# Posting 2

## Posting

This project was posted for comment from November 24, 2023, through January 8, 2024.

WECC distributed notice for the posting on November 24, 2023. The WECC-0153 INT Consolidated Criterion (ICC) Drafting Team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized WECC-provided web portal.

Three comments were received.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0153](https://www.wecc.org/Standards/pages/wecc-0153.aspx)  project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

The following changes were made to INT-021-WECC-CRT. (See the following response for details.)

* The Purpose statement is proposed for change adopting the phrase “NAESB e-Tag Authority Service” in lieu of the Interchange Software.
* INT-020-WECC-CRT, WR5 is relocated to INT-021-WECC-CRT.
* WRs 1–8, 11, and 12 are deleted.
* WR 9, 10, and 15 are redrafted.
* A supportive narrative is added to the Rationale section.

## Minority View

## There were no minority comments.

## Implementation Plan—Justification

*Proposed Effective Date*

The proposed effective date is the first day of the second quarter following regulatory approval.

*Justification*

The entirety of the ICC is Procedurally up to date with only two sections due for five-year review in the first half of 2024. Because the entire ICC is Procedurally up to date, and because the project proposes no new requirements, the ICC can be implemented without undue burden or delay. The DT did not identify any other WECC Criteria, Standards, or NAESB documents that would be impacted if the proposed ICC where adopted.

## Action Plan

On January 24, 2024, the WECC-0153 INT ICC DT agreed to post Posting 3 for a 30-day comment period. Once the comment period opens, comments can be submitted by selecting the Submit and Review Comments accordion on the WECC-0153 homepage. Then, click Submit Responses to Posting 3.

The posting period will open January 26, 2024, and close February 26, 2024. The DT will meet on February 28, 2024, and March 6, 2024, to address comments received.

## Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](mailto:sblack@wecc.org), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.

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| Commenter | Organization |
| Raj Hundal[[1]](#footnote-1) | Powerex |

**Index to Questions, Comments, and Responses**

**Question**

1. **The drafting team invited comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| Raj Hundal  Power | Powerex appreciates the dedication of the drafting team to undertake the INT consolidation project. Powerex has concerns regarding the removal of many of the requirements in INT-020, and we were not able to find additional justification of the removal beyond the general paragraph stated below:    The entirety of INT-020-WECC-CRT (except for WR5) is proposed for deletion because it does not accurately reflect various current processes, hinders the applicable entity’s ability to use other processes, and is largely inefficient. WR5 would be excerpted from INT-020-WECC-CRT and relocated to INT-021-WECC-CRT as WR4, along with its Rationale section. This move preserves a notification requirement.    Powerex believes further elaboration is required before any removal of the INT-020 requirements. Could the drafting team elaborate and answer the following questions:   1. What are the “various current processes” that are being referred to and what are the inaccuracies in the criterion? 2. What inefficiencies are being experienced and which requirements are driving those inefficiencies ? 3. What are the hindrances in the requirements ? 4. Was the drafting team able to review procedure of Sink BAs on how they would handle eTag tool outages? Were those procedures consistent with other Sink BAs ?   The key purpose of the criterion is to ensure consistent understanding and approach during outages of e-Tag distribution and processing, as well as ensuring that interchange transactions, required for reliability purposes, are facilitated by BAs and TSPs (e.g., WR9 and 10) in times of need. WECC has experienced extreme weather events in recent years, and a tool outage, without a backstop procedure, during an event could have negative effects on reliability in the region. It would be important that these criterion [sic] be modified and reflect current operations to ensure that reliability is maintained.    Powerex appreciates the drafting team reviewing our concerns, and we look forward to having discussions during the drafting team meetings to address our comments. |
| After discussion with Mr. Hundal, the DT agreed not to propose retirement of INT-020-CRT in its entirety. Rather, subject to renumbering, the team made the following changes:  **Purpose:** The purpose of this document is to establish a coordinated scheduling process for use during failure of the NAESB e-Tag Authority Service as determined by Sink Balancing Authority Areas.  WR5 is relocated to INT-021-WECC-CRT.  WRs 1–8, 11, and 12 are deleted.  WR 9, 10, and 15 are redrafted and will be renumbered.  **“The following requirements only apply during failure of the NAESB e-Tag Authority Service within the Western Interconnection.**  **WR1.** Each Sink Balancing Authority shall implement new Interchange transactions when necessary to maintain load-to-generation balance, reserve requirements, or to maintain reliability.  **WM1.** Each Sink Balancing Authority will have evidence that it implemented new Interchange transactions that were necessary to maintain load-to-generation balance, reserve requirements, or to maintain reliability, per WR1.  **WR2.** Each Sink Balancing Authority shall create new Interchange by verbally communicating and confirming with the Source Balancing Authority.  **WM2.** Each Sink Balancing Authority will have evidence that the Sink Balancing Authority created and confirmed new Interchange with the Source Balancing Authority that was a party to the new Interchange, per WR2.  **The following requirements only apply after restoration of the NAESB e-Tag Authority Service within the Western Interconnection.**  **WR3.** Each Sink Balancing Authority shall submit or cause to have submitted an After-the-Fact (ATF) e-Tag before the end of the ATF e‑Tag submission deadline for each transaction implemented during the outage.  **WM3.** Each Sink Balancing Authority will have evidence that it submitted an After-the-Fact (ATF) e-Tag that met the criteria of WR3.  A supportive narrative is added to the Rationale section.  “Within the Western Interconnection, the Interchange Software processes Interchange, including accounting for primary inadvertent interchange. If the Interchange Software fails, its failure does not impact the *validation or distribution* of an e-Tag.  By contrast, the NAESB e-Tag “Authority Service *validates and distributes* e-Tags for approval on behalf of the Sink Balancing Authority.”[[2]](#footnote-2) (Emphasis added.) Whereas an e-Tag Author[[3]](#footnote-3) may use the NAESB *Agent* Service, a Balancing Authority would use the NAESB *Authority* Service.” | |

1. Via email received at 1543 HRS, January 8, 2024, by W. Shannon Black, WECC Consultant, Standards Processes, Raj Hundal of Power reported having software issues and requested Powerex’ comments be submitted manually. In response, Mr. Black input the comments manually. [↑](#footnote-ref-1)
2. See NAESB Electronic Tagging Functional Specifications, Version 1.8.4., or successor. See also FERC Order 771, “Availability of E-Tag [sic] Information to Commission Staff”, footnote 6. (Issued December 20, 2012), 141 FERC ¶ 61,235, 18 CFR Part 366, Docket No. RM11-12-000 [↑](#footnote-ref-2)
3. An e-Tag Author is typically a Purchasing-Selling Entity. A PSE is the entity that purchases or sells, and takes title to, energy, capacity, and Interconnected Operations Services. PSEs may be affiliated or unaffiliated merchants and may or may not own generating facilities. FERC Order 771. [↑](#footnote-ref-3)