

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

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### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

### Comments on Appendices (List comments by Appendix Subsection)

### General Comments

The ACE expression is innately linked to physical generator movement, actual interchange flow, and grid reliability. The requirements in this business practice are regional in nature and apply to the Regional Councils that are responsible for determining the ACE methodology and coordinating such methodology among the Control Areas/Balancing Authorities within that Region.

The IRC is concerned that the development of NAESB Version 0 Business Practices has resulted in requirements that have a greater impact on reliability requirements than anticipated when the JIC

made its original assignment to NAESB. It may not be the intent for these NAESB Business Practices to impact reliability any more than was considered by the JIC but it is impossible to understand any business practice's impact on reliability until details of the requirements are known. In addition, certain NAESB Ver 0 Business Practices are conflicting with requirements and procedures that are currently specified and developed by Regional Reliability Councils (RRC). These NAESB standards, though intended to specify requirements for continental business practices, have an integral effect on how RRCs meet reliability requirements. As such, the IRC recommends that NAESB review its proposed Business Practices to ensure Version 0 Business Practices do not conflict with RRC requirements and negatively impact reliability.