**FORMAL COMMENTS**

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

**Recommendation:** Annual Plan Item 2013 3.a.iii

Develop standards to support interconnection scheduling in 15 minute intervals per FERC Order No. 764

**Submitted By:** MISO

**Date:** September 9, 2013

MISO is submitting the following comments for consideration by the NAESB Wholesale Electric Quadrant’s Executive Committee when they take action on Annual Plan Item 2013 3a.iii (Develop standards to support interconnection scheduling in 15 minute intervals per FERC Order No. 764).

* Sections 17.1 and 17.2 seem to be incompatible with section 17.3. 17.1 indicates the the default ramp in the Eastern Interconnection is always 10 minutes however, if it crosses the Eastern/Western interconnection it should be 20 minutes. It would seem appropriate for the default ramp time to always be 10 minutes regardless of whether it crosses interconnections. Likewise the default ramp for the Western Interconnection should not have special requirements for the top of the hour (20 minutes) and then 10 minutes for all of the other intervals. It would seem appropriate that the default ramp in the Western Interconnection should always be 10 minutes.
* In the WECC Timing Table there were a number of changes made to the table which created inconsistencies with the timing table all of the other interconnections.
  + All references to the Interchange Authority were removed from the Western Interconnection timing table but the changes were not applied to the other timing table.
  + Column A header information indicates the “Sink BA Makes Initial Distribution of Arranged Interchange.” This responsibility has been revised from the Interchange Authority. A conforming change was not made to the “Timing Requirements for all Interconnections except WECC.”
  + Column B header information has replaced GPE, PSE, and LSE with BA and Transmission Provider. This change is inconsistent with the “Timing Requirements for all Interconnections except WECC.”
  + Column B also indicates the time to respond is for a Reliability Assessment. In the “Timing Requirements for all Interconnections except WECC” and what was previously listed the timing to respond was for a market assessment.
  + Footnote 2 within the NAESB ratified “Timing Requirements for all Interconnections except WECC” states “This PSE reference applies to PSEs whose transmission rights are cited on Arranged Interchange.” This footnote should be removed to be consistent with the new WECC timing table.
  + Footnote 3 within the NAESB ratified “Timing Requirements for all Interconnections except WECC” indicates the timings are in conjunction with INT-005-3. NERC is proposing to retire this standard and move the timing tables to INT-006-4. If the timing tables are to align with the new proposed NERC standards, the footnote with the “Timing Requirements for all Interconnections except WECC” should be revised to reflect the new NERC standard.