

Feedback on NAESB Recommendation R03013 (Coordinate Interchange Business Practice)

Introduction

We interpret the last sentence to mean that this document is concerned with the financial side of the transaction and not the physical side which is covered by the NERC Standards. TVA would like to know if this is a correct assumption.

Definitions

RFI Standard 1.14 TVA would like to see the word “Reliability” changed to “Assessment”. This would be more appropriate especially if our above assumption is correct and this document only addresses the front end of the transaction and not the physical side.

Business Practices

RFI Standard 8.0 TVA would like to see the last word in this sentence changed to NERC.

RFI Standard 8.1 This requirement could be a significant burden to a small utility so TVA would like to see the word “shall” changed to “should”. We would also like to have the phrase “Electronic System” defined.

NAESB RFI Datasheet

It appears that this document is taken right out of NERC Appendix 3A4 except that section B titled Curtailments and Reloads (Reliability Related Profile modifications) has been excluded. We don't disagree with leaving it out, but would like an explanation for clarification purposes.