

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Thad K. Ness
Organization:	AEP
Telephone:	614-716-2053
E-mail:	tkness@aep.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information:

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

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The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "CI Timing Table" by **March 8, 2008**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: It is inappropriate to say an ATF classification for the RFI has a reliability assessment period for applicable BAs and TSPs in the timing table. There is no point because the ATF submittal is merely there for accounting and settlement purposes in the inadvertent interchange process. If the RFI was for extended hours, then it would there for identification in reliability assessment/monitoring and the congestion management process. It must be understood that a ATF classification for RFI would only be valid if the affected reliability assessment entities had prior confirmation of interchange to be implemented prior to the time of implementation into the ACE equation, as stated in NERC Standard INT-003-2. The impact of reliability on the Bulk Electric System is pertinent to real-time and not ATF.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Troy Simpson
Organization:	Bonneville Power Administration, Business Process & Implementation Office - TSPB
Telephone:	360-418-8659
E-mail:	tdsimpson@bpa.gov
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
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The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "CI Timing Table" by **March 8, 2008**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Bonneville Power Administration believes that all requests for interchange should be confirmed with at least 5 minutes available for the BA to Prepare Confirmed Interchange for Implementation with a minimum of 3 minutes for the BA and TSP to conduct Reliability Assessments. For that reason, we recommend requests with <10 minutes prior to the ramp start and < 1 hour after the start time allow the BA and TSP reliability assessments 3 minutes. For requests 10 minutes prior to ramp start time, should also provide 3 minutes for the BA and TSP to conduct reliability assessments. For request 11 minutes prior to ramp start time, should provide 4 minutes for the BA and TSP to conduct reliability assessments; etc.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time requests. Late requests may have a reliability impact and should require assessment as well. The Timing Requirements for WECC tables in all three standards should be modified to remove the "Response not required" and "if they choose" language. Requirement R1 (and the associated Measure M1) should be modified to include Late requests.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The Timing Requirements for WECC Timeline chart ignores the IA response times. We recommend that the timeline be revised to incorporate the IA response times in the Submittal & Assessment Times.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Raj Hundal
Organization:	BC Transmission Corp
Telephone:	604-699-7475
E-mail:	raj.hundal@bctc.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
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1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

- Yes
 No

Comments: The following statement in BA and TSP Conduct Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.

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3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

- Yes
 No

Comments: All requests should be processed in the same manner and should be actively approved or denied. There is not reason to have Late and ATF tags not be processed within required timelines.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

- Yes
 No

Comments:

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(Complete this page for comments from one organization or individual.)	
Name:	Greg Rowland
Organization:	Duke Energy
Telephone:	704-382-5348
E-mail:	gdrowland@dukeenergy.com
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Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ed Davis
Organization:	Entergy Services, Inc
Telephone:	504-576-3029
E-mail:	edavis@entergy.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

The following comment applies only to the details of the Late row in the "Timeline Requirements for all Interconnections Except WECC" table in each of the three standards. Column B of the new Late requirement contains the entry that "Response not required" and "Entities have up to 10 minutes to respond if they choose".

The new standard should also explicitly state that the RFI defaults to EXPIRED, as defined and used in Electronic Tagging Functional Specification Version 1.8.0, if a response has not been received within the 10 minutes.

Please add to Column B of Late: "The RFI will default to EXPIRED, as defined and used in Electronic Tagging Functional Specification, if a response has not been received within the 10 minutes".

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Not applicable.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

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Comments:

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Linda Campbell
Organization:	FRCC
Telephone:	8130207-7961
E-mail:	lcampbell@frcc.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information:

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "CI Timing Table" by **March 8, 2008**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	IESO
Telephone:	905-855-6187
E-mail:	ron.falsetti@ieso.ca
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
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<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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Background Information:

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments: We notice that while the revisions are intended to address the RFI timing for WECC, changes have been made to the timing table for other Interconnections as well. We agree with these latter changes as we believe this to be corrections to the timing relationship to ramp start times since it is always 20 minutes to the top of the hour before the tags were considered late.

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The IESO continues to be concerned with the proposed "variable" implementation dates that will result in various jurisdictions having different effective dates for the standards. This is particularly important for arranged transaction (RFI) between neighbouring jurisdictions with different effective dates, resulting in different timing schedules for interchange transactions.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Craig McLean
Organization:	Manitoba Hydro
Telephone:	204 487 5517
E-mail:	cmclean@hydro.mb.ca
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

No

Comments:

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Yes

No

Comments:

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(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
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E-mail:	
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<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
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Background Information:

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

No

Comments:

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Yes

No

Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Stan Southers / Ellis Rankin
Organization:	Oncor Electric Delivery Company LLC
Telephone:	214-486-2084 / 214-743-6825
E-mail:	stan.southers@oncor.com / erankin@oncor.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments: Oncor endorses the changes as made by the standards drafting team.

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

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Yes

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- INT-008 — Interchange Authority Distributes Status

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The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "CI Timing Table" by **March 8, 2008**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Jim Hansen
Organization:	Seattle City Light
Telephone:	206-706-0165
E-mail:	james.hansen@seattle.gov
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information:

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: The table states that entities are not required to respond to Requests for Interchange which represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.

This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.

In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: This new exemption represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.

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4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: Despite their differences, there are a few common items in the two tables that should be aligned, such as the title to the first column and the status of the column to rights of Column D.

Additionally, the proposed standard revision is beyond the scope of the original SAR. The SAR sought to 1) Reintroduce the timing classifications to the INT standards which were dropped in the transition from Policy 3 to NAESB/NERC split Coordinate Interchange (INT) standards, 2) to introduce the ATF timing classification and relaxed assessment requirements associated with it, and to 3) increase the reliability assessment period for the WECC timing tables up to the maximum possible while still meeting market needs. The SAR did not seek to remove requirements for active response to all but on-time requests.

An argument has been made that "it is up to interpretation" on whether row 1 of the timing tables applies to anything other than on-time requests however it is a mathematical statement that has mathematic proof to back it up. Row 1 applies to any RFI that is submitted < 1 hour prior to ramp start. Just as -15 is < 60, an RFI submitted at 1010 with a ramp start of 955 is -15 minutes prior to ramp start -15 minutes is < 60 minutes, therefore row 1 applies. On a continuous time graph, if the RFI has a ramp start of 955, row 1 applies to the RFI for all submittal times from 855 and later (including all times past 955). This consistent application of row 1 was also adopted by all e-Tag vendors without ever raising the question with NERC or NERC members, committees, subcommittees, or working groups and is how the e-Tag calculation of reliability assessment periods works today.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Rich Salgo
Organization:	Sierra Pacific Resources
Telephone:	775-834-5874
E-mail:	rsalgo@sppc.com
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments: N/A

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Tags not considered "On-Time" encompass two different transaction type tags, ATF tags and LATE tags, and those transaction types need to be broken down further than simply not "On-Time". We agree ATF tags generally are not a reliability issue and do not warrant penalties yet because Dynamic Schedule Adjustments are treated as ATF tag adjustments there is a need for this type of tag to be acted on every hour for reliability reasons. LATE tag requests should always require action within up to 10 minutes as shown on the proposed timing table particularly if marked Emergency Tags.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: Again tags not considered "On-Time" need to be treated differently depending on whether they are ATF Dynamic Schedule Adjustment tags or LATE tags. The INT-006-3 R1 and the associated Measure M1 could apply to ATF tags that are not Dynamic Schedule Adjustments and not to Late tags but this could be confusing. In the WECC Late Emergency Tags are required to be acted on and we believe this requirement should continue.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The impact of introducing "On-Time" to the Standards will be more detrimental than beneficial. There are too many variables in the ATF Tag Types for implementation and Late tags need to be assessed and acted on. The driving purpose to re-open the Timing Tables was to make permanent the changes requested for the West prior to expiration of the Urgent Action SAR and this needs to be completed as soon as possible.

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (Please check all Regions in which your company operates.)	Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: INT-006 – Requirement 1 – The Drafting Team is to be commended for ensuring the Requirement 1 that references the revised timing table has been modified to correct possible reliability assessment issues with the inclusion of the ATF, Late and On-time Time Classifications to the table. The application of the requirement to respond to a request from the IA to transition an Arranged Interchange was correctly limited only to "On-time" interchange, an appropriate change to keep the timing table implications in line with reliability assessment capabilities and needs.

It is recommended, however, that the application to respond also be expanded slightly to include Late reliability curtailments. The importance of the timely processing of reliability-based curtailments/adjustments was reflected in the fact that in INT-005, R1.1 was expressly broken out to limit the distribution to necessary assessment entities so that processing could take place with limited delay and unnecessary or inappropriate Denials. This same importance to actively process a reliability curtailment should be extended to the requirement to respond on INT-006.

Suggested wording would be "...shall respond to all On-time and any Late reliability-based Curtailment request from an Interchange Authority to transition...". Omission of "Late" curtailments from the requirement to respond could adversely impact reliability due to the intentional or unintentional failure to respond (with no resulting compliance implications) and the resulting IA action to not confirm the Arranged Interchange requesting the curtailment.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008

Yes

No

Comments: There is no explanation of the acronym "ATF" in the timing tables. Suggest that the first occurrence at a minimum be spelled out "After-the-Fact (ATF)". Also, RFI (Request for Interchange) is not defined

Heading in 2nd column of timing table in INT-005 and INT-008 should be "IA Assigned" and not "IF Assigned...".

The new timelines should be labeled as examples since specific times were used rather than a generic syntax such as xx:40, xx:00, etc. Recommend using something like "Example Timing Requirements" in the timeline heading. This would help make sure there is no confusion about implied requirements such as a top-of-the hour start time or 10 minute ramp time.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Operating Reliability Working Group	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
NERC Region (Please check all Regions in which your company operates.)		Registered Ballot Body Segment (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "CI Timing Table" by **March 8, 2008**.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: We concur with the proposed changes which primarily affect WECC and appreciate the separation of the two tables for clarification.