Subcommittee Response:

The subcommittee reviewed the comment and accepted the recommended footnote renumbering.

**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Document:** WEQ 2019 Annual Plan Item 3.h / R18011: Request regarding the implementation of WEQ-004 Appendix D – Commercial Timing Tables for WECC.

**Submitted By:** Standard Review Subcommittee

**Date:** March 7, 2019

The Standard Review Subcommittee welcomes the opportunity to provide comments related to the Coordinate Interchange Scheduling Subcommittee proposed standards to address Standards Request R18011.

Below is the following standards reviewed by the subcommittee for consistency and/ or conflicts by providing the following comments:

WEQ-000 Abbreviations, Acronyms, and Definition of Terms

* No new abbreviation, acronyms or definitions.

WEQ-004 Coordinate Interchange

Appendix D:

Recommend changes for consistency:

Since the footnote language are identical for both Timing Requirements consider renumbering WECC footnotes.

Timing Requirements for WECC

* renumber footnotes to (1,2,3,4)

WEQ-008 Transmission Loading Relief – Eastern Interconnection Business Practice Standards

* No Issues

Electronic Tagging – Functional Specification, Version 1.8.3

* Agrees with wording change based on 1.6.1.1 (Processing time is based on receipt)

Standards Review Subcommittee suggests the Executive Committee consider the minor changes to appendix D listed above.

Best Regards

WEQ – Standards Review Subcommittee

Subcommittee Response:

The subcommittee reviewed the comment and determined it would not make this change.

**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant (WEQ)

**Committee:** Executive Committee

**Recommendation:** R18011/2019 WEQ Annual Plan Item 3.h

**Submitted By:** IESO, ISO-NE, MISO, NYISO, PJM, and SPP1

**Date:** March 13, 2019

The ISOs/RTOs listed above submit the following comments for consideration by the Executive Committee regarding the 2019 WEQ Annual Plan Item 3.h “Request regarding the implementation of WEQ-004 Appendix D – Commercial Timing Tables for WECC.”

We propose the Executive Committee not approve the changes to the Coordinate Interchange Timing tables as documented in the recommendation. Our concern is the changes made to the timing tables are contrary to how the industry has operated for years. Prior versions of the NERC timing tables included the Interchange Authority which had up to one minute to distribute the Arranged Interchange, as noted in Column A. The GPE, LSE, and TSP had ten minutes, or as noted in Column B, to conduct market assessments. Any time not used by the Interchange Authority was available for the GPE, LSE, and TSP in addition to its ten minutes. The recommendation as written states there is only a total of ten minutes for the Sink BA to distribute the Arranged Interchange (previously performed by the Interchange Authority) and then conduct the market assessments.

The question raised by the requestor ties back to when NERC included the Interchange Authority in the Compliance Registry. The requestor indicates in his request that it is clear these tables conflict with current practice. We do believe some clarity should be added to the standards to specify how the process works but do not see a conflict. As the recommendation is drafted, the clock starts ticking for the GPE, LSE, TPSE, MO, and TSP to conduct their market assessments prior to them receiving notification of the Tag. Additionally, approving this recommendation will result in an unnecessary cost to the industry, as the Tag Vendors will be required to make changes to their systems.

One approach to the timing tables would be to seek an interpretation from NERC. However, with the changes to the Coordinate Interchange Standards (INT) under NERC’s Standards Efficiency Review (SER) initiative we have reservations as to whether NERC would consider moving forward with an interpretation of an INT requirement. In the absence of any interpretation from NERC or guidance from FERC that the timing table is incorrect, we suggest the most appropriate action is to revise the recommendation to document how the distribution of the Arranged Interchange and current market assessment time periods were designed and are implemented today.

This could be achieved by removing the reference of footnote 3 for column B so that footnote 3 only applies to Column A. Add a new footnote for column B that states “Measurement starts after the completion of the posted Column A timing requirements, regardless of the Sink BA’s system performance in completing Column A’s requirements.

CAISO, and ERCOT have not signed on to these comments.

Subcommittee Response:

The subcommittee reviewed the comment and determined it would not make this change.

March 14, 2019

**Quadrant:** Wholesale Electric Quadrant

**Subcommittee:** Executive Committee

**Recommendation:** 2018 AP Item 3.h

**Submitted By:** PJM Interconnection, LLC

PJM appreciates the opportunity to offer comments in response to NAESB’s February 12, 2019 request for Formal Comments pertaining to the 2019 WEQ Annual Plan Item 3.h/ R18011.

After careful review, PJM would like to raise the following points for consideration.

## Reliability Entities Will Be Impacted

The recommendation contains the statement “The proposed changes maintain consistency with the NERC INT-006-4 Reliability Standards,” but we note that “consistency with” is not the same as stating there will be no impact to Reliability Entities. The recommendation fundamentally changes the Market Assessment time granted to Market Entities (GPE, LSE, TPSE, MO, & TSP) and includes the statement “Entities in Column B will have their assessment times reduced by up to 60 seconds to account for the distribution window.” Based on the discussions that occurred at the CISS, we believe it is not only unreasonable to expect that Tag Authority software providers will calculate Assessment Windows differently for Market and Reliability entities, but that doing so would be unworkable given the proposed technical solutions. For that reason, the adoption and implementation of this recommendation will have a direct impact on Reliability Entities that must comply with NERC INT-006-4 in that they too will have their assessment times reduced by up to 60 seconds.

The recommendation fails to disclose in a transparent manner that these changes will impact Reliability Entities who must comply with the NERC INT-006-4 Reliability Standard. For that reason, we suggest that this recommendation should not be implemented until and unless similar modifications are incorporated into the NERC Reliability Standards.

## The Status Quo Interpretation and Software Solutions Are Sufficient

The recommendation makes clear that ambiguity exists with respect to the calculation of timings present in the WEQ-004 Appendix D Timing Tables; however, no argument or evidence is supplied to indicate why this ambiguity should be viewed in a negative light. In fact, we suggest that a small amount of ambiguity in regulatory language can be a positive feature and a purposeful component of language intended to permit entities latitude in their approach to compliance. From that standpoint, we cannot help but consider that each Tag Authority software provider has individually interpreted the current Timing Table language in the same way and constructed software solutions that adhere to the NAESB e-Tag Specification. Simply stated, the existing Timing Table ambiguity has not translated to non-standard software solutions. The Market and Reliability Entities impacted by these proposed changes have been utilizing the software designed via these interpretations, without incident, for well over a decade.

Despite the current ambiguity, we believe the status quo interpretation and technical solutions work sufficiently well; consequently, we suggest that a deviation from the status quo and many years of precedent must be qualified by a discussion that highlights why the status quo is deficient. The recommendation does not offer a persuasive argument in this regard.

## Insufficient Value Gained by Implementing the Proposed Changes

The recommendation contains no mention of identified operational, financial, or compliance risks as a rationale for adopting the proposed changes. As such, we believe it reasonable to expect that the proposal conveys sufficient benefit to justify the cost of implementation in terms of time, resources, and the socialized expense of software development. However, the recommendation appears to reflect only diminished value to impacted entities in the form of allocating less time to conduct a Market Assessment. As the compliance obligation created by Column B of WEQ-004 Appendix D Timing Tables resides with these Market Entities, the value gained by adopting this proposal and reducing the time available for compliance is not obvious. Similarly, the value gained by other entities as a result of limiting Market Entities in this fashion is not obvious.

It is PJM’s position that the recommendation fails to demonstrate sufficient value to justify the cost of implementation.

Subcommittee Response:

The subcommittee reviewed the comment and determined it would not make this change.

From: Ronald L. Robinson

Subject: Formal Comments to address WEQ 2019 Annual Plan Item 3.h / R18011

Date: March 13, 2019

Good Morning,

Tennessee Valley Authority (TVA) appreciates the hard work that the Coordinated Interchange Scheduling Subcommittee has done to address Annual Plan Item 3.h/R18011.

TVA would support the NAESB WEQ Coordinated Interchange Subcommittee’s recommendation to clarify WEQ-004 Standard “eTag request Timing Requirements,” once submitted by the tag author if the maximum assessment period total time is less than or equal to ten (10) minutes.

TVA recommends that any proposal to change the timing requirement language and/or eTag specification should not be required. Vendor software updates or coding changes applied to comply with the NAESB WEQ-004, NERC INT-006 Timing Requirements, and eTag Functional Specification should resolve the issue.

TVA also recommends that any patches or updates to the vendor’s software should not be implemented until the eTag Functional Specification receives final approval of NAESB WEQ-004 version 3.3.

Best Regards

Ronald L. Robinson

Sr. System Op, Transmission and Interchange

Transmission Operations & Power Supply

Tennessee Valley Authority

1101 Market Street

Chattanooga, TN 37402

423-751-3141 (w)

423-304-2640 (m)

[rlrobins@tva.gov](mailto:rlrobins@tva.gov)

Subcommittee Response:

The subcommittee reviewed the comment and noted no modification necessary to address the comment.

-----Original Message-----  
From: Vojdani, Raymond <AVOJDANI@WAPA.GOV>   
Sent: Friday, March 1, 2019 10:17 AM  
To: naesbmail <naesbmail@naesb.org>  
Subject: RE: [EXTERNAL] NAESB WEQ Request for Formal Comments on Recommendation to Support 2019 WEQ Annual Plan Item 3.h / R18011 – Due March 14, 2019

Good Friday Morning to you,

Western Area Power Administration supports NAESB's Annual Plan Item 3.h (modification toWEQ-004 Appendix D, Commercial Timing Tables for WECC). Furthermore, we appreciate all the hard work that staff and NAESB sub-committees have done in this regard.

Thanks,

Raymond R. Vojdani, P.E.| Transmission Policy Advisor Western Area Power Administration | Rocky Mountain Region

(O) 970.461.7379 | (C) 970.227.2823| [avojdani@wapa.gov](mailto:avojdani@wapa.gov)

Subcommittee Response:

The subcommittee reviewed the comment and noted no modification necessary to address the comment.

**From:** Ambrosi, Brenda <Brenda.Ambrosi@bchydro.com>   
**Sent:** Wednesday, March 13, 2019 12:08 PM  
**To:** naesbmail <naesbmail@naesb.org>  
**Subject:** NAESB WEQ Request for Formal Comments on Recommendation to Support 2019 WEQ Annual Plan Item 3.h / R18011 - Due March 14, 2019

To Whom It May Concern,

Further to NAESB's request for formal comments on recommendation to support 2019 WEQ Annual Plan Item 3.h / R18011 regarding modifications to the standards to resolve the ambiguity in WEQ-004 Appendix D Timing Tables, BC Hydro supports the WEQ Coordinate Interchange Scheduling Subcommittee's (CISS) recommended solution.  This recommended solution aligns with both the eTag Specification as well as NERC INT-006.  BC Hydro appreciates the opportunity to comment and the CISS's efforts in identifying this solution in a timely manner.

Sincerely,

Brenda

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**Brenda Ambrosi** | Manager, Market Policy & Operations

**BC Hydro**

Fraser Valley Office

333 Dunsmuir St.

Vancouver, BC  V6B 5R3

**P**     604 455 4203

**M**      604 312 7391

**E**      [brenda.ambrosi@bchydro.com](mailto:brenda.ambrosi@bchydro.com)

[bchydro.com](http://www.bchydro.com/)

Smart about power in all we do.

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Subcommittee Response:

The subcommittee reviewed the comment and noted no modification necessary to address the comment.

**From:** Hundal, Raj <Raj.Hundal@powerex.com>   
**Sent:** Wednesday, March 13, 2019 6:07 PM  
**To:** naesbmail <naesbmail@naesb.org>  
**Subject:** NAESB WEQ Request for Formal Comments on Recommendation to Support 2019 WEQ Annual Plan Item 3.h / R18011 - Due March 14, 2019

To whom it may concern,

Further to NAESB's request for formal comments on recommendation to support 2019 WEQ Annual Plan Item 3.h / R18011 regarding modifications to the standards to resolve the ambiguity in WEQ-004 Appendix D Timing Tables, Powerex supports the WEQ Coordinate Interchange Scheduling Subcommittee's (CISS) recommended solution.  Powerex submitted the SAR, on behalf of the WECC MIC, as a result of tags in the WECC region taking longer to process than the prescribed timelines in the WEQ and NERC tag timing tables.  We thank the CISS for addressing the concerns raised in the SAR, and providing a solution that balances the various interests while making tag processing more efficient.

Regards,

Raj Hundal

Market Policy & Practices Manager

***Powerex Corp.***

Suite 1300 - 666 Burrard Street

Vancouver, BC  V6C 2X8

Telephone:  (604) 891-6063

Cell: 604-837-2500

Email: [raj.hundal@powerex.com](mailto:raj.hundal@powerex.com)

[www.powerex.com](http://www.powerex.com/)

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-PowerexDisclaimerID5.2.8.1541

Subcommittee Response:

The subcommittee reviewed the comment and noted no modification necessary to address the comment.

**From:** Reese, Doug <dreese@tristategt.org>   
**Sent:** Friday, March 15, 2019 11:36 AM  
**To:** naesbmail <naesbmail@naesb.org>  
**Subject:** NAESB WEQ Request for Formal Comments on Recommendation to Support 2019 WEQ Annual Plan Item 3.h

To Whom It May Concern,

Further to NAESB's request for formal comments on recommendation to support 2019 WEQ Annual Plan Item 3.h / R18011 regarding modifications to the standards to resolve the ambiguity in WEQ-004 Appendix D Timing Tables, Tri-State Generation & Transmission supports the WEQ Coordinate Interchange Scheduling Subcommittee's (CISS) recommended solution.  This recommended solution aligns with both the E-Tag Specification as well as NERC INT-006.  Tri-State Generation & Transmission appreciates the opportunity to comment and the CISS's efforts in identifying this solution in a timely manner.

Thank you,

Doug Reese

**R. Doug Reese**

Transmission Training & OASIS Manager

1-303-254-3676

[dreese@tristategt.org](mailto:dreese@tristategt.org)

cid:image001.jpg@01D4DB1A.DB775310