Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. SAR posted for comment (July 2, 2008 through July 31, 2008).
2. Revised SAR and response to comments posted (December 1, 2008).
3. SC authorized moving the SAR forward to standard development (December 16–17, 2008).
4. SDT appointed (February 12, 2009).
5. First draft of proposed standard posted (November 10, 2009).
6. Project became inactive until February, 2013.
7. Second draft of standard posted for 30 day informal comment period (July 25-August 23, 2013).

Description of Current Draft

This is the third draft of the proposed standard and is being posted for stakeholder comments and an initial ballot. This draft includes the modifications based on comments submitted by stakeholders, as well as items identified in the SAR and applicable FERC directives from FERC Order 693.

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Parallel Initial Ballot	September – October 2013
Recirculation ballot	December 2013
BOT adoption	February 2014
File standard with regulatory authorities.	February 2014

Effective Dates

The first day of the first calendar quarter that is six months after the date that this standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is six months after the date this standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

Version History

Version	Date	Action	Change Tracking
1	TBD		New

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

Proposed revisions to existing definitions (redlined to show changes):

Request for Interchange (RFI) - A collection of data as defined in the NAESB Business Practice Standards ~~RFI Datasheet,~~ to be submitted to the ~~Interchange~~ Sink Balancing Authority for the purpose of implementing bilateral Interchange between a Source and Sink Balancing Authority or within a single Balancing Authority.

Confirmed Interchange - The state where no party has denied and all required parties have approved ~~the Interchange Authority has verified~~ the Arranged Interchange.

Dynamic Interchange Schedule or Dynamic Schedule: A time-varying energy transfer ~~telemetered reading or value~~ that is updated in real time and ~~used~~ included in the Net Interchange Scheduled term in the same manner as an Interchange Schedule in the affected Balancing Authorities' control ACE equations (or alternate control processes). ~~as a schedule in the AGC/ACE equation and the integrated value of which is treated as a schedule for interchange accounting purposes. Commonly used for scheduling jointly owned generation to or from another Balancing Authority Area.~~

Sink Balancing Authority - The Balancing Authority in which the load (sink) is located for an Interchange Transaction and the resulting Interchange Schedule. ~~(This will also be a Receiving Balancing Authority for the resulting Interchange Schedule.)~~

Proposed new definitions:

Reliability Adjustment Arranged Interchange - Request to modify a Confirmed Interchange or Implemented Interchange for reliability purposes.

When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.

A. Introduction

1. **Title:** **Interchange Initiation and Modification for Reliability**

2. **Number:** **INT-010-2**

3. **Purpose:** To provide guidance for required actions on Confirmed Interchange or Implemented Interchange to address reliability.

4. **Applicability:**

   4.1. Balancing Authority

   4.2.

5. **Background:**

   This standard was revised as part of the Project 2008-12 Coordinate Interchange Standards.

   - R1 is modified to replace "request for Arranged Interchange" with the correct term "Request for Interchange".
   - R2 and R3 are modified to shift compliance from the Reliability Coordinator to the Sink Balancing Authority.
   - R4 was created to address the fact that when a Reliability Adjustment Arranged Interchange is approved for a Pseudo-Tie or Dynamic Schedule, action is required by the Balancing Authority to ensure that the data source feeding the Net Interchange value of ACE value does not exceed the MW value of the Reliability Adjustment Arranged Interchange.

B. Requirements and Measures

R1. The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no RFI is required [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]

M1. The Balancing Authority that uses its energy sharing agreement where the duration exceeds 60 minutes shall have evidence such as dated and time-stamped RFI, electronic logs or other similar evidence that it submitted an RFI per Requirement R1. (R1)

R2. Each Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchange reflecting that modification is submitted within 60 minutes of the start of the modification if a Reliability Coordinator directs the modification of a Confirmed

Interchange or Implemented Interchange for actual or anticipated reliability-related reasons. [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]

M2. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that a Reliability Adjustment Arranged Interchange was created within 60 minutes of the start of a modification to either a Confirmed Interchange or an Implemented Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R2)

R3. Each Sink Balancing Authority shall ensure that a Request for Interchange is submitted reflecting that Interchange schedule within 60 minutes of the start of the scheduled Interchange if a Reliability Coordinator directs the scheduling of Interchange for actual or anticipated reliability-related reasons. [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]

M3. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other evidence that a RFI was created reflecting that Interchange schedule within 60 minutes of the start of any scheduled Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R3)

R4. Each Balancing Authority involved in a Pseudo-Tie or Dynamic Schedule shall ensure the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange is not exceeded in their ACE equation. [*Violation Risk Factor: Medium*] [*Time Horizon: Real Time Operations*]

Rationale for R1: The Balancing Authority is responsible for implementing the Confirmed Interchange that results from a Reliability Adjustment Arranged Interchange. Future actions may be taken by the Balancing Authority or other entities that may reduce or eliminate the curtailment.

M4. The Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that, following any Reliability Adjustment Arranged Interchange on a Pseudo-Tie or Dynamic Schedule, it ensured the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange was not exceeded in their ACE equation. (R4)

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Evidence Retention

The Balancing Authority and Transmission Service provider shall each keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- The Balancing Authority shall maintain evidence to show compliance with R1, R2, R3, and R4for the most recent three calendar months plus the current month.
- If a Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real Time Operations	Lower	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 60 minutes, but not more than 75 minutes, following the resource loss.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 75 minutes, but not more than 90 minutes, following the resource loss.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 90 minutes, but not more than 120 minutes, following the resource loss.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 120 minutes following the resource loss. OR The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement did not ensure that a RFI was submitted following the resource loss.
R2	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a Reliability Adjustment Arranged Interchange reflecting the modification was submitted within 60 minutes following the start of the modification.
R3	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a RFI was submitted within 60 minutes following the

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						start of the scheduled Interchange.
R4	Real Time Operations	Lower	N/A	N/A	N/A	The Balancing Authority involved in a Pseudo-Tie or Dynamic Schedule failed to ensure that the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange was not exceeded in its ACE equation.

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Guidelines and Technical Basis

General Considerations for Curtailments of Dynamic Transfers

In NERC's Dynamic Transfer Reference Guidelines, Version 2, it describes unique handling of curtailments of dynamic transfers.

For Dynamic Schedules:

> **If transmission service between the source and sink BA(s) is curtailed then the allowable range of the magnitude of the schedules between them, including Dynamic Schedules, may have to be curtailed accordingly. All BAs involved in a Dynamic Schedule curtailment must also adjust the Dynamic Schedule signal input to their respective ACE equations to a common value. The value used must be equal to or less than the curtailed Dynamic Schedule tag. Since Dynamic Schedule tags are generally not used as dynamic transfer signals for ACE, this adjustment may require manual entry or other revision to a telemetered or calculated value used by the ACE.**

For Pseudo-ties:

> **If transmission service between the native and attaining BA(s) is curtailed, then the allowable range of the magnitude of the Pseudo-Ties between them must be limited accordingly to these constraints.**

Both sections above describe that when curtailments (typically communicated through e-Tags) of dynamic transfers occur, they require additional action by Balancing Authorities to ensure compliance with the curtailment.

Curtailments of most tagged transactions are implemented through a change in the Source and Sink Balancing Authorities' ACE equations. However, changes, including curtailments, in Dynamic Schedule and Pseudo-tie tagged transactions do not change the Source and Sink Balancing Authorities' ACE equations directly. These types of transactions impact the ACE equation via the dynamic transfer signal, not by the e-Tag. As such, Balancing Authorities need to develop additional automation or perform additional manual actions to reduce the dynamic transfer signal in order to comply with the curtailment.

Requirement R1:

Requirement R2:

Requirement R3: