**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant (WEQ)

**Committee:** Executive Committee

**Recommendation:** R18011/2019 WEQ Annual Plan Item 3.h

**Submitted By:** IESO, ISO-NE, MISO, NYISO, PJM, and SPP[[1]](#endnote-1)

**Date:** March 13, 2019

The ISOs/RTOs listed above submit the following comments for consideration by the Executive Committee regarding the 2019 WEQ Annual Plan Item 3.h “Request regarding the implementation of WEQ-004 Appendix D – Commercial Timing Tables for WECC.”

We propose the Executive Committee not approve the changes to the Coordinate Interchange Timing tables as documented in the recommendation. Our concern is the changes made to the timing tables are contrary to how the industry has operated for years. Prior versions of the NERC timing tables included the Interchange Authority which had up to one minute to distribute the Arranged Interchange, as noted in Column A. The GPE, LSE, and TSP had ten minutes, or as noted in Column B, to conduct market assessments. Any time not used by the Interchange Authority was available for the GPE, LSE, and TSP in addition to its ten minutes. The recommendation as written states there is only a total of ten minutes for the Sink BA to distribute the Arranged Interchange (previously performed by the Interchange Authority) and then conduct the market assessments.

The question raised by the requestor ties back to when NERC included the Interchange Authority in the Compliance Registry. The requestor indicates in his request that it is clear these tables conflict with current practice. We do believe some clarity should be added to the standards to specify how the process works but do not see a conflict. As the recommendation is drafted, the clock starts ticking for the GPE, LSE, TPSE, MO, and TSP to conduct their market assessments prior to them receiving notification of the Tag. Additionally, approving this recommendation will result in an unnecessary cost to the industry, as the Tag Vendors will be required to make changes to their systems.

One approach to the timing tables would be to seek an interpretation from NERC. However, with the changes to the Coordinate Interchange Standards (INT) under NERC’s Standards Efficiency Review (SER) initiative we have reservations as to whether NERC would consider moving forward with an interpretation of an INT requirement. In the absence of any interpretation from NERC or guidance from FERC that the timing table is incorrect, we suggest the most appropriate action is to revise the recommendation to document how the distribution of the Arranged Interchange and current market assessment time periods were designed and are implemented today.

This could be achieved by removing the reference of footnote 3 for column B so that footnote 3 only applies to Column A. Add a new footnote for column B that states “Measurement starts after the completion of the posted Column A timing requirements, regardless of the Sink BA’s system performance in completing Column A’s requirements.

1. CAISO, and ERCOT have not signed on to these comments. [↑](#endnote-ref-1)