Unofficial Comment Form
Project 2008-12 Coordinate Interchange Standards

Please **DO NOT** use this form for submitting comments. Please use the electronic form to submit comments on the standards. The electronic comment form must be completed by 8:00 p.m. ET **Thursday, August 22, 2013**. Enter comments in simple text format. Certain characters, bullets, numbers, and special formatting will not be retained.

If you have questions please contact **Steve Crutchfield** or by telephone at 609-651-9455.

**Project 2008-12: Coordinate Interchange Standards Project Page**

**Background Information**
The Coordinate Interchange Standard Drafting Team posted drafts of INT-004-3, INT-006-4, INT-009-2, INT-010-2, and INT-011-1 for a 30-day public comment period from November 10, 2009 through December 11, 2009. Following the posting, the drafting team began to respond to comments and revised the standards. At about the same time, the NERC Standards Committee began an effort to reprioritize projects and to focus industry and NERC staff resources to the most important projects.

As a result, this project was placed on the inactive list for two years. In February 2013, the team was reconvened and has completed its consideration of comments from the previous posting and as well as comments concerning the INT standards from Phase 1 of the Paragraph 81 project. The team is soliciting specific additional feedback before finalizing the standards for balloting, to ensure that appropriate alternatives identified, and if necessary, a transition plan is developed for any requirements that meet Paragraph 81 criteria but are necessary for other reasons.

The following documents are posted on the project page to assist in preparing a response to the drafting team:

- The criteria developed by the Paragraph 81 drafting team
- A spreadsheet containing the comments related to the INT standards that were received during Phase 1 of Paragraph 81
- A mapping document showing the disposition of each requirement from the currently enforceable versions of the INT standards in the proposed revisions
- A summary of the revisions made to each standard since the last posting
Questions

**Paragraph 81 Considerations:** The Coordinate Interchange SDT (CISDT) has reviewed all of the previously posted INT standards, along with stakeholder feedback on the INT standards from Phase 1 of the Paragraph 81 project, as well as outstanding FERC directives assigned to the Coordinate Interchange project. The CISDT believes that all of the requirements remaining in the four standards that are being posted are necessary and require accountability.

Please review the mapping document and the list of Paragraph 81 recommendations provided to the INT team as a result of comments received from stakeholders during Phase 1 of Paragraph 81, along with the proposed revisions to the INT standards. If you believe that a specific requirement in the proposed INT-004-3, INT-006-4, INT-009-2, INT-010-2, or INT-011-1 could be better addressed through alternate means than a NERC Reliability Standard, please provide the specific standard and requirement number, along with a specific suggestion for an alternate means to ensure the intended action is accomplished. Some examples of alternate means could include working with NAESB to incorporate the requirement into NAESB business practice standards; moving the requirement into the Guideline and Technical Basis section of the same standard; or working with a technical committee to develop a NERC guideline.

Please be as specific as possible.

Comments: In general, these Standards represent the functions and actions necessary to effectively manage the details of interchange data. If this information were located in NAESB Business Practice Standards, which are the sources of the software specifications, and open to the industry for comment and voting, that would be adequate to serve reliability needs.

Comments by each individual Standard:

**INT-004**
For those entities that utilize dynamic transfers the transparency that the requirements provide is necessary for reliability.

**INT-006**
Requirements R1 and R6 can be removed (assuming the Standard is not retired) because they deal with given concepts of Arranged Interchange.

**INT-009**
BAL-005 Requirements R9 through R12 could be revised to incorporate the language/intent of these INT requirements. INT-009 would no longer be necessary. Regarding INT-009 R3, even though this requirement has been present since the original policy language was converted to Standards, it is an obvious function that is required in order for the flow to be set as desired.
INT-010
Requirements R1 through R3 are administrative to “document” the flow after the fact. This is good practice. These Requirements would be more appropriate in another Standard, possibly INT-011-1 Interchange Coordination Support.

R4 is simply trying to enforce that entities don’t use the “expedited” approval process for non-reliability reasons. A description in NAESB business practices would be adequate.

R5 has reliability value in that an expedited process to have a curtailment approved is desirable. However, a RC can direct people to do something without the Tag. It is definitely needed in the software design to ensure the typical process of a curtailment is efficient.

R6 is unnecessary because it is a qualifier for the operation of a dynamic schedule. If someone gets a Tag curtailment, that is their notice to adjust the source generation. They should not have to wait to get that direction (again) from somewhere else.