

Comment Form

Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

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)

Contact Name	:	Karl Tammar
Comments submitted on Behalf of Organization	:	ISO RTO Council - SRC
Email of Contact	:	ktammar@nyiso.com
Phone Number on Contact	:	518.356.6205

Comments on Definitions (List comments by Definition)

Comments on Requirements (List comments by Requirement Number)

- 1.1.1.3 In the Western Interconnection, a bilateral inadvertent interchange payback of 25 MW or less does not require a NERC tag. Noting the regional differences.

Comments on Appendices (List comments by Appendix Subsection)

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.