

Request to Move the Coordinate Interchange Standards to Ballot

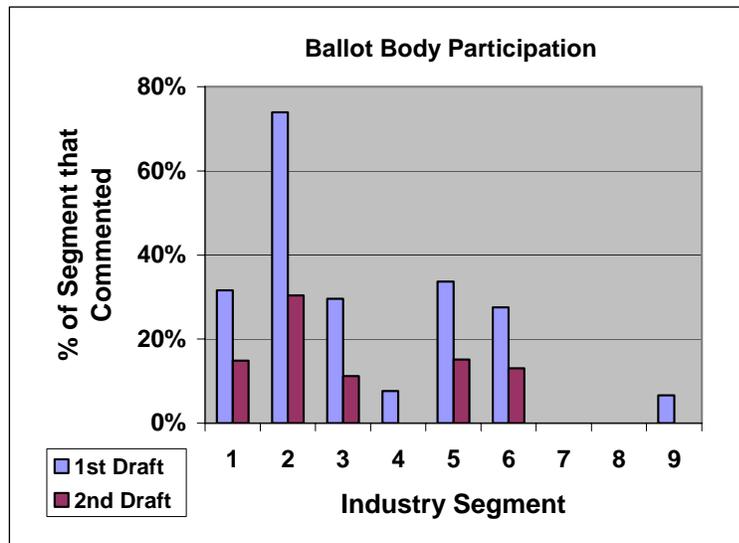
Request to Ballot the Coordinate Interchange Standards:

The six Version 1 Coordinate Interchange Standards and their Implementation Plan were last posted from September 1 through October 15, 2005:

- INT-005 IA Distributes Arranged Interchange
- INT-006 Response to IA
- INT-007 Interchange Confirmation
- INT-008 IA Distributes Confirmation Status
- INT-009 Implementation of Interchange
- INT-010 Interchange Coordination Exemptions

The Drafting Team considered the responses and finalized the Standards and the associated Implementation Plans, making mostly minor changes. All comments received and all responses have been posted, and all commenters have been advised that there is an appeals process.

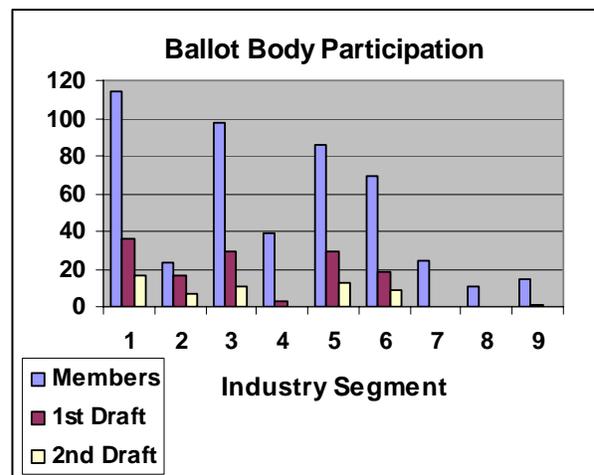
The Drafting Team believes that additional postings will not significantly improve consensus on the Standards or the Implementation Plan. The original Ballot Pool for these standards has been dissolved and no new Ballot Pool has been formed, so no conclusions can be drawn about the participation of members of the Ballot Pool. The following charts show the participation levels of the members of the Ballot Body in the first two comment periods used to refine these standards.



The chart on the left shows the percentage of each Industry Segment who participated in the two comment periods. The participation levels varied greatly, with very little participation in Industry Segments 4, 7, 8 and 9.

The chart below shows the total number of Ballot Body Members in each of the Industry Segments along with the total number of Members in each Segment who submitted comments on each of the two comment periods.

There are 478 members of the Ballot Body and most have not submitted any comments on these standards. Until the standards are balloted, the drafting team will have no way of identifying any concerns these balloters may have.



Milestones in the development of the standards:

First Drafts of Standards

The first draft of the Coordinate Interchange Standards was posted from December 15, 2003 – February 12, 2004. The first draft of the set of standards is publicly posted at the following site:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_DRAFT_STD_01.pdf

Following the first posting, the drafting team delayed action in re-posting the standards pending finalization of Version 0 and then further delayed any re-posting while waiting for changes to the Functional Model. In May, 2005 the Standards Authorization Committee directed the Drafting Team to continue developing its standards without waiting any longer for the Functional Model to be revised.

All comments received on the first posting are publicly posted at the following site:

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

Every comment was considered and the responses to the comments associated with the first drafts of the Coordinate Interchange Standards have been publicly posted at the following site:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_%20Considerationofcomments%20on%201st%20posting_Final.pdf

Second Drafts of Standards

The second draft of the Coordinate Interchange Standards was posted from September 1, 2005 through October 15, 2005. The second draft, along with the red lines to show changes from the first draft and an associated implementation plan, are publicly posted at the following sites:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_D2_Clean.pdf

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_D2_Redline.pdf

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_D2Implementation_Plan.pdf

All comments received on the second posting are publicly posted at the following site:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_D2_Comments.pdf

Every comment was considered and the responses to the comments associated with the second drafts of the Coordinate Interchange Standards have been publicly posted at the following site:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_Consideration_of_Comments_2nd_Posting.pdf

Third Draft of Standards

The drafting team did make minor changes to most of the standards following the second comment period. While most changes made between the second and third drafts were very minor, the drafting team did make changes to the requirements in INT-010 to better align the measures and requirements with the levels of non-compliance. The changes improve the clarity but don't change the intent of the requirements. The drafting team does not believe, given the large number of potential balloters that have not participated in the comment periods, that these changes warrant an additional posting.

The changes made to the standards between the second and third postings are highlighted for stakeholders to review. The third draft, along with the red lines to show changes from the second draft and an updated implementation plan, are publicly posted at the following sites:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_005-010-2_D3_Clean.pdf

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTRCHNG_005-010-1_D3_Redline.pdf

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_Plan_Pre-ballot.pdf

The Implementation Plan for the Version 1 Coordinate Interchange Standards recommends modification or deletion to requirements in the Version 0 Interchange Standards INT-001 through INT-004. The

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drafting team posted a red line version of each of these standards (INT-001 through INT-004) to highlight the proposed changes. The Implementation Plan and the four red lines are publicly posted at the following site:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/COORD_INTERCHNG_001-004-1_D3_Redline.pdf

There were three minority views that were not resolved.

- Several entities from one Region recommended that the drafting team modify the requirements to align with the Functional Model by assigning responsibility for conducting a reliability analysis of Arranged Interchange to the TOP rather than the TSP:
 - The Drafting Team followed the SAC's directives with respect to the Functional Model. 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.
- Several entities from one Region recommended that the drafting team modify the sequence of validations to better align with real time practices by reorganizing the requirements throughout INT-005, INT-006 and INT-007.
 - The drafting team did rearrange some, but not all of the requirements. The proposed change is a 'format' change, rather than a 'content' change. The drafting team was concerned that people who are accustomed to the current sequence of requirements may become confused if the sequence is drastically changed. The requirements in INT-005 through INT-009 are linked to a 'Timing Table.' The drafting team modified its reference document's explanation of the Timing Table to clarify that the requirements are not all sequentially ordered, and some of the validations of Arranged Interchange information that are required under Reliability Standard INT-007 may occur electronically before the Arranged Interchange is distributed under Reliability Standard INT-006.
- Several entities from one Region recommended that INT-003 and INT-004 be retired and the remaining content of those standards be moved into other associated INT standards.
 - The proposed change is a 'format' change, rather than a 'content' change. The drafting team was concerned that people who are accustomed to the current sequence of requirements may become confused if the sequence is drastically changed.

The Drafting Team recommends the SAC authorize posting the Standards and Implementation Plan for a 30-day pre-ballot review on January 17, 2006, followed by balloting on February 20, 2006. The drafting team wants these balloted as a single set with one ballot.