**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2014 WEQ Annual Plan Item 1(a), 1(b) and 1(d) / R11020 (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution, WEQ-008 Consistency Review, Standards Request R11020)

**Submitted By:** IESO, ISO New England, NYISO,PJM, and SPP

**Date:** October 3, 2014

It has been recognized there are shortcomings in the TLR process that need to be addressed

1. Lack of visualization as to the source of loop flows in the Eastern Interconnection\*
2. Use of static generation-to-load (GTL) data by the Interchange Distribution Calculator (IDC) during TLR events
3. IDC assumes all GTL is firm and can only be curtailed during TLR 5
4. Have a historical record of loop flows occurring in the Eastern Interconnection that can be used during after-the-fact reviews.

Using the NERC Operating Reliability Subcommittee approved the Parallel Flow Visualization motion in May 2009 as a starting point, NAESB had drafted and adopted an Annual Plan item “1.a Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection-Permanent Solution.”, The NAESB Business Practices Subcommittee (BPS) has met on a regular basis to develop a draft standard consistent with the Annual Plan.

The Annual Plan includes assigning curtailment priorities to GTL flows as calculated by the IDC. The draft standard recognizes differences by allowing a hybrid approach to report GTL priorities using either the Tag Secondary Network Transmission Service Method or the Generator Prioritization Method while respecting company specific requirements such as generator priority over-rides being submitted by Seams Agreements parties. Furthermore, if an ISO/RTO has a congestion management process that meets or exceeds the current standards, changes do not need to be made to that process to be in line with NAESB PFV standard unless explicitly specified by the standard. To the extent any ISO/RTO governing documents or FERC filed documents[[1]](#footnote-1) (e.g., seams agreements approved by FERC and/or specified within Transmission Service Providers’ governing documents such as Transmission Tariff and etc.) differ from IDC’s method of calculating GTL flows and GTL priorities, those exceptions will be accepted by the IDC. Many compromises were made with the expectation that the concerns would be documented and addressed during the field trial. The BPS has documented these concerns in an issues and concerns document that has yet to be finalized, and these concerns should be addressed before final adoption of the standard.

While modifications to the standard may be needed as a result of the field test (including but not limited to i) IDC evaluating market entities’ tagged PTP Intra-BA transactions within the TLR process ii) establishing parameters for determining Intermittent Resources’ DNR capacity), we believe the standards are ready for Executive Committee consideration of approval with the understanding that the standards will be held in abeyance until the completion of the field test.

1. Not applicable to IESO. [↑](#footnote-ref-1)