

Comment Form

Time Error Version 0 Draft 3 WEQBPS-004-000

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Please submit comment form by November 25, 2004 to:
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Contact Information (Must be Provided)

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Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. In order to achieve a consistent set of definitions, matching NAESB Standards definitions to the Glossary that will be incorporated in NERC Version 0 Standards would eliminate duplication. To the extent that a NERC Version 0 definition does not satisfy the NAESB Standard's need, i.e. requires more explanation, etc., NAESB could supply an appropriate definition, subject to reaching consensus on the definition's validity and/or appropriateness.

Comments on Requirements (List comments by Requirement Number)

- 1.1 If a BA normally operates asynchronous to an Interconnection and they establish their own time error control bands, the BA has no reason or necessity to notify the Interconnection Time Monitor of the bands being utilized, or to provide notification when they are changed. If that BA has the ability to connect with an Interconnection, then it will become subject to Interconnection rules of that region, and thus Time Error notification upon paralleling with the Interconnection.
- 4. This section reflects manual time error correction practices in the Eastern Interconnection and ignores regional practices in the West whenever the WECC is not operating under Automatic Time Error control (WATEC).
- The IRC is concerned about the impact of this standard on the regional diversity and the varying requirements that exist at this time.

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.