Bonneville Power Administration Comments to Recommendation for R11020

January 13th, 2020

BPA appreciates the opportunity to provide comments on the NAESB Recommendation for R11020, ‘Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection and Revise TLR level 5 to be treated similarly to TLR level 3 …’

BPA can support the Recommendation (which modifies WEQ Booklets WEQ-000 and WEQ-008) as long as it addresses the needs of the Eastern Interconnection without impinging on the standards applicable to the industry at large.

BPA supports the changes to the WEQ-008 given that the modifications recognize the regional Eastern Interconnection and do not affect other regional and industry standards relating to congestion management.

New terms added to the WEQ-000 (NAESB glossary) should clarify that the applicability is to the Eastern Interconnection. Additionally, the Recommendation modifies the ‘Interchange Distribution Calculator (IDC)’ definition which is also a defined term in the NERC Glossary. Has the revised NAESB definition for the ‘IDC’ been coordinated with NERC?