**TVA Formal Comments to NAESB PFV WEQ-008 Recommendation**

**October 3, 2014**

TVA would like to submit the following formal comments as modifications to the Parallel Flow Visualization (WEQ-008) Recommendation.

**Seams Agreements**

It is important to allow for the incorporation of Seams agreements in WEQ-008, because of the importance of the Congestion Management Process in managing the impact of Firm Market flows in the Eastern Interconnection. Those Seams agreements should not be allowed to game the system and create additional firm service for those entities entering into the seams agreement and to take firm service from 3rd parties. Also, seams agreements should not be able to be used to reduce the granularity of the GTL calculation but should be allowed to enhance the granularity.

*Possible language to add:*

1. X008-1.10.1 Seams Agreements - GTL priorities that are calculated via a Seams Agreements should not be allowed to create more total Firm Service between the seams agreement members than was available from the standard GTL calculation processes. The agreements are allowed to reduce firm service rights between the Seams agreement members or move firm service rights from one Seams member to another Seams member. Seams agreements cannot decrease the amount of Firm Service available to 3rd parties on those flowgates identified in the agreements from the standard GTL calculations.

2. X008-1.10.2 Seams Agreements - Seams Agreements cannot decrease the level of granularity of the GTL calculation below the level of granularity required under PFV.

**Transparency and Visibility**

Every TSP, TOp, BA and RC is impacted by these GTL calculations because of the possible curtailments that result from the GTL values. These calculated values and possible Seams overrides need to be visible by all impacted entities. Currently the IDC is usually only available to Reliability Coordinators. There should be a requirement that these values be available for viewing by all impacted entities. The likely tool to accomplish this transparency is the SDX tool.

**Pseudo-ties**

Intra-BA and Inter-BA pseudo ties change the GTL calculations. The pseudo ties change the apparent location and impact of generators and transactions and could be used to minimize the impact of certain transactions on neighboring systems. More defined rules around how pseudo ties are used are needed in order to minimize the impact of intra-BA and inter-BA pseudo ties on the GTL calculations.

*Possible language to add:*

The impact of Intra-BA and Inter-BA pseudo ties will be calculated using the physical location of the source and sink in the GTL calculation and not their pseudo tied location.

**X008-1.12 Consolidating BAAs**

The impact of consolidating BAAs does not require impacted 3rd parties be notified as an affected system and given the opportunity to study those impacts. The consolidating of BAA has the potential to create large flows on the transmission system and should be treaded similar to a TSR study.

1) X008-1.12 Consolidating BAAs

After a BAA footprint changes, a Network Resource shall be considered a DNR to the BAA or sink for which it was originally granted Firm Transmission Service. A Network Resource shall be considered a DNR to a BAA or sink it did not originally have firm service when it meets one of the following requirements:

*Possible language to add:*

Impacted neighboring systems must be notified as an impacted party and given the opportunity to study the impacts of the consolidation of BAAs. Before the consolidation can occur, impacts on neighboring systems must be resolved.

**Use of Term Non-Jurisdictional**

In X008-1.12 (Consolidating BAAs), the word “non-jurisdictional entities” is used twice in the standard language as shown below:

* A BA with a process that is defined in the Transmission Provider’s approved tariff or similar governing documents for non-jurisdictional entities, for designating a Network Resource to meet firm capacity requirements shall establish DNR status utilizing that process provided that it includes an evaluation of transmission limitations (equivalent to a transfer analysis between consolidating BAAs). This evaluation will not violate any SOL on the BAA being evaluated and on adjacent BAA(s). A violation of any SOL found in the evaluation will limit the firm capacity of a DNR.
* A resource shall be considered as DNR between consolidating BAA’s up to capacity of existing firm PTP and NITS. If additional firm PTP and NITS capacity is desired between consolidating BAAs, the additional capacity must be evaluated for transmission service utilizing a process that is defined in the Transmission Provider’s approved tariff or similar governing documents for non-jurisdictional entities. This evaluation will not violate any SOL on the BAA being evaluated and on adjacent BAA(s). A violation of any SOL found in the evaluation will limit the additional firm transmission service.

We would recommend removing these two references. Placing these particular references basically infers that this standard is for use only with U.S. entities. NAESB’s membership includes companies from Canada and Mexico such as Alberta Electric System Operation, BC Hydro, Independent Electricity System Operation (IESO), Hydro-Quebec Transenergie, and Manitoba Hydro who use NAESB standards but answer to their own regulators. Limiting this to only FERC jurisdiction in the U.S. would exclude the needs of NAESB’s members from other countries.

In addition, the term “non-jurisdictional” is not found in any of the current NAESB standards – Version 3. The word “other governing documents” has been historically been used to cover non-jurisdictional entities and members from other countries.