

## NAESB Coordinate Interchange comments from the WECC ISAS:

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The WECC ISAS held a conference call on 3/17 at 0800 to solicit comments from the members for the following NAESB Coordinate Interchange document and associated Data sheet and response timetable. The WECC ISAS members present on the call applaud the NAESB drafting team for attempted to following existing NERC policies and not trying to reinvent the wheel for the industry.

WECC has a Reliability Management System compliance program in place that includes sanctions with current E-Tag criteria. WECC would assume that its current compliance program is complemented by these proposed Business Practices and is not currently contemplating any changes to the existing compliance program.

The comments are imbedded in the original document.

## **NAESB Coordinate Interchange Business Practice Standard (Request For Interchange, RFI)**

### **Background:**

In light of the continuing restructuring of the Electric industry, and FERC's rulemakings to ensure open and non-discriminatory access to the nation's transmission systems, NERC is developing Reliability Standards to replace current Operating Policies and Procedures. Furthermore, NERC Operating Policies do not reflect the new organizations or merchant functions that are forming.

With regards to Policy 3, NERC currently is developing the Coordinate Interchange Standard to address the reliability issues associated with a bilateral interchange Transaction. The Standard is being developed using the Functional Model as a basis for defining the "Functions" necessary for Bulk Electric System reliability rather than the existing NERC Operating Policies for "Control Areas".

### **Introduction:**

A request for the development of a NAESB complementary Business Practice Standard to NERC's Coordinate Interchange Standard was submitted in June, 2003. This Standard was approved by the Joint Interface Committee (JIC) representatives from NERC, NAESB, and RTO/ISO and assigned to NAESB for development.

This Standard is being developed to identify market-supported processes to facilitate fair & "equitable" competitive interchange practices. This standard will provide the necessary data and arrangements to the Interchange Authority and all involved parties of the Request for Interchange (RFI) for an Interchange Transaction to take place between Sink and Source Balancing Authorities (BA). This standard is designed to implement the flow

of data and approval mechanisms to facilitate Interchange. It is not intended to be the “Tagging Standard”. NAESB’s ESS is aware of the Industry desire to maintain a “Tagging” mechanism for the dissemination of data. The ESS will be the entity that will go forward with Tagging rules and procedures. The RFI shall contain at a minimum the required market and reliability information from the NAESB RFI Datasheet (attached). It should be understood this Standard covers the front-end business arrangements and requirements for an Interchange Transaction to take place. Upon receiving all approvals from the Approval Entities, the IA will utilize NERC’s Coordinate Interchange Standard to transition the Arranged Interchange to a Confirmed Interchange and finally the implementation of the Confirmed Interchange.

The Standard is being developed using Functional Model definitions to provide consistency with NERC’s Reliability Standards.

### **Definitions**

**RFI Standard 1.0** For the purposes of this Standard, the following definitions shall be applied:

**NAESB should ensure that the NERC and NAESB standard definitions are the same.**

**RFI Standard 1.1** Balancing Authority (BA) – The entity which performs the Balancing Function. Some of the duties of the Balancing Function include integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. In today’s operating environment with respect to Interchange, this entity closely resembles a Control Area. Until such time as the Balancing Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Control Area.

**RFI Standard 1.2** Interchange Authority (IA) – The entity which performs the Interchange Function. Some of the duties of the Interchange Function include authorizing implementation of valid and balanced Interchange schedules between Balancing Authority areas, and ensuring Interchange Transactions are properly identified for reliability assessment purposes. Until such time as the Interchange Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Tagging Authority for the sink Control Area for the requested Interchange.

**RFI Standard 1.3** Interchange Transaction – A transaction representing the delivery of energy from a generator located within a Point of Resource (POR) BA to a load located within a Point of Delivery (POD) BA.

**RFI Standard 1.4** Point of Resource BA – The Balancing Authority responsible for monitoring and/or controlling the generation identified as the source of an Interchange Transaction.

**RFI Standard 1.5** Point of Delivery BA – The Balancing Authority responsible for monitoring and/or controlling the load identified as the sink of an Interchange Transaction.

**In RFI Standard 1.3-5 why is the NAESB standard using POR/POD instead of Source or Sink BA. WECC recommends using Source or Sink language instead of the POR/POD language. The POR/POD language has been applicable for transmission and not generation previously.**

**RFI Standard 1.6** Requesting PSE – The PSE submitting the Request For Interchange (RFI). Under current policy this entity would be called the “Tag Author”.

**RFI Standard 1.7** Market Period – The period of time when a Requesting PSE is making purchase, sale, and Transmission service arrangements needed to support a RFI.

**RFI Standard 1.8** Arranged Interchange – The state where completed and required information from the business arrangements are provided to and received by the Interchange Authority.

**RFI Standard 1.9** Confirmed Interchange - The state where the Interchange Authority has verified the Arranged Interchange and is ready to submit it to the Balancing Authorities.

**RFI Standard 1.10** Implemented Interchange- The state where the Balancing Authority enters the Confirmed Interchange into its area control error (ACE) equation.

**RFI Standard 1.11** Approval Entities – Those entities responsible for providing active approvals to an Arranged Interchange.

**RFI Standard 1.12** Implemented Interchange Block Accounting – Energy accounting that assumes a beginning and ending ramp time of zero minutes. For accounting purposes, this moves the energy associated with the starting and ending ramps into the adjacent starting and ending clock time of the Interchange.

**RFI Standard 1.13** Market Adjustment – A desired modification to the energy and/or transmission profile during the Confirmed Interchange period.

**RFI Standard 1.14** Transaction Correction – Modifications to non-reliability data of a Request For Interchange (RFI) while in the Arranged Interchange period. This nonreliability

data is located in the NAESB RFI Datasheet and is labeled as “correctable”.

**RFI Standard 1.15** Reliability Period – The segment of time from when the IA has received the RFI from the requesting PSE to physical implementation (beginning of ramp time).

**RFI Standard 1.16** Request For Interchange, RFI- Process of providing required data as defined in the NAESB RFI Datasheet to the IA for the purpose of implementing a bilateral Interchange Transaction.

**RFI Standard 1.17** Transmission Service Provider- Approves or denies transmission service requests from PSEs, Generator Owners, and LSEs. This entity also administers the transmission tariff and provides transmission service agreements.

**RFI Standard 1.18** Reliability Authority- Ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority area. Provides Interchange Transaction approvals to Interchange Authorities based on reliability analysis. Until such time as the Reliability Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Reliability Coordinator.

### **Business Practices**

**RFI Standard 2.0** All requests to implement an Interchange Transaction shall be accomplished by the submission of a completed “Request For Interchange”, RFI, to the Interchange Authority (IA). Upon receipt of the RFI, the IA shall immediately forward the RFI to all involved parties of the RFI.

**RFI Standard 2.1** All energy purchase, energy sale, and Transmission service arrangements necessary to implement the completed RFI shall be performed during the Market Period.

**RFI Standard 2.2** Until such time as other protocols are established by NERC and/or NAESB, submission of the completed RFI shall be in accordance with NERC Policy 3 Appendix 3A4.

**RFI Standard 3.0** While any Purchasing Selling Entity (PSE) may act as the “Requesting PSE”, it shall be the responsibility of the load serving Purchasing-Selling-Entity (PSE), or their designee, to ensure that the completed RFI has been submitted to the IA.

**RFI Standard 4.0** A completed RFI shall contain, at a minimum, the required information specified in the most current version of the **NAESB RFI Datasheet** (attached).

**RFI Standard 5.0** On behalf of the Requesting PSE, the IA shall verify approvals from all involved Approval Entities (e.g. TSP-for transmission reservations, BA-for ramping start/end times and rate, RA-reliability analysis, Generator/Load PSE) prior to being confirmed and implemented in accordance with the NERC Coordinate Interchange Standard.

**RFI Standard 5.1** The Requesting PSE shall submit required RFI information and data in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable** (attached).

**RFI Standard 5.2** Until such time as other protocols are established by NERC and/or NAESB, timing requirements for the submission and approval of the completed RFI shall be in accordance with NERC Policy 3 Appendix 3A1.

**RFI Standard 6.0** All requests for approval/validation of the completed RFI by the IA during the Arranged Interchange Period shall be assessed in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable**. The results of that assessment shall be promptly communicated by the IA back to all involved parties.

**RFI Standard 6.1** Any denial of a RFI request by any Approval Entity shall be communicated to the IA and Requesting PSE and accompanied by the reason for such denial.

**RFI Standard 7.0** The IA shall be responsible for communicating changes on the status of the RFI to all involved parties of the RFI, including BAs, IAs, RAs, counterparty PSE (Generator or Load Serving), and the TSPs, and the PSEs holding the associated transmission rights necessary to support the transaction.

**RFI Standard 8.0** The primary method for submitting a RFI to the IA shall be by electronic means using protocols to be determined by NAESB.

**RFI Standard 8.1** A backup or redundant electronic system shall be available for immediate use should the primary electronic means become disabled.

**RFI Standard 8.2** Submitting a RFI to the IA via facsimile is acceptable only as a last resort when the electronic means and its required backup or redundant system are not available.

**RFI Standard 8.3** Until such time as NERC and/or NAESB establish replacement protocols, the preferred method of submitting data to the IA shall be the

most current version of the NERC E-Tag Specifications.

**RFI Standard 9.0** The PSE who created the RFI shall be allowed to submit a Transaction correction to the RFI during the Arranged Interchange Period in accordance with the **NAESB RFI Submission and Response Timetable**.

**RFI Standard 9.1** Market adjustments made during the Confirmed Interchange Period by the PSE must be submitted to the IA who immediately communicates the revised request to all involved parties of the RFI. Timing of the approval assessment on the market adjustment by the Approval Entities shall be in accordance with the NAESB

**RFI Submission and Response Timetable.** If denied by any Approval Entity, the original request remains valid.

**Add - RFI Standard 9.2 Curtailment Requests for reliability reasons are not to be denied. Further Language that accommodates reliability curtailments may need to be added to this standard.**

**RFI Standard 10.0** Each PSE submitting a RFI for an Interchange Transaction shall have, or arrange to have, personnel on site and immediately available 24 x 7 for notification of Interchange Transaction changes.

**RFI Standard 10.1** These personnel shall be available from the beginning of the Market Period until the end of the Implementation Period.

**RFI Standard 11.0** Energy accounting for all RFIs shall be accomplished via Implemented Interchange Block Accounting.

**Should language be included to state that a FERC approved Tariff supercedes this document?**

**RFI Standard 12.0** Settlement of losses shall be either handled as financial or as payment in-kind.

**RFI Standard 12.1** For losses handled as payment in-kind, the PSE shall communicate to the IA the mw losses and the entity the losses are with for each TSP along the transaction path.

**RFI Standard 12.2** All bilateral transactions are equal and opposite in direction for a source and sink BA.

**RFI Standard 13.0** Ramp rates shall be standard across the North American Interconnections **as stated in items 13.1 & 13.2 for the Eastern and Western interconnects**

**RFI Standard 13.1** Ramp rate for the Eastern Interconnection shall be 10 minutes equally across the start and end times of the Transaction unless otherwise agreed to by all parties involved in the Transaction.

**RFI Standard 13.2** Ramp rate for the Western Interconnection shall be 20 minutes equally across the start and end times of the Transaction unless otherwise agreed to by all parties involved in the Transaction.

**RFI Standard 14.0** For Dynamic Transfer Transactions, the requirements shall be established by NERC, **except where regional differences are approved.**

**RFI Standard 14.1** Until such time as NERC establishes formal standards for Dynamic Schedule, requirements shall be governed by the most recent version of NERC's "Dynamic Transfer White Paper" shall be followed.