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NAESB WEQ Business Practices Subcommittee
Time & Inadvertent Management Task Force:

Please see Entergy (SPO) formal comments in response to the proposed changes to WEQ-006 and WEQ-007.

Feel free to contact me if you have any questions about our comments. Thank you for the opportunity to provide comments.

Regards,
Will Franklin

WEQ-006:

The suggestion that Method 2 will reduce the number of TEC is not necessarily true since the time spent in each TEC is longer.

TECs place the interconnection closer to operating limits and equipment trip set points, thus inherently TECs reduce reliability. One could contend that TECs should be entirely eliminated unless there is a true business need to perform them. If there is a valid business need, NAESB should identify that business need and the impact to reliability should be analyzed by NERC and if determined to be needed, appropriate limits on TECs should be established.

Instead of proposing “Method 2”, why not propose the suspension of TECs altogether?

Time Error Correction Initiation Method 2 states that a 24 hr TEC will be applied with no termination value for TE. This means that the TE would continue, even if TE went negative. (Note that many systems are programmed to terminate TEC if TE is in a direction not congruent with the TEC). Recommend defining a TE termination criteria for TEC.

Also, the initiation criteria of +/- 30 seconds seems arbitrary (as is the criteria in Method 1). What is the business justification for 30 seconds vs. 5 or 10?

WEQ-007

Bilateral Payback Method 2: The concept of financial settlement of inadvertent is beneficial to reliability in that physical transfer of energy is no longer needed and thus those flows (especially unilateral payback) would not impact the interconnection.

To whom at NERC will BAs report the settled amounts?

Unilateral Payback Method 2:

This method appears to be a more restrictive variation of Method 1. I can't understand why any BA would elect to use Method 2 when they could use Method 1.

The statement to "to assist in correcting time error..." is not necessary as the purpose of this is to reduce inadvertent. TEC is accomplished through the process in WEQ-006.

Why does this have only a + 0.02 Hz offset as a mode of payback?

What is meant by "an Interchange Schedule of 5 MW..." Who would this Interchange Schedule be with?

Additionally, this method is biased towards those who have a positive balance (since TE has been typically positive over the last several years).