

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

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)

Appendix A - Interchange Transaction Tagging Between Interconnections, Section A – Between ERCOT and Eastern Interconnections.

Requirements for coordination of ATC across the DC tie between SPP and ERCOT do not reflect the current practices as provided for in filed SPP tariffs and procedures. ISO-RTO Council (“IRC”) concurs with SPP’s previously provided individual comments to Draft 2 to make appropriate changes to this section. We are aware of the specific directive of the Version 0 drafting initiative the Business Practices Subcommittee is operating under which does not allow for any changes to the existing NERC requirements. However, the IRC does not support the establishment of standards which employ practices that are known

**to be out of date. It is the IRC's understanding that NASEB elected not to include an out-of date ERCOT transaction curtailment process from NERC Policy 9 as part of the NAESB TLR Business Practice. NAESB also elected not to include the WECC transaction curtailment process in the NAESB TLR Business Practice because it was not consistent to be included as a continental business standard.**

**The requirements in Appendix A are also regional in nature and apply only between transactions across the ERCOT and SPP borders. We believe it is inappropriate for NAESB to include these regional ATC procedures in a continental standard for Coordinate Interchange.**

**For these reasons, the IRC requests NAESB to remove Appendix A from the Version 0 Coordinate Interchange standard. Any additional business requirements for coordinate interchange between ERCOT and SPP can be requested as Version 1 changes in the future.**

## **General Comments**

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.