

**Subject:** Developmental and Staffing Reliability Functional Agreement

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BPA's comments on the February 22, 2007 Draft Developmental and Staffing Reliability Functional Agreement are attached below. Our comments are limited to suggested changes to Section 3.4 (on ACE Diversity) of the agreement and we don't believe these comments change the intent of the agreement. A summary of our comments follows:

- We recommend elimination of the wording about CG designing and coordinating its own ACE diversity sharing test during the term of this agreement. We don't believe ColumbiaGrid should be expected to run a test because, during this limited time period, ColumbiaGrid will be developing expertise and recommendations for future work. During the term, we believe that ColumbiaGrid should be participating, along with the few other regional technical experts, in the Northwest Power Pool (NWPP) ACE Diversity Interchange (ADI) process. We do suggest that future ColumbiaGrid testing be considered in developing the recommendations for the written report.
- We believe that the term ACE Diversity Sharing (ADS) should be replaced with ADI, which is the industry accepted acronym for this effort, as used by IEEE, ISO New England, New York ISO, PJM, NPCC, and even in the Pacific Northwest by the Northwest Power Pool and the Northern Tier Transmission Group. We think the use of standard industry nomenclature will help external parties understand immediately the nature of this initiative.
- The language saying CG will participate in ADI "on behalf of Reliability Parties" should be eliminated. While we all understand that CG is working on this issue at the request of the Parties, we think we should avoid confusion about who can speak and decide for those Reliability parties on matters dealing with ACE diversity.
- We think the Agreement should specify that CG will report on progress in the monthly Forum meetings.
- The agreement should specify that the written report will include information about the expected benefits, impact, constraints and concerns associated with ADI. Again, there have been assurances this would be included and it makes sense to record this expectation.

<<BPA Comments on DSRFA.DOC>>

Thank you for considering these recommendations.

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