**Informal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Subcommittee:** Coordinate Interchange Scheduling Subcommittee

**Request:** Request for Formal Comments 2015 WEQ Annual Plan Item 1.e/R14002 (Develop, modify, or delete business practice standards to support request R14002 (NERC Project 2012-05 ATC Revisions (MOD A))

**Submitted By:** ERCOT, IESO, MISO and PJM

**Date:** July 28, 2015

The members of the Independent Grid Operators/Planners (IGO) segment listed above appreciate the time and effort by the NERC and NAESB groups to better refine the MOD standards related to the AFC/ATC processes. The revised NERC standards and proposed NAESB Business Practice Standards better reflect reliability and relevant business processes without the purely administrative requirements. To further improve the clarity and consistency of the proposed Business Practice Standards we recommend the following revisions:

* Sections xxx.2.1.6.1, xxx.2.2.6.1, and possibly others contain references to WEQ-001.18.2.2 which has now been set to Reserved. The new section is likely in the new xxx.5 post back section. We recommend the entire document be reviewed and revised for references in the proposed standards that currently reflect sections being updated to “RESERVED.”
* We are concerned that requirements 1.4 and 1.4.1 could prevent possible future market products designed to enhance utilization, especially if neighboring entities feel that such products are beneficial and would not result in a reliability impact on other systems. We recommend additional clarification to requirements 1.4 and 1.4.1 as follows:

*The sum of Facility Ratings of Tie Facilities referenced in these requirements should take into account the expected use of reservations and schedules to help ensure efficient use of the transmission system*.