

NAESB,

Please accept the following comments from Allegheny Power concerning Request No. R03013 - NAESB Coordinate Interchange Business Practice Standard (Request For Interchange, RFI):

Allegheny Power agrees that the standard accurately represents the business practices inherent in NERC Policy 3.

Allegheny Power believes that the standard, as written, will allow for the continuation of the E-Tag process.

Allegheny Power believes that the standard will appropriately facilitate the implementation of the NERC Functional Model.

In addition to the above issues, Allegheny Power wishes to introduce the issue of Resource Service Points as referenced in the NAESB RFI Datasheet A.2.1.1.1 and A.2.1.3.1. The expansions of RTOs/Markets have led to the decreased granularity of Resource Service Points. This in turn has made it increasingly difficult to accurately determine the effect of Interchange Transactions on System Operating Limits. The result, in instances where there is a lack of generation available for re-dispatch in the local area, has been increasing reliance on dropping local load as a loading relief methodology instead of being able to correctly identify the interchange transactions that most significantly impact the System Operating Limit in question. Allegheny Power requests this business practice address the need for increasing the required granularity of Resource Service Points. Allegheny Power recognizes that this is a reliability issue and that NAESB may not be the proper venue for this discussion. However, since the issue of granularity is included in this business practice standard, we feel compelled to introduce this issue. We ask that this issue be forwarded to the proper venue if it is deemed that NAESB and this business standard is not the proper place for this discussion.

Thanks,
Bill

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