

## Minutes Joint Interchange Scheduling Working Group

September 16, 2008  
Marriott Vancouver Pinnacle Downtown  
Vancouver, British Columbia, Canada

A meeting of the North American Electric Reliability Corporation (NERC) and the North American Energy Standards Board (NAESB) Joint Interchange Scheduling Working Group (JISWG) was held on September 16, 2008 in Vancouver, British Columbia, Canada. The meeting announcement, agenda, and attendance list are attached as **Exhibits A, B, and C**, respectively. JISWG co-chairs Jim Hansen and Bob Harshbarger presided.

### **Antitrust Compliance Guidelines**

Secretary Vandervort acknowledged the NERC Antitrust Compliance Guidelines.

### **Minutes of the Previous Meetings**

The JISWG reviewed and approved by unanimous consent the May 21–22, 2008 and July 23–24, 2008 meeting minutes, as written.

### **Coordinate Interchange Timing Tables Standard Drafting Team**

Chair Harshbarger reported that the NERC Coordinate Interchange Timing Tables Standard Drafting Team (CITTSDT) had two conference calls to address comments received on the last posting of the Coordinate Interchange Timing Tables draft standards. The Standards Committee posted the INT-005-3, INT-006-3, and INT-008-3 draft standards for a 30-day pre-ballot period from August 13, 2008 until September 11, 2008. Followed by a 10-day ballot period that began on September 11, 2008 and will end on September 22, 2008.

If the standards are successfully balloted, all requirements in the standards shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

The announcement, standards revisions, industry comments, implementation plan, and comment form can be found on the NERC Standards Coordinate Interchange – Timing Table (Project 2007-14) Web site, as follows:

[http://www.nerc.com/~filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/~filez/standards/INT_Urgent_Action.html)

### **e-Tag 1.8.1 Specifications - Comments and JISWG Responses**

The JISWG posted an “Options for providing the capability in the e-Tag system for supporting multiple reliability limits” that included a request for comments, on both the NERC and NAESB Web sites from July 29 through September 10, 2008. The JISWG responded to the comments during this meeting. See **Exhibit D** for the comments with responses. The comments and responses will be posted on the NERC JISWG and NAESB JISWG Web sites for your review.

The JISWG appreciates those who took the time to generate and submit comments. The JISWG considers these valuable comments in the development to the e-Tag 1.8.1 Specifications.

### **Proposed Transfer of e-Tag Specifications from NERC to NAESB**

The JISWG discussed the informal proposal to transfer the e-Tag Specifications and e-Tag Schema from NERC to NAESB. The e-Tag Specifications have been identified as a gray area within the NERC Reliability Standards process. The e-Tag Specifications are not a reliability standard, but are significantly more than just a supporting/reference document. Since NAESB already owns and maintains several technical standards such as OASIS Standards & Communications Protocol and gas pipeline Electronic Data Interchange, it is proper to consider having NAESB become the official sponsor of the e-Tag Specifications and e-Tag Schema. NAESB already incorporates vendor representation, which seems to support NAESB ownership of the e-Tag Specifications.

The transition from NERC to NAESB would give more weight to the e-Tag Specifications as a NAESB Business Practice and would ensure that the specifications, schema, and the e-Tag process implementation are reviewed through a process geared toward business practices and software standards. The concept envisions the JISWG developing the NAESB Business Practice standard. It is also anticipated that NERC and NAESB would remain as the significant participants in electronic tagging specifications development through the JISWG.

Since the electric industry registry (EIR) is transferring from NERC to NAESB, the JISWG believes it also makes sense to transfer the e-Tag Specifications and Schema from NERC to NAESB.

Secretary Vandervort sent a letter to NERC’s Lynn Constantini and to NAESB’s Rae McQuade outlining the JISWG proposed transfer of e-Tag Specifications and Schema from NERC to NAESB. This was followed by a discussion between Ms. McQuade, Paul Sorrenson, and Andy Rodriguez following a NAESB EC meeting in September, 2008. Ms. McQuade stated that she did not see a problem in the proposed transfer.

The JISWG hopes to see progress in the transition during the fourth quarter of 2008.

**Dates and Locations of Future Meetings**

The JISWG May 2009 meeting was changed from a NERC-coordinated meeting to a NAESB-coordinated meeting. Look for additional information and meeting details on the NERC JISWG Web site and on the NAESB JISWG Web site.

Additional meetings or conference calls may be scheduled as necessary for the implementation of the e-Tag, version 1.8.1 or other JISWG-related business.

<i>JISWG Meeting/Conf Call/Webcast Schedule</i>				
	<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Meeting Coordinator</b>
Meeting	Wed, Nov 12, 2008 Thur, Nov 13, 2008	10 am – 5 pm 9 am – Noon	Houston	NAESB
Meeting	Wed, Jan 14, 2009 Thur, Jan 15, 2009	10 am – 5 pm 9 am – Noon	Phoenix *	NERC
Meeting	Wed, Mar 11, 2009 Thur, Mar 12, 2009	10 am – 5 pm 9 am – Noon	Houston (or volunteer city)	NAESB
Meeting	Wed, May 13, 2009 Thur, May 14, 2009	10 am – 5 pm 9 am – Noon	Houston (or volunteer city)	NAESB
Meeting	Wed, Jul 15, 2009 Thur, Jul 16, 2009	10 am – 5 pm 9 am – Noon	Toronto *	NERC
Meeting	Wed, Sep 16, 2009 Thur, Sep 17, 2009	10 am – 5 pm 9 am – Noon	Houston (maybe Seattle)	NAESB
Meeting	Wed, Nov 18, 2009 Thur, Nov 19, 2009	10 am – 5 pm 9 am – Noon	Houston (or volunteer city)	NAESB

\* NERC meeting locations are subject to change.

Respectfully submitted,

*Tom Vandervort*

Thomas J. Vandervort  
 NERC JISWG Secretary

Angie Nicastro

**From:** Angie Nicastro  
**Sent:** Wednesday, July 23, 2008 3:33 PM  
**To:** Angie Nicastro  
**Subject:** MEETING: September 2008 Joint Interchange Scheduling Working Group  
**Attachments:** NERC Joint Interchange Scheduling Working Group.vcs



## Meeting Announcement: Joint Interchange Scheduling Working Group

September 16, 2008 | Vancouver, B.C., Canada

Register online today: <http://www.nerc.net/meetingregistrations/Committee.aspx?meetingdate=9/16/2008&meetingtype=JISWG>

Meeting Group and Dates	
Group Name	Joint Interchange Scheduling Working Group
Dates	9/16/2008 -- 8:00:00 AM - 4:00:00 PM
Hotel	
Hotel	Marriott Vancouver Pinnacle Downtown
Address	1128 West HASTings Street
City	Vancouver
State	BC
Phone	604-684-1128
Fax	
<b>Cut-Off Date</b>	<b>8/22/2008</b>
Attending Staff	
Staff	Tom Vandervort
Miscellaneous	
Notes	<p><b>PLEASE CALL THE HOTEL DIRECTLY TO BOOK RESERVATIONS</b></p> <p><a href="#">Hotel Location- map</a></p> <ul style="list-style-type: none"> <li>• Room Block Code: NERC</li> <li>• Room rate: \$215 single/double occupancy</li> <li>• Room block: Nights of September 15, 2008 - There are a limited amount of rooms are available.</li> <li>• Check-in: 3 p.m., Check-out: noon</li> <li>• Check with the hotel directly for early cancellation/departure fees</li> <li>• <b>Hotel cut-off date: August 22, 2008.</b> NOTE: After the cut-off date the hotel will release this block of rooms and only accept reservations on a space-available basis at the prevailing room rate.</li> <li>• Dress code: Business casual</li> </ul>

*When making your hotel reservation, please be sure to mention the "NERC" to get the preferred rate and ensure your reservation is credited to the NERC room block. The hotel will charge NERC a penalty if the total rooms blocked for this event are not picked up. Also, if you use a travel agency for your travel plans, please make sure the agency mentions NERC. For more information or assistance, please contact Angie Nicastro, Administrative Assistant, at [angie.nicastro@nerc.net](mailto:angie.nicastro@nerc.net) or at (609) 452-8060.*

Attached please find an outlook meeting invitation. If you would like to add it to your schedule, just double click on the attachment, select "Open" from the pop up screen, and then hit the "Save & Close" button at the upper left hand of the meeting screen to add to your calendar.

North American Electric Reliability Corporation  
 116-390 Village Blvd.  
 Princeton, NJ 08540  
 609.452.8060 | [www.nerc.com](http://www.nerc.com)

## Joint Interchange Scheduling Working Group Meeting

Tuesday, September 16, 2008 — 8 a.m.–5 p.m. PDT  
Marriott Vancouver Pinnacle Downtown  
1128 West Hastings Street  
Vancouver, British Columbia  
Hotel Phone: (604) 684-1128

Conference Bridge (Call-in):  
Phone Number: (732) 694-2061  
Access Code: 1123091608#

Participation via WebEx Webcast  
Location: <https://nerc.webex.com/nerc>  
Topic: JISWG  
Wednesday Password: 091608

### Agenda

1. **Administrative**
  - a. Membership and Guests — Chair
  - b. Arrangements — Secretary
  - c. Approval of Meeting Minutes
    - i) May 21–22, 2008 Meeting Minutes — Chair
    - ii) July 23–24, 2008 Meeting Minutes — Chair
  - d. Procedures
    - i) Parliamentary Procedures — Secretary
    - ii) Antitrust Compliance Guidelines — Secretary
  - e. Approval of Agenda — Chair
2. **Coordinate Interchange Timing Tables Standard Drafting Team** — Chair
3. **NAESB Confidentiality Agreement** — Chair
4. **NAESB Electric Industry Registry (EIR) Transition from NERC to NAESB** — Chair
5. **Proposal to Transfer e-Tag Specifications from NERC to NAESB** — Chair
6. **e-Tag Specifications Version 1.8.1 Development** — Chair

**7. Future JISWG Meetings/Conference Calls — Chair**

- a. Review Meeting Dates, Start and End Times
- b. NERC-hosted Meeting Guidelines
- c. Future JISWG Meetings Conference Calls/Webcast Schedule

November 12–13, 2008	Houston
January 14–15, 2009	Phoenix
March 11–12, 2009	Houston
May 13–14, 2009	Houston
July 15–16, 2009	Toronto
September 16–17, 2009	Houston
November 18–19, 2009	Houston

## Joint Interchange Scheduling Working Group Meeting

Tuesday, September 16, 2008 — 8 a.m.–4 p.m. Pacific Time  
Marriott Vancouver Pinnacle Downtown  
Vancouver, B.C., Canada

### ATTENDANCE

#### ***Attended Meeting***

Bob Harshbarger (Co-chair - Puget Sound Energy)  
Jim Hansen (Co-chair – NERC)  
Tom Vandervort (NERC)  
Demetrios Fotiou (Powerex)  
Eric Grau (TVA)  
Nelson Muller (OATI)  
Mark Nielson (OATI)  
Troy Simpson (BPA)  
Mark Sundsten (Sungard)  
Andrew Tritch (Sungard)

#### ***Via Conference Phone***

Jonathan Boone  
Ernie Cardone  
Jim Cyrulewski  
Tim Kannel  
Cherly Mendrola  
Gail Parker  
Phillip Shafeei  
Larry Stone  
Jeremy West

September 16, 2008

**E-Tag 1.8.1 Specifications Comments Responses**

The NERC-NAESB Joint Interchange Scheduling Working Group (JISWG) appreciates the comments and input provided by those who took the time to respond to the public posting. Comments are presented below along with embedded responses.

**SoftSmiths Comments to the Multiple Reliability Limits Proposal**

Following are some technical comments on the proposal and the example.

We would propose that the key for a reliability limit be Entity and ProfileID.

- Since all profiles are components of the tag, it doesn't make sense to specify the TagID as part of the limit key.
- Reliability limit profiles are specified as applying to specific ProfileIDs, rather than PhysicalSegmentIDs. This is done because a TransmissionSegment has two ProfileIDs associated with it, a POR profile and a POD profile, and if a reliability limit specified only a PhysicalSegmentID, it would not be clear which profile was to be affected.
- It might also be good to make clear that an Entity for these purposes is a TaggingEntityID assigned by NERC. For example, if SOCO shows up in a tag as both a BA and as a TSP, that is two separate entities; each can have its own set of reliability limits, and neither can act on the other's limits, regardless of the legal relationship between the entities.

Response: JISWG agrees with the above comments and will include them in a revised draft design document.

In the example, there are actually 5 physical segments, not 3. Generation is segment 1, then there are 3 transmission segments (2, 3, and 4), and finally load is segment 5.

The generation segment has a single profile, and the load segment has a single profile. Each transmission segment can have up to two profiles (POR and POD).

In order to make the example more interesting, I'd suggest having some in-kind losses, but not on every segment. The example interactions will keep the same spirit as those in the published text, but specifying profile numbers instead of segment numbers.

Segment	PhySeg #	"POR" Profile #	"POD" Profile #
Generation	1	N/A	1
Transmission, TSP1, Leg 1	2	1	2

Transmission, TSP1, Leg 2	3	2	2
Transmission, TSP2	4	2	3
Load	5	3	N/A

Initially, the MW levels are flat at 100, 96, and 92 for profiles 1, 2, and 3 respectively. The Source BA sets profile #1 to 50 MW from 05:30 to 06:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:30	06:00	50	48	46	FALSE

TSP2 sets profile #2 to 24 MW from 05:00 to 08:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	08:00	25	24	23	FALSE

TSP2 clears its reliability limit on profile #2 from 05:00 to 08:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	05:30				TRUE
05:30	06:00	50	48	46	FALSE
06:00	08:00				TRUE

TSP1 sets profile #1 to 75 MW from 05:00 to 06:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Note: The following from the original comments:

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	05:30	50	48	46	FALSE
05:30	06:00	75	72	69	FALSE

Was revised for accuracy by JISWG to be:

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	05:30	75	72	69	FALSE
05:30	06:00	50	48	46	FALSE

TSP1 sets profile #2 to 24 MW from 05:00 to 06:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	06:00	25	24	23	FALSE

Source BA clears its limit on profile #1 from 05:30 to 06:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:30	06:00	25	24	23	FALSE

TSP1 clears its limit on profile #1 from 05:00 to 06:00. Once approved, the following Composite Reliability Limit profile is included in the DistributeResolution message.

Start	Stop	Prof #1	Prof #2	Prof #3	AllLimitsCleared
05:00	06:00	25	24	23	FALSE

Response: JISWG agrees that this is a good example to include in the design document. Thank you for the example! The JISWG will include it in the design document and will determine a home for frequently asked questions (FAQ), items, and examples which are separate from but accompany the e-Tag specification.

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JISWG,

OATI is concerned with the JISWG's proposed changes on how reliability profiles are handled. Specifically, these concerns include:

Companies attempting to adjust the reliability profile of a tag will find it difficult to determine the final outcome of a tag, especially when there are multiple pending competing reliability profiles. Various displays in both tagging and back-end systems will need to be re-written to display additional data so that it is clear who needs to issue which curtailment/reload. Depending on the availability and willingness of the participants on a tag, this could result in curtailments/reloads that should be lifted but are not, and could result in other reliability problems. For Entities who utilize counter flow schedules, this process will become much more cumbersome. Typically they would create a tag in the opposite direction and then reload curtailments. Under the proposed scheme, no single party can do the reload; anyone with a curtailment will have to do it separately. This could potentially be every reliability party on the tag.

Response: The JISWG agrees that this could be confusing to reliability entities who are reviewing/assessing adjustment Requests depending on the design of the user interface by the Approval Service provider. JISWG believes that vendors are able to design an interface that is neither cumbersome nor confusing. Reliability Entities need to spend more time managing their limits without having multiple reliability limits. It is appropriate that no single entity can do the reload.

Looking at a set of overlapping pending requests, it will not be obvious which request (if any) will set the MW level for any given time period. To know that, approval parties will need to do a lot of extra profile calculation. Additional tools will need to be written to support this. In particular, this may hamper the ability of the GCA and LCA to analyze the impact of profiles on a tag.

Response: The JISWG disagrees with the comment. Each Request is considered independent from all other pending Requests. The approval parties would not need to do any additional profile calculations but would instead assess each Request independently and accept the profile delivered by the Authority service.

The proposal, as written, will require the distribution of current profiles with implemented requests. That will cause messages to be much larger than they need to be, with significant increase in bandwidth with very little relevant information.

Response: The JISWG agrees that the distributions will be larger however, we disagree that they would not contain relevant information. The Authority would be distributing both the Request (as received) along with the profile that the services require to know the applicable level as set by the Authority service based on the approved Requests.

The proposal will fundamentally change the structure and behavior of Tagging. The participants on an e-Tag will no longer be able to query for the most recent approved request to determine the current profile. Instead, they will need to query for all reliability requests for a given time period from different submitters to determine the current profile. This paradigm shift will require significant changes to the e-Tag systems for every vendor and back-end systems such as scheduling, accounting and settlement for every utility, thus requiring significant testing and personnel training.

Response: The JISWG agrees that this design would be a major paradigm shift and may require significant work for every vendor of e-Tag services and associated downstream systems. The JISWG disagrees with the assessment that the participants would need to query for all Requests. The design would instead provide a single applicable reliability limit for each profile.

NERC Standards and NAESB Business Practices Standards may need to be revised to accommodate the limited approval rights on a reliability profile, still limited to the GCA and LCA of a tag.

Response: The JISWG does not agree that this design would require a change to the NERC reliability standards. Nothing that JISWG does in the e-Tag specification would require a revision to any existing standards, instead JISWG revises the specification in order to comply with Standards or add desired functionality. The approval entities would remain the same as they are today. The alternative approach presented below by OATI would require a modification to the Standards in order to be implemented.

Implementation of the proposed e-Tag changes will be time consuming and quite expensive to the industry in general.

Response: The JISWG agrees and is receptive to simplified approaches. Our intent is to minimize the cost while providing the desired functionality and simultaneously reducing effort by participants.

OATI would like to propose the following as an alternative solution that is less intrusive and much more cost effective:

All parties that are capable of issuing curtailments on a given tag will be given approval rights over every curtailment on that tag. Source and sink BAs will always be required to take an approval action (i.e. active approval). All other parties will have optional approval rights (i.e. passive approval). If company A has issued a curtailment and company B attempts to reload that curtailment prematurely, then company A has the right to deny the new curtailment request from company B. This alternative has the following benefits:

The fundamental request order principle is not changed. The scope of changes is limited to the Tag Authorities and Approval entities. Some back-end systems directly related to the approval of e-Tag requests and that automate request approvals may need to be changed as well. Nevertheless, the changes are much less significant than the proposal from the JISWG.

There should be no confusion on the current profile of an e-Tag. The same principles that apply today will apply in the future; that is, the most recent request takes precedence over previously submitted and approved requests.

There is no reason to distribute current profiles.

There is no need to revise the NERC Standards and NAESB Business Practice Standards. In fact, the proposed alternative modifies the e-Tag system to comply with the current standards whereby all reliability entities will have approval rights over reliability requests.

The proposed alternative solution addresses the intent that drove the need for change to the e-Tag specification – all Transmission Service Providers and other reliability entities in the path of a tag, other than the GCA and LCA will have a say in the outcome of the energy profile on a tag.

OATI is in favor of finding a solution to deal with the multiple competing tag curtailment issue; however, we feel strongly that the current proposal will prove too burdensome. We believe this alternate idea can better balance the solution to impacts. Thank you.

**Mark Nielson, PE**

Director of Transmission Operations Applications

Response: To rephrase the concern that OATI has, the impacts of the proposed design on the authority service and other e-Tag services and associated systems will be significant. The JISWG agrees and appreciates any alternative design proposal that will simplify the draft design and decrease industry impacts. The JISWG disagrees that the alternative proposed by OATI would not require modifications to the NERC standards. The NERC INT standards would need to be revised to give reliability entities other than the source and sink optional approval rights. The alternative design proposed above would start with a NERC SAR. No modifications to NAESB standards will be required. The alternative simpler design has the benefit of being much lower cost than the draft proposal, However, reliability entities would be burdened with managing their curtailment requests (as they must do today). When the tag had multiple associated Reliability limits in effect on different physical segments, the reliability entities would need to either deny a reload request or approve it and then issue a subsequent Request that would reset their previously existing limits. When Transmission Operators or Balancing Authorities are handling hundreds of curtailments, this would require significant effort (as is required today). The JISWG will propose this design alternative to the industry as well as potentially other designs and seek industry input.

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From: Rowland, Gregory D  
Sent: Friday, September 05, 2008 9:44 AM  
To: naesb@naesb.org  
Subject: FW: e-Tag Multiple Reliability Limits

Below are Duke Energy responses to the Request for Comments issued July 30, 2008. Thanks for the opportunity to review and comment.

#### Request for Comments

The JISWG is seeking comments on this proposed solution. Specifically, does it resolve the problem? If not, why and how could the solution be modified to address the issue(s)?

[At this time, it does seem to resolve the issue as presented by the JISWIG. For clarification, will multiple RCs be able to set limits on a transaction?](#)

Response: Thank you for your comments. Multiple RCs would be able to set limits on a transaction if the transaction were to span multiple RC areas. Currently the RCs manage reliability adjustments through tools that have rules specifying that the RC associated with the sink sets the curtailment. In the case where the tag spans interconnections, both the RC associated with the sink and the RC associated with the last physical segment in the e-Tag before the e-Tag crosses interconnection boundaries may issue reliability adjustments.

Does it create any new problems? If so, how could the proposed solution be modified to address these?

[After review, it does not seem to create any new problems.](#)

Response: Thank you for your comments.

Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?

The RC should only be allowed to modify the limit set by him.

Response: Thank you for your input, the design will be modified to specify this.

Are there additional associated features that would be beneficial to the industry?

No Comment for this one.

Sincerely,  
Greg Rowland

Greg Rowland  
Director, Reg. Business Policy Dev.  
Federal Regulatory Policy Group  
Duke Energy Corporation  
526 South Church Street / ECII1270  
P.O. Box 1006  
Charlotte, N.C. 28201-1006

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## ENTERGY COMMENTS ON JISWG REQUEST

Options for providing the capability in the e-Tag system for supporting multiple reliability limits

Due September 10, 2008

Ed Davis  
Entergy Services

Entergy supports the proposed solution for supporting multiple reliability limits on e-Tags. This change will improve Balancing Authorities' and Transmission Providers' abilities to maintain reliability. Specifically, it will prevent other reliability entities from interfering with reliability limits set by other reliability entities to address real-time transmission issues.

Response: Thank you for your comments.

Entergy sees no issues with the proposed implementation of this solution. One recommendation is to allow enough lead time so that entities can implement this change on any internal IT systems which may be impacted.

Response: The JISWG agrees wholeheartedly. In any modification that JISWG may make we plan on building in plenty of time in the project schedule for modifications to e-Tag systems and any related systems, thorough testing, training, and implementation.

Entergy is not in favor of allowing Reliability Coordinators to modify or eliminate reliability limits set by other entities. Reliability Coordinators take a wide-area view of the area for which they are responsible, and this view does not normally include looking at individual tags. Entergy believes it is more beneficial to leave the e-Tag system as is and retain the current practice of coordination between a Reliability Coordinator and an entity that needs to take action.

Response: The JISWG agrees. Thank you for your input. JISWG will include this specifically in the design.

Finally, Entergy believes entities should actively approve all reliability adjustment messages. First, the INT standards currently read that all tagging changes require active approval. More importantly, a reliability entity should view all requests that change tags' energy profiles. For example, a 100 MW tag may be adjusted to 50 MW using a reliability adjustment. A second reliability entity may issue another adjustment to 75 MW that seemingly has no effect on the tag. However, the first entity could release their adjustment and the tag would then move to the 75 MW limit set by the second entity. For this reason, reliability entities should actively review all requests to adjust tags for reliability purposes.

Response: Thank you for your comments. The JISWG agrees that all Requests should be approved as required in the NERC INT standards and that the e-Tag specification must reflect this. As pointed out above, each Request has a potential reliability impact, regardless of its impact on the current applicable limits. Based on your comments, we will not be creating a SAR to modify the standards.

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September 9, 2008  
Mr. Thomas J. Vandervort  
NERC JISWG Secretary  
North American Electric Reliability Corporation  
116 390 Village Blvd.  
Princeton, NJ 08540

Dear Mr. Vandervort:

Re: IESO Comments on Options for Providing the Capability in the E-Tag System for Supporting Multiple Reliability Limits

The IESO appreciates the opportunity to comment on the subject proposal.

The IESO generally supports the concept of enhancing reliability by inclusion of additional system limitations that may affect transmission service reservations and subsequent implementation of Interchange Transactions. Specific to the questions asked in the proposal, we offer the following comments:

1. We agree that reliability entities whose limits are shown on an e-Tag must maintain control over the limits they have set. Further, any reliability entity may set different limits on different physical segments that they are associated with to reflect different generation or transmission constraints (or restoration). The proposal calls for "... the Authority service maintain a separate reliability profile. Only the entity issuing the reliability limit may modify it (with the exception of ATF DYNAMIC adjustments)." We are not clear on how this process may be implemented. If the proposed approach is for the Transmission Service Provider to create and maintain this profile based on inputs from the reliability entities such as TOPs and RCs, then the process would work. Otherwise, the process may not work since neither the TOPs nor the RCs receive tags during the Arrange stage. The RCs will be able to view tag information after an Interchange Transaction becomes an Interchange Schedule.

Response: The proposal would not change the distribution but instead would require the Authority service to manage applicable reliability profiles. The TSP would not be required to manage these. Currently the TSP and RCs receive Requests in the arrange stage (new tag Request in Pending state) and also receive the resolution (approval or denial). Note that the entity identified in the e-Tagging system and the NERC standards for distribution is the TSP that currently implies the TOP. The standards are being revised and (hopefully) the TOP can be called out as a reliability entity separately while the TSP is defined as a commercial entity. Also note that there is a pending request before the NERC IS for the RC to be required to actively approve new tag requests (FERC Order 693).

2. We are not clear on the intent of the question: "Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?" Does it mean a process that will allow an RC to make changes to a limit on a tag, or does it mean an RC to override the limits set by others on the same transmission segment by other process? If it is the former, the RC does not receive tag information and hence is unable to make any changes. If it is the latter, RCs and TOPs that monitor a transmission facility or path are required by NERC standards to observe the lowest value of multiple limits on that facility or path. We thus do not see the need for any modification for so long as the Transmission Service Provider selects the lowest value on a particular segment that has multiple limits provided by more than one reliability entity.

Response: The RCs do indeed receive copies of the e-Tags. The question was whether an RC limit should override all other limits set on the tag or whether they should be independent. The industry has overwhelmingly responded (as you have stated above) that the RC limits should be independent and not override other limits. RCs may issue reliability adjustments. However, the lowest reliability limit would always be in effect.

3. We do not have any additional features to suggest.
4. On the final question, the IESO supports active approval on reliability adjustments or limit clearing, regardless of their impacts on the composite reliability profile.

Response: Thank you for your comments. This will be included in the design document.

Thank you for your attention to our comments.  
Yours truly,  
Dan Rochester  
Manager – Reliability Standards & Assessments  
Independent Electricity System Operator

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## **COMMENTS FROM BONNEVILLE POWER ADMINISTRATION 9-10-08**

Options for providing the capability in the e-Tag system for supporting multiple reliability limits

### Problem Statement

Currently, the e-Tag system supports only a single reliability limit per e-Tag. This reliability limit can be modified (set or lifted) by any reliability entity in the e-Tag chain and any associated Reliability Coordinator. The last Request sets or clears the reliability limit. Over the years various entities have cited problems with this limitation and have asked JISWG to correct it. Specifically JISWG has been asked to modify the e-Tag system to recognize that it is possible for multiple reliability limits to be in effect on the same e-Tag for different reasons and to give reliability entities ownership rights over their own limit. **(FULLY SUPPORT THIS PROPOSAL)**. Conceivably all physical segments could have different constraints in effect. One Scheduling Entity could clear a reliability limit for their associated physical segment while another could still be in effect. There are multiple examples of various combinations of reliability limits being set, cleared, or raised, where the outcome has been that the current level in the e-Tag is set to an undesired value, thus creating a reliability problem.

### Proposed Solution

The reliability entities on an e-Tag must maintain control over only those reliability limits which they have set. Further, any reliability entity may need to set different limits on different physical segments that they are associated with to reflect different generation or transmission constraints (or restoration). JISWG proposes that for each physical segment and for each reliability entity associated with the physical segment, the Authority service maintain a separate reliability profile. Only the entity issuing the reliability limit may modify it (with the exception of ATF DYNAMIC adjustments).

Multiple entities may have different reliability limits on a single segment and a single entity may have different reliability limits on multiple segments. In order to maintain uniqueness, the key to the reliability limits are TagID, Entity, and PhysicalSegmentID. The Authority service will maintain (or calculate) composite reliability profiles and distribute these along with an AllLimitsCleared flag which is set to FALSE if any reliability limits are in effect and TRUE if no reliability limits are in effect. Please provide clarity on the calculation of the Composite Reliability Profiles. (For example the lowest set reliability limit on any segment of an e-tag sets the limit for the entire tag.)

Response: Correct, the lowest Reliability limit would be distributed as the composite. The comments from SoftSmiths included additional examples that should clarify exactly how the composite reliability profile would be set.

When a reliability profile change request is Approved, the Authority will include the composite reliability profiles (even if they were not changed from previous values) in the DistributeResolution message and set the AllLimitsCleared flag to FALSE. An adjustment that clears limits must contain a profile reference. In the case of limit clearing, the DistributeResolution message would again contain the new composite reliability profiles and if there were no applicable reliability limits for any particular profile duration then the AllLimitsCleared flag would be set to TRUE. This may result in multiple profiles being sent with various values for the AllLimitsCleared flag. No problems with the flagging conventions. I take the All Limits Cleared flag to mean that no particular entity has any reliability limits set. If the flag is set to FALSE, then someone on the tag has a reliability limit in place.

Response: That is correct.

This example is fine, but it seem that this proposal could be more easily described to just say the lowest set reliability limit on any segment of an e-tag sets the limit for the entire tag. It seems that would be simpler and convey the same thing.

Response: While we agree, we also seek to provide sufficient detail for analysis by the technical staff who may need to modify e-Tag systems or downstream related systems that may be impacted by the proposed design. We will seek to create a simplified and clear, concise, specification of our proposal.

## Request for Comments

The JISWG is seeking comments on this proposed solution. Specifically, does it resolve the problem? If not, why and how could the solution be modified to address the issue(s)?

Yes, we believe this will resolve the problem of the current level in the e-Tag being set to an undesirable value.

Response: Thank you for your comments.

Does it create any new problems? If so, how could the proposed solution be modified to address these?

No new problems are anticipated.

Response: Thank you for your comments.

Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?

No, we feel that the RC role is defined as “An entity that provides the reliability assessment and emergency operations coordination for a specific portion of an interconnection.” They are not a listed Reliability Entity. If a change is requested to make the RC a Reliability Entity we would like the opportunity to make additional comments.

Response: Thank you for your comments. We agree, along with every other commentor, that the RC has the ability to make reliability adjustments today via the WEBSAS and IDC tools.

Are there additional associated features that would be beneficial to the industry?

Not at this time.

Response: Thank you for your comments.

In addition, the JISWG seeks comments on whether approval entities should be required to actively approve reliability adjustments or limit clearing that do not impact the composite reliability profiles. JISWG’s interpretation of current NERC INT standards are that they require active approval of these Requests regardless of their impact on the composite reliability limit, therefore a change to the INT standards may be required to implement this facet.

We believe that the INT standards require active approval of all Requests. We don’t support any special handling for these Requests.

Response: Thank you for your comments. The JISWG agrees with your comments and will include them in the design document. JISWG will not create a SAR requesting revisions to the INT standards.

Comments submitted on 9/10/08 by:

Bonneville Power Administration

Denise Koehn on behalf of SME's: Robin Chung, Kristy Humphrey, Troy Simpson, Wes Hutchison, Correne Surface, Salah Kitale, Rod Kelley

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ISO New England Comments on Changes to e-Tag to Support Multiple Reliability Limits: The JISWG is seeking comments on this proposed solution. Specifically, does it resolve the problem? If not, why and how could the solution be modified to address the issue(s)?

Based on our understanding of the proposal, it does seem to resolve the issue as presented in this example. Please see attached table of the example providing a comparison of what would happen today versus what is desired. In reviewing the current result and the desired result, we would like to see if there a different approach that can be taken to gain some/most of the benefit without such substantial changes being required?

Response: Thank you for your comments. The JISWG agrees that this approach is complex. Most of the complexity is limited to the Authority Service (by design) however there may be significant impacts to other downstream systems. The JISWG will propose alternatives for the industry to consider that are simpler but may not achieve all desired functionality.

Does it create any new problems? If so, how could the proposed solution be modified to address these?

The actual implementation of this approach is not clear in this conceptual proposal and seems to be very complicated. Additional discussion and vetting of that implementation should occur before any decision is made on how to proceed.

A question on the implementation: If an entity were using CURTAIL to a higher MW level rather than a RELOAD, would the proposal still work as described?

Response: In a nutshell, the draft design would be for the Authority service to manage multiple reliability limits, presenting the Approval service with the lowest (composite) reliability profile(s). Yes, the proposal would still work as described. If a reliability adjustment Request is approved that is at a higher level than an already existing Request from another entity, then the lowest request would be distributed in the composite reliability profile. Thank you for pointing out the common misunderstanding that a curtailment is somehow different than a reload. In reality, both are reliability adjustment requests, though the vendor may present the user with a different view.

Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?

No, the RC should continue to maintain an overview role. The RC function today does not have approval rights on an eTag. While some entities that have eTag approval rights also perform the RC function, it is not the RC function that is approving the eTags. If the RC sees changes that are required to eTags for reliability, the RC function should continue to communicate with the entities performing the eTag approval to facilitate that change.

Response: Thank you for your comments. The RC does not currently have approval rights but may issue curtailments. JISWG agrees (as do all other commenters) that the RC's limits should be their own, and not override the limits that other reliability entities may have set.

In response the question regarding the requirement for active approval of reliability adjustments or limit clearing .

ISO New England agrees with JISWG's interpretation of the current NERC INT standards and believes that those requirements are appropriate.

Response: Thank you for your comments.

ACTI ON	Entity	Segme nt	Star t	Stop	MW	CURRENT VALUES			New AllCle ar Flag	NOTES (any times not noted in CURE MW)
1	Source BA	1,2	053 0	060 0	75					
	TODA Y = DESIR ED					053 0	060 0	75		
2	TSP2	3	050 0	080 0	25					
	TODA Y = DESIR ED					050 0	080 0	25		
3	TSP2	3	050 0	080 0	Cleare d					<p>Today, the clearing for time 5 revert to 100 MW. However, active.</p> <ul style="list-style-type: none"> <li>• If Source BA had denied RE would remain.</li> <li>• If the TSP had profiled their Source BA, then the Source they could RELOAD to some TSP2 RELOADED to.</li> </ul>
	TODA Y					000 0	240 0	100		
	DESIR ED					050 0 053 0 060 0	053 0 060 0	100 75 100	Y N Y	
4	TSP1	1	050 0	060 0	85					<p>Note that there's a typo on the here is noted as '65'..</p>
	TODA Y					050 0	060 0	85		
	DESIR ED					050 0 053 0	053 0 060 0	85 75	N N	
Response: Correct, unfortunately did not get posted										
5	TSP1	2	050 0	060 0	65					<p>This is more restrictive for the previous actions</p>
	TODA Y					050 0	060 0	65		
	DESIR ED					050 0	060 0	65	N	
Response: Correct.										

6	Source BA	1,2	053 0	060 0	Cleared				In this Action, the resulting C distributed profile described in different [the current profile is distributed profile in the propo 0600]
	TODAY					050 0	053 0	65 100	
	DESIRE					050 0	060 0	65 ?	
									Response: 65 remains in effect cleared their limit but TSP1 li single 65 MW profile would b Authority Service. All limits FALSE.
7	TSP1	1	050 0	060 0	Cleared				Segment 1 is Cleared but Seg
	TODAY					000 0	240 0	100	
	DESIRE					050 0	060 0	65 N	
									Response: Correct.

-----Original Message-----

From: LaBray, Shayleah

Sent: Wednesday, September 10, 2008 6:07 PM

To: naesb@naesb.org

Cc: Edmonds, Sarah; Downey, Kathryn

Subject: RE: Request for Informal Comments on e-Tag multiple reliability levels - Comments due Sept. 10, 2008

PacifiCorp appreciates the opportunity to submit the following informal comments in response to the request for informal comments of a proposed approach regarding e-Tag multiple reliability levels.

1. Does the proposed solution resolve the problem? If not, why not?

PacifiCorp believes that the proposal seems to be an appropriate response to the problem.

Response: Thank you for your comments.

2. Does the proposed solution create any new problems? If so, how could it be modified?

It is not anticipated that the proposed solution will create new problems at this time.

Response: Thank you for your comments.

3. Should the reliability Coordinator be given the capability of modifying (or eliminating) limits set by other reliability entities?

No, the Reliability Coordinator should not be given the capability of modifying (or eliminating) limits if the limits referred to in the question above represent limits set on specific tags. If the limits need modifying or eliminating, it is preferred that the Reliability Coordinator contact the Transmission dispatch of the entity for which the limit is set to request the change.

Response: Thank you for your comments. The industry is indicating to us that the RC's limits should be their own and not override other limits.

4. Are there additional association features that would be beneficial to the industry?

None that we can think of at this time.

Response: Thank you for your comments.

5. Should approval entities be required to actively approve reliability adjustments or limit clearing that do not impact the composite reliability profiles? (JISWG interprets NERCs INT standards as currently requiring active approval of these requests regardless of their impact on the composite reliability limit - would this require a change to NERC's INT standards to implement this facet?)

The Western Electricity Coordinating Council's Interchange Scheduling and Accounting Subcommittee has previously explored the possibility of having reliability adjustments "auto approved." However, it was difficult to reach consensus on this approach. There was seemingly agreement however, that reliability adjustments should never be denied. Yet, even without an active "denial" there are instances of the reliability adjustments time limits expiring and by default the curtailment not being implemented. The NERC INT Standards require active approval of reliability adjustments and whether or not "auto approval" would meet the definition of "active approval" would need to be discussed in detail before proposing any changes to the NERC's INT standards.

Response: Thank you for your comments. The JISWG agrees with this assessment and will not be submitting a NERC SAR to propose INT standard revision.

If there are questions regarding the above responses, please contact Shay LaBray at (503) 813-6176 or Kathy Downey at (503) 251-5163. Thank you.

Regards,  
Shay

Shay LaBray  
Consultant - Transmission Strategy & Policy PacifiCorp  
825 NE Multnomah, Suite 1600  
Portland, OR 97232

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**Group Comments on  
Options for Providing the Capability in the E-Tag System for  
Supporting Multiple Reliability Limits**

On behalf of the following group of organizations, I submit these comments for the JISWG's consideration.

AESO, ERCOT, IESO, ISO-NE, MISO<sup>1</sup>, PJM and SPP

We generally support the concept of enhancing reliability by inclusion of additional system limitations that may affect transmission service reservations and subsequent implementation of Interchange Transactions. Specific to the questions asked in the proposal, we offer the following comments:

1. We agree that reliability entities whose limits are shown on an e-Tag must maintain control over the limits they have set. Further, any reliability entity may set different limits on different physical segments that they are associated with to reflect different generation or transmission constraints (or restoration). The proposal calls for "... the Authority service maintain a separate reliability profile. Only the entity issuing the reliability limit may modify it (with the exception of ATF DYNAMIC adjustments)." We are not clear on how this process may be implemented.

If the proposed approach is for the Transmission Service Provider (TSP) to create and maintain this profile based on inputs from the reliability entities such as Transmission Operators (TOPs) and Reliability Coordinators (RCs), then the process would work. Otherwise, the process may not work since neither the TOPs nor the RCs receive tags during the Arrange Interchange stage. The RCs will only be able to view tag information after an Interchange Transaction becomes an Interchange Schedule.

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<sup>1</sup> MISO supports all comments except Comment No. 2

Response: The proposal would not change the distribution but instead would require the Authority service to manage applicable reliability profiles. The TSP would not be required to manage these. Currently the TSP and RCs receive Requests in the arrange stage (new tag Request in Pending state) and also receive the resolution (approval or denial). Note that the entity identified in the e-Tagging system and the NERC standards for distribution is the TSP that currently implies the TOP. The standards are being revised and (hopefully) the TOP can be called out as a reliability entity separately while the TSP is defined as a commercial entity. Also note that there is a pending request before the NERC IS for the RC to be required to actively approve new tag requests (FERC Order 693).

2. We are not clear on the intent of the question: “Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?” Does it mean a process that will allow an RC to make changes to a limit on a tag, or does it mean an RC to override the limits set by others on the same transmission segment by other process? If it is the former, the RC does not receive tag information and hence is unable to make any changes. If it is the latter, RCs and TOPs that monitor a transmission facility or path are required by NERC standards to observe the lowest value of multiple limits on that facility or path. We thus do not see the need for any modification for so long as the Transmission Service Provider selects the lowest value on a particular segment that has multiple limits provided by more than one reliability entity.

Response: The RCs do indeed receive copies of the e-Tags. The question was on whether an RC limit should override all other limits set on the tag or whether they should be independent. The industry has overwhelmingly responded (as you have stated above) that the RC limits should be independent and not override other limits. RCs may issue reliability adjustments however the lowest reliability limit would always be in effect.

3. We do not have any additional features to suggest.

4. On the final question, we are unable to offer a preference since we are unclear on who that “Authority” is in approving limit changes. As indicated in the proposal paper, the reliability entity that owns these limits maintains control over these limits and hence it is the provider as well as the inherent approval body for these limits. Hence, updating the limits on the tag does not require an explicit, third party approval, unlike the submission of E-tags for approving Interchange Transactions. We would therefore appreciate the further elaboration on such an approval process as envisaged by the JISWG.

Response: Thank you for your comments. The Interchange Authority is being referenced here (as its actions are described in the INT standards). This is currently parallel to the e-Tag Authority service. The Authority Service (in our draft design) would be given the responsibility of managing the curtailment requests and distributing the appropriate composite reliability profile. There would be no change in approval processes from existing standards. We apologize for the confusion and hope that this clarifies the draft design concept.

Thank you for your attention to our comments.

Yours truly,

*Charles Yeung*

Charles Yeung  
SPP

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**From:** Tim

**Subject:** Current Proposed Etag Revisions

Who is best suited to get more detailed information on the Multiple Reliability Limits change in the Etag spec.? I want to understand who the multiple limits are applied to, whether the whole path is restricted to the lowest curtailment level, the impact on our tools, etc.

Thanks

Tim

Response: The JISWG would be happy to answer any questions you have. We are going to revise the conceptual document and propose additional proposed solutions. The industry will again be asked to provide their comments and input. If you would like to hold a discussion with JISWG we encourage you to participate in our next JISWG meeting in person or via conference call/webcast.

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**From:** Harshbarger, Robert

**Sent:** Monday, August 11, 2008

**To:** JISWG

**Subject:** Curtailment versus Reload Assessment

The 1.8 specification's section 1.3 Tagging Terminology states there are six types of requests – New e-Tag, Curtailment, Reload, Adjustment, Termination, and Extension. However, I suspect the schema does not reflect this (I would look but our IT department removed my XML Spy software to keep me safe and secure). It seems there are really only two types of requests – New and Change. Change could have several sub categories based on the status of the New request, based on the initiator of the Change request, based on the submittal time of the Change request, and/or a combination of these.

What brought me to this lowly state was investigating a collision of two TP's respective curtailments. The first curtailment request set a reliability limit lower than the second request. While both were submitted as change profile requests by reliability entities acting on the Reliability Limit, one was deemed a Curtailment and the other a Reload. Both distributions, however, only required assessment by the source/sink BAs.

The e-Tag specification refers to the NERC/NAESB standards to determine who is required to do an assessment of any request. INT-006 says all BAs and TSPs are to assess every request. An exception is in INT-005 regarding a curtailment request - only the source/sink BAs need to assess and respond.

Only INT-004 (Dynamic Interchange Transaction Modifications) refers to a "reload". IRO standards concerning TLR and IDC do reference reloads.

So, what's the point? In our work on 1.8.1 and maybe in the INT review, can we clarify what really should happen. I believe a policy call should be made if a change profile request seeks to raise a reliability limit (a.k.a. a reload) it should be assessed by all reliability entities, not just source and sink BAs.

Bob Harshbarger

OASIS Trading Manager

<p>Response: JISWG agrees with your assessment and will include it as part of 1.8.1 revisions and any related standards work.</p>
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