. Then if it is necessary to define the same term in another location, only a reference to the location of the "official definition" should be used. This type of system would go a long ways towards avoiding and/or resolving any confusion.</p>
<p>Response: The formatting should be consistent and has been corrected for draft 3 of these standards. The teams have been making a good faith effort to keep the definitions in alignment with one another.</p>	
<p>SPP Operating Reliability Working Group (G5)</p>	<p>Level 4 Non-Compliance for each of the proposed standards is for four occurrences of not fulfilling the requirements/measures of the specific standard. This should be changed to four or more occurrences.</p> <p>The definition of Confirmed Interchange in INT-006-1 is not consistent with that given in INT-005-1.</p>
<p>Response: The levels of non-compliance were modified as suggested. The definition of Confirmed Interchange was correct in INT-005 and was modified in INT-006 to match INT-005. (Correct definition is: Confirmed Interchange: The state where the Interchange Authority has verified the Arranged Interchange.)</p>	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

14. Do you have any other comments on the proposed standards you haven't already provided?

Commenters	Comments
<p>IESO, Ontario Ron Falsetti</p>	<p>The overall assessment and approval time of 15 minutes seems reasonable, but the individual intervals are overly prescriptive and may prove impossible to meet other than electronically. Although much of this process is handled electronically, and the time lines are acceptable most of the time, a standard that requires the time lines to be met that cannot be accomplished manually may not be in the industry best interest. Also no reference is made that these processes are to be normally carried out electronically.</p> <p>The relationship between INT-005, INT-006 and INT-007 should be reconsidered. We would recommend that the IA review the Arranged Interchange for all data validations, as defined in INT-007, prior to distributing the Arrange Interchange for reliability assessment. This change would also influence the column headings in the Timing Table, where the IA should be removed from Column B.</p> <p>There is no description of what actions Column D of the timing Table includes.</p>
<p>Response: The drafting team added the timing table and the response intervals at the request of stakeholders. Note that a footnote was added to the standard to clarify that the Compliance Monitor may exempt an entity from compliance with the timing requirements if there are extenuating circumstances – and an electronic failure would be one type of extenuating circumstance.</p> <p>Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.5 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.</p> <p>The actions under Column D would be whatever the BA needs to do to comply with INT-009.</p>	
<p>ISO – NE John Simonelli</p>	<p>The IA is included in Column B of the timing table, but does the IA really perform any Reliability Assessment? The data validations the IA performs should be prior to distributing the Arranged Interchange for reliability assessment.</p> <p>~ Since the phrase "BA Prepares Confirmed Interchange for Implementation" as included in the timing table introduces new concept in the industry, we believe that it would be helpful to clearly describe the expected actions of the BA in this step. If the action is to enter the Confirmed Interchange in the ACE then why would a BA do that 1:58 minutes before the ramp?</p> <p>~ Reiterating a question in INT-009 – Does Implemented Interchange refer to only those hours of the transaction that have flowed or does the entire Confirmed Interchange become Implemented Interchange after the first hour of the transaction has started to flow?</p> <p>~ There was a question on the corresponding NAESB CIBP that implied the timing for submittal to ERCOT was not included in the NERC standards. Review of the NERC Timing table would imply that the table does apply to ERCOT, via the note in the first row that says it applies 'for all Interconnections except WECC'. If that is not true, than we believe the specific ERCOT timing table should be included in the NERC document.</p>
<p>Response:</p>	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

14. Do you have any other comments on the proposed standards you haven't already provided?

Commenters	Comments
<p>The heading of the Timing Table was modified in support of your comment.</p> <p>The actions under Column D would be whatever the BA needs to do to comply with INT-009.</p> <p>As soon as the BA first enters the Confirmed Interchange into its ACE equation, the entire interchange profile is implemented and this is called an 'Implemented Interchange'.</p> <p>The Timing Table does apply to ERCOT.</p>	
<p>NPCC CP9, Reliability Standards Working Group (G6)</p>	<p>- The relationship between INT-005, INT-006 and INT-007 should be reconsidered. We would recommend that the IA review the Arranged Interchange for all data validations, as defined in INT-007, prior to distributing the Arrange Interchange for reliability assessment. This change would also influence the column headings in the Timing Table, where the IA should be removed from Column B.</p> <ul style="list-style-type: none"> - There is no description of what actions Column D of the timing Table includes. - It seems that the changes to INT-001 through INT-004 were made earlier in the editing process than INT-005 through INT-009 as there are some inconsistencies in language between the two sets of standards.
<p>Response: Some of the validations in INT-007 don't have to wait until after INT-005 is accomplished – the only constraint is that they be accomplished within the specified time. Note that Requirement 1.5 in INT-007 cannot occur before INT-006 is accomplished and the 'approvals' of the BAs and TSPs have been collected. Some validations do occur in the e-tagging system today prior to the IA's distribution.</p> <p>The actions under Column D would be whatever the BA needs to do to comply with INT-009.</p> <p>Please be more specific in identifying the inconsistencies in language between the two sets of standards.</p>	
<p>Bonneville Power Administration – Transmission Shirley Buckmier</p>	<p>The numbering is not consistent between all documents. under Section D. Compliance. INT-005 through 007 has one set of numbering and INT 008 through 009 has another numbering system. Not a big deal, but it should be consistent.</p> <p>Also the NERC and NAESB definitions glossary should match up and they don't.</p>
<p>Response: The inconsistent format will be corrected.</p> <p>The teams have been making a good faith effort to keep the definitions in alignment with one another.</p>	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

15. Do you agree with the proposed changes to INT-001?

Commenters	Agree?	Comments
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15. Do you agree with the proposed changes to INT-001?

Summary Consideration: Most commenters agreed with the proposed changes to INT-001. Note that following the public posting the drafting team received additional information from the NERC Interchange Subcommittee and Operating Reliability Subcommittee, suggesting that tagging internal transactions is not necessary because the information is not used in the IDC. Based on this recommendation, the drafting team will modify INT-001 to eliminate INT-001 R1.2:

All transfers that are entirely within a Balancing Authority Area using Point-to-Point Transmission Service (including all grandfathered and “non-Order 888” Point-to-Point Transmission Service).

SRP Mike Pfeister	No	Reliability Standards pertaining to any entity submitting a RFI should remain in tact, regardless of what is characterized as a "Business Practice".
Response: Please be more specific.		
Midwest Reliability Organization (G2)	No	We are concerned about the general confusion building standards around an entity that doesn't exist today (Interchange Authority) and how coordination will be done with NAESB such that their future business changes will be accommodated within the NERC infrastructure and timelines.
Response: The only thing keeping the IA from existing today is registering the entity. The implementation plan was revised to include time for entities to register to perform the IA function. The implementation plan for these reliability standards states that these reliability standards should be implemented at the same time as the NAESB Business Practice for CI. Addressing future business changes is outside the control of the drafting team.		
NPCC CP9, Reliability Standards Working Group (G6) IESO, Ontario Ron Falsetti	No Yes	<ul style="list-style-type: none"> - We recommend changing the purpose to say "To ensure that an Arranged Interchange is submitted for energy transfers that cross Balancing Authority boundaries". Requirement R1 would need to be modified accordingly. - The remaining requirements in this standard do not seem consistent with the purpose of the standard. For example, INT-001 now requires that transactions within a BA must submit an Arranged Interchange, but no longer requires transactions between BAs to submit an Arranged Interchange. - We recommend that the information in INT-004 regarding dynamic schedules be included in this INT-001 standard instead.
Response: The requirements in INT-001 address situations beyond those implied in the suggested purpose. INT-001 captures those scenarios where an Arranged Interchange is necessary for reliability assessments, but isn't initiated by a PSE through		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

15. Do you agree with the proposed changes to INT-001?

Commenters	Agree?	Comments
<p>the NAESB CI BP. The requirements aren't wrong where they are.</p>		
<p>ISO – NE John Simonelli</p>	<p>No</p>	<p>What is “the NERC identified reliability analysis service”? Isn't the purpose of this standard to define transactions that can impact reliability and have to be submitted to the IA?</p> <ul style="list-style-type: none"> ~ It is not clear why the NERC standard removed the requirement that ALL Interchange transactions between Bas must be submitted to the IA. ~ It is not clear they where NERC standards retained the requirement for transfers within a BA to be submitted. These do not meet the NERC definition of interchange. We understand that in some regions require these transactions, but they would be analyzed solely from a commercial perspective, not by the BA, TOP or RC and should be in the NAESB CIBP. ~ We recommend that the information in INT-004 regarding dynamic schedules be included in the INT-001 standard
<p>Response: The drafting team was trying to avoid ‘dating’ these standards but including references to specific tools – the term, ‘NERC identified reliability analysis service’ is a replacement for ‘IDC and WebSAS’.</p> <p>INT-009 requires BAs to implement Confirmed Interchange as received from the Interchange Authority – therefore there is no Interchange if it doesn't get to the IA.</p> <p>The purpose seems appropriate for the revisions made to INT-001.</p> <p>The information for internal transfers still needs to be submitted so the information can be made available for reliability analyses. Moving the requirement to another standard is outside the scope of changes needed for implementation of INT-005 through INT-010.</p>		
<p>MAAC John Horakh</p>	<p>Yes</p>	<p>Agree this should be retained (with changes suggested) to cover internal BA transactions</p>
<p>Response: Thank you for your support.</p>		
<p>SPP Operating Reliability Working Group (G5)</p>	<p>Yes</p>	<p>Level 4 Non-Compliance for each of the proposed standards is for four occurrences of not fulfilling the requirements/measures of the specific standard. This should be changed to four or more occurrences.</p> <p>The definition of Confirmed Interchange in INT-006-1 is not consistent with that given in INT-005-1.</p>
<p>Response: Agreed. These should have all said the following: Confirmed Interchange: The state where the Interchange Authority has verified the Arranged Interchange.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

15. Do you agree with the proposed changes to INT-001?

Commenters	Agree?	Comments
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Entergy Services Melinda Montgomery	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

15. Do you agree with the proposed changes to INT-001?

Commenters	Agree?	Comments
Ray Morella		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

16. Do you agree with the proposed changes to INT-002?

Commenters	Agree?	Comments
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16. Do you agree with the proposed changes to INT-002?

Summary Consideration: Most commenters agreed with the proposed changes to INT-002.

Midwest Reliability Organization (G2)	No	See response to item 15.
Response: See response to comment on item 15.		
Entergy Services Melinda Montgomery	No	<p>There are gaps between what is required by INT-002 and what is being implemented in INT-005 and INT-008. For instance, while it is true that the intermediate balancing authorities are not currently included on the tag, they are represented by the scheduling entities between the source and sink balancing authorities. This communication of the interchange with the scheduling entities needs to be included in INT-005 and INT-008. See comments for INT-005 and INT-008 for additional comments about gaps that exist between how the tag authority service works today and what the IA is expected to do in the near future. If these functions are not specified in the new standards, they should not be removed from the INT-002. For example, INT-007 indicates that appropriate loss provisions will be assessed by the IA, and INT-006 does not include the validation of loss provision as a responsibility of the TSP, but the verification of loss accounting is being removed as a provision of INT-002.</p> <p>Also, connectivity of transmission path is being verified by the IA, which is inconsistent with current practice. That portion of INT-002 should remain with the TSP, not with the IA, which may not have sufficient information to make that assessment.</p> <p>Likewise, in INT-002 R3.4, the Balancing Authorities are responsible for determining if the BAs and Scheduling Entities on the path are contiguous. In INT-006, the IA is responsible for that verification. I am concerned that the sink BA may not know all necessary BAs, scheduling entities, or TSPs between a given source and sink, whereas each BA knows its own neighboring areas.</p>
<p>Response:</p> <p>We believe the standards are correct and the tools used should be modified to conform to the requirements in the standard. The term, 'scheduling entity' is not a function for which NERC is writing reliability requirements. If the scheduling entity is performing a reliability task for the BA, then the BA is still responsible for ensuring that the task is accomplished, even though the BA is allowed to delegate the task to the scheduling entity.</p> <p>The standards were revised to shift responsibility for verification of the scheduling path (proper connectivity of Adjacent Balancing Authorities) to</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

16. Do you agree with the proposed changes to INT-002?

Commenters	Agree?	Comments
the BA in INT-006 R1.1.3; and to shift responsibility for verification of the Transmission Service Provider connectivity to the TSP in INT-006 R1.2.		
ISO – NE John Simonelli	No	It seems that the entire content of INT-002 has been deleted. We concur that the deleted content has been covered elsewhere.
Response: This supports the drafting team's recommendation.		
IESO, Ontario Ron Falsetti	Yes	We agree that the content that was deleted has been covered elsewhere – with comments as noted in other sections.
Response: This supports the drafting team's recommendation.		
SPP Operating Reliability Working Group (G5)	Yes	There is nothing left in INT-002. Why isn't it totally removed?
Response: This was posted as a 'red line' so that stakeholders could see what had been removed. The drafting team is recommending that this entire standard be retired.		
MAAC John Horakh	Yes	Agree this should be completely deleted because it mandates a specific tool
Response: The drafting team is recommending it be retired because all of the requirements are addressed in the proposed INT-005 through INT-010 standards.		
SRP Mike Pfeister	Yes	
Southern Company Generation (G1)	Yes	
Tennessee Valley Authority (G7)	Yes	
Bonneville Power Administration Power Business	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

16. Do you agree with the proposed changes to INT-002?

Commenters	Agree?	Comments
Line Kristy Humphrey		
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

17. Do you agree with the proposed changes to INT-003?

Commenters	Agree?	Comments
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17. Do you agree with the proposed changes to INT-003?

Summary Consideration: Most commenters agreed with the proposed changes to INT-003.

MAAC John Horakh	No	This should be completely deleted and any relevant parts placed into INT-009-1. Otherwise there are two separate standards covering the same subject
Response: The standard is not covering the same topic as that covered in INT-009. The remaining requirement in INT-003 addresses the 'BA to BA checkout' that is done today. INT-009 only requires the BA to enter the Confirmed Interchange as it was received from the IA.		
Midwest Reliability Organization (G2)	No	See response to item 15.
Response: Please see the response to item 15.		
NPCC CP9, Reliability Standards Working Group (G6) IESO, Ontario Ron Falsetti	No Yes	- INT-003 should be retired. Requirement R1 on INT-003 is contradictory to INT-009, where the BA is to implement the Confirmed Interchange as directed by the IA. - R1.2 in INT-003 is covered in INT-008 but could also be reiterated in INT-009 for completeness.
Response: If the 'checkout' uncovers some discrepancy, the BAs are still required to implement Confirmed Interchange as received from the Interchange Authority. The information verified between BAs in R1.2 is needed as part of the final 'BA to BA checkout'.		
ISO – NE John Simonelli	No	INT-003 should be retired. Requirement R1 on INT-003 is contradictory to INT-009, where the BA is required to implement the Confirmed Interchange as directed by the IA. ~ R1.2 in INT-003 is covered in INT-008 but could also be reiterated in INT-009 for completeness. ~ We do not agree that standard ramping times are a business practice
Response: The sections of INT-003 that addressed ramping times are covered in the NAESB CI BP.		
SRP Mike Pfeister	Yes	
Southern Company Generation	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

17. Do you agree with the proposed changes to INT-003?

Commenters	Agree?	Comments
(G1)		
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Entergy Services Melinda Montgomery	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

18. Do you agree with the proposed changes to INT-004?

Commenters	Agree?	Comments
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18. Do you agree with the proposed changes to INT-004?

Summary Consideration: Most commenters agreed with the proposed changes to INT-004.

MAAC John Horakh	No	This should be completely deleted and any relevant parts placed into INT-010-1. Otherwise there are two separate standards covering the same subject
Response: These two standards (INT-0004 and INT-010) do not address the same topics. INT-004 addresses tagging dynamic transfers; INT-010 addresses exceptions to the normal Interchange process.		
Midwest Reliability Organization (G2)	No	See response to item 15.
Response: See the response to your comment on Item 15.		
NPCC CP9, Reliability Standards Working Group (G6) ISO – NE John Simonelli	No	<ul style="list-style-type: none"> - We do not believe that all the information within this original standard was carried forward; see comments on INT-010. - We recommend that the dynamic schedule information be moved into INT-001 - With the above two recommendation, INT-004 could be retired.
Response: There was no intent to carry forward all of the information that was in the original INT-004. Modifications were aimed at moving the industry forward, such that some of the concepts in the Functional Model are adopted.		
Entergy Services Melinda Montgomery	No	There is language in INT-004 that refers to how interchange modification in response to a loss of generation will be handled. While I agree that a portion of this standard is replaced by INT-010, there is still a portion of INT-004 that is not. Specifically, the fact that if a loss of generation occurs, the host BA for the source has the ability to modify the transaction, and that for a loss of load, the host BA for the sink has the ability to modify the transaction. These are special situations that do not require an emergency change with a retroactive interchange transaction under INT-010. I think that INT-004 R2, 2.1, 2.2 should remain in the standard.
Response: When there is a revision to an Arranged Interchange, and the change is not considered an 'emergency' then the change is treated the same way as a 'new' Arranged Interchange and is submitted to the IA.		
SRP Mike Pfeister	Yes	
IESO, Ontario Ron Falsetti	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

18. Do you agree with the proposed changes to INT-004?

Commenters	Agree?	Comments
Southern Company Generation (G1)	Yes	
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
PacifiCorp Robert Williams	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
SPP Operating Reliability Working Group (G5)	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

19. Are you aware of any other V0 Requirements that should be changed with the implementation of the proposed CI Standards?

Commenters	Comments
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19. Are you aware of any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards?

Summary Consideration: No commenter identified any other Version 0 Requirements (beyond INT-001 through INT-004) that should be retired or revised coincident with the implementation of the set of Coordinate Interchange Standards.

IESO, Ontario Ron Falsetti	Any standards that refer to the phrases interchange or tagging or transaction should be reviewed once these Coordinate Interchange standards are closet to being finalized.
Response: If you know of any specific standards with these references, please let the drafting team know. The only standards in Version 0 that were assigned to the 'Interchange' category were INT-001 through INT-004, and the drafting team has made recommendations for adjustments to these V0 Standards.	
NPCC CP9, Reliability Standards Working Group (G6)	Any standards that refer to the phrases interchange or tagging or transaction should be reviewed once these Coordinate Interchange standards are nearly final
Response: If you know of any specific standards with these references, please let the drafting team know. The only standards in Version 0 that were assigned to the 'Interchange' category were INT-001 through INT-004, and the drafting team has made recommendations for adjustments to these V0 Standards.	
ISO – NE John Simonelli	Now that there several different stages of the "Interchange", the use of the term in the functional model and any other NERC standard should be reviewed for consistency with these definitions.
Response: The teams have been making a good faith effort to keep the definitions in alignment with one another.	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

20. Do you agree that entities should already be fully compliant with the requirements when adopted by BOT?

Commenters	Agree?	Comments
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20. Do you agree that entities should already be fully compliant with the requirements in the standards on the date of the Board of Trustees' adoption?

Summary Consideration: Most commenters agreed that entities should already be fully compliant with the requirements in the standards on the date of the BOT's adoption. Some entities suggested time may be needed to register entities that want to be recognized as performing the IA function, and some entities suggested time may be needed to make minor modifications to existing processes. To meet these varying requests, the drafting team modified the Implementation Plan and each of the standards to indicate that the effective date is January 1, 2007, approximately 8 months beyond the date of the BOT adoption.

ISO – NE John Simonelli	No	The implementation date of these standards should be coordinated with the development and implementation of the NAESB Coordinate Interchange Business Practice document. Together, these documents may impact the way the industry currently does business and the implementation date of these changes should consider what entities would have to change in their current day-to-day business to be compliant
<p>Response: The intent is to implement the proposed Coordinate Interchange Standards, to implement recommended modifications to INT-001 through INT-004 and to implement the NAESB Coordinate Interchange Business Practice all at the same time. The drafting team modified the Implementation Plan to include time for entities to register as the Interchange Authority. Since the proposed standards are not requiring new tools or systems, most entities are not expected to need much time to make the minor adjustments needed to meet compliance.</p>		
IESO, Ontario Ron Falsetti NPCC CP9, Reliability Standards Working Group (G6)	No	The impact of these standards, in conjunction with the NAESB CIBP could require changes throughout the industry in documentation, business practices and/or software to put these new standards into practice. An evaluation should be done after the NERC and NAESB standards are approved to establish that impact and a reasonable time table for implementation.
<p>Response: The drafting team modified the Implementation Plan to include time for entities to register as the Interchange Authority. Since the proposed standards are not requiring new tools or systems, most entities are not expected to need much time to make the minor adjustments needed to meet compliance.</p>		
Midwest Reliability Organization (G2)	No	The proposed standards deal with an entity that doesn't exist today, a "request for interchange" format or mechanism that is defined outside the scope of the standard, and an untested expectation of what performance should be.
<p>Response: The drafting team modified the Implementation Plan to include time for entities to register as the Interchange Authority. In many cases, the Sink Balancing Authority is expected to register as the Interchange Authority. Since the proposed standards are not requiring new tools or systems, most entities are not expected to need much time to make the minor adjustments needed to meet compliance.</p>		

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

20. Do you agree that entities should already be fully compliant with the requirements when adopted by BOT?

Commenters	Agree?	Comments
Entergy Services Melinda Montgomery	No	<p>As discussed above, I don't believe that a lot of the evidence is currently in the hands of the IA, BA, TSP. Reports, and possibly user interfaces to the tagging systems may have to be created. I suspect that displays, and reports would initially be provided by the vendor, so I don't have an idea of how long it would take to develop.</p> <p>In the cases where the new standards differ from the existing standards in who is performing which validation, business rules may need to be developed, training may need to be developed and provided to operators, or automated validation checks built into software. I would estimate it would take on the order of 4-6 months to complete those activities.</p>
<p>Response: The drafting team researched the spec for the current E-Tag system, and it does require that a great deal of data be retained. In many cases, this is all the data that is needed to meet the 'evidence' requirements.</p> <p>The implementation plan has been adjusted to give entities time to register and then train their employees. Since there are very few changes to processes currently in use, writing additional procedures and developing and delivering training shouldn't be an overly burdensome task.</p>		
PacifiCorp Robert Williams	No	<p>The Interchange Authority Function has not been established in the WECC. Once it is established, some amount of time should be allowed to implement and settle into this new process (at least one year). For the most part, coordination of interchange meets the current policies and RMS (Reliability Management Systems) requirements, which are not far removed from the proposed standards and compliance measures.</p>
<p>Response: The Implementation Plan has been modified to allow time for entities to register themselves as Interchange Authorities. In many cases, the Sink Balancing Authority is expected to register as the Interchange Authority. Since the proposed standards are not requiring new tools or systems, most entities are not expected to need much time to make the minor adjustments needed to meet compliance.</p>		
SPP Operating Reliability Working Group (G5)	Yes	<p>It would be advantageous for entities to have a trial compliance period following implementation of the Standard where compliance would be monitored but penalties would not be administered.</p>
<p>Response: The Reliability Standards Process Manual (RSPM) does not allow for a 'trial' compliance period after the approval of a standard. The RSPM states that any field testing must be accomplished before a standard is approved and adopted.</p>		
Southern Company Generation (G1)	Yes	
MAAC John Horakh	Yes	
SRP	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

20. Do you agree that entities should already be fully compliant with the requirements when adopted by BOT?

Commenters	Agree?	Comments
Mike Pfeister		
Bonneville Power Administration Power Business Line Kristy Humphrey	Yes	
Cinergy Jeff Baker	Yes	
Bonneville Power Administration – Transmission Shirley Buckmier	Yes	
Southern Power Administration Carter Edge	Yes	
FRCC (G3)	Yes	
Southern Company Services (G4)	Yes	
Entergy Services Ed Davis	Yes	
FirstEnergy Corp Ray Morella	Yes	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

21. Do you have any other comments on the Implementation Plan that haven't already been provided?

Commenters	Comments
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21. Do you have any other comments on the proposed Implementation Plan that haven't already been provided above?

<p>IESO, Ontario Ron Falsetti</p>	<p>It appears that the tagging requirements have been transferred to NAESB, which seems appropriate. However, some of the requirements retained in the standard will be met via the electronic system. Some reference to this fact should be included. Additionally, with the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.</p>
<p>Response: The drafting team avoided specific references to existing tools to recognize that these tools may be replaced by other tools. The drafting teams for the NAESB Coordinate Interchange Business Practice and the Coordinate Interchange Reliability Standards are working cooperatively to keep the two standards coordinated and synchronized.</p>	
<p>Entergy Services Melinda Montgomery</p>	<p>I am concerned that there is a disconnect between who has the responsibility for compliance with these measures (the reliability entities) and who has control over the communication of the information (in most cases, a third party vendor). If the IA fails to send the data within the required time, how will the sink BA performing that function be able to mitigate the problem? By breaking a service contract, finding a new vendor? And in the time it takes to effect these solutions, more non-compliances would be mounting.</p> <p>While I do not expect that our vendor would fail these standards, unless it were because of planned outages necessary for the maintenance of the systems, I am concerned that we will have to comply with standards we have little direct influence upon.</p>
<p>Response: The standards were modified to include footnotes indicating that the Compliance Monitor may exempt entities from compliance with the timing requirements when there are extenuating circumstances.</p>	
<p>FRCC (G3)</p>	<p>As currently written the existing INT standards applicability would remain with the Balancing Authority or the Purchasing-Selling Entity and the new INT standards would apply to the Interchange Authority. The FRCC believes all INT standards should either use the Interchange Authority applicability or all should use the Balancing Authority / Purchasing-Selling Entity applicability but should not mix the two. If the choice is made to use the Interchange Authority the implementation of the Interchange Authority for the first time needs to be addressed in the Implementation Plan.</p>
<p>Response: The drafting team made a good faith effort at modifying language in INT-001 through INT-004 to use the term, 'IA' where applicable. If you see of any specific instance we missed, please let us know. The Implementation Plan was modified to add time for entities to register to perform the IA function.</p>	

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

21. Do you have any other comments on the Implementation Plan that haven't already been provided?

Commenters	Comments
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The following letter was received by the SDT after the closing of the public comment period:

November 2, 2005

Mr. Mike Oatts
Southern Company Services
Chair-NERC Coordinate Interchange Standard Drafting Team
P.O. Box 2641
Birmingham, Al. 35291

Dear Mike,

I am writing on behalf of the NAESB Coordinate Interchange Business Practice (CIBP) Task Force and the NAESB Joint Interchange Scheduling Working Group (JISWG) to request a change to the Timing Table contained in Standard INT-005-1.

As previously discussed and agreed to with the NERC Coordinate Interchange standard drafting team, the CIBP task force removed the market approval process previously contained in the NAESB CIBP standard in favor of one approval process currently contained in the NERC Coordinate Interchange Standard and implemented by the E-tagging system. In doing so, the Purchasing Selling Entity (PSE) (whose transmission rights are cited in the Arranged Interchange), Generator-Providing Entity (GPE) and Load-Serving Entity (LSE) are required in the NAESB CIBP standard (to be contained in next draft) to respond to the Interchange Authority's (IA) request for assessment in the same manner as the Transmission Service Provider (TSP) and Balancing Authority (BA) are required to do in the NERC standard.

However, the PSE (whose transmission rights are cited), GPE and the LSE are not mentioned or required in the Timing Table contained in INT-005-1, under column B, to conduct assessments as the IA, BA, and TSP are required to do. We recognize that the PSE, GPE and LSE are not reliability entities, but in order for both the NERC and NAESB Coordinate Interchange standards to reference only one timing table, it is appropriate for them to be included in column B of the table.

Therefore, the CIBP Task Force and the JISWG respectfully request that the PSE (whose transmission rights are cited in the Arranged Interchange), GPE and the LSE be included in the Timing Table, under column B, in the final draft of the NERC Coordinate Interchange standard.

We appreciate the NERC Coordinate Interchange standard drafting team considering this request and, should you have any questions, please don't hesitate to contact me.

Sincerely,

Roman Carter,
Chair-Coordinate Interchange Business Practice Task Force

Consideration of Comments on 2nd Posting of Coordinate Interchange Standards

21. Do you have any other comments on the Implementation Plan that haven't already been provided?

Commenters	Comments
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Response: The Timing Table was not changed to add the business practice tasks. NERC's standards are limited to addressing the reliability-related aspects of the interchange process. Additional language will be added to the supporting reference document to clarify that there are some business practice tasks that take place in parallel with the reliability-related tasks.