

Comment Form - SAR for CI Standards Revisions - Project 2008-12

Survey Response: Comment Form - SAR for CI Standards Revisions - Project 2008-12
Comment Request - SAR for Coordinate Interchange Standard Revisions - Project 2008-12

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- 1) **Individual or group.**
Group

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- 2) **Group Name**
MRO NERC Standards Review Subcommittee (NSRS)

- 3) **Lead Contact**
Marie Knox

- 4) **Contact Organization**
Midwest ISO Inc.

- 5) **Registered Ballot body segment (check all applicable industry segments)**
2 - RTOs and ISOs

- 6) **Contact Telephone**
(###) ###-####
(317) 249-5264

- 7) **Contact E-mail**
mknox@midwestiso.org

- 8) **Please complete the following information.**

	Additional Member	Additional Organization	Region	Segment Selection
1.	Neal Balu	Wisconsin Public Service	MRO	3, 4, 5, 6
2.	Terry Bilke	Midwest ISO Inc.	MRO	2
3.	Carol Gerou	Minnesota Power	MRO	1, 3, 5, 6
4.	Jim Haigh	Western Area Power Administration	MRO	1, 6
5.	Ken Goldsmith	Alliant Energy	MRO	4
6.	Tom Mielnik	MidAmerican Energy Company	MRO	1, 3, 5, 6
7.	Pam Sordet	Xcel Energy	MRO	1, 3, 5, 6
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6

10. Joseph Knight	Great River Energy	MRO	1, 3, 5, 6
11. Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6
12. Larry Brusseau	Midwest Reliability Organization	MRO	10
13. Mike Brytowski	Midwest Reliability Organization	MRO	10
14.			
15.			

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9) Question 1 Comments:

Please note that question 1 is different than the word form provided on the website. The word comment form states, "Do you agree that there is a reliability-related reason for the proposed standard action?" and offers the options of Yes, No, and Yes and No.

Our group responded with "Yes and No" and offered the comments listed below:

INT-001-2 - Since Market Flow is included in TLR cuts, this suggestion is overreaching its intent. Specification to types of interchange can be supported, but not "all point-to-point..."

INT-006-2 - TSPs are already performing AFC calculations on the related TSRs. Those same TPs and BAs are already doing reliability assessments per INT-007. System conditions that require RC action are typically assessed in real-time, past the requirement for ETag submissions. What system conditions exist that will give an RC cause to approve or deny a transaction a month out? a day? an hour?

INT-008-2 - Yes.

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10) Question 2:

Do you agree with the scope of the proposed standard action?

No

11) Question 2 Comments:

INT -001-2 - Since Market Flow is included in TLR cuts, this suggestion is overreaching its intent. Specification to types of interchange can be supported, but not "all point-to-point..."

INT -006-2 - TSPs are already performing AFC calculations on the related TSRs. Those same TPs and BAs are already doing reliability assessments per INT-007. System conditions that require RC action are typically assessed in real-time, past the requirement for ETag submissions. What system conditions exist that will give an RC cause to approve or deny a transaction a month out? a day? an hour?

INT-008-2 & INT-009-1 -No. The requirements in the standards that deal with the Interchange Authority are primarily those tasks done by e-tagging services and not Balancing Authorities. For example, INT-005-2 R1. and R1.1. both state actions that are completed by e-tagging services. This is a problem that was created by an incorrect conversion of Policy 3 into the V0 standards.

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12) Question 3:

Do you agree with the applicability of the proposed standard action? If not, what functional entities do you think need to be added/deleted?

No

13) Question 3 Comments:

The activities in the Interchange standards should clearly identify the responsible entity. The MRO believes the Interchange Authority (IA) requirements should be retired.

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14) **Question 6:**

If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.

The activities in the Interchange standards should clearly identify the responsible entity. The MRO believes the Interchange Authority (IA) requirements should be retired. All of the requirements applicable to the IA (except CIP) were tagging process steps in Policy 3 that were converted to IA requirements in the V0 effort. There is not a common understanding of what the IA is. Since these are tagging process steps and tagging tools aren't users, owners, or operators, the requirements should be retired or moved to an informational document.

The IA function should be retired from the functional model (FM), as it just causes confusion. The BA's responsibilities for scheduling are already defined in the other INT standards. The final action would be to remove the IA as an applicable entity from the CIP standards. If NERC feels the tagging vendors should be held to the CIP standards, they should deal with them directly, and at the same time approach the IDC, SDX, GADS, CERTS and other vendors of NERC-supporting tools.

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