

ENTERGY SERVICES COMMENTS

NAESB DRAFT STANDARD R03013
Coordinate Interchange Business Practices

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I. DEFINITIONS – Comments

We recommend all defined terms used in other documents, standards, processes, or previously approved documents should not be repeated here but should be incorporated into this NAESB standard by reference only. Deleting from this standard terms that are defined in other documents will:

- Help facilitate the implementation of the Functional Model,
- Make this standard consistent with the Open Access Transmission Tariff,
- Facilitate the coordination of this standard with the NERC Coordinate Interchange Reliability Standard,
- Allow for the continuation of the E-Tag process and the defining documents for E-Tag 1.7, and
- Avoid future confusion and constant changes or uncertainty as terms under the control of other entities would require changes to this standard.

In particular, defined terms that should be removed from this standard include: Arranged Interchange, Balancing Authority, Confirmed Interchange, Implemented Interchange, Interchange Authority, Interchange Transaction, Reliability Authority, Reliability Period, Transmission Service Provider, and any terms defined in the E-Tag documents.

- II. RFI Standard 5.0 should be deleted as it is a repeat of part of the NERC Coordinate Interchange Standard. RFI Standard 5.1 should be changed to 5.0, and 5.2 should be changed to 5.1.
- III. Ramp rates specified in the draft should be changed to “default ramp rates” for each Interconnection.
- IV. References to “dynamic transfers”, “dynamic schedules” and “dynamic pseudo-ties” should be deleted because of the existing industry turmoil on these subjects. Standards addressing these issues can be created in the future when the industry has coalesced on these issues.
- V. Appendix 3A1.A should have the following words added to the standard after Table 1 which are in the existing NERC Operating Manual:

Tag submission timing requirements are based on the duration of the TRANSACTION. Tags representing TRANSACTIONS that run for less than one day (24 hours) must be submitted at least 20 minutes prior to the start of the TRANSACTION (excluding ramp time). Tags representing TRANSACTIONS running for one day or more (24 hours or more) must be submitted at least four hours prior to the start. Tags submitted that meet these requirements shall be considered “on-time” by the E-Tag system and may be granted conditional approval. Tags submitted that do not meet these requirements shall be considered “late” by the E-Tag system, and consequently will be denied if not explicitly approved by all parties.

The E-Tag system accepts tags with a start time up to one hour prior to the current time. Tags with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit tags to document emergency actions taken to mitigate an OPERATING SECURITY LIMIT violation (Policy 3, Section A 2.4.1). This provision shall not be used to schedule TRANSACTIONS without the proper tag.

Tag assessment timing requirements are based on the submission time of the tag, as well as the duration. Hourly tags submitted one hour or less prior to start must be evaluated in ten minutes. Hourly tags submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. Tags with a duration of less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. Tags with a duration of 24 hours or more must be evaluated in two hours.

Timing Requirements for Reallocation when in a TLR Event

During a NERC TLR event, TRANSACTIONS may be submitted to replace existing TRANSACTIONS with a lower transmission priority. The new TRANSACTION tag must be received by the Interchange Distribution Calculator no later than 35 minutes prior to the top of the hour to allow time for RELIABILITY COORDINATOR to assess the impact of reallocation.

- VI. Appendix 3A1.B should have the following words added to the standard after Table 2 which are in the existing NERC Operating Manual:

Notes/Clarification:

- 1. All clock times are in PPT.**
 - 2. Tags falling under the criteria in yellow are deemed pre-schedule tags.**
 - 3. Tags falling under the criteria in green are deemed real-time tags.**
 - 4. Pre-schedule tags submitted between 15:00 and 18:00 will be assigned LATE composite status.**
 - 5. Real-time tags submitted after 20 minutes prior to the start of the Transaction will be assigned LATE composite status.**
- *Start-time references are for start of the Transaction, not the start of the ramp.**

Tag submission timing requirements are based on the type and duration of the TRANSACTION. Tags representing TRANSACTIONS that run for less than one day (24 hours) within the current day must be submitted at least 30 minutes prior to the start of the TRANSACTION (excluding ramp time). Tags representing TRANSACTIONS that are pre-scheduled to start the next day must be submitted by 1500 PST the day prior to the day the TRANSACTION is to start. Tags submitted that meet these requirements shall be considered “on-time” by the E-Tag system and may be granted conditional approval. Tags submitted that do not meet these requirements shall be considered “late” by the E-Tag system, and consequently will be denied if not explicitly approved by all parties.

The E-Tag system accepts tags with a start time up to one hour prior to the current time. Tags with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit tags to document emergency actions taken to mitigate an OPERATING SECURITY LIMIT violation. This provision shall not be used to schedule TRANSACTIONS without the proper tag.

Tag assessment timing requirements are based on the submission time of the tag, as well as the duration. Hourly tags submitted one hour or less prior to start must be evaluated in ten minutes. Hourly tags submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. Tags with a duration of less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. Tags submitted for pre-scheduled service starting the next day or a future day must be evaluated in three hours.