



**NBSO** New Brunswick System Operator  
**ERNB** Exploitant du réseau du Nouveau-Brunswick

October 2, 2009

North American Energy Standards Board.  
1301 Fannin, Suite 2350  
Houston, Texas  
77002

Attention: Cory Galik Cummings, NAESB Staff Attorney

**Subject: Request for Formal Comments on 2009 WEQ Annual Plan Items 1(a); 3(a)(vii);  
R05020: Version 1.8.1 Electronic Tagging Functional Specification and Schema**

Dear Mr. Cummings,

In response to your email/posting dated September 4, 2009 regarding industry comments to the E-Tagging Specification Version 1.8.1, the New Brunswick System Operator respectfully submits the comments detailed below recommending changes to the aforementioned specification.

The comments that follow are in regard to Section 3.6.1.3:

**Proposal #1**

*The NBSO proposes the loss carry forward be an optional setting. A flag can be set at tag creation indicating if losses should be carried forward during profile changes. This flag could be set by segment or for the entire tag. If the flag is set to False, loss rounding error will not be carried forward.*

*Rationale: There are jurisdictions, like the Maritimes Area, which use other methods to account for loss rounding error that conflict with the method described in section 3.6.1.3.*

**Proposal #2**

*The NBSO proposes the specification be changed to allow a loss percentage to be set for transmission sections that use in-kind losses. When available this would replace the calculation labelled Loss Percentage Step.*

*Rationale: This is a more accurate and consistent way to account for transmission losses compared to the current method of:  $(TotalDailyMWhPOR - TotalDailyMWhPOD) / TotalDailyMWhPOR$ .*

*Below is an example demonstrating the rationale of proposal # 2:*

*In-kind system losses are 3.3%*

*Tag A*

*TotalDailyMWhPOR = 100*

*TotalDailyMWhPOD = 97*

*Tag A Calculated Losses =  $(100 - 97) / 100 = 3.0 \%$*

*Tag B*

*TotalDailyMWhPOR = 50*

*TotalDailyMWhPOD = 48*

*Tag B Calculated Losses =  $(50 - 48) / 50 = 4.0\%$*

*As a result the calculated loss percentage varies significantly from the actual value.*

The New Brunswick System Operator (NBSO) located in Fredericton, New Brunswick, Canada is an independent system operator whose primary responsibilities are to ensure the reliability of the electrical system and to facilitate the development and operation of a competitive electricity market in New Brunswick. The NBSO is the Reliability Coordinator for the Maritimes Area and the Balancing Authority /Transmission Operator in the New Brunswick Balancing Area.

Please contact me with any questions comment.

**NEW BRUNSWICK SYSTEM OPERATOR**

Dean Landers  
Manager, Operations Services and Settlement  
Power System Operations

cc: T. Vandervort, NERC  
E. Sears, NBSO