

Individual or group. (23 Responses)

Name (10 Responses)

Organization (10 Responses)

Group Name (13 Responses)

Lead Contact (13 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (1 Responses)

Comments (23 Responses)

Question 1 (21 Responses)

Question 1 Comments (22 Responses)

Question 2 (16 Responses)

Question 2 Comments (22 Responses)

Question 3 (0 Responses)

Question 3 Comments (22 Responses)

Question 4 (0 Responses)

Question 4 Comments (22 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
Yes
Yes
Yes.
Yes.
Group
Dominion NERC Compliance Policy
Randi Heise
Yes
Yes
Yes.
Individual
Russell Noble
Cowlitz PUD
No
Cowlitz disagrees with the SDT dismissal of comments submitted by Seattle City Light.
Cowlitz disagrees with the SDT's dismissal of comments submitted by Seattle City Light and NextEra.
Individual
Michael Falvo
Independent Electricity System Operator
Yes

Yes
The revised R1 is unclear on the condition under which a BA needs to submit an RFI no more than 60 minutes beyond the resource loss. The phrase "or other reliability needs" R1 seems to be out of place and subject to a number of possible interpretations. R1 stipulates that: R1. The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no RFI is required. We ask the SDT to revise this to more clearly convey the intent.
Group
Southern Company; Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela Hunter
Yes
INT-004-3 R1: How do entities know the forecast for submitted pseudo-ties included in congestion management? In order to add bounds to the alternate method, we request that the SDT consider adding the following (bolded section) to R1: Each Purchasing-Selling Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method that provides a projection of usage of the Pseudo-Tie to the Transmission Operator. INT-004-3 R3: We request that the SDT consider adding the following (bolded section) to R3 in order to clarify roles and responsibilities: Each Purchase-Selling Entity is responsible for registering Pseudo-Ties in the NAESB Electronic Industry Registry publication. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.
Yes
Yes.
Yes.
Individual
Shirley Mayadewi
Manitoba Hydro
No
(1) R1 – We note the addition of language by the SDT in the Rationale for R1 with respect to a situation where no forecast may be available. It is Manitoba Hydro's view that the text currently contained in the Rationale with respect to what is required to be in an RFI belongs more appropriately in the body of the standard itself rather than in a Rationale. Our understanding is that the content of the Rationale text boxes will be moved to the Application Guidelines section of the standard upon approval of the standard; the content of the Application Guidelines section is not one of the mandatory or enforceable components of a reliability standard even though they may be looked to for guidance by entities and auditors. This particular Rationale goes beyond an explanation by the SDT of why the requirement/part is required, or why the wording changes are appropriate, and provide specific direction as to the appropriate inclusion in the RFI; something that is missing in the body of the standard itself. (Law, Export Operations, RCD) (2) R1 – The additional language added by the SDT, while it does attempt to address circumstances where no forecast is available, still leaves some uncertainty as to the appropriate volume to be tagged in an RFI. Suggested alternative language to make it abundantly clear would be: "If no forecast is available for the Dynamic Schedule, the energy profile in the Request for Interchange should be the expected maximum value of the Dynamic Schedule."
Yes
Yes
Although Manitoba Hydro supports the proposed changes, we have the following comments: (1) R1 - unclear what the phrase 'other reliability needs' is meant to cover. The remainder of the standard only talks about resource loss and doesn't address 'other reliability needs'. (2) M1 – should include greater detail from requirement language. i.e. "The Balancing Authority that uses its energy sharing agreement where the duration of use exceeds 60 minutes from the resource loss shall have...." (3) M3 – RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI

acronym is desired, Request for Interchange should be defined as such at its first use and RFI used consistently throughout. (4) VSLs, R1 – RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI acronym is desired, Request for Interchange should be defined as such at its first use and RFI used consistently throughout. (5) VSLs, R2 - RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI acronym is desired, Request for Interchange should be defined as such at its first use and RFI used consistently throughout. Also, the words 'reflecting an Interchange Schedule' should be inserted following 'Request for Interchange'. 'The' scheduled interchange should be 'that' scheduled interchange.

Individual
Paul Kerr
Shell Energy North America

No
Shell Energy North America disagrees with the comments filed and the decision to revert the applicability of INT-004 to Purchasing Selling Entities. The wording in the proposal at R1 retains the condition existing in the currently approved INT-001 standard that the subject transactions are taking place to serve load. R2 is entirely contingent on R1 and continues the misplaced applicability to PSEs. This load serving aspect remains the impetus to the belief by some stakeholders that this type of activity has reliability impacts, rather than being the business process requirements that they truly are. If the R1 and R2 requirements of the standard are to be maintained, the applicability should be on Load Serving Entities as originally proposed in the this Project. LSEs engaging in such transactions are the responsible party, and if the LSE is not also a PSE, a reliability gap will be created by setting the applicability to PSEs.

Individual
Anthony Jablonski
ReliabilityFirst

No
During the last comment period, ReliabilityFirst questioned the term "on-time" within Requirement R1. ReliabilityFirst appreciates the SDT response that "The term 'on-time' is addressed in the timing tables contained in INT-006". ReliabilityFirst believes a reference to the INT-006 standard should be placed in the INT-004-3 standard. Absent a reference to the INT-006 standard, those not familiar with the table in the INT-006 standard may not understand the meaning of the term "on-time" and thus cause both reliability and compliance complications.

During the last comment period, ReliabilityFirst requested clarification of the term "energy sharing agreement" within Requirement R1. ReliabilityFirst appreciates the SDT response (and updated rationale box within the standard) that stated "There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled." ReliabilityFirst does have a concern that once the standard is approved, the rational box will be removed from the standard and the clarification of this term may be lost. ReliabilityFirst recommends including a portion of the rational into the requirement as follows: "The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement [(regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled)] or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted..."

Individual
Thomas Foltz
American Electric Power

Yes
Though we welcome the addition of the PSE in the applicability section, we believe the LSE should be retained rather than replacing it entirely. In some non-RTO areas for example, there is the potential that it is the LSE who would be tasked with performing this work. Our negative vote on this standard is solely driven by the removal of the LSE in the Applicability section. We believe that the BA, PSE, *and* LSE should all be included.

Yes
Yes.

Group
PPL NERC Registered Affiliates
Brent Ingebrigtsen
No
These comments are submitted on behalf of the following PPL NERC Registered Affiliates: Louisville Gas and Electric Company and Kentucky Utilities Company; PPL EnergyPlus, LLC; PPL Electric Utilities Corporation; PPL Generation, LLC, PPL Susquehanna, LLC and PPL Montana, LLC on behalf of its NERC registered entities. The PPL NERC Registered Affiliates are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP. It is unclear in R1 as to which BA's congestion management procedures the information for the Pseudo-Tie is to be included, the Source BA's or the Sink BA's (or both).
No
The proposed defined term Arranged Interchange is not needed as it is effectively the same as (and redundant to) Request for Interchange. Each is a set of data that has been submitted for approval. The verb "submitted" implies "submitted for approval" in the definition of Request for Interchange. To clarify this issue, the SDT should revise the definition of Request for Interchange to the following: A collection of data as defined in the NAESB Business Practice Standards, that has been initiated or revised and submitted for approval to the Sink Balancing Authority for the purpose of implementing bilateral Interchange between Source and Sink Balancing Authorities or an energy transfer within a single Balancing Authority.
No. See comment to question 2. It is unclear how the proposed change in the definition of Arranged Interchange would impact other standards, particularly MOD-004-1 R11 and R12. Therefore, remove the proposed changes to this definition from the project and use only the one term – Request for Interchange.
Yes.
Group
Oklahoma Gas and Electric Co
Donald Hargrove
No
INT-004-3 R3 requires BA's to only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry. This is clearly a Commercial/Business practice issue. From a reliability perspective if the RC, PC and TSP are informed, a BA should be able to implement or operate a Pseudo-Tie. Requiring administrative reporting to a non-reliability (commercial / business practice) entity is not appropriate for the Reliability Standards. This requirement falls clearly with Criteria A and Criteria B6 of the paragraph 81 criteria and should be removed from the draft Standard. Criterion A (Overarching Criterion) The Reliability Standard requirement requires responsible entities ("entities") to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES. Criteria B (Identifying Criteria) B6. Commercial or Business Practice The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues. This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.
No
The definition of "Request for Interchange," references the NAESB Business Practice Standards. I cannot submit an affirmative vote because I do not have access to the NAESB Business Practice Standards; I have no idea what constitutes the data defined therein. As long as the NAESB standards are not open and freely available like the NERC Standards, I cannot in good conscience vote affirmative on a NERC Reliability Standard or NERC Glossary Definition that references them.
Yes.
Yes.
Individual
Alice Ireland
Xcel Energy
No
Xcel Energy is voting negative b/c we do not agree with the inclusion of Pseudo-Ties. Here are our specific issues with each requirement: R1- Pseudo-Ties do not have tags, they are metered into the BA as part of the NAI term of the ACE equation. R2- All references to Pseudo-Ties should be removed. This requirement is just for "Confirmed Interchange" that is a Dynamic Schedule, which is part of the NSI term of the ACE equation. R3- This requirement should specify a minimum level before registration of a Pseudo-Tie is required. We feel Pseudo-Ties should only be registered if they are in a congested transmission area.

Group
Duke Energy
Michael Lowman
No
Duke Energy suggests the following change to R3 of INT-004-3, "Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication. " Since NAESB will define the requirements for Pseudo-Tie registration, there is no need to add "in support of congestion management procedures." Based on the Purpose of the standard, as written, our interpretation is that this is already understood.
Yes
Yes. Duke Energy supports the changes made by the SDT.
Yes. Duke Energy supports the changes made by the SDT.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Yes
Yes
Yes
Yes
Individual
Chris Scanlon
Exelon
Yes
We support the combination of INT-001 and INT-003 however, the registration of a Pseudo – Tie in NAESB must be transparent to all parties. Currently, that information is not readily available.
Group
Florida Municipal Power Agency
Frank Gaffney
Our comments from last November's posting were not addressed. In summary, FMPA believes these standards are not important for reliability, are commercial in nature, and are duplicative of NAESB standards and BAL standards. Please refer to our comments submitted on November 13, 2013.
Please see FMPA comments to Question 1.
Please see FMPA comments to Question 1.
Please see FMPA comments to Question 1.
Group
SERC OC Review Group
Rene Free
Yes
We respectfully submit a change to R3 Sever VSL to further align with R3. Current Language: The Balancing Authority did not implement or operate a Pseudo-Tie that was included in the NAESB Electric Industry Registry publication. Proposed Language: The Balancing Authority DELETE: "did not" implement Add: "ed" or operate Add: "d" a Pseudo-Tie that was Add: "Not" included in the NAESB Electric Industry Registry publication.

Yes
Yes
Yes. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.
Group
ISO/RTO Council Standards Review Committee
Greg Campoli
Yes
Yes
Yes
Yes
Group
ACES Standards Collaborators
Jason Marshall
No
(1) We do not support this concept as a reliability standard and believe it should be retired and transferred to NAESB. The purpose statement of the standard is to ensure that Dynamic Schedules and Pseudo Ties are “accounted for appropriately in congestion management procedures.” While this is an important business practice to ensure the schedules are treated equitably, it is not a reliability issue and should not be in a NERC standard. Congestion management procedures are designed and intended to ensure the transmission service is curtailed based on its priority so that lower priority service does not supersede higher priority service. It designed to comport with FERC pro forma tariff requirements for the treatment of various levels of transmission service. A reliability entity such as a BA, TOP, or RC must still be able to reduce loading via other methods (e.g. manual redispatch or transmission reconfiguration) in addition to congestion management. While some entities (e.g. ISO and RTOs) have designed very effective congestion management procedures that are defined by their tariffs through the use of locational marginal pricing (LMP), they are still required to have other capabilities to reduce loading(e.g. manual redispatch or transmission configuration). Thus, congestion management is clearly a business practice designed to facilitate the orderly curtailment of transmission service so that lower priority service is curtailed first. Congestion management is a tool to facilitate management of transmission service curtailments. It is not a reliability tool. Thus, a NERC standard designed to ensure that Dynamic Schedules and Pseudo-Ties are tagged is an important business practice but is not required for reliability. This standard should be retired and moved to NAESB.
No
(1) We disagree with the inclusion of intra-BA schedules because there is a direct conflict with other NERC glossary terms. “Interchange” is defined in the NERC glossary as “Energy transfers that cross Balancing Authority boundaries.” Thus, “Interchange” only deals with external transfers and does not include intra-BA schedules. We think it will be confusing to define a “Request for Interchange” inconsistently with “Interchange” and that they will be used inconsistently as documented in our response to question 4 regarding INT-010-2 R3. “Request for Interchange” should literally be a request to schedule the NERC term “Interchange,” which would be for energy transfers that cross BA boundaries. The proposed definition of “Request for Interchange” conflicts with the existing definition of “Interchange”and needs to be modified so they are both aligned.
We disagree with the inclusion of the clause “initial or revised.” Does the definition of “Request for Interchange” include initial requests and revisions to those requests? If so, then the inclusion of the clause “initial or revised” is superfluous. If not, then the definition for Arranged Interchange is implying that “Request for Interchange” can include revisions incorrectly. Either way, the clause should be removed.
(1) “Request for Interchange” is used inconsistently with “Interchange” in R3. Request for Interchange includes intra-BA transfers. However, by definition, Interchange does not since it only includes “energy transfers that cross Balancing Authority boundaries.” Thus, the requirement is written incorrectly when the Request for Interchange is for an intra-BA energy transfers. As an example, R3 requires that a Request for Interchange should be submitted within 60 minutes of the “start of the scheduled Interchange.” If the Request for Interchange is for an intra-BA energy transfer, to which Interchange schedule does the requirement refer ? It cannot refer to the Interchange schedule associated with the Request for Interchange, because the definition Interchange does not include intra-BA schedules. The conflict of the NERC defined terms “Request for Interchange” and “Interchange” has created ambiguity and uncertainty in the requirements and needs to be resolved. (2) Thank you for the opportunity to comment.

Individual
RoLynda Shumpert
South Carolina Electric and Gas
Agree
SERC OC
Group
Bonneville Power Administration
Jamison Dye
Yes
BPA supports the proposed changes to the draft INT-004-3 except for the Rational in R1. The Rationale starting with the second sentence is not valid for R1. R1 is regarding when a PSE must submit an RFI for Dynamic Transfer. How information is utilized does not belong in a rationale for such a requirement. The second and third sentence in Rational R1 should be removed. The second sentence is unclear as to what is meant by "max transaction profile". E-tags do not have a "transaction profile". The third sentence in the rationale implies that if a forecast is used, the transmission profile can be exceeded. In the Table of Compliance Elements, the last sentence of the Severe VSL description for R1 ends with a comma. Assuming more verbiage does not follow the comma but is not visible in the table, the comma should be replaced with a period. Dynamic Transfer is a defined NERC Glossary term and as such, BPA suggests that the draft team capitalize the term if its use is intended to align with the NERC definition.
Yes
BPA supports the proposed changes to the Request for Interchange definition.
BPA supports the proposed changes to the Arranged Interchange definition.
BPA supports the proposed changes to the draft INT-010-2 with the following comment: Dynamic Transfer is a defined NERC Glossary term and as such, BPA suggests that the draft team capitalize the term if its use is intended to align with the NERC definition.
Group
SPP Standards Review Group
Robert Rhodes
Yes
While we have no issues with the proposed changes to the most recent draft that has been posted, in this reading we did note a few items that we missed in previous readings of the standard. Most of these items are minor with the exception of an item regarding the Severe VSL for R3. This is a significant item and needs to be corrected in the proposed draft in order for us to continue to support the proposed standard. We recommend modifying the Severe VSL for R3 to read: 'The Balancing Authority implemented or operated a Pseudo-Tie that was not included in the NAESB Electric Industry Registry publication.' This wording is more on-point since the requirement does not require Balancing Authorities to implement or operate all Pseudo-Ties in the NAESB Registry but restricts the Balancing Authority to only implement or operate those Pseudo-Ties which are included in the Registry. Capitalize Dynamic Transfer throughout the Background and the Application Guidelines sections since the term is in the Glossary of Terms. Use a lower case 'for' in 'Request for Interchange' in R2. Capitalize Frequency Bias Setting, Frequency Bias and Dynamic Schedule in the table in the Application Guidelines on Page 9. We suggest modifying the first sentence under the General Considerations for Curtailments of Dynamic Transfers section in the Application Guidelines to read: 'The unique handling of Curtailments of Dynamic Transfers is described in NERC's Dynamic Transfer Reference Guidelines, Version 2.' Capitalize 'Curtailed' in the paragraph under For Dynamic Schedules in the Application Guidelines. We suggest modifying the last paragraph on Page 9 of the Application Guidelines to read: 'Both sections above describe when Curtailments (typically communicated through e-Tags) of Dynamic Transfers require additional action by Balancing Authorities to ensure compliance with the Curtailment.' Use a lower case 'signal' in Dynamic Transfer signal in the last paragraph of the Application Guidelines on Page 10.
Yes
Yes
Yes While we have no issues with the proposed changes to the most recent draft that has been posted, in this reading we did note a few items that we missed in previous readings of the standard. Most of these items are minor with the exception of items in the Severe VSL for R1 and in the Compliance 1.2 Evidence Retention section. These are significant items and need to be corrected in the proposed draft in order for us to maintain our support for the proposed standard. RFIs are only required when an energy sharing agreement is used for more than 60 minutes. The latter portion of the Severe VSL for R1 (after the OR) is currently written such that a Balancing Authority would be non-compliant if it failed to submit a RFI regardless of the length of time the energy sharing agreement was utilized. We recommend inserting '...when the use of the energy sharing agreement exceeded 60 minutes...' at the end of the VSL.

Delete '...and Transmission Service provider...' from the Compliance 1.2 Evidence Retention section. The Balancing Authority is the only applicable entity listed in the standard. In that same sentence, insert '(CEA)' following Compliance Enforcement Authority since CEA is used later in this section. Capitalize 'schedule' in Interchange Schedule in R3 and M3. It is a defined term in the Glossary of Terms. The Application Guidelines were not included in the clean version of the standard. Capitalize Dynamic Transfer throughout the Application Guidelines section since it is a defined term in the Glossary of Terms. Modify the first sentence in the Application Guidelines such that it reads the same as we suggested in INT-004-3. 'The unique handling of Curtailments of Dynamic Transfers is described in NERC's Dynamic Transfer Reference Guidelines, Version 2.' Also as in INT-004-3, we suggest modifying the next to last paragraph in the Application Guidelines to read: 'Both sections above describe when Curtailments (typically communicated through e-Tags) of Dynamic Transfers require additional action by Balancing Authorities to ensure compliance with the Curtailment.'

Individual
Russell Noble
Cowlitz PUD
No
The Standard mixes applicability in the Requirement. Please state applicability in Section 4.
Yes
Yes
Abstain

Note: ISO RTO Council Standards Review Committee (SRC) comments above for Question 1: PJM does not support the response.