Consideration of Comments

Project 2008-12 Coordinate Interchange Standards

The Coordinate Interchange Standard Drafting Team thanks all commenters who submitted comments on the drafts of INT-004-3, INT-006-4, INT-009-2, INT-010-2, and INT-011-1. These were posted for a 45-day public comment period from September 30, 2013 through November 13, 2013. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form.

The Coordinate Interchange Standard Drafting Team (CISDT) posted drafts of INT-004-3—Dyanmic Transfers, INT-006-4—Evaluation of Interchange Transactions, INT-009-2—Implementation of Interchange, INT-010-2—Interchange Initiation and Modification for Reliability, and INT-011-1—Intra-Balancing Authority Transaction Identification, along with nine revised definitions and four new definitions, for a 45-day comment and ballot period from September 30-November 15, 2013. There were 40 sets of comments, including comments from approximately 125 different people from approximately 89 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Support for the standards and definitions was generally high. The CISDT considered each of the comments submitted and has incorporated those that the team found to improve the quality of the standards.

INT-006-4, INT-009-2, INT-011-1, and most of the definitions (Pseudo-Tie, Adjacent Balancing Authority, Confirmed Interchange, Intermediate Balancing Authority, Sink Balancing Authority, Source Balancing Authority, Dynamic Schedule, Reliability Adjustment Arranged Interchange, Composite Confirmed Interchange, Attaining Balancing Authority, Native Balancing Area) earned stakeholder approval of 68% or more in the ballot, and the CISDT did not make any substantive changes to these standards or definitions based on stakeholder comments. Those standards and definitions will proceed to final ballot.

INT-004-3 received 67.35% approval in the ballot, but the CISDT was persuaded by stakeholder comments to make the following improvements to the standard:

- Changed the definitions of Request for Interchange (RFI) and Arranged Interchange to enhance clarity. (While the revised definitions of Arranged Interchange and Request for Interchange received 77.82% approval as part of the package of all definitions, the CISDT was persuaded by stakeholder comments to make improvements to the definitions to add clarity.

- Changed Load-Serving Entity to Purchasing-Selling Entity in the Applicability and Compliance sections and in R1 and R2 in response to industry comments.
- Made changes to the Background section to reflect changes to the standards.
- Added language in the R1 Rationale section to clarify that if no forecast is available, the energy profile cannot exceed the maximum expected transaction MW amount.
- Added language in the R2 Rationale section to clarify that R2 does not preclude tags from being updated at any time, and that the requirement specifies conditions under which the tag must be updated.
- Made changes to R3 to clarify Balancing Authority obligations with respect to Pseudo-Ties included in the NAESB Electric Industry Registry publication.
- Modified the VSLs for R1, R2, and R3 to ensure that the language is consistent with the language in the requirements.
- Made minor changes to the definition of Sink Balancing Authority, Attaining Balancing Authority, Native Balancing Authority, and to the Background section and the R3 Rationale box for consistency or to correct typographical errors.
- Made various errata changes to ensure that capitalization of glossary terms and acronym usage is consistent across the standard.

INT-010-2 received 58.03% approval in the ballot, and the CISDT made the following improvements to address stakeholder comments:

- Added language and a Rationale box to R1 to provide clarity around “energy sharing agreement.”
- Deleted R4 in response to industry comments that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit.
- Made minor changes to the Applicability Section, R1, R2, M2, and M3 for consistency or to correct typos.
- Modified the VSLs in R1 and R2 to ensure that the language is consistent with the language in the requirement.
- Made various errata changes to ensure that capitalization of glossary terms and acronym usage is consistent across the standard.

The revised two standards and two definitions are posted for a 45-day comment and ballot period from December 9, 2013-January 22, 2014, with a 10-day ballot period from January 10-22, 2014. **Note that all definitions have been stripped from the individual standards in favor of posting separate definition documents.**

All comments submitted may be reviewed in their original format on the standard’s project page.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

Index to Questions, Comments, and Responses

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	Greg Campoli	New York Independent System Operator	NPCC	2
3.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
4.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1
5.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
6.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5
7.	Kathleen Goodman	ISO - New England	NPCC	2
8.	Michael Jones	National Grid	NPCC	1
9.	Mark Kenny	Northeast Utilities	NPCC	1
10.	Christina Koncz	PSEG Power LLC	NPCC	5
11.	Helen Lainis	Independent Electricity System Operator	NPCC	2
12.	Michael Lombardi	Northeast Power Coordinating Council	NPCC	10
13.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9
14.	Bruce Metruck	New York Power Authority	NPCC	6

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

15.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
16.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
17.	Robert Pellegrini	The United Illuminating Company	NPCC	1
18.	Si Truc Phan	Hydro-Quebe TransEnergie	NPCC	1
19.	David Ramkalawan	Ontario Power Generation, Inc,	NPCC	5
20.	Brian Robinson	Utility Services	NPCC	8
21.	Ayesha Sabouba	Hydro One Networks Inc,	NPCC	1
22.	Brian Shanahan	National Grid	NPCC	1
23.	Wayne Sipperly	New York Power Authority	NPCC	5
24.	Ben Wu	Orange and Rockland Utilities	NPCC	1
25.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
26.	David Burke	Orange and Rockland Utilities Inc.	NPCC	3

2.	Group	Paul Haase	Seattle City Light	X		X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Pawel Krupa	Seattle City Light	WECC	1
2.	Dana Wheelock	Seattle City Light	WECC	3
3.	Hao Li	Seattle City Light	WECC	4
4.	Mike Haynes	Seattle City Light	WECC	5
5.	Dennis Sismaet	Seattle City Light	WECC	6

3.	Group	Greg Campoli	ISO/RTO Standards Review Committee		X								

	Additional Member	Additional Organization	Region	Segment Selection
1.	Kathleen Goodman	ISO-NE	NPCC	
2.	Ben Li	IESO	NPCC	
3.	Terry Bilke	MISO	RFC	
4.	Charles Yeung	SPP	SPP	
5.	Ali Miremadi	CAISO	WECC	
6.	Al DiCaprio	PJM	RFC	
7.	Cheryl Mosley	ERCOT	ERCOT	

4.	Group	Pamela Hunter	Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
			Marketing										
No additional responses													
5.	Group	Ryan Millard	PacifiCorp					X					
No additional responses													
6.	Group	Robert Rhodes	SPP Standards Review Group		X								

	Additional Member	Additional Organization	Region	Segment Selection
1.	John Allen	City Utilities of Springfield	SPP	1, 4
2.	Allan George	Sunflower Electric Power Corporation	SPP	1
3.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6
4.	Allen Klassen	Westar Energy	SPP	1, 3, 5, 6
5.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6
6.	James Nail	City of Independence, MO	SPP	3
7.	Kevin Nincehelser	Westar Energy	SPP	1, 3, 5, 6
8.	Susan Quinn	Westar Energy	SPP	1, 3, 5, 6
9.	Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
10.	Bryan Taggart	Westar Energy	SPP	1, 3, 5, 6
11.	Marc Welsh	Westar Energy	SPP	1, 3, 5, 6

7.	Group	Michael Lowman	Duke Energy	X		X		X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Doug Hils		RFC	1
2.	Lee Schuster		FRCC	3
3.	Dale Goodwine		SERC	5
4.	Greg Cecil		RFC	6

8.	Group	Rene Free	SERC OC Review Group	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Bob Thomas	IMEA	SERC	4
2.	Scott Homberg	TVA	SERC	1, 3, 5, 6
3.	Ken Clarke	PowerSouth	SERC	1, 5

9.	Group	Randi Heise	Dominion NERC Compliance Policy	X		X		X	X				

Additional Member	Additional Organization	Region	Segment Selection

Group/Individual	Commenter	Organization	Registered Ballot Body Segment									
			1	2	3	4	5	6	7	8	9	10

1.	Louis Slade	Dominion	SERC	5, 6
2.	Connie Lowe	Dominion	RFC	6, 5
3.	MIke Garton	Dominon	NPCC	5, 6
4.	MIchael Crowley	Dominion	SERC	1, 3
5.	Randi Heise	Dominion	MRO	6

10.	Group	Frank Gaffney	Florida Municipal Power Agency	X		X	X	X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Tim Beyrle	City of New Smyrna Beach Utilities	FRCC	4
2.	Jim Howard	Lakeland Electric	FRCC	3
3.	Greg Woessner	Kissimmee Utility Authority	FRCC	3
4.	Lynne Mila	City of Clewiston	FRCC	3
5.	Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4
6.	Randy Hahn	Ocala Utility Services	FRCC	3
7.	Stanley Rzad	Keys Energy Services	FRCC	1

11.	Group	Jason Marshall	ACES Standards Collaborators						X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5
2.	John Shaver	Southwest Transmission Cooperative	WECC	1
3.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5
4.	Michael Brytowski	Great River Energy	MRO	1, 3, 5, 6
5.	Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5
6.	Megan Wagner	Sunflower Electric Power Corporation	SPP	1

12.	Group	Jamison Dye	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Suzie Stone	Trans Commercial System Mgmt	WECC	1
2.	Wes Hutchison	Trans Commercial System Mgmt	WECC	1
3.	Mary Willey	Trans Commercial System Mgmt	WECC	1
4.	Andy Meyers	Power Scheduling Preschedule	WECC	6

13.	Group	Russel Mountjoy	MRO NERC Standards Review Forum	X	X	X		X	X	X			

Additional Member	Additional Organization	Region	Segment Selection

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6									
2.	Chuck Wicklund	Otter Tail Power Co.	MRO	1, 3, 5									
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6									
4.	Dave Rudolph	Basin Electric Power Coop	MRO	1, 3, 5, 6									
5.	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6									
6.	Jodi Jensen	Western Area Power Administration	MRO	1, 6									
7.	Joseph DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6									
8.	Ken Goldsmith	Alliant Energy	MRO	4									
9.	Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5, 6									
10.	Marie Knox	Midcontinent Independent System Operator	MRO	2									
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6									
12.	Randi Nyholm	Minnesota Power	MRO	1, 5									
13.	Scott Bos	Muscatine Power & Water	MRO	1, 3, 5, 6									
14.	Scott Nickels	Rochester Public Utilities	MRO	4									
15.	Terry Harbour	MidAmerican Energy	MRO	1, 3, 5, 6									
16.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6									
17.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5									
14.	Group	David Dockery	Associated Electric Cooperative, Inc. - JRO00088	X		X		X	X				

Additional Member	Additional Organization	Region	Segment Selection
1. Central Electric Power Cooperative		SERC	1, 3
2. KAMO Electric Cooperative		SERC	1, 3
3. M & A Electric Power Cooperative		SERC	1, 3
4. Northeast Missouri Electric Power Cooperative		SERC	1, 3
5. N.W. Electric Power Cooperative, Inc.		SERC	1, 3
6. Sho-Me Power Electric Cooperative		SERC	1, 3

15.	Group	Kaleb Brimhall	Colorado Spings Utilities	X		X		X	X				
No additional responses													
16.	Individual	Russ Schneider	Flathead Electric Cooperative, Inc.			X	X						
17.	Individual	Silvia Parada Mitchell	NextEra Energy/Florida Power and Light	X		X		X	X				
18.	Individual	Thomas Foltz	American Electric Power	X		X		X	X				
19.	Individual	Steve Alexanderson	Central Lincoln			X	X					X	

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
20.	Individual	Joe O'Brien	NIPSCO	X		X		X	X				
21.	Individual	Shirley Mayadewi	Manitoba Hydro	X		X		X	X				
22.	Individual	John Idzior	ReliabilityFirst Corporation										X
23.	Individual	Marie Knox	MISO		X								
24.	Individual	Terry Harbour	MidAmerican Energy	X		X		X	X				
25.	Individual	Chris Scanlon	Exleon Companies	X		X	X	X	X				
26.	Individual	Bill Fowler	City of Tallahassee, TAL			X							
27.	Individual	Jack Stamper	Clark Public Utilities	X									
28.	Individual	John Canavan	NorthWestern Energy	X									
29.	Individual	Scott Langston	City of Tallahassee	X									
30.	Individual	Brett Holland	Kansas City Power & Light	X		X		X	X				
31.	Individual	David Jendras	Ameren	X		X		X	X				
32.	Individual	Michael Falvo	Independent Electricity System Operator		X								
33.	Individual	Don Schmit	Nebraska Public Power District	X		X							
34.	Individual	Steven Wallace	Seminole Electric Cooperative, Inc.	X		X	X	X	X				
35.	Individual	Gordon Dobson-Mack	Powerex Corp.						X				
36.	Individual	Texas Reliability Entity	Texas Reliability Entity										X
37.	Individual	Catherine Wesley	PJM Interconnection		X								
38.	Individual	Keith Morisette	Tacoma Power	X		X	X	X	X				
39.	Individual	Andrew Gallo	City of Austin dba Austin Energy	X		X	X	X	X				
40.	Individual	Kathleen Goodman	ISO New England Inc.		X								

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

The CISDT thanks all commenters who supported other entities. Please see the responses to those comments below.

Organization	Agree	Supporting Comments of "Entity Name"
Associated Electric Cooperative, Inc. - JRO00088	Agree	SERC OC Review Group
Flathead Electric Cooperative, Inc.	Agree	I support the comments submitted by Steve Alexanderson with Central Lincoln / Western Small Entity Comment Group
City of Tallahassee, TAL	Agree	NextEra
Clark Public Utilities	Agree	Seattle City Light
City of Tallahassee	Agree	NextEra
Ameren	Agree	Ameren supports MISO's comments on the INT standards
ISO New England Inc.	Agree	IRC SRC
Seattle City Light		NextEra

1. **INT-004-3: Do you have any comments relating to INT-004-3? Please provide specific suggestions for improvement, including alternate language.**

Summary Consideration:

The CISDT thanks all commenters who submitted feedback. In response to industry feedback, the CISDT has modified the definitions of Request for Interchange and Arranged Interchange to enhance clarity, changed Load-Serving Entity to Purchasing-Selling Entity in all references, modified the Background section to reflect changes to the standard, modified the Rationale sections of both R1 and R2, modified R3 to clarify Balancing Authority obligations, modified the VSLs to ensure that the language is consistent with the language in the requirements, and made minor changes elsewhere for consistency (e.g., ensuring that all glossary terms are capitalized) or to correct typographical errors.

Organization	Yes or No	Question 1 Comment
Nebraska Public Power District	No	The standards still include RFI for pseudo ties. Ties are not interchange. I understand the desire to be able to curtail the transfer of energy on a pseudo tie, but we don't require RFI for internal schedules utilizing Network Transmission Service, so not sure there is really much difference. I suggest the registration of the pseudo tie be included in the congestion management tools if that is really the concern.
Response: Thank you for your comment. The standard only requires that RFIs for Pseudo-Ties are submitted if information about that Pseudo-Tie is not already included in congestion management procedure(s) via an alternate method.		
Northeast Power Coordinating Council	No	
PacifiCorp	No	
MRO NERC Standards Review Forum	No	
Colorado Spings Utilities	No	

Organization	Yes or No	Question 1 Comment
NIPSCO	No	
MidAmerican Energy	No	
Kansas City Power & Light	No	
Independent Electricity System Operator	No	
Seattle City Light	Yes	This proposed standard is a major change in the policy and how the Pseudo Ties have been used in the past. To date a number of Transmission Service Providers created some Business Practices (BP) requiring tagging of Pseudo Ties, there was no requirement in the NERC standards to do so. Seattle City Light does not feel there is a need for change at this time, and supports the position of NextEra regarding this proposed Standard. A second aspect of this change is the possible compliance implications. While the violation of Business Practices usually has some financial penalties these penalties do not have the same weight as violations of reliability standards. So implementation of this Standard as currently proposed will put entities in double jeopardy not only facing penalties for Business Practice violations but also NERC Standard violations. Seattle's preferred position is that all INT standards should be removed from the Reliability Standards and move to the Business Practices currently being implemented by NAESB, because they more closely represent commercial practices rather than reliability requirements. If this is not realistic and possible for the present INT development project (but may occur in the follow-up activities to the NERC Independent Expert Review) Seattle recommends the following language changes to the standard draft (new text in CAPS, cuts indicated by <deleted text>): 1. Add the following exclusion in R.1 R1. Each Load-Serving Entity that

Organization	Yes or No	Question 1 Comment
		secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method, OR ATTAINING AND SINK BALANCING AUTHORITIES ARE THE SAME. 2. Change R.2 as follows.R2. Each Load-Serving Entity that submits a Request For Interchange in accordance with Requirement R1 shall ensure the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie is updated for future hours <delete in order to support> WHEN congestion management procedures ARE IN EFFECT and if any one of the following occurs: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning, Same Day Operations, Real Time Operations]2.1. For Confirmed Interchange greater than 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than <deleted 10%> 30% for that hour and that deviation is expected to persist THROUGH THE HOURS WHEN CONGESTION MANAGEMENT PROCEDURES ARE IN EFFECT.2.2. For Confirmed Interchange less than or equal to 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than <deleted 25> 75 MW for that hour and that deviation is expected to persist THROUGH THE HOURS WHEN CONGESTION MANAGEMENT PROCEDURES ARE IN EFFECT.2.3. The Load-Serving Entity receives notification from a Reliability Coordinator or Transmission Operator to update the Confirmed Interchange THROUGH THE HOURS WHEN CONGESTION MANAGEMENT PROCEDURES ARE IN EFFECT.
Response: Thank you for your comments. **1. The CISDT disagrees, as your proposed revision would eliminate all Pseudo-Ties from the standard and that is a main part of the requirement.**		

Organization	Yes or No	Question 1 Comment
2. The CISDT notes that it is important for the appropriate information to be in the tagging system at all times so that congestion management systems have the correct data with which to work. If the information is not updated until congestion management is in effect, the wrong curtailments or other congestion management steps may be taken.		
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	INT-004-3 R1 states, "Each Load-Serving Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method."Can the SDT clarify the reliability benefit for INT-004-3 R3, which requires the registration of Pseudo-Ties in the NAESB Electric Industry Registry prior to implementation? Why is registering pseudo-ties in the NAESB Electric Industry Registry required if R1 has been met?
Response: The CISDT originally drafted this requirement to have Pseudo-Ties registered to ensure that a Pseudo-Tie is properly established prior to its implementation. Transparency of all Pseudo-Ties ensures proper modeling by all impacted entities. Based on stakeholder feedback, the requirement was modified to be operational in nature: **R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.**		
SPP Standards Review Group	Yes	Capitalize 'scheduled Interchange' in the Guidelines and Technical Basis Section to make it consistent with actual Interchange in the same section.
Response: Thank you for your comment. The SDT has made this change.		
Duke Energy	Yes	Duke Energy recommends combining R2.1 and R2.2 as follows for added clarity for when a Dynamic Schedule or Pseudo-Tie should be updated."R2.1. For Confirmed Interchange, when the actual hourly integrated energy deviates from the Confirmed Interchange by 25MW or 10%, whichever is greater, for that hour and that deviation is expected to

Organization	Yes or No	Question 1 Comment
		persist.”
Response: Thank you for your comment. The CISDT is not persuaded that this language would improve the sub-requirements. Since most commenters support the current language, the CISDT has not changed it.		
SERC OC Review Group	Yes	The SDT is respectfully requested to clarify that a Pseudo-Tie is not a physical tie that actually exists. In the Table of Compliance, R2 the current draft language is: A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3, but the Load-Serving Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours Suggested addition to Table of Compliance, R2 to make the Severe VSL consistent to the requirements: A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3, but the Load-Serving Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours ADD: if expected to persist.
Response: Thank you for your comment. The CISDT notes that the definition includes the phrase “in the same manner as a Tie Line” which indicated that a Pseudo-Tie is not a physical tie line. The CISDT has made the suggested edit to the VSL for R2 for better consistency with the requirement language.		
Dominion NERC Compliance Policy	Yes	Throughout the entire Standard, Pseudo-Tie needs to be corrected to read as Pseudo-tie, as changed in the definition.
Response: Thank you for your comment. The reference has been changed to “Pseudo-Tie” for consistency through the standard documents.		
Florida Municipal Power Agency	Yes	FMPA thanks the SDT for their efforts. However, we believe that most of the requirements of the INT standards ought to be retired as being commercial in nature and duplicative of NAESB standards; and hence, should be retired in accordance with P81 recommendations and the

Organization	Yes or No	Question 1 Comment
		Independent Expert Review Panel recommendations. The requirements of INT-004 are duplicative with WEQ-004 and WEQ-005 and the standard should be retired in its entirety. If the SDT believes there are commercial considerations that ought to be included in the NAESB standards that are not currently within those standards, then the SDT ought to contact NAESB to initiate a modification to those standards. It is FMPA's opinion that the only reliability related requirements contained in the proposed INT standards are those that cause BA's to agree on composite interchange. The proposed standards should be reduced to just INT-009; the remainder of the proposed standards should be retired.
Response: Thank you for your comments. The CISDT has performed a thorough review of the INT standards and has proposed to retire a number of requirements that did not provide a discernible reliability benefit. The standards were posted in August with a specific question regarding the reliability benefit of each requirement and the majority of stakeholders agreed with the drafting teams recommendations. The Industry Expert Review Panel recommendations were considered by the CISDT as well. While the team agreed with many of their proposed retirements, there are a number of exceptions that the CISDT has noted in the Mapping Document for each requirement.		
ACES Standards Collaborators	Yes	(1) We appreciate the improvements that drafting team has made to the standard but continue to believe many of the requirements are in fact business practices. For example, tagging Dynamic Schedules and Pseudo-ties and intra-BA transactions are commercial equity issues intended to ensure these transactions are curtailed equitably with other transmission service. RCs, BAs and TOPs have the ability to re-dispatch (which is essentially all a transmission service curtailment is) in other ways and must be able to do so for reliability purposes. Even FERC has recognized that the IDC and WECC USF are essentially congestion management tools and required the IRO-006-EAST standard to be modified to compel other tools such as redispatch to be used in conjunction with TLR curtailments to address IROL exceedances and violation. By NERC definition (both proposed and existing), a Dynamic Schedule is already correctly implemented in both

Organization	Yes or No	Question 1 Comment
		the Attaining and Native Balancing Authorities. Thus, load, generation, and interchange will be balanced. The only reliability concern that is left is if the transmission system can handle the Dynamic Schedule. Since the vast majority of these Dynamic Schedules are grandfathered and, those, that are not will utilize firm transmission, the transmission system can certainly handle these Dynamic Schedules. This means that the only issue left is that it is a commercial equity and transparency issue. Even the purpose statement of the standard is clear that the purpose is to ensure that the transactions are accounted for in congestion management procedures appropriately. This is not a reliability concern and it should be transitioned to a NAESB business practice. (2) The interaction between R1 and R2 is not clear for the time period after the Request for Interchange has been submitted for the Dynamic Schedule but before the Dynamic Schedule has become Implemented Interchange. If the initial submittal of the Request for Interchange for the Dynamic Schedule is submitted at one MW level, transitions to Confirmed Interchange, and then the expected average MW profile changes (i.e. a unit derate) before the schedule becomes Implemented Interchange, is the LSE required to adjust the E-Tag? Clearly, if the Dynamic Schedule had transitioned to Implemented Interchange and the deviation exceeded thresholds in R2, the E-Tag would have to be adjusted but it is not clear that the Dynamic Schedule must be adjusted for changes before it transitions to Implemented Interchange. We recommend providing additional clarity of how R1 and R2 apply during the transition from Request for Interchange, Confirmed Interchange and Implemented Interchange in the Application Guidelines section of the standard. (3) INT-004-3 - The reliability impact of Dynamic Schedules will be addressed appropriately in the agreement established between the Attaining BA and the Native BA. The agreement will include items such as common metering points, implementation dates, testing requirements, etc.

Organization	Yes or No	Question 1 Comment
		No additional reliability standards requirements are necessary for Dynamic Schedules. Furthermore, a NERC reliability guideline has already been written on dynamic transfers. We feel that there is enough technical guidance available to industry that could provide justification to FERC that additional requirements covering Dynamic Schedules are not needed. (5) Requirement R3 is clearly a business practice. It is a requirement to in essence follow a NAESB business practice to register Pseudo-Ties. While we agree the business practice should be followed for business and commercial reasons, it is simply not a reliability issue and should be removed. If the drafting team disagrees, it should pursue NERC taking over the Electric Industry Registry from NAESB. The recent transition from the NERC TSIN registry to the NAESB EIR should provide justification that registering Pseudo-Ties should now be a function of NAESB. (6) Some of the information in the Guidelines and Technical Basis section is confusing or oversimplified and may be duplicated from existing NERC guidelines. For example, the table specifying the BA's obligation is based on whether a Dynamic Schedule or Pseudo-Tie is implemented shows that the Attaining BA or the Native BA is responsible for manual load shedding in an EEA. Clearly, it is the entity that is short that is responsible for shedding load. This is covered in other standards, such as EOP-003, and is not necessary here. Since this information is essentially a copy and paste from the guideline, perhaps a simple link to the guideline is all that is necessary. (7) Part 2.3 of INT-004 states that the LSE is responsible maintaining the RFI for Reliability Adjustment requests. INT-010 R4 seems to transfer that same activity to the BA role. We request to remove Requirement R4 from INT-010. If this is change is not made, we request that the application guidelines of each standard explain how these requirements complement one another.

Organization	Yes or No	Question 1 Comment
Response: Thank you for your comment. 1. The CISDT has performed a thorough review of the INT standards and has proposed to retire a number of requirements that did not provide a discernible reliability benefit. The standards were posted in August with a specific question regarding the reliability benefit of each requirement and the majority of stakeholders agreed with the drafting teams recommendations. The Industry Expert Review Panel recommendations were considered by the CISDT as well. While the team agreed with many of their proposed retirements, there are a number of exceptions that the CISDT has noted in the Mapping Document for each requirement. 2. The CISDT believes that the tag should be updated whenever you have sufficient information that warrants a revision. The requirement does not preclude the tag from being updated at anytime, but there is a point in time where the information must be updated (per R2). We have added a Rationale for R2 to clarify this. 3. The CISDT has performed a thorough review of the INT standards and has proposed to retire a number of requirements that did not provide a discernible reliability benefit. The standards were posted in August with a specific question regarding the reliability benefit of each requirement and the majority of stakeholders agreed with the drafting teams recommendations. The Industry Expert Review Panel recommendations were considered by the CISDT as well. While the team agreed with many of their proposed retirements, there are a number of exceptions that the CISDT has noted in the Mapping Document for each requirement. 5. R3 has been revised to be operational in nature. Rather than requiring the Balancing Authority to register a Pseudo-Tie, they are required to ensure that it is registered prior to implementation: R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures. 6. We note that a link to the document is on Section F of the standard. We will retain the language in the Guidelines and Technical Basis section as it adds value to the standard. 7. The CISDT has removed R4 from INT-010. A Reliability Adjustment Arrange Interchange (RAAI) that is approved does not require an update to a Confirmed Interchange (CI). A RAAI that is approved should impact how the Attaining and Native BA implement a dynamic transfer in real-time to honor the MW amount resulting from the RAAI. An update to a CI which impacts future time periods is only required when directed by the Transmission Operator in the Western Interconnection or the		

Organization	Yes or No	Question 1 Comment
Reliability Coordinator in all other Interconnections.		
Bonneville Power Administration	Yes	o Definitions o Dynamic Schedule BPA recommends the drafting team remove the word "time-" from "A time-varying energy transfer that is update . . ." The term time-varying is inaccurate; the amount of energy varies while time does not. o Pseudo-TieBPA recommends the drafting team remove the word "time-" from "A time-varying energy transfer that is update . . ." The term time-varying is inaccurate; the amount of energy varies while time does not. o 3rd bullet in Background BPA recommends the drafting team remove the extra "that" in the sentence. ". . . dynamic transfer and agree that that various responsibilities . . ." o Requirement 3BPA requests that the drafting team provide clarification on what type of information needs to be registered for Pseudo-Tie.
Response: Thank you for your comments. The CISDT disagrees with the first two bullets, as the term "time-varying" is an adjective relating to the energy transfer. The CISDT agrees with the removal of the extraneous "that" in the Background section. With respect to R3, additional information on the information needed to register a Pseudo-Tie will be established during the NAESB process. R3 has been revised to be operational in nature. Rather than requiring the Balancing Authority to register a Pseudo-Tie, they are required to ensure that it is registered prior to implementation: **R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.**		
NextEra Energy/Florida Power and Light	Yes	This standard appears to be more directed at correcting a perceived inequity in congestion management procedures than in promoting or ensuring real-time reliability. If the industry believes congestion

Organization	Yes or No	Question 1 Comment
		management procedures require enhancements related to Dynamic Schedules and Pseudo-Ties, there are much more efficient and less burdensome means to achieve this goal than to put in place this reliability standard. For example, NERC could require a LSE or BA to post near real-time flows for Dynamic Schedules and Pseudo-ties on System Data Exchange (SDX) so that congestion management procedures could have access to more accurate current-hour data than anything provided in this burdensome and administrative standard, which also means it should be more closely considered under the paragraph 81 criteria. Issues with the individual requirements are as follows: R1 requires a LSE to submit an on-time RFI that will never be implemented in a real-time EMS system and in no way impacts real-time flows and thus, reliability. It is an administrative function and provides no actual real-time reliability benefits, and, thus, should be deleted under paragraph 81 criteria. R2 does not require a LSE to do anything, regardless of the size of a deviation, if the LSE does not expect the same deviation to persist. Updating future hours based on a deviation last hour does nothing for the current hour real-time reliability, which is what the congestion management procedures are intended to deal with. Additionally, these requirements needlessly expose a LSE to potential violations and fines if an auditor chooses, well after the fact, to second guess the LSE's decision about not updating a RFI that never gets implemented in an EMS. R3 is putting the cart before the horse. It requires a BA to register a Pseudo-Tie in a non-existing registry proposed by this requirement to be administered by NAESB, an entity not responsible for reliability, in order to support congestion management procedures. It is both unclear and hard to fathom how requiring a BA to resister a Pseudo-Tie in a registry does anything for reliability when no reliability standard requires any entity to

Organization	Yes or No	Question 1 Comment
		utilize this data for anything. Further, this requirement is not just an administrative task, but a future administrative task that provides no discernible reliability benefits, and, thus, should be deleted under paragraph 81 criteria.
Response: The CISDT has performed a thorough review of the INT standards and has proposed to retire a number of requirements that did not provide a discernible reliability benefit. The standards were posted in August with a specific question regarding the reliability benefit of each requirement and the majority of stakeholders agreed with the drafting teams recommendations. The Industry Expert Review Panel recommendations were considered by the CISDT as well. While the team agreed with many of their proposed retirements, there are a number of exceptions that the CISDT has noted in the Mapping Document for each requirement. **R1: The CISDT disagrees as Dynamic Schedules and Pseudo-Ties are included in appropriate terms in ACE equation and therefore can impact reliability. The applicability of R1 was revised to be the Purchasing-Selling Entity.** **R2: R2 is intended for the PSE (applicability changed from LSE) to update tags when they know that the existing tag is incorrect and will remain that way.** **R3: R3 has been revised to be operational in nature. Rather than requiring the Balancing Authority to register a Pseudo-Tie, they are required to ensure that it is registered prior to implementation:** **R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.**		
American Electric Power	Yes	Pseudo-Ties and Dynamic Schedules are handled by two different Functional Entities. Dynamic Schedules are managed by PSE's while Pseudo-Ties require input from LSE's. We recommend that this work be separated from R1 into different requirements and that PSE be added to the Applicability section. We would like the project team to provide some insight on why definitions

Organization	Yes or No	Question 1 Comment
		for were needed for Attaining Balancing Authority and Native Balancing Authority rather than utilizing Source Balancing Authority and Sink Balance Authority. Definition of Arranged Interchange - We recommend the definition be changed to the following: The state where the Interchange Sink Balancing Authority has received the RFI or intra-Balancing Authority transfer information (initial or revised). Our negative vote on this standard is primarily driven by our recommendation that the PSE be added to the Applicability section.
Response: The CISDT thanks you for your comments. **1 Based on your and other's comments, the CISDT has changed the applicable entity for Requirements R1 and R2 to PSE as is the case in the existing standard.** **2 This definition is used to align more with the terms used in the NAESB standards.** **3 Based on your and other's comments, the CISDT has revised this definition to: "The state where a Request for Interchange (initial or revised) has been submitted for approval."**		
Central Lincoln	Yes	Suggest changing "4.2. Load-Serving Entity" to "4.2. Load-Serving Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie." This better matches the trend to more explicitly state the applicability within the applicability section.
Response: Thank you for your comment. All references to "Load-Serving Entity" have been changed to "Purchasing-Selling Entity."		
Manitoba Hydro	Yes	(a) Manitoba Hydro does not agree with the INT-004-3 Draft 3 changes (issued September 17, 2013) to R1 and R2. The CISDT had previously incorporated stakeholder's suggestions in both Draft 1 (issued November 10, 2009) and Draft 2 (issued July 12, 2013) to address tagging Dynamic Transfers in the absence of a forecast. Subsequently in Draft 3 (after the

Organization	Yes or No	Question 1 Comment
		30-day informal comment period following Draft 2) the CISDT, in addressing a stakeholder's concern with the word 'expected' in the term "expected maximum", made modifications to both R1 and R2, including deleting in its entirety the bulleted statement which contained the word that were the subject of the stakeholder comment. Such modification indirectly implies a forecast is possible. Manitoba Hydro would respectfully like to point out that there are instances in which an LSE cannot forecast Dynamic Transfers, such as market transactions were ISOs dispatch energy and/or ancillary services based on economic price signals. In such instances tagging at a maximum value is appropriate to ensure reliability. Currently the language of Requirement R1 and R2 is not sufficiently clear to indicate to the LSE what value should properly be included in the energy profile for the Dynamic Transfer tag. The Rationale Statement (which will be removed from the requirement in any event once the standard is finalized) refers only to a scenario where a forecast is available, and leaves it open to interpretation what value should be included where a forecast is not available. Our preference is to see clear direction given to the Responsible Entity in the language of the standard itself as to the appropriate values for inclusion in Dynamic Transfer tags. As a solution, Manitoba Hydro suggests (i) returning to the Draft 1 / Draft 2 language for R1 and R2, or in the alternative, (ii) returning to the Draft 1/Draft 2 language for R1 and R2 but in order to remove confusion, replace the term "expected maximum" in R1 with "maximum" or "capped maximum". (b) The term "Dynamic Transfer" is used in the two new proposed definitions. Dynamic Transfer is a defined term in the NERC Glossary - is it meant to be capitalized here? (c) The definitions seem to indicate that Pseudo-Tie has a lower case 't'. However, throughout the standards, Pseudo-Tie has a capital 'T'. (This applies to all the Interchange Standards reviewed here).

Organization	Yes or No	Question 1 Comment
		(d) M1 - Words seem to be missing from the first sentence. Sentence should end with 'Pseudo-ties as an on-time Arranged Interchange to the Sink Balancing Authority for the Dynamic Schedule or Pseudo-tie." (e) M3 - includes the words 'prior to its implementation' which do not appear in the requirement itself.
Response: Thank you for your comments. **(a) The CISDT has added this concept to the Rationale for Requirement R1: If no forecast is available, the energy profile cannot exceed the maximum expected transaction MW amount.** **(b) Yes, the term should be capitalized. The team has made that change.** **(c) "Pseudo-Tie" should be all uppercase, and that has been made consistent throughout the standards.** **(d) The CISDT agrees and has made that change.** **(e) The CISDT agrees and has made that change.**		
ReliabilityFirst Corporation	Yes	ReliabilityFirst votes in the affirmative because the modifications to this standard help to ensure Dynamic Schedules and Pseudo-Ties are communicated and accounted for appropriately in congestion management procedures. Even though ReliabilityFirst votes in the affirmative, we offer the following for consideration: 1. Requirement R1 a. ReliabilityFirst requests further clarification on the meaning of the term "on-time" which proceeds the term "Arranged Interchange". Does the "on-time" term have a specific meaning within the context of the standard and if so, ReliabilityFirst recommends making it a defined term.
Response: Thank you for your comment. The term "on-time" is addressed in the timing tables contained in INT-006.		
Exleon Companies	Yes	R1 requires a LSE to submit an on-time RFI that will not be implemented in a real-time EMS system and will not impact reliability. It appears to be an

Organization	Yes or No	Question 1 Comment
		administrative function. R2 does not appear to require a LSE to do anything impacting operations. R3 requires a BA to register a Pseudo-Tie in a non-existing registry proposed by this requirement to be administered by NAESB, an entity not responsible for reliability. This seems unrelated to reliability and premature.
Response: The CISDT has performed a thorough review of the INT standards and has proposed to retire a number of requirements that did not provide a discernible reliability benefit. The standards were posted in August with a specific question regarding the reliability benefit of each requirement and the majority of stakeholders agreed with the drafting teams recommendations. The Industry Expert Review Panel recommendations were considered by the CISDT as well. While the team agreed with many of their proposed retirements, there are a number of exceptions that the CISDT has noted in the Mapping Document for each requirement. **R1: The CISDT disagrees as Dynamic Schedules and Pseudo-Ties are included in appropriate terms in ACE equation and therefore can impact reliability. The applicability of R1 was revised to be the Purchasing-Selling Entity.** **R2: R2 is intended for the PSE (applicability changed from LSE) to update tags when they know that the existing tag is incorrect and will remain that way.** **R3: R3 has been revised to be operational in nature. Rather than requiring the Balancing Authority to register a Pseudo-Tie, they are required to ensure that it is registered prior to implementation:** **R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.**		
NorthWestern Energy	Yes	We believe the VSL for R2 should be low, not severe because this would not have a negative impact on BES reliability because the values are not included in the ACE equation.
Response: Thank you for your comment. VRFs measure the impact to reliability of violating a specific requirement and VSLs		

Organization	Yes or No	Question 1 Comment
measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."		
Seminole Electric Cooperative, Inc.	Yes	R1 is ambiguous and open to interpretation. Recommend changing language to: R1 Each Load-Serving Entity that secures energy to serve Load via a Dynamic transfer shall ensure that a Request for Interchange is submitted as an on-time Arranged Interchange to the Sink Balancing Authority for that Dynamic Transfer. R1.1- A Request for Interchange shall be submitted as an on-time Arranged Interchange to the Sink Balancing Authority for all Dynamic Schedules. R1.2- A Request for Interchange shall only be submitted as an on-time Arranged Interchange to the Sink Balancing Authority for Dynamic Transfers using Pseudo-Ties if the Pseudo-tie has not been included in congestion management procedures, such as IDC model data or written / electronic agreements, which define the responsibilities associated with the dynamic transfer.
Response: Thank you for your comment. The CISDT and most stakeholders support the current language. Besides changing Load-Serving Entity to Purchasing-Selling Entity, no changes have been made to R1.		
Powerex Corp.	Yes	Powerex has reviewed the latest draft of the Interchange Standards and considers these standards a necessity for reliable operations of the Bulk Electric System. The Interchange Standards provide the appropriate validation and verification of the interchange schedules prior to implementation. The Interchange Standards are important and prevent entities that transact from providing false and misleading information to reliability entities, which minimize impacts to the operation of the BES. The Interchange Standards also require that adjacent Balancing Authorities agree upon the magnitude and ramping of the interchange before it is

Organization	Yes or No	Question 1 Comment
		implemented in the ACE equations in order to avoid the imbalance and inadvertent in the Interconnection. This allows for efficient and more reliable operations. Powerex does not believe that any of the requirements of the Interchange Standards should be removed or moved to the NAESB business practice standards. Powerex believes that it is fundamentally important that all interchange be scheduled using e-Tags, and appropriately evaluated by the reliability entities listed on the e-Tag. Powerex agrees with the CISDT that Pseudo-Ties should be tagged so that those transactions are transparent and the appropriate reliability impacts are assessed. Ensuring that all interchange transaction are e-Tagged allows reliability tools, such as NERC IDC and WECC webSAS, to effectively manage congestion through curtailments in accordance with transmission priority. R1 as currently written is only applicable to LSEs that use Dynamic Transfer to serve load, and is not applicable to any PSE that submits a Dynamic Transfer. Powerex believes that the standard should be applied to PSEs that use Dynamic Transfers, whether it is used to serve load or provide imbalance service. The Dynamic Transfer, regardless of its intended use, has the same level of impact to the BES, and applying this requirement only to a subset of Dynamic Transfers would not meet the intent and purpose of this standard. Powerex also suggests that when a forecast is not available that the RFI be submitted at the "expected maximum". The standard is silent on the transmission requirements that would be used for the Dynamic Transfer. It is important that the transmission capacity required to support the transfer of dynamic flow be appropriately obtained, validated and verified prior to implementation. For example, dynamic schedules that are e-Tagged at an average MW level, but do not have sufficient transmission capacity above the average MW level may cause SOL exceedances when dynamic dispatches exceed the average MW indicated on the e-Tag. These types of scheduling issues result in cascading curtailments, which has impacts to other Generators and Loads that must

Organization	Yes or No	Question 1 Comment
		accommodate because of the inaccurate scheduling of Dynamic Transfers. It is important that this standard clearly articulate that each dynamic transfer shall procure sufficient transmission to accommodate the maximum dynamic transfer.
Response: Thank you for your comment. The CISDT put the "expected maximum" language in the Rationale. Transmission requirements for Interchange are addressed in NAESB Business Practices and approved tariff.		
Texas Reliability Entity	Yes	1. Requirements R2.1 and R2.2: The phrase "and the deviation is expected to persist" is too open-ended. Suggest revising to "and the deviation is expected to persist for at least one additional hour." Also, future hours may not meet the 10% or 25 MW criteria but should be included in the update. Consider adding to the end of 2.1 and 2.2 "even if the future hour deviations are less than the criteria". 2. "Dynamic Transfer" is a defined term in the NERC Glossary. It should be capitalized in this standard and related materials.
Response: Thank you for your comment. **1. The CISDT disagrees, as the proposed language indicates that the tag must be updated every hour regardless of the deviation amount.** **2. The CISDT agrees and has made this revision.**		
PJM Interconnection	Yes	PJM does not support the applicability of R1 and R2 being assigned solely to Load-Serving Entities, as this appears to create a compliance gap for dynamic transfers that have been established without the involvement of an LSE. Consider a Variable Energy Resource that seeks to dynamically schedule its generation output from the Native BA to the Attaining BA without entering into an agreement with a specific LSE. In this example, which entity is responsible for R1 and R2? PJM does not support R1, as written. While PJM applauds the drafting

Organization	Yes or No	Question 1 Comment
		team's attempt to allow either the tagging of Pseudo-Ties or their inclusion in a congestion management procedure, these alternatives are not equivalent from a reliability standpoint. A requirement to tag Pseudo-Ties ensures that all involved parties have visibility into the path and estimated magnitude of the transfer, including the congestion management tools currently in use. However, the alternative to include the Pseudo Tie in congestion management procedures via an alternate method fails to provide that same visibility. Further, the use of the term "congestion management procedure" implies that a local congestion management procedure established in the Native BA's footprint is sufficient to meet the requirement for not tagging a Pseudo Tie transfer that may span several Intermediate BAs. If the requirement is meant to ensure that all involved BAs and all congestion management procedures/tools benefit from added visibility, the existing language is insufficient. PJM encourages the drafting team to retain the flexibility provided in R1 while also taking steps to ensure that the alternatives to tagging provide equivalent benefit to all involved BAs and RCs. PJM does not support R2, as written, due to the applicability being granted solely to Load Serving Entities, which appears to introduce a compliance gap for dynamic transfers that do not involve LSEs. PJM supports R3, but asks the drafting team to consider adding further refinements to require the registration of Dynamic Schedules as well as Pseudo Ties. Additionally, PJM asks that a requirement be introduced that states a dynamic transfer is valid only if all parties have approved the dynamic transfer registration.
Response: Thank you for your comments. **Applicability: The CISDT has revised the applicability for R1 and R2 to Purchasing-Selling Entity.**		

Organization	Yes or No	Question 1 Comment
R1 the use of "congestion management procedures" in R1 is to differentiate between Interconnections. For example, the Eastern Interconnection uses TLR while the Western Interconnection uses a different term. **R2 The CISDT has revised the applicability for R2 to Purchasing-Selling Entity.** **R3 has been revised to be operational in nature. Rather than requiring the Balancing Authority to register a Pseudo-Tie, they are required to ensure that it is registered prior to implementation:** **R3. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.**		
City of Austin dba Austin Energy	Yes	City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Thank you. Please see the response to Seattle City Light.		
MISO	Yes	

2. INT-006-4: Do you have any comments relating to INT-006-4? Please provide specific suggestions for improvement, including alternate language.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT did not make any substantive changes to INT-006-4, and it will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 2 Comment
Seattle City Light	No	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
SPP Standards Review Group	No	
MRO NERC Standards Review Forum	No	
American Electric Power	No	
Central Lincoln	No	

Organization	Yes or No	Question 2 Comment
NIPSCO	No	
s	No	
MidAmerican Energy	No	
Exleon Companies	No	
NorthWestern Energy	No	
Kansas City Power & Light	No	
Independent Electricity System Operator	No	
Northeast Power Coordinating Council	Yes	It isn't clear in what manner the entities listed in 5.1 through 5.5 shall be notified by the BA of the Confirmed Interchange.
Response: Thank you for your comment. The CISDT expects that this will be accomplished through the e-tagging system or, in its absence, the responsible entity's back up procedures.		
ISO/RTO Standards Review Committee	Yes	R3 (Measurement)Will evidence that the BA communicated to the E-tag system, which is then delivered to the RC, within 10 minutes of the denial of the Reliability Adjustment Arranged Interchange suffice as meeting Requirement R3.1? If not, please provide clarification as to why this will not suffice and what additional evidence would be needed.R5. Per FERC Order 764, an RFI may be submitted 20-minutes in advance of start time. Per NERC Standards, that RFI has a 10-minute approval window. If the Ramp Duration of the RFI is 20-minutes, normal system communication may lend itself to a violation of this standard. Recommend the SDT consider the timing implication and revise the requirement so that it is not a zero exceptions requirements.

Organization	Yes or No	Question 2 Comment
Response: Thank you for your comment. With respect to R3, the CISDT concurs that tagging evidence will suffice. With respect to R5, the CISDT notes that, under your scenario, the tag would be considered late per the timing tables and implementation will be less than 3 minutes after receipt of Confirmed Interchange. This example is exempt from Requirement R5.		
PacifiCorp	Yes	Requirement R2.1: It is unclear to PacifiCorp why the drafting team has only referenced "Proper connectivity of adjacent TSPs" that is "invalid" as the criteria required for a denial or curtailment. Highlighting "proper connectivity of adjacent Transmission Service Providers" seems to indicate that connectivity is the only validation that occurs (which is inherently misleading). To align more with the assessment TSPs are required to perform, PacifiCorp suggests adding additional validations where a denial or curtailment would occur (e.g., physical path, transmission profile, transmission limit, valid OASIS reservation, etc.). If the intent of the requirement is to more broadly cover all criteria that would result in the denial or curtailment of the Arranged Interchange and Confirmed Interchange (rather than to reference an exhaustive list of criteria), connectivity should be removed from the requirement or cited as an example. Otherwise, a denial or curtailment for something other than what is explicitly referenced in the requirement could be interpreted as an improper denial or curtailment. Requirement R3.1: It is unclear to PacifiCorp what the drafting team has intended the word "communicate" to mean under R3.1, as all approvals and denials associated with a Reliability Adjustment Arranged Interchange are "communicated" to the Reliability Coordinator via e-tagging. Additionally, all reasons for a denial are indicated on an e-tag. PacifiCorp would like to understand the rationale for requiring additional communication and the specific method of communication which is required under R3.1.
Response: Thank you for your comment. With respect to R2.1, The CISDT wrote the requirement to provide clarity regarding denial of a tag for specific situations. This includes the minimum set of conditions under which the tag should be denied. The reasons for denial are not comprehensive and additional conditions may exist. With respect to R3.1, t he CISDT concurs that tagging evidence will suffice for this requirement.		

Organization	Yes or No	Question 2 Comment
Duke Energy	Yes	The tasks identified in Requirements 4 and 5 are performed by a third party vendor. Duke Energy is concerned with how an auditor will measure this requirement and that this would be an administrative burden on the BA. Duke Energy believes the actual reliability based need for R4 and R5 is contingent upon the failure of the third party vendor's tool and recommend revising the requirements to identify a process to ensure that the tasks preformed in R4 and R5 are completed by a sink BA when there is a failure.
Response: Thank you for your comment. The tasks defined in R4 and R5 are required at all times, regardless of whether or not a third party vendor tool is available. If a third party tool is being used, it is the responsibility of the Sink Balancing Authority to obtain information from that vendor necessary to demonstrate compliance with the requirements.		
SERC OC Review Group	Yes	The SDT is requested to consider modifying the Reliability Adjustment Arranged Interchange definition. The current definition language is: Reliability Adjustment Arranged Interchange - Request to modify Confirmed Interchange or Implemented Interchange for reliability purposes. Suggested modification follows: DELETE: "Request to modify a" ADD: Modified New definition: Modified Confirmed Interchange or Implemented Interchange for reliability purposes.
Response: Please see the CISDT's responses in the definition section.		
Dominion NERC Compliance Policy	Yes	Attachment 1; footnote numbers 5 & 7 are listed in the table, but there are no corresponding footnotes at the bottom of the pages.
Response: Thank you for your comment. These should have been 2 and 4 respectively and have been corrected.		
Florida Municipal Power Agency	Yes	Please see FMPA comments to Question 1. INT-006 is commercial in nature, duplicative of NAESB standards, and should be retired in accordance with P81 recommendations and the Independent Expert Review Panel recommendations.
Response: Please see the CISDT's response to Question 1.		

Organization	Yes or No	Question 2 Comment
ACES Standards Collaborators	Yes	(1) We appreciate the changes made to this standard and believe it is improved. However, we still have several issues with the standard. (2) The adjective "emergency" should be removed from requirement R1 because it causes confusion. The addition of this adjective to "Arranged Interchange" does nothing to change the requirement and may lead to confusion in registered entities trying to determine the purpose of delineating it. Each BA and TSP will still be required to approve or deny the Arrange Interchange regardless of whether it is an emergency Arranged Interchange or not. Thus, the adjective provides no clarification for what the requirement compels and will only lead to confusion. Please strike it from the requirement. (3) We disagree with the need for the BAs and TSPs to meet the timing requirements in column B of Attachment 1 per requirements R1 and R2 in an enforceable reliability standard. It is not necessary to meet timing requirements in column B for reliability and column B is, in fact, a business practice. Meeting timing requirements in Column D is all that is necessary for reliability. Consider if a BA or TSP fails to approve or deny an Arranged Interchange within two hours for a schedule submitted five hours before the ramp start. Reliability is not impacted if the schedule is ultimately approved in time for it to be implemented. The TSP or BA could take over four hours to approve and ultimately still transition the Arranged Interchange to Confirmed Interchange and then Implemented Interchange without any negative reliability impacts. Thus, column B timing is not ultimately what is needed for reliability. (4) INT-006-4 Part 1.2 - Denying Arranged Interchange or curtailing Confirmed Interchange because the scheduling path is invalid is a business practice issue. While we agree that this is a necessary task to comply with open access transmission tariffs, it is not a reliability issue but rather a business practice issue. Furthermore, this is a validation that should be performed automatically with tagging software. Thus, this part should be removed. (5) INT-006-4 Part 2.1 - Denying Arranged Interchange because the transmission path

Organization	Yes or No	Question 2 Comment
		is invalid is a business practice issue and is not a reliability issue. It provides no indication for whether the transmission system can handle the Arranged Interchange. This should be moved to a NAESB business practice. Furthermore, this is something that should be automatically handled via the tagging software and is obviated by the entrenched nature of the software. (6) INT-006-4 Part 3.1 is unnecessary and duplicative with the proposed NERC Board resolution for COM-002/COM-003 for developing the final standard. Part 3.1 does not reflect that an adjustment request may originate from other reliability entities such as BAs and may include arbitrary timelines. First, COM-002/COM-003 will compel three-part communication when preserving or changing the "state" of a Bulk Electric System Element. This could potentially compel communication of denial of Reliability Adjustment Arranged Interchange since curtailing a schedule could be viewed as changing the state. Second, Part 3.1 does not reflect that a reliability adjustment may be issued by a BA. It presumes that the adjustment comes from the RC by requiring communication to only the RC. Third, the basis for the need to communicate the denial within 10 minutes is not established or stated in the technical guidelines section. Without such basis, we can only assume it is arbitrary. We recommend striking Part 3.1 from the standard. (7) The clause "the time period specified in Attachment 1, Column B, has elapsed" should be struck from the third bullet of requirement R4. It is unnecessary as the only conditions necessary are that the Arranged Interchange has not been denied and it is not a Reliability Adjustment Arranged Interchange. (8) INT-006-4 Part 5.5 - PSE has been replaced in many parts of the proposed modifications to the INT standards with LSE. Part 6.4 compels notification of approvals and denials to the PSE but there is no companion part to compel notification to the LSE. Is this intended? (9) INT-006-4 - Guideline and Technical Basis - The first main bullet on page 16 and its sub-bullets need to be modified. The main bullet states that the LSE "that approves or denies Arranged Interchange". The LSE does neither. The LSE submits a

Organization	Yes or No	Question 2 Comment
		Request for Interchange that becomes Arranged Interchange once the appropriate reliability entities receive and approve the request. The second associated sub-bullet in combination with the main bullet states that the LSE is responsible for communicating of the Arranged Interchange to the Sink Balancing Authority. Again, the LSE does not approve or deny so it cannot communicate approval or denial. (10) INT-006-4 - Guideline and Technical Basis - The first sub-bullet under the second main bullet on page 16 refers to communication that occurs between BAs, TSPs and PSEs. This is not consistent with the remainder of the proposal which focuses on replacing PSEs with LSEs.
Response: Thank you for your comments. **1) Thank you.** **2) An emergency RFI may not be "on-time" and this is why it is delineated in the requirement.** **3) It would not be reliable for entities to consistently deny just before ramping begins. These provide a reasonable amount of time for each entity to perform their evaluation, allow for correction of any issues that are identified and allow time for to prepare the system.** **4) This requirement part is included to ensure that all entities on the path are notified of the transaction so that they may perform a reliability assessment.** **5) This requirement part is included to ensure that all entities on the path are notified of the transaction so that they may perform a reliability assessment.** **6) The CISDT believes that the tagging system will suffice for this requirement.** **7) Since an entity can approve even after denying, the Arranged Interchange is not set to a denied state until the time period has expired** **8) It is intended that all PSEs on the Interchange are notified; therefore the LSE would be included in the PSE notifications.** **9) The CISDT did not modify this language since the NAESB functional specification allows for an LSE to have approval rights** **10) The CISDT did not change this language since this description is referring to the more general PSE as identified in the NAESB functional specification.**		
Bonneville Power	Yes	o Requirement 2BPA recommends the sub-requirements worded and numbered similar to R1.1 and R1.2 under R1 be added under R2: Change current draft R2.1 to

Organization	Yes or No	Question 2 Comment
Administration		R2.2 in regard to path and proper connectivity with adjacent TSP's and insert a new R2.1 worded similar to R1.1 to address interchange magnitude. For example:2.1. Each Transmission Service Provider shall deny the Arranged Interchange or curtail Confirmed Interchange if it does not expect to be capable of supporting the magnitude of the Interchange, including ramping, throughout the duration of the Arranged Interchange.2.2. Each Transmission Service Provider shall deny the Arranged Interchange or curtail Confirmed Interchange if the transmission path (proper connectivity of adjacent Transmission Service Providers) between it and its adjacent Transmission Service Providers is invalid. o Requirement 5 BPA requests clarification on how R5 will be implemented. Does the drafting team expect JESS/NAESB to make changes in the NAESB Tagging specification prior to the changes in the NERC Interchange standards? BPA recommends a 60-90 day bandwidth to allow entities to make necessary changes to meet this requirement. o VSL Section, R5BPA requests clarification on the paragraph in High VSL column as it matches to the first paragraph in Severe VSL column. Should the word "OR" between the two risks description in the Severe VSL column be an "AND"? If no, how do NERC and WECC assess which severity level to apply when a Sink BA does not notify all of the entities listed in R5.1-5.5? o Attachment 1 - Timing Tables For clarification, BPA recommends modifying footnote 5 to read: "See NAESB WEQ004 Timing Tables, this table is a partial repeat of the NAESB Timing Table containing only items which are applicable to this standard."
Response: Thank you for your comment. With respect to R2, the CISDT does not agree with this suggestion. The CISDT does not believe that the TSP is responsible for evaluating being able to support the magnitude of the interchange or ramping capability. With respect to R5, the CISDT does not expect any changes will be required to the NAESB Tagging specification. With respect to the VSL section, the VSLs have been better distinguished. With respect to Attachment 1, the CISDT believes this is comparable to the language that is currently in the standard. Stakeholder consensus has been reached on this item and the CISDT will not be		

Organization	Yes or No	Question 2 Comment
modifying the language.		
Colorado Spings Utilities	Yes	Thank you standard drafting team for all of your efforts. Please revise the VSL levels for this standard. The Violation Severity Levels are inappropriately high and disproportional to the risk to the Bulk Electric System.
Response: Thank you for your comment. The CISDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."		
NextEra Energy/Florida Power and Light	Yes	This standard is primarily a proposed business practice and should be mostly transferred to NAESB and replaced with a single requirement that captures the single reliability essence contained in the standard. Proposed language for the requirement is as follows: R1. Each Balancing Authority and Transmission Service Provider that receives an Arranged Interchange shall evaluate it with respect to their respective obligation pursuant to the Arranged Interchange to ensure it is accurate, complete and that they have the resources, facilities and capability to implement the Arranged Interchange as Confirmed Interchange prior to approving the Arranged Interchange to be transitioned to Confirmed Interchange. Any requirements above or beyond this R1 should be driven by market needs, not a NERC reliability standard. Additionally, the timing requirements in Attachment 1 are arbitrary, not reliability based and are better determined based on market needs through NAESB then by NERC through a reliability standard. As long as Arranged Interchange is evaluated from a reliability prospective the BA's and TSP's prior to being transitioned to Confirmed Interchange, any reliability issues related to the interchange transactions should be identified and addressed by the Balancing Authorities and Transmission Service Providers.
Response: The CISDT appreciates your comments and suggested language but stakeholder consensus has been reached and these		

Organization	Yes or No	Question 2 Comment
requirements will not be modified.		
Manitoba Hydro	Yes	(a) Purpose - wondering whether the reference to 'entities' should more appropriately be 'responsible entities' (b) R1 - the use of the word 'expect' is very open. Without further qualifying language, parties will proceed on the assumption that this is completely within the Balancing Authority's own judgment. (c) M1 - there is no measure that addresses the requirement 1.1 and 1.2 (d) M2 - the language of this measure does not match the language of the requirement. In order to be consistent with the language of the requirement, the measure should read "....that it responded to each Arranged Interchange or emergency Arranged Interchange within the time defined in Attachment 1..." (e) M3 - the language of the measure does not match the language of the requirement with respect to the communication of the denial. It should appropriately read "...or denied the request and, if applicable, communicated denial to the Reliability Coordinator...." (f) M5 - 'is' should be 'was'
Response: The CISDT appreciates your comments. **a) This clarification has been made to the Purpose Statement.** **b) Part 1.1 requires the BA to deny a tag if it does not believe that it can meet the ramp or other considerations of a particular schedule. The BA must rely on its expertise in its own operations to make this decision.** **c) While M1 does not explicitly call out Parts 1.1 and 1.2, it does include the notation of "(R1)" at the end, which includes all of the Requirement and its Parts.** **d) This correction has been made to M2.** **e) This correction has been made to M3** **f) This correction was made to M5.**		

Organization	Yes or No	Question 2 Comment
ReliabilityFirst Corporation	Yes	ReliabilityFirst votes in the negative because the use of bullets (or statements) in Requirement R4 is not consistent with the wording of the parent requirement. This has the possibility of creating compliance issues and lead to potential interpretations. ReliabilityFirst offers the following comments for consideration: 1. Requirement R1 and R2a. ReliabilityFirst requests further clarification on meaning of the term "on-time" which proceeds the term "Arranged Interchange". Does the "on-time" have a specific meaning within the standard and if so, ReliabilityFirst recommends making it a defined term. 2. Requirement R4a. Requirement R4 States "...that none of the following conditions" and there are three bullets associated with the requirement. Bullets are considered "or" statements in Reliability Standards and ReliabilityFirst believes that these are should be "and" statements. Thus, ReliabilityFirst recommends reformatting the bullets to become sub-parts (i.e., 4.1, 4.2 and 4.3). Without this modification, there is a high probability for potential compliance complications and possible interpretations. 3. VSL Requirement R5a. The High VSL and the first Severe VSL seem to be saying the same thing. ReliabilityFirst recommends the following for consideration for the High VSL: "The Sink Balancing Authority notified all but one of the entities listed in Requirement R5 Parts 5.1-5.5 of the on-time Confirmed Interchange."
Response: Thank you for your comment. **1. The CISDT does not believe a defined term is required since the term on-time is described in the Time Classification column of the INT-006 Attachment 1.** **2. The CISDT believes bullets are appropriate. If any of these bullets apply the Arranged Interchange will not be transitioned to Confirmed Interchange therefore it is an 'or' condition.** **3. The CISDT has modified the VSLs**		
Seminole Electric Cooperative, Inc.	Yes	Requirement R4 as written is ambiguous and confusing and we suggest it be re-worded. Specifically, the language requiring the Sink BA to confirm the double

Organization	Yes or No	Question 2 Comment
		negatives stated in the requirement, should be re-written to simplify.
Response: Thank you for your comment. The CISDT has considered many different versions of this language in attempt to simplify and could not find another way to state this in results bases standard language.		
Powerex Corp.	Yes	Powerex has reviewed the latest draft of the Interchange Standards and considers these standards a necessity for reliable operations of the Bulk Electric System. The Interchange Standards provide the appropriate validation and verification of the interchange schedules prior to implementation. The Interchange Standards are important and prevent entities that transact from providing false and misleading information to reliability entities, which minimize impacts to the operation of the BES. The Interchange Standards also require that adjacent Balancing Authorities agree upon the magnitude and ramping of the interchange before it is implemented in the ACE equations in order to avoid the imbalance and inadvertent in the Interconnection. This allows for efficient and more reliable operations. Powerex does not believe that any of the requirements of the Interchange Standards should be removed or moved to the NAESB business practice standards. There does not appear to be any requirement that prescribes, at a minimum, that an Interchange Transaction or Interchange Schedule must be submitted for energy that flows between Balancing Authorities. This should be the case, and a new requirement should be developed to reflect this. Otherwise some entities may choose not to submit certain interchange transactions even though it may affect adjacent Balancing Authorities and TSPs. This standard must prescribe at a minimum the verification and validations that must be performed during the reliability assessment by a BA and TSP. Those minimum requirements should not be prescribed in the Technical Guidance section of the standard because they would not be considered mandatory and could be ignored by Responsible Entities. It is imperative that this standard provide clear requirements that ensure BA and TSP are validating impacts, and not allowing transactions to flow that will cause issues within the interconnection. For example, a Source BA should validate and not allow a generator to schedule above and beyond its nameplate capacity to ensure accurate scheduling. Powerex believes that a

Organization	Yes or No	Question 2 Comment
		Source BA will only perform these types of checks if there is a prescribed minimum requirement within a standard, and suggests that the CISDT provide the minimum set of validations. R1 and R2 does not hold the BA or TSP accountable to correctly approve or deny the interchange request the first time, and allows the entities to rectify the issue through curtailment of the interchange. Powerex believes that these requirements should be modified to rectify a possible loophole that could lead to inefficient scheduling practices.M1 and M2 should measure the times the BA or TSP approves a request without proper verification or validation and then subsequently curtails the interchange once they realize the mistake. The BA or TSP should perform a thorough validation of an Arranged Interchange to avoid such instances which rectify BA or TSP mistakes. Powerex suggests that when a BA or TSP reevaluates a Confirmed Interchange that they note in the comments the reason for the reevaluation. For Attachment 1, there should be a reference point for the time that constitutes whether or not an Arranged Interchange is "on-time" or not. The previous Standard (INT-006-3) used to have the second column of the Timing Requirements table labeled as "IA Assigned Time Classification". The new table heading for the second column is not assigned to an entity and states just "Time Classification" and should state "Sink BA Time Classification". This will result in potential disputes as to who determines and classifies whether or not the RFI is "on-time". An Entity should be assigned the responsibility to determine the correct time classification (On-Time, Late, etc). Powerex suggests that the Sink BA be the Responsible Entity, and that once the Sink BA assigns a classification that other approval entities should respect that classification.
Response: Thank you for your comment. The CISDT does not believe the wording in these requirements presents a loophole; it provides the ability to modify the status of the Interchange if an issue is identified after the initial approval. **With respect to Attachment 1, the CISDT does not believe that a second time classification column is required. We do not understand how different entities would determine different time classifications; if transactions are submitted so close to the border of a time classification such that processing could impact the results that is a risk to be borne by the submitter.**		

Organization	Yes or No	Question 2 Comment
PJM Interconnection	Yes	PJM supports the language in R1; however, the measures in M1 do not appear to cover R1.1 and R1.2. PJM suggests that the drafting team modify M1 to address these requirements. PJM supports the language in R2, R4 and R5. PJM supports the language in R3; however, there appears to be a potential typo in M3: " . . . or denied the request or that it communicated denial to the Reliability Coordinator" should read " . . . or denied the request and that it communicated denial to the Reliability Coordinator." PJM supports the revision to the Attachment 1 Timing Tables, but offers that in the draft that was reviewed, there appears to be a potential typo in the superscripts for columns A and C in both tables, as they superscripts do not match existing footnotes.
Response: Thank you for these comments. The CISDT has considered the comments and applied those found relevant as indicated in the redline.		
City of Austin dba Austin Energy	Yes	City of Austin dba Austin Energy (AE) respectfully requests consideration of the following comment: Requirement R4 contains a number of double negatives making it unnecessarily confusing. Please consider the following language: “Prior to transitioning an Arranged Interchange to Confirmed Interchange, each Sink Balancing Authority shall confirm the following conditions exist: (i) the time period specified in Attachment 1, Column B has elapsed and (ii) if it is a Reliability Adjustment Arranged Interchange, the Source Balancing Authority or the Sink Balancing Authority associated with the Arranged Interchange has communicated its approval of the transition, or if it is not a Reliability Adjustment Arranged Interchange, (a) all Balancing Authorities and Transmission Service Providers associated with the Arranged Interchange have communicated their approval of the transition and (b) no entity associated with the Arranged Interchange has communicated its denial of the transition.” We suggest the SDT format the foregoing language to aid in comprehension. We also ask that the SDT consider whether both (a) and (b) are truly necessary. If approval/denial is a binary choice, then satisfying (a), that is, having all BAs’ and TSPs’ approval, should be sufficient.

Organization	Yes or No	Question 2 Comment
Response: Thank you for your comment. The CISDT recognizes this wording can be confusing but has considered many alternatives. With your suggested language, no Arranged Interchange would transition to Confirmed Interchange until after the time period specified in Attachment 1, Column B had expired. If all parties have approved the Arranged Interchange we do not want to wait until the time period has expired before confirming to Confirmed Interchange.		
MISO	Yes	

3. INT-009-2: Do you have any comments relating to INT-009-2? Please provide specific suggestions for improvement, including alternate language.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT reviewed and considered all comments, and it believes that only minor, non-substantive changes to the standard are necessary. The standard will proceed to final ballot.

The purpose statement has been edited to better reflect the content and intent of the standard; clarifying changes were made to R1 and M1 for consistency and to better reflect the standard's intent; a clarifying notation for "Net Interchange Actual" was added to R2; and "if applicable" was removed from R3.

Many commenters expressed concern about redundancy with R2 and BAL-005-2b. The CISDT is aware that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. INT-009-2 R2 fills that gap. INT-009-2 R2 can be retired in the future if BAL-005-2b is updated to reflect the reference to Pseudo-Ties.

Minority comments are addressed below, in responses to individual commenters.

Organization	Yes or No	Question 3 Comment
Nebraska Public Power District	No	I am concerned that the BA in which a DC line that crosses interconnection boundaries exists is not treated as a source/sink BA. The BA in which a DC line that crosses an interconnection boundary terminates, needs to have the ability to approve or deny these tags, based upon more than just the path between BA's being correct. In addition, I am concerned that valid reasons for denying a reliability related interchange curtailment are not specified. We run into times when the DC tie trips and curtailments get denied by the sink (PJM). As a result the energy must be made up by the BA on the same side of the DC tie as the sink BA. The sink BA simply denies the curtailment even though the source has effectively tripped off-line. The BA that was not involved in the transaction is now on the hook to provide the MW immediately. This is not conducive to reliability and needs to be corrected.

Organization	Yes or No	Question 3 Comment
Response: Thank you for your comment. This situation falls outside of the scope of R3 of INT-009-2. Approval rights for curtailments by intermediate BAs are not addressed in this standard.		
Northeast Power Coordinating Council	No	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
Duke Energy	No	
MRO NERC Standards Review Forum	No	
Colorado Spings Utilities	No	
American Electric Power	No	
Central Lincoln	No	
NIPSCO	No	
s	No	
Independent Electricity	No	

Organization	Yes or No	Question 3 Comment
System Operator		
Seminole Electric Cooperative, Inc.	No	
Seattle City Light	Yes	Seattle City Light supports the position of Next Era. Specifically:R1, R2 and R3 should be replaced with a single requirement that better captures the stated purpose of this standard ("To ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process and maintain the generation-to-load balance.")The proposed single requirement is: R1. Each Balancing Authority that receives a non-dynamic Confirmed Interchange shall implement such Confirmed Interchange prior to the later of i) the start of the ramp; and ii) one minute after a non-dynamic Arranged Interchange is transitioned to Confirmed Interchange. Issues with the individual requirements are as follows: R1 seems to partially reflect some party's business practice and is more suitable for adaption by NAESB than NERC. While, with some work, it could help identify instants when a BA failed to properly implement a schedule transaction, it does not require a BA to actually "implement Interchange as agreed upon in the Interchange confirmation process", which is the stated purpose of this standard. It also allows BA's to agree to hourly or multiple-hour Composite Confirmed Interchange, and allows agreements to be reached before, after or during the time the Composite Confirmed Interchange occurs or even once a month. R2 does not add anything obligation on a BA to "ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process" and does not belong in this standard. Clearly, its inclusion in this standard is an attempt to remedy a perceived deficiency in BAL-005-.2b. The appropriate place to fix such deficiency, if indeed BAL-005-.2b is deficient, is within BAL-005.2b, not INT-009-2.

Organization	Yes or No	Question 3 Comment
		R3 is unnecessary, just like it is unnecessary to include a requirement that requires each BA in whose area the generation is controlled shall coordinate the Confirmed Interchange with the Generation Operator of the generation if applicable. Any BA that contains a DC tie already has processes and procedures for coordinating its use just like all BA's have with individual generators within their BA. If the industry believes the better processes or procedures are required, NAESB is a more appropriate organization to develop them than NERC. Finally, if the phrase "and maintain the generation-to-load balance" contained in the Purpose statement seems to be out of place and extraneous to implementing the Interchange as agreed upon. By removing it, the purpose is better focused.
Response: Thank you for your comments. The CISDT appreciates the suggestion for consolidating the requirements, but has decided to retain the individual requirements, as most stakeholders support them. **With respect to R1, the CISDT believes that existing language more appropriately addresses the CISDT intent than your proposed language.** **The CISDT has also retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement.** **With respect to R3, the CISDT maintains that there are TOPs that are not aware of Interchange by any other means and has therefore retained this requirement. The BA has a responsibility to coordinate with them to ensure that the flow on the DC tie reflects the Interchange.** **The CISDT agrees with your suggestion about the purpose statement and has revised it to better reflect the content of the standard.**		
ISO/RTO Standards Review Committee	Yes	Comments: Requirement #3Each Balancing Authority in whose area the high-voltage direct current tie is controlled shall coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie if applicable. Suggest to remove "if applicable". If the condition exists, what else

Organization	Yes or No	Question 3 Comment
		would make the condition non-applicable to the standard?
Response: Thank you for your comment. The SDT agrees and has removed "applicable."		
PacifiCorp	Yes	Requirement R1: As indicated in our previous comments, it is unclear to PacifiCorp what the distinction is between Net Scheduled Interchange and Composite Confirmed Interchange in Requirement R1. Although Net Scheduled Interchange has been defined as the "algebraic sum of all interchange schedules across a given path" and Composite Confirmed Interchange is based on the "aggregate of all confirmed interchange," PacifiCorp does not see the two terms as being distinct from one another in practice. To avoid confusion, PacifiCorp recommends keeping Net Scheduled Interchange as the only term referenced in the requirement. Requirement R2: PacifiCorp maintains that the addition of this requirement is redundant. The Rationale for R2 only reinforces this point. If R2 is "equivalent to R10 of BAL-005-2b," why is the inclusion of R2 in INT-009-2 necessary? Wouldn't the existence of an "equivalent" requirement in another standard be grounds for its removal under Paragraph 81?
Response: Thank you for your comment. With respect to R1, the CISDT believes the new term "Composite Confirmed Interchange" provides flexibility in dealing with profiles over time while the existing term "Net Scheduled Interchange" represents a single value at one point in time. **The CISDT has retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement.**		
SPP Standards Review Group	Yes	In consideration of the Paragraph 81 effort, we suggest retiring R10 in BAL-005-0.2b. There is no need to have this requirement in both BAL-005-0.2b and INT-009-2. We suggest the following wording for R3: Each Balancing Authority in whose area a high-voltage direct current tie is controlled shall coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of that high-

Organization	Yes or No	Question 3 Comment
		voltage direct current tie if applicable. Additionally, we do not understand what the 'if applicable' at the end of the requirement is referring to. Is it the BA or is it something else? If it is indeed the BA, we suggest deleting the phrase since it doesn't add any clarification to the requirement. If it isn't referring to the BA, then please add additional clarification such that the reference can be understood.
Response: Thank you for your comment. The CISDT has retained R2 in INT-009-2 The CISDT has retained R2, though it has observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation. However, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement. **The CISDT agrees with your wording suggestion for R3, and has removed the "if applicable" from the requirement.**		
SERC OC Review Group	Yes	The SDT is respectfully requested to clarify that a Pseudo-Tie is not a physical tie that actually exists.
Response: Thank you. Please see the response to this comment is other sections		
Dominion NERC Compliance Policy	Yes	Throughout the entire Standard, Pseudo-Tie needs to be corrected to read as Pseudo-tie, as changed in the definition.
Response: Thank you for your comment. Pseudo-Tie has been made consistent throughout the documents.		
Florida Municipal Power Agency	Yes	FMPA would have supported this standard but for the definitions. Please see our comments on definitions.
Response: Thank you for your comment. See responses to your comments on the definitions.		
ACES Standards Collaborators	Yes	(1) INT-009-2 R1 - This requirement is redundant with BAL-006-2 R4, which already requires Adjacent BAs to operate to a "common Net Interchange Schedule and Actual Net Interchange value" with opposite signs. Redundancy is one of the paragraph 81

Organization	Yes or No	Question 3 Comment
		criteria. Please remove the redundancy to avoid implementing requirements that will be retired later. (2) INT-009-2 R2 - This requirement also meets Paragraph 81 criteria because it is redundant with BAL-005-0.2b R12 and R12.3. The BAL-005 standard already requires the BAs to use a common metering point for Pseudo-Ties and Dynamic Schedules.
Response: Thank you for your comments. (1) BAL does not have an exclusion for Dynamic Schedules and does not have an inclusion for INT-010 R1-R3. (2) The CISDT has retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement.		
Bonneville Power Administration	Yes	o Definitions o Dynamic Schedule BPA recommends the drafting team remove the word "time-" from "A time-varying energy transfer that is update . . ." The term time-varying is inaccurate; the amount of energy varies while time does not. o Pseudo-TieBPA recommends the drafting team remove the word "time-" from "A time-varying energy transfer that is update . . ." The term time-varying is inaccurate; the amount of energy varies while time does not. o R1 contains the term "Pseudo-tie", whereas in Measure 1 and in VSL Section for R1 do not contain the term "Pseudo-tie". BPA requests clarification on why the term "Pseudo-tie" in R1 but not in M1 and in the VSL for R1?
Response: Thank you for your comment. The CISDT has added "Pseudo-Tie" to M1 and the VSL.		
NextEra Energy/Florida Power and Light	Yes	R1, R2 and R3 should be replaced with a single requirement that better captures the stated purpose of this standard ("To ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process and maintain the generation-to-load balance.")The proposed single requirement is:

Organization	Yes or No	Question 3 Comment
		R1. Each Balancing Authority that receives a non-dynamic Confirmed Interchange shall implement such Confirmed Interchange prior to the later of i) the start of the ramp; and ii) one minute after a non-dynamic Arranged Interchange is transitioned to Confirmed Interchange. Issues with the individual requirements are as follows: R1 seems to partially reflect some party's business practice and is more suitable for adaption by NAESB than NERC. While, with some work, it could help identify instants when a BA failed to properly implement a schedule transaction, it does not require a BA to actually "implement Interchange as agreed upon in the Interchange confirmation process", which is the stated purpose of this standard. It also allows BA's to agree to hourly or multiple-hour Composite Confirmed Interchange, and allows agreements to be reached before, after or during the time the Composite Confirmed Interchange occurs or even once a month. R2 does not add anything obligation on a BA to "ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process" and does not belong in this standard. Clearly, its inclusion in this standard is an attempt to remedy a perceived deficiency in BAL-005-.2b. The appropriate place to fix such deficiency, if indeed BAL-005-.2b is deficient, is within BAL-005.2b, not INT-009-2. R3 is unnecessary, just like it is unnecessary to include a requirement that requires each BA in whose area the generation is controlled shall coordinate the Confirmed Interchange with the Generation Operator of the generation if applicable. Any BA that contains a DC tie already has processes and procedures for coordinating its use just like all BA's have with individual generators within their BA. If the industry believes the better processes or procedures are required, NAESB is a more appropriate organization to develop them than NERC. Finally, if the phrase "and maintain the generation-to-load balance" contained in the Purpose statement seems to be out of place and extraneous to implementing the Interchange as agreed upon.

Organization	Yes or No	Question 3 Comment
		By removing it, the purpose is better focused.
Response: Thank you for your comments. The CISDT appreciates the suggestion for consolidating the requirements, but has decided to retain the individual requirements, as most stakeholders support them. **With respect to R1, the CISDT believes that existing language more appropriately addresses the CISDT intent than your proposed language.** **The CISDT has also retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement.** **With respect to R3, the CISDT maintains that there are TOPs that are not aware of Interchange by any other means and has therefore retained this requirement. The BA has a responsibility to coordinate with them to ensure that the flow on the DC tie reflects the Interchange.** **The CISDT agrees with your suggestion about the purpose statement and has revised it to better reflect the content of the standard.**		
Manitoba Hydro	Yes	(a) R1 - the word 'Adjacent' should be added before the words 'Balancing Authority' in the second line. (b) M1 - the language of the measure is missing a few concepts that are in the requirement. i.e. 'and Pseudo-ties' should be added after Dynamic Schedules', and 'by a Reliability Coordinator' should be added after 'as directed'. (c) R2, M2 (and VSLs) - the standard uses the term Net Interchange Actual but the Glossary defined term which I assume is desired to be used is Net Actual Interchange.
Response: Thank you for your comments. (a) The CISDT agrees. (b) The CISDT has added Pseudo-Ties but removed "by a Reliability Coordinator" from R1. (c) The term that the CISDT intended to use it the Net Interchange Actual (NI_A) term in the ACE equation. This notation has been added to R2.		

Organization	Yes or No	Question 3 Comment
ReliabilityFirst Corporation	Yes	ReliabilityFirst abstains and offers the following comment for consideration:1. Requirement R1a. ReliabilityFirst believes Reliability Standards should stand on their own merit and should not reference other Reliability Standards. The reference to INT-010-2 may cause issues if the intent of the INT-010-2 standard changes in the future. Furthermore, with the reference to the INT-010-2 standard the approval of INT-009-2 is completely dependent to the approval of the INT-010-2 (i.e., the approval of the INT-009-2 is dependent on the INT-010-2 standard).
Response: Thank you for your comment. The SDT believes the cross reference is required, the flows created by INT-010 must be incorporated into the INT-009 process.		
MidAmerican Energy	Yes	Requirement R2: This requirement is redundant. As identified in the rationale box, the requirement is equivalent to BAL-005-2b. To avoid double jeopardy, the R2 requirement in INT-009-2 should be removed and any remaining concerns should be addressed in BAL-005.
Response: Thank you for your comment. The CISDT has retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement.		
Exleon Companies	Yes	INT-009-2 includes new definitions for Dynamic Schedule and Pseudo-Tie requiring that these values be treated as Interchange Schedules and Actual Interchange, respectively, and included in ACE equations. It is confusing, then, that R1 should specify that Composite Confirmed Interchange is to be calculated without inclusion of Dynamic Schedules and Pseudo-Ties. As Dynamic Transfers represent inputs to the ACE equation, and measurements against which a BA is managing its balancing function, to exclude them from the Composite Confirmed Interchange seems to paint an inaccurate picture of the Interchange between two Balancing Authorities. If the intention is to not skew Composite Arranged Interchange by the inclusion of values that change in Real Time with no settled value available until after-the-fact, that can

Organization	Yes or No	Question 3 Comment
		be accomplished by stipulating that estimated values of Dynamic Schedules and Pseudo-Ties not be included in Composite Confirmed Interchange, and that the real-time values should be used for calculation of Composite Confirmed Interchange in the Real Time horizon, with the agreed on after the fact values used for calculation of Composite Confirmed Interchange in the after the fact horizon.
Response: Thank you for your comment. The CISDT has chosen to retain the current language of the requirement and definition so not to preclude the use of the defined terms in other standards.		
Kansas City Power & Light	Yes	BAL-005-0.2b R10 is the same requirement as in INT-009-2 so we have a duplicate requirement in both standards. In order to remove duplication, BAL-005-0.2b R10 could be retired in reference to Paragraph 81. R3. Each Balancing Authority in whose area the high-voltage direct current tie is controlled shall coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie if applicable. One would think BA and TOP coordination over the HVDC would be applicable all the time, would it not? In what conditions would it not be coordinated?
Response: Thank you for your comment. The CISDT has retained R2. The CISDT observed that a requirement exists in the BAL-005-2b standard describing how Dynamic Schedules are used in the ACE equation; however, there is no comparable requirement for Pseudo-Ties. This requirement is here to fill this gap. This can be retired in the future if the BAL-005-2b standard is updated to reflect this requirement. With respect to R3, the CISDT has removed "if applicable" from the requirement.		
Powerex Corp.	Yes	Powerex has reviewed the latest draft of the Interchange Standards and considers these standards a necessity for reliable operations of the Bulk Electric System. The Interchange Standards provide the appropriate validation and verification of the interchange schedules prior to implementation. The Interchange Standards are important and prevent entities that transact from providing false and misleading information to reliability entities, which minimize impacts to the operation of the BES. The Interchange Standards also require that adjacent Balancing Authorities agree upon the magnitude and ramping of the interchange before it is implemented

Organization	Yes or No	Question 3 Comment
		in the ACE equations in order to avoid the imbalance and inadvertent in the Interconnection. This allows for efficient and more reliable operations. Powerex does not believe that any of the requirements of the Interchange Standards should be removed or moved to the NAESB business practice standards.
Response: Thank you for your support!		
PJM Interconnection	Yes	PJM supports the language in R1. PJM supports the language in R2, but asks the drafting team to consider providing accommodation for existing Pseudo-Ties. The effective date listed in the implementation plan does not provide sufficient time for the coordination required to modify existing Pseudo Ties. PJM does not support the language in R3, as written. Specifically, 1. The qualifier "if applicable" is ambiguous and suggests that there exist situations in which a Balancing Authority would not be required to coordinate with a Transmission Operator. If this is the case, the requirement should clearly outline these situations. 2. This requirement carries an unduly heavy compliance burden as there exist no options to streamline the coordination effort via agreements or technical solutions that mitigate the need for active coordination. BAs and TOPs should have an option to reduce their compliance burden in situations such as the TOP allowing the BA to directly control the HVDC tie via a telemetered control signal or when the TOP chooses to actively monitor E-Tag software and/or the BA's scheduling system to facilitate the operation of their HVDC facility.
Response: Thank you for your comment. The CISDT has removed "if applicable" from R3. The CISDT believes that the actions that you mention in your second comment are examples of the type of coordination envisioned by the team with respect to this requirement.		
Tacoma Power	Yes	R1, R2, and R3 should be replaced with a single requirement that captures the stated purpose, "To ensure that BAs implement the Interchange as agreed upon in the Interchange confirmation process and maintain the generation-to-load

Organization	Yes or No	Question 3 Comment
		balance."Proposed single requirement:"R1. Each Balancing Authority that receives a non-dynamic Confirmed Interchange shall implement such Confirmed Interchange prior to the later of i) the start of the ramp; or ii) one minute after the non-dynamic Arranged Interchange is transitioned to Confirmed Interchange."
Response: Thank you for the proposed language. The CISDT has decided to retain the three requirements of this standard.		
City of Austin dba Austin Energy	Yes	City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Thank you for your comment. Please see the CISDT's response to Seattle City Light's comments.		
MISO	Yes	

4. INT-010-2: Do you have any comments relating to INT-010-2? Please provide specific suggestions for improvement, including alternate language.

Summary Consideration:

The CISDT thanks all commenters for their feedback on INT-010-2. In response to industry comments, the CISDT has added language and a rationale box to R1, deleted R4, and made minor changes to other requirements.

With respect to R1, the CISDT has added language and a Rationale box to provide clarity around "energy sharing agreement." The requirement was modified to read "covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement" (rather than just "covered by an energy sharing agreement") and a rationale was added:

Rationale for R1: This requirement was originally revised to replace the term "request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled.

Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.

In response to industry comments, and for consistency or to correct typos, minor changes were also made to the Applicability Section, R1, R2, M2, and M3.

Minority comments are addressed below, in responses to individual commenters.

Organization	Yes or No	Question 4 Comment
MISO	No	R2.3 of INT-004 states that the LSE is responsible for maintaining the RFI for Reliability Adjustment requests. If the Pseudo-Ties are implemented through an

Organization	Yes or No	Question 4 Comment
		agreed upon alternate congestion management approach (such as reporting market flows or generation-to-load flows to the IDC), the IDC will assign a relief obligation to the BA. The BA will redispatch its system to meet the relief obligation which may or may not involve a change to the pseudo-tie output. In this instance, it is not appropriate to limit the pseudo-tie output in the ACE equation to a reliability cap if other generation is being redispatched to meet the relief obligation. Therefore it is recommended this requirement be removed.
Response: Thank you for your comment. Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		
Nebraska Public Power District	No	Requirement 2.3 of INT-004 states that the LSE is responsible for maintaining the RFI for Reliability Adjustment requests. If the Pseudo-Ties are implemented through an agreed upon alternate congestion management approach (such as reporting market flows or generation-to-load flows to the IDC), the IDC will assign a relief obligation to the BA. The BA will redispatch its system to meet the relief obligation which may or may not involve a change to the pseudo-tie output. In this instance, it is not appropriate to limit the pseudo-tie output in the ACE equation to a reliability cap if other generation is being redispatched to meet the relief obligation. Therefore it is recommended this requirement be removed.
Response: Thank you for your comment. Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		
City of Austin dba Austin Energy	No	City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Thank you. Please refer to the SDT's response to Seattle City Light.		

Organization	Yes or No	Question 4 Comment
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
PacifiCorp	No	
Duke Energy	No	
Colorado Spings Utilities	No	
American Electric Power	No	
Central Lincoln	No	
MidAmerican Energy	No	
Exleon Companies	No	
Northeast Power Coordinating Council	Yes	The notation “4.2” in Section A4 Applicability should be removed. Suggest revising Requirement R2 as follows: R2. Each Sink Balancing Authority shall submit a Reliability Adjustment Arranged Interchange reflecting that modification 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. With the wording change, corresponding changes must be made to the Measures and the VSLs as appropriate. The above

Organization	Yes or No	Question 4 Comment
		wording change to R2 is also proposed for the other requirements in this standard where applicable.
Response: Thank you for your comment. The SDT has removed the notation in Section A4. With respect to your comment on R2, the Sink BA is responsible for ensuring that the tag is updated or created, but the Sink BA may not be the entity that actually submits the revised tag. R2 has not been modified.		
Independent Electricity System Operator	Yes	1. The notation “4.2” in Section A4 Applicability should be removed. 2. While we understand and support the intent of Requirement R2, we suggest it be revised as indicated below to remove the term “shall ensure” which may not be measurable.R2. Each Sink Balancing Authority shall submit a Reliability Adjustment Arranged Interchange reflecting that modification 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. If the SDT accepts the proposed wording change, then please make corresponding changes to the Measures and the VSLs as appropriate. The above wording change to R2 is also proposed for other requirements in this standard, where appropriate.
Response: Thank you for your comment. The SDT has removed the notation in Section A4. With respect to your comment on R2, the Sink BA is responsible for ensuring that the tag is updated or created, but the Sink BA may not be the entity that actually submits the revised tag. R2 has not been modified.		
Seattle City Light	Yes	Seattle City Light supports the concerns of NextEra regarding this draft. Specifically, "This standard appears to be more directed a correcting a perceived inequity in congestion management procedures and/or in energy sharing agreements for reliability than in promoting or ensuring real-time reliability. R1, R2 and R3 should be retired (using the paragraph 81 criteria), and possibly transferred to NAESB. They do nothing to impact real-time reliability, and could actually adversely impacts reliability if a RFI for reliability fails to get implemented within the arbitrary 60 minute windows specified in these requirements and the energy scheduled for reliability reasons

Organization	Yes or No	Question 4 Comment
		prematurely ends. Additionally, any limitations on how long energy sharing transactions or RC directed schedules for reliability reason should be exempted from standard interchange scheduling processes and procedures should be addressed by NAESB, not NERC. Finally, R4 does not belong in an INT standard. It is unclear how capping the MW value in ACE equations helps ensure reliability. While a cap may change which BA supplies the energy above the MW cap, it does nothing to ensure the flow through the metering point where the dynamic signal emanates from ever changes. Additionally, if it belongs in a reliability standard at all, it should be included in a BAL standard."Regarding R4, Seattle adds that it will be almost impossible to determine or prove that the adjusted value was not exceeded as required in Measure 4. An entity could possibly do that positively if it only had one intertie and one interchange schedule.
Response: Thank you for your comment. These requirements allow changes directed by the RC or necessitated by loss of resources to be implemented before submitting an RFI or modifying a Confirmed Interchange for future consideration as part of the congestion management process. **With respect to R4, comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.**		
SPP Standards Review Group	Yes	Delete 4.2 in the Applicability Section. It is blank. In the 4th bullet of the Background Section, we suggest changing the reference to the ACE value to the ACE equation. The bullet would then read: 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 in the ACE equation does not exceed the MW value of the Reliability Adjustment Arranged Interchange. Also we suggest the following wording change for

Organization	Yes or No	Question 4 Comment
		R3: Each Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchange reflecting a modification is submitted within 60 minutes of the start of that modification if a Reliability Coordinator directs the modification of a Confirmed Interchange or Implemented Interchange for actual or anticipated reliability-related reasons.
Response: Thank you for your comment. The blank 4.2 in Section A4 has been deleted. **With respect to R4, comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.** **The SDT notes that your comment on R3 actually applies to R2. We agree with the revision and have revised R2 accordingly.**		
SERC OC Review Group	Yes	The SDT is requested to consider modifying the Reliability Adjustment Arranged Interchange definition. The current definition language is: Reliability Adjustment Arranged Interchange - Request to modify Confirmed Interchange or Implemented Interchange for reliability purposes. Suggested modification follows: DELETE: "Request to modify a" ADD: Modified New definition: Interchange or Implemented Interchange for reliability purposes. The SDT is requested to modify M2 so it is consistent with R2. The current M2 language is: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) Suggested modification to 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 DELETE: "created" REPLACE with: "submitted" 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

Organization	Yes or No	Question 4 Comment
		or anticipated reliability-related reasons. (R2) The SDT is requested to modify M3 so it is consistent with R3. The current M3 language is: 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)Suggested modification to M3. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other evidence that a RFI was DELETE: "created" REPLACE with: "submitted" 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)
Response: Thank you for your comment. The CISDT disagrees with your comment about Reliability Adjustment Arranged Interchange. A Reliability Adjustment Arranged Interchange is a request and not the result of an approved request to modify Confirmed Interchange. **The CISDT agrees with your comments on the Measures for R2 and R3 and has modified M2 and M3 accordingly.**		
Dominion NERC Compliance Policy	Yes	Throughout the entire Standard, Pseudo-Tie needs to be corrected to read as Pseudo-tie, as changed in the definition.
Response: Thank you for your comment. The defined term is "Pseudo-Tie," and the CISDT has made this consistent throughout the standard.		
Florida Municipal Power Agency	Yes	Please see FMPA comments to Question 1. The proposed INT-010 is duplicative of BAL standards (e.g., BAL-002) that already cause a BA to balance supply and demand for loss of a generator. This proposed standard simply contains commercial considerations for how such replacement is made and as such is not reliability based. As such, the standard should be retired in accordance with P81 recommendations and the Independent Expert Review Panel recommendations.

Organization	Yes or No	Question 4 Comment
Response: Thank you for your comment. Requirements R1, R2 and R3 allow changes directed by the RC or necessitated by loss of resources to be implemented before submitting an RFI or modifying a Confirmed Interchange for future consideration as part of the congestion management process. With respect to R4, comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		
ACES Standards Collaborators	Yes	(1) INT-010-2 R4 uses the wrong interchange term. It states that each BA shall ensure the MW level from the Confirmed Interchange for Reliability Adjustment Arranged Interchange is not exceeded for the Dynamic Interchange Schedule or Pseudo-Tie established in the BA's ACE equation. However, it is the Implemented Interchange state in which the value is supposed to be entered into the ACE equation per the NERC Glossary Definition. Thus, we recommend changing Confirmed Interchange to Implemented Interchange. (2) INT-010-2 R1 - There is a missing period at the end of the requirement.
Response: Thank you for your comment. **1) Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.** **2) The CISDT has made this correction.**		
Bonneville Power Administration	Yes	o Definitions o Dynamic Schedule o BPA recommends the drafting team remove the word "time-" from "A time-varying energy transfer that is update . . ." The term time-varying is inaccurate; the amount of energy varies while time does not. o Requirement 2 BPA requests clarification on how the drafting team expects R2 to be accomplished if the Sink BA is not the Transmission Operator. o General Considerations for Curtailments of Dynamic Transfers For clarification purposes, BPA recommends revising and moving the first sentence from the For

Organization	Yes or No	Question 4 Comment
		Dynamic Schedule section to above the General Considerations for Curtailments of Dynamic Transfers section. "If Transmission Services between the source and sink BA is curtailed, then the allowable range of the magnitude of the schedules between them must be curtailed accordingly." o For Dynamic Schedules: BPA recommends the term curtailment be modified to Reliability Adjustment Arranged Interchange in the For Dynamic Schedules section. o For Capacity Transactions: BPA recommends the drafting team consider adding the following subsection for Capacity Transactions, similar to the pseudo-tie statement as follows: If transmission services between the sink BA and the source BA are curtailed, then the allowable range of magnitude of the capacity transaction between them must be limited according to these constraints.
Response: Thank you for your comment. The CISDT disagrees with the comment on the definition of Dynamic Schedule, as the term "time-varying" is an adjective relating to the energy transfer. **With respect to R2, the CISDT notes that the BA is responsible for Interchange and that the requirement allows 60 minutes for the Reliability Adjustment Arranged Interchange to be submitted. This allows for communication between and among entities to take actions to maintain reliability and then submit an RAAI.** **With respect to your final three comments, the CISDT notes that these three comments apply to the Guidelines and Technical basis of the standard. The CISDT has excerpted sections of the Dynamic Transfer Reference Guidelines here and prefers to leave the language as-is because it is directly quoting that document. The CISDT also does not consider capacity transactions to be Dynamic Transfers.**		
MRO NERC Standards Review Forum	Yes	R2.3 of INT-004 states that the LSE is responsible for maintaining the RFI for Reliability Adjustment requests. If the Pseudo-Ties are implemented through an agreed upon alternate congestion management approach (such as reporting market flows or generation-to-load flows to the IDC), the IDC will assign a relief obligation to the BA. The BA will redispatch its system to meet the relief obligation which may or may not involve a change to the pseudo-tie output. In this instance, it is not appropriate to limit the pseudo-tie output in the ACE equation to a reliability cap if

Organization	Yes or No	Question 4 Comment
		other generation is being redispatched to meet the relief obligation. Therefore it is recommended this requirement be removed.
Response: Thank you for your comment. Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		
NextEra Energy/Florida Power and Light	Yes	This standard appears to be more directed a correcting a perceived inequity in congestion management procedures and/or in energy sharing agreements for reliability than in promoting or ensuring real-time reliability. R1, R2 and R3 should be retired (using the paragraph 81 criteria), and possibly transferred to NAESB. They do nothing to impact real-time reliability, and could actually adversely impacts reliability if a RFI for reliability fails to get implemented within the arbitrary 60 minute windows specified in these requirements and the energy scheduled for reliability reasons prematurely ends. Additionally, any limitations on how long energy sharing transactions or RC directed schedules for reliability reason should be exempted from standard interchange scheduling processes and procedures should be addressed by NAESB, not NERC. Finally, R4 does not belong in an INT standard. It is unclear how capping the MW value in ACE equations helps ensure reliability. While a cap may change which BA supplies the energy above the MW cap, it does nothing to ensure the flow through the metering point where the dynamic signal emanates from ever changes. Additionally, if it belongs in a reliability standard at all, it should be included in a BAL standard.
Response: Thank you for your comment. Requirements R1, R2 and R3 allow changes directed by the RC or necessitated by loss of resources to be implemented before submitting an RFI or modifying a Confirmed Interchange for future consideration as part of the congestion management process. **With respect to R4, comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has**		

Organization	Yes or No	Question 4 Comment
removed R4.		
NIPSCO	Yes	Per MISO recommendation: R2.3 of INT-004 states that the LSE is responsible maintaining the RFI for Reliability Adjustment requests. INT-010 R4 seems to transfer that same activity to the BA role. We request to remove Requirement #4 from INT-010.
Response: Thank you for your comment. Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		
Manitoba Hydro	Yes	(a) M2 and M3 - use the language 'created' instead of 'submitted' as used in the corresponding requirements.
Response: Thank you for your comment. The CISDT has made this correction.		
ReliabilityFirst Corporation	Yes	ReliabilityFirst abstains and offers the following comment for consideration:1. Requirement R1a. ReliabilityFirst requests further clarification on meaning of the term "energy sharing agreement". If this term has a specific meaning that has an impact on the intent of the standard, ReliabilityFirst recommends making it a defined term.
Response: Thank you for your comment. The CISDT has added language to R1, as well as a Rationale box for R1 to provide clarity around "energy sharing agreement." The requirement was modified to read "covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement" (rather than just "covered by an energy sharing agreement") and a rationale was added: **Rationale for R1: This requirement was originally revised to replace the term "request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would**		

Organization	Yes or No	Question 4 Comment
include the applicable conditions under which the energy could be scheduled.		
NorthWestern Energy	Yes	R1 needs more clarification - what does this requirement mean, e.g., what is an energy sharing agreement?
Response: Thank you for your comment. The CISDT has added language to R1, as well as a Rationale box for R1 to provide clarity around "energy sharing agreement." The requirement was modified to read "covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement" (rather than just "covered by an energy sharing agreement") and a rationale was added: Rationale for R1: This requirement was originally revised to replace the term "request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled.		
Kansas City Power & Light	Yes	Background Section -4th bullet, I suggest changing the term "ACE value" to the "ACE equation". The bullet would then read: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 in the ACE equation does not exceed the MW value of the Reliability Adjustment Arranged Interchange
Response: Thank you for your comment. R4 has been deleted, so the Background Section information related to it has been as well.		
Seminole Electric Cooperative, Inc.	Yes	R1 should not be qualified / limited to "a loss of resources covered by an energy sharing agreement". Propose the following: ï,§ The Balancing Authority that experiences a loss of a resource or Reliability Adjustment Arranged Interchange, requiring an immediate adjustment to scheduled interchange which will exceed 60 minutes in duration shall ensure that a Request for

Organization	Yes or No	Question 4 Comment
		Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the start time of the event. Alternately, some effort should be made to clarify the intended meaning of "energy sharing agreement", the use of which creates considerable ambiguity regarding the requirement and distinction from events NOT "covered by an energy sharing agreement". R2 and R3 wording is ambiguous. Propose combining the two into the following: R2 Upon receiving a directive for a Reliability Adjustment Arranged Interchange to confirmed or implemented Interchange due to actual or anticipated reliability-related reasons, the Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchange including the scheduled interchange is submitted within 60 minutes.
Response: Thank you for your comment. The CISDT has added language to R1, as well as a Rationale box for R1 to provide clarity around "energy sharing agreement." The requirement was modified to read "covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement" (rather than just "covered by an energy sharing agreement") and a rationale was added: **Rationale for R1: This requirement was originally revised to replace the term "request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled.** **The CISDT believes that combining Requirements R2 and R3 would create more confusion because R2 deals with Reliability Adjustment Arranged Interchange while R3 deals with submitting a new RFI.**		
Powerex Corp.	Yes	Powerex has reviewed the latest draft of the Interchange Standards and considers these standards a necessity for reliable operations of the Bulk Electric System. The Interchange Standards provide the appropriate validation and verification of the interchange schedules prior to implementation. The Interchange Standards are

Organization	Yes or No	Question 4 Comment
		important and prevent entities that transact from providing false and misleading information to reliability entities, which minimize impacts to the operation of the BES. The Interchange Standards also require that adjacent Balancing Authorities agree upon the magnitude and ramping of the interchange before it is implemented in the ACE equations in order to avoid the imbalance and inadvertent in the Interconnection. This allows for efficient and more reliable operations. Powerex does not believe that any of the requirements of the Interchange Standards should be removed or moved to the NAESB business practice standards. In R1, the term "energy sharing" is not capitalized and thus is open to interpretation, and this leaves the door open for entities to submit RFIs after the scheduling deadlines. In the original INT-010-1, this issue was dealt with by describing the circumstance which this was allowed, specifically "...a loss of resources covered by an energy sharing agreement....". Either "energy sharing" needs to be defined, or the conditions to allow these modifications should be limited. Powerex suggests reverting back to the current INT-010-1 language use, "...a loss of resources covered by an energy sharing agreement....".
Response: Thank you for your comment. The CISDT has added language to R1, as well as a Rationale box for R1 to provide clarity around "energy sharing agreement." The requirement was modified to read "covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement" (rather than just "covered by an energy sharing agreement") and a rationale was added: **Rationale for R1: This requirement was originally revised to replace the term "request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled.**		
PJM Interconnection	Yes	PJM supports the language in R1, R2 and R3. PJM does not support R4, as written, for the following reasons:

Organization	Yes or No	Question 4 Comment
		o It appears that Balancing Authorities have the leeway to take actions in an attempt to remain compliant that simultaneously leave the interconnection worse off. PJM suggests that Balancing Authorities should also be required to coordinate with their Adjacent Balancing Authorities as opposed to only requiring that the values included in their ACE equation never exceed the Confirmed Interchange value. o Further, this requirement makes no allowance for the implementation of a 10-minute straddle ramp without being considered non-compliant, nor does it allow for the physical ramp rates of generators that may be unable to reduce output before the Confirmed Interchange reduction takes effect. o Lastly, INT-004-3 R2 establishes a bandwidth that allows Confirmed Interchange to deviate from actual hourly integrated energy without requiring a tag update. Similarly, the MW value included in an ACE equation should be allowed to deviate from Confirmed Interchange within a certain bandwidth, even when the Confirmed Interchange results from a Reliability Adjustment Arranged Interchange.
Response: Thank you for your comment. Comments received indicate industry consensus for removing Requirement R4. Industry has commented that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit. The CISDT agrees and has removed R4.		

5. **INT-011-1: A requirement was developed to require that each Load-Serving Entity that uses Point to Point Transmission Service for intra-Balancing Authority Area transfers shall submit a Request for Interchange unless the information about intra-Balancing Authority transfers is included in congestion management procedure(s) via an alternate method. Do you agree with this proposed requirement? If not, please provide specific suggestions for improvements to the requirement.**

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT did not make any substantive changes to INT-011-1, and it will proceed to final ballot.

Some commenters questioned the necessity of the standard, but the CISDT maintains that it is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue. Because of this, and in order to be responsive to the associated FERC directive, the CISDT will retain INT-011-1.

Organization	Yes or No	Question 5 Comment
Seattle City Light	No	Seattle City Light supports that comments of NextEra. Specifically, "This standard appears to be more directed a correcting a perceived inequity in congestion management procedures than in promoting or ensuring real-time reliability. It is also basically an administrative task that does not alter or have any effect on real-time operations, and, thus should be eliminated using the paragraph 81 criteria. If the industry believes congestion management procedures require enhancements related to intra-Balancing Authority Area transfers, there are much more efficient and less burdensome means to achieve this goal than to put in place this reliability standard. For example, NERC could require a LSE to post data related to current-hour schedules for real-time intra-Balancing Authority Area transfers on System Data Exchange (SDX) so that congestion management procedures could have access to such data. Additionally, many BA may have practices that already require entities to submit an RFI related to intra-Balancing Authority Area transfers within or through their BA for energy imbalance calculations and/or for identifying unreserved use. Alternatively, if

Organization	Yes or No	Question 5 Comment
		the drafting team determines a requirement is require for reliability, R1 should be modified to read as follows:R1. Each Load-Serving Entity that uses Point to Point Transmission Service or Network secondary Transmission Service for intra-Balancing Authority Area transfers shall submit a Request for Interchange. The phrase “unless the information about intra-Balancing Authority Area transfers is included in congestion management procedure(s) via an alternate method” adds nothing to the requirement. If the sole reason for this requirement is to get data related to intra-Balancing Authority Area transfers into congestion management procedure, the requirement is not needed for reasons stated above."
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While “what” is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue. The CISDT believes that entities should have the option of using alternative methods to address these transfers in congestion management processes. The CISDT believes that the requirement has achieved stakeholder consensus and that no further revisions are necessary.		
NextEra Energy/Florida Power and Light	No	This standard appears to be more directed a correcting a perceived inequity in congestion management procedures than in promoting or ensuring real-time reliability. It is also basically an administrative task that does not alter or have any effect on real-time operations, and, thus should be eliminated using the paragraph 81 criteria. If the industry believes congestion management procedures require enhancements related to intra-Balancing Authority Area transfers, there are much more efficient and less burdensome means to achieve this goal than to put in place this reliability standard. For example, NERC could require a LSE to post data related to current-hour schedules for real-time intra-Balancing Authority Area transfers on System Data Exchange (SDX) so that congestion management procedures could have access to such data. Additionally, many BA may have practices that already require entities to submit an RFI related to intra-Balancing Authority Area transfers within or through their BA for energy imbalance calculations and/or for identifying unreserved use. Alternatively, if the drafting team determines a requirement is require for

Organization	Yes or No	Question 5 Comment
		reliability, R1 should be modified to read as follows:R1. Each Load-Serving Entity that uses Point to Point Transmission Service or Network secondary Transmission Service for intra-Balancing Authority Area transfers shall submit a Request for Interchange. The phrase "unless the information about intra-Balancing Authority Area transfers is included in congestion management procedure(s) via an alternate method" adds nothing to the requirement. If the sole reason for this requirement is to get data related to intra-Balancing Authority Area transfers into congestion management procedure, the requirement is not needed for reasons stated above.
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue. The CISDT believes that entities should have the option of using alternative methods to address these transfers in congestion management processes. The CISDT believes that the requirement has achieved stakeholder consensus and that no further revisions are necessary.		
American Electric Power	No	AEP sees no reliability benefit to the BES from INT-011-1 and encourage the drafting team to not pursue it.
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue.		
Florida Municipal Power Agency	No	Please see FMPA comments to Question 1The proposed INT-011 is duplicative of NAESB standards and is commercial in nature. As such, the standard should be retired in accordance with P81 recommendations and the Independent Expert Review Panel recommendations.
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order		

Organization	Yes or No	Question 5 Comment
to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue.		
Exleon Companies	No	Exelon agrees with comments provided by NextEra for this standard. Addresses congestion management more than reliability. Administrative task that does not alter or have any effect on real-time operations. Alternatively, propose R1 should be modified to read as follows: R1.Each Load-Serving Entity that uses Point to Point Transmission Service or Network secondary Transmission Service for intra-Balancing Authority Area transfers shall submit a Request for Interchange.
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue. The CISDT believes that entities should have the option of using alternative methods to address these transfers in congestion management processes. The CISDT believes that the requirement has achieved stakeholder consensus and that no further revisions are necessary.		
Tacoma Power	No	"Intra-Balancing Authority" is not a defined term and must be fully defined before using the term in a reliability standard.
Response: Thank you for your comment. The CISDT did not create a new term. The use of "intra-Balancing Authority" is meant to include transfers solely within a single Balancing Authority as described in the purpose statement.		
ACES Standards Collaborators	No	(1) INT-011-1 addresses commercial equity issues and is a business practice. RCs, BAs, and TOPs are perfectly capable of working together to re-dispatch generation to address system constraints. The purpose of tagging these intra-BA transactions is to ensure they are included in congestion management procedures such as the IDC so that they are treated equitably with other interchange transactions which is essentially reflected in the purpose statement. While the primary purpose of the IDC is to manage congestion in an equitable fashion, the IDC and WECC USF are not reliability tools because they cannot relieve flows rapidly enough. In fact, FERC

Organization	Yes or No	Question 5 Comment
		recognized this and required NERC to reflect this in the IRO-006 standards. IRO-006-EAST-1 R1 requires the RC to actually implement another action such as re-dispatch besides TLR to mitigate IROL exceedances and violations. Please strike this entire standard.
Response: Thank you for your comment. It is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue.		
Northeast Power Coordinating Council	No	
Colorado Spings Utilities	No	
Central Lincoln	No	
NIPSCO	No	
Seminole Electric Cooperative, Inc.	No	
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern	Yes	

Organization	Yes or No	Question 5 Comment
Company Generation and Energy Marketing		
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Powerex Corp.	Yes	

Organization	Yes or No	Question 5 Comment
PJM Interconnection	Yes	

6. INT-011-1: Do you have any other comments relating to INT-011-1 that you have not previously submitted? Please provide specific suggestions for improvement, including alternate language.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT did not make any substantive changes to INT-011-1, and it will proceed to final ballot.

Some commenters questioned the necessity of the standard, but the CISDT maintains that it is a reliability issue when flow must be reduced and this is when congestion management procedures apply. All relevant information must be available to know which flows are affecting the system in order to determine which flows must be reduced. While "what" is reduced is an equity / commercial issue, the availability of information for evaluation is a reliability issue. Because of this, and in order to be responsive to the associated FERC directive, the CISDT will retain INT-011-1.

Organization	Yes or No	Question 6 Comment
Exleon Companies	No	See response to Q 5.
Response: See the CISDT's response to Question 5.		
ISO/RTO Standards Review Committee	No	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	

Organization	Yes or No	Question 6 Comment
PacifiCorp	No	
SPP Standards Review Group	No	
Duke Energy	No	
SERC OC Review Group	No	
Dominion NERC Compliance Policy	No	
Florida Municipal Power Agency	No	
Bonneville Power Administration	No	
MRO NERC Standards Review Forum	No	
Colorado Spings Utilities	No	
American Electric Power	No	
NIPSCO	No	
ReliabilityFirst Corporation	No	
MISO	No	
MidAmerican Energy	No	

Organization	Yes or No	Question 6 Comment
Kansas City Power & Light	No	
Seminole Electric Cooperative, Inc.	No	
PJM Interconnection	No	
Seattle City Light	Yes	For this draft to proceed, Seattle City Light requests that the term "intra-Balancing Authority Area transfer" be defined (in addition to the changes suggested by NextEra as indicated in Question 5).
Response: Thank you for your comment. The use of "intra-Balancing Authority" is meant to include transfers solely within a single Balancing Authority as described in the purpose statement.		
Central Lincoln	Yes	Suggest changing "4.1.1. Load-Serving Entities" to "4.1.1. Load-Serving Entity that uses Point to Point Transmission Service for intra-Balancing Authority Area transfers." This better matches the trend to more explicitly state the applicability within the applicability section.
Response: Thank you for your comment. The CISDT does not believe this revision is necessary or adds clarity to the standard.		
Powerex Corp.	Yes	Powerex has reviewed the latest draft of the Interchange Standards and considers these standards a necessity for reliable operations of the Bulk Electric System. The Interchange Standards provide the appropriate validation and verification of the interchange schedules prior to implementation. The Interchange Standards are important and prevent entities that transact from providing false and misleading information to reliability entities, which minimize impacts to the operation of the BES. The Interchange Standards also require that adjacent Balancing Authorities agree upon the magnitude and ramping of the interchange before it is implemented in the ACE equations in order to avoid the imbalance and inadvertent in the Interconnection. This allows for efficient and more reliable operations. Powerex does

Organization	Yes or No	Question 6 Comment
		not believe that any of the requirements of the Interchange Standards should be removed or moved to the NAESB business practice standards.
Response: Thank you for your support.		
Texas Reliability Entity	Yes	1. These INT standards in general, and INT-011 in particular, do not appear to apply to intra-Balancing Authority Area transfers in the ERCOT region. Consider expressly excluding such transfers from the applicability of these standards in order to avoid future misunderstandings.
Response: Thank you for your comment. When the drafting team reviewed the requirements we did not see that an exemption is required. For example, on INT-011, if ERCOT does not have point-to-point service, the requirement would not apply and an exemption is not needed. However, when we look at INT-006, if ERCOT is involved in a transaction outside its area, all of these requirements would apply.		
City of Austin dba Austin Energy	Yes	City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: See response to Seattle City Light.		
Manitoba Hydro	Yes	

7. Definitions: The CISDT proposed revisions to the defined term Dynamic Schedule. Do you agree with the proposed revisions? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected typos in the definition of Dynamic Schedule, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 7 Comment
SPP Standards Review Group	No	Change 'real time' to 'Real-time' since it is NERC Glossary Term.
Response: Thank you for your comment. The CISDT has made this revision.		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		
Exleon Companies	No	See response to INT-009 question.
Response: See response to INT-009 comment.		
ACES Standards Collaborators	No	(1) "Net Interchange Scheduled" should be "Net Interchange Schedule" to match the definition in the NERC Glossary of Terms. There is an extra "d" at the end of the term. (2) There is no need to include the clause "that is updated in real time" in the

Organization	Yes or No	Question 7 Comment
		definition. It only makes the definition longer, more confusing and could lead to ambiguity. Stating that it is updated in real-time implies that someone is actually taking action to update the schedule which is contrary to what is happening because the schedule is updated in the ACE equation automatically as the telemetered value changes. The description of a time-varying energy transfer is sufficiently clear and succinct to avoid ambiguity. Furthermore, if the energy transfer is time-varying it would change real-time.
Response: Thank you for your comments. **1) The CISDT has corrected this error.** 2) **The CISDT does not believe that the propose definition is verbose. Stakeholder consensus for the definition has been achieved with regard to this definition and no change was made.**		
Colorado Spings Utilities	No	
ReliabilityFirst Corporation	No	
Kansas City Power & Light	Yes	Typo - need to capitalize Real-time
Response: Thank you for your comment. The CISDT has corrected this error.		
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia	Yes	

Organization	Yes or No	Question 7 Comment
Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
PacifiCorp	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Seminole Electric Cooperative,	Yes	

Organization	Yes or No	Question 7 Comment
Inc.		
Powerex Corp.	Yes	
PJM Interconnection	Yes	

8. Definitions: The CISDT proposed revisions to the defined term Pseudo-Tie. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected a typo and made a clarifying change to the definition of Pseudo-Tie, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 8 Comment
SPP Standards Review Group	No	Change 'real time' to 'Real-time' since it is NERC Glossary Term.
Response: Thank you. The CISDT has corrected this error.		
SERC OC Review Group	No	The SDT is respectfully requested to clarify that a Pseudo-Tie is not a physical tie that actually exists.
Response: The CISDT notes that a Pseudo-Tie is not a physical tie that actually exists.		
Exleon Companies	No	See response to INT-009 question.
Response: See response to those comments.		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		
ACES Standards Collaborators	No	(1) "Net Interchange Actual" should be "Net Actual Interchange". The former is not

Organization	Yes or No	Question 8 Comment
		in the NERC Glossary of Terms. (2)There is no need to include the clause "that is updated in real time" in the definition. It only makes the definition longer, more confusing and could lead to ambiguity. Stating that it is updated in real-time implies that someone is actually taking action to update the schedule which is contrary to what is happening because the schedule is updated in the ACE equation as the telemetered value changes. The description of a time-varying energy transfer is sufficiently clear and succinct to avoid ambiguity. Furthermore, if the energy transfer is time-varying it would change real-time.
Response: Thank you for your comments. **1) The correct term is Net Actual Interchange as those relates to ACE. We have added notation (NI_A) to the definition for clarification.** **2) The CISDT does not believe that the proposed definition is verbose and believes that stakeholder consensus has been achieved with regard to this definition.**		
Colorado Spings Utilities	No	
Duke Energy	Yes	Duke Energy recommends revising the definition as follows: "Pseudo-tie: A time-varying energy transfer that is updated in real time and included in the Net Interchange Actual term in the same manner as a Tie Line in the affected Balancing Authorities' control ACE equations (or alternate control processes), but for which no physical tie or energy metering actually exists."
Response: The CISDT thanks you for the proposed revision but we believe that stakeholder consensus has been achieved with regard to this definition.		
Dominion NERC Compliance Policy	Yes	Dominion suggests in the Implementation Plan that Pseudo-Tie should be corrected to read as Pseudo-tie (as changed in the definition).

Organization	Yes or No	Question 8 Comment
Response: The existing term is Pseudo-Tie and the CISDT has made this consistent throughout its documents.		
Kansas City Power & Light	Yes	Typo - need to capitalize Real-time
Response: Thank you. This correction has been made.		
PJM Interconnection	Yes	PJM supports the revisions to the Pseudo Tie definition and recommends further modification of the definition to include reference that Pseudo Tied generation should be properly accounted for in a Balancing Authority's load calculation. The Native Balancing Authority must exclude that generation from their internal load calculation and the Attaining Balancing Authority must include that generation in their internal load calculation.
Response: The CISDT thanks you for the proposed revision but we believe that stakeholder consensus has been achieved with regard to this definition.		
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: See response to Seattle City Light.		
Northeast Power Coordinating Council	Yes	
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power	Yes	

Organization	Yes or No	Question 8 Comment
Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
PacifiCorp	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Powerex Corp.	Yes	

9. Definitions: The CISDT proposed revisions to the defined term Adjacent Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected a typo in the definition of Adjacent Balancing Authority, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 9 Comment
ISO/RTO Standards Review Committee	No	Comments: Remove the first "Area" in the sentence and add the phrase "within an Interconnection": A Balancing Authority Area whose Balancing Authority Area that is interconnected within an Interconnection with another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.
Response: Thank you for your comment. This error was contained in the redline version only. The clean version in the Implementation Plan was correct as you noted.		
ACES Standards Collaborators	No	(1) There are multiple definitions posted with slight variations. The definition as stated in INT-006 states that it is a "Balancing Authority Area whose Balancing Authority Area". There is an extra Area in the definition. The definition as written in the implementation plan correctly does not include the first "Area". However, it does include "that" which was struck in INT-006. These definitions need to be aligned. We believe the definition should be "A Balancing Authority whose Balancing Authority Area is interconnected with another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff".
Response: Thank you for your comment. This error (additional Area) was contained in the redline version only. The clean version in the Implementation Plan was correct as you noted. We have also aligned the Implementation Plan with the standard by		

Organization	Yes or No	Question 9 Comment
removing "that" as you suggested.		
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see response to those comments.		
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	

Organization	Yes or No	Question 9 Comment
Florida Municipal Power Agency	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	
PJM Interconnection	Yes	

10. Definitions: The CISDT proposed revisions to the defined term Arranged Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all stakeholders for their feedback. Based on stakeholder feedback, the definition has been simplified to read, "The state where a Request for Interchange (initial or revised) has been submitted for approval."

Organization	Yes or No	Question 10 Comment
ISO/RTO Standards Review Committee	No	Comments: If Sink distribution requirements are going away, why define the Sink as the recipient in this definition. The Sink was removed from Confirmed definition. Proposal: The state where a Request for Interchange or intra-Balancing Authority transfer information (initial or revised) have been submitted for approval from applicable entities. An Arranged Interchange marks the beginning of the Requirement Timing Assessment Period as defined in INT-006.
Response: Thank you for your comment. Based on stakeholder feedback, the definition has been simplified to read, "The state where a Request for Interchange (initial or revised) has been submitted for approval."		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions a currently in the NERFC Glossary of Terms and the team believes that these are necessary for the standards.		
ACES Standards Collaborators	No	(1) Since we believe that tagging of intra-BA schedules is performed for commercial and equity reasons and belongs in a business practice and not a standard, we do not support adding intra-BA scheduling to the definition. Reliability standards and

Organization	Yes or No	Question 10 Comment
		corresponding definitions should not focus on market activities or interactions, as they do not relate to reliability of the Bulk Electric System.
Response: Thank you for your comment. Based on stakeholder feedback, the definition has been simplified to read, "The state where a Request for Interchange (initial or revised) has been submitted for approval."		
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Thank you for your comments. Please see the response to Seattle City Light's comments.		
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	

Organization	Yes or No	Question 10 Comment
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	

Organization	Yes or No	Question 10 Comment
PJM Interconnection	Yes	

11. Definitions: The CISDT proposed revisions to the defined term Confirmed Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has made no changes to the definition of Confirmed Interchange and it will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 11 Comment
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		
ACES Standards Collaborators	No	(1) The definition should be simplified. Arranged Interchange can only become Confirmed Interchange once all required parties have approved it. Thus, there is no need to mention anything about parties not approving the interchange because it would not meet the definition. If a transaction is an Arranged Interchange, by definition, all required parties have approved it. Thus, please strike "no party has denied and".
Response: Thank you for your comment. There are certain PSEs that have denial rights but not approval responsibilities. Therefore, the CISDT will retain the original language.		
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.

Organization	Yes or No	Question 11 Comment
Response: Please see the responses to those comments.		
Northeast Power Coordinating Council	Yes	
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	

Organization	Yes or No	Question 11 Comment
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	
PJM Interconnection	Yes	

12. Definitions: The CISDT proposed revisions to the defined term Intermediate Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has made no changes to the definition of Intermediate Balancing Authority and it will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 12 Comment
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the responses to Seattle City Light.		
Colorado Spings Utilities	No	
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	

Organization	Yes or No	Question 12 Comment
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
ACES Standards Collaborators	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative,	Yes	

Organization	Yes or No	Question 12 Comment
Inc.		
Powerex Corp.	Yes	
PJM Interconnection	Yes	

13. Definitions: The CISDT proposed revisions to the defined term Request for Interchange (RFI). Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their comments. Based on stakeholder feedback, the CISDT has revised the proposed definition to: "A collection of data as defined in the NAESB Business Practice Standards submitted for the purpose of implementing bilateral Interchange between Balancing Authorities or an energy transfer within a single Balancing Authority."

Organization	Yes or No	Question 13 Comment
ISO/RTO Standards Review Committee	No	Comments: As there are no requirements for distribution, nor does this definition supply where the request is coming from, the definition does not also have to define the Sink BA as the recipient of the request. Proposed: 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 collecting approvals~~ for the implementation of bilateral Interchange between a Source and Sink Balancing Authority or energy transfer within a single Balancing Authority.
Response: Thank you for your comment. Based on stakeholder feedback, the CISDT has revised the proposed definition to: "A collection of data as defined in the NAESB Business Practice Standards submitted for the purpose of implementing bilateral Interchange between Balancing Authorities or an energy transfer within a single Balancing Authority."		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your feedback. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		

Organization	Yes or No	Question 13 Comment
ACES Standards Collaborators	No	(1) By definition in the NERC Glossary, Interchange is an energy transfer that crosses BA boundaries. The proposed definition of Request for Interchange states that a bilateral Interchange may be within a single BA. This conflicts with the definition of Interchange.
Response: Thank you for your comment. Based on stakeholder feedback, the CISDT has revised the proposed definition to: "A collection of data as defined in the NAESB Business Practice Standards submitted for the purpose of implementing bilateral Interchange between Balancing Authorities or an energy transfer within a single Balancing Authority."		
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Thank you. Please see the response to Seattle City Light.		
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	

Organization	Yes or No	Question 13 Comment
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	

Organization	Yes or No	Question 13 Comment
PJM Interconnection	Yes	

14. Definitions: The CISDT proposed revisions to the defined term Sink Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected a typo in the definition of Sink Balancing Authority, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 14 Comment
ISO/RTO Standards Review Committee	No	There will also be a Sink BA for Interchange Transactions that do not require an Interchange Schedule. Recommend that the phrase "and the resulting Interchange Schedule" be deleted.
Response: Thank you for your comment. We have revised the language to indicate "any resulting Interchange Schedule" to address your concern.		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		
Northeast Power Coordinating	Yes	

Organization	Yes or No	Question 14 Comment
Council		
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
ACES Standards Collaborators	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
NIPSCO	Yes	

Organization	Yes or No	Question 14 Comment
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	
PJM Interconnection	Yes	

15. Definitions: The CISDT proposed revisions to the defined term Source Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected a typo in the definition of Source Balancing Authority, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 15 Comment
ISO/RTO Standards Review Committee	No	There will also be a Source BA for Interchange Transactions that do not require an Interchange Schedule. "IS" reference should be removed.
Response: Thank you for your comment. We have revised the language to indicate "any resulting Interchange Schedule" to address your concern.		
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		
Florida Municipal Power Agency	No	Since these are commercial definitions and not reliability based, the NAESB definitions should be used and no attempt to define it differently should be made. See WEQ-000 for NAESB definition.
Response: Thank you for your comment. The CISDT notes that many of these definitions are currently in the NERC Glossary of Terms and the team believes that these are necessary for the standards.		

Organization	Yes or No	Question 15 Comment
Colorado Spings Utilities	No	
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
ACES Standards Collaborators	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review	Yes	

Organization	Yes or No	Question 15 Comment
Forum		
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Seminole Electric Cooperative, Inc.	Yes	
Powerex Corp.	Yes	
PJM Interconnection	Yes	

16. Definitions: The CISDT proposed a new defined term, Reliability Adjustment Arranged Interchange which is a replacement for the current term Reliability Adjustment RFI. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected a typo in the definition of Reliability Adjustment Arranged Interchange, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 16 Comment
SPP Standards Review Group	No	We suggest the following change to the definition of Reliability Adjustment Arranged Interchange: A request to modify a Confirmed Interchange or Implemented Interchange for reliability purposes.
Response: Thank you for your comment. We have added "A" to the beginning of the definition as requested.		
SERC OC Review Group	No	The SDT is requested to consider modifying the Reliability Adjustment Arranged Interchange definition. The current definition language is: Reliability Adjustment Arranged Interchange - Request to modify Confirmed Interchange or Implemented Interchange for reliability purposes. Suggested modification follows: DELETE: "Request to modify a" ADD: Modified New definition: Modified Confirmed Interchange or Implemented Interchange for reliability purposes.
Response: Thank you for your comment. The CISDT disagrees as a Reliability Adjustment Arranged Interchange is a request and not the result of an approved request to modify Confirmed Interchange.		
ACES Standards Collaborators	No	(1) First, contrary to the name of the term, it is not actually Interchange but rather a request to modify Confirmed Interchange or Implemented Interchange. The

Organization	Yes or No	Question 16 Comment
		name implies it is Interchange and this may cause confusion. (2) The name of the definition implies it is a type of Arranged Interchange which leads to confusion when reading INT-010 R2. Arranged Interchange is the state in which the sink BA has received Interchange information. Thus, if a reader assumes that Reliability Adjustment Arranged Interchange is a type of Arranged Interchange, INT-010 R2 becomes circular because it requires the Sink BA to ensure that Arranged Interchange is submitted which ultimately goes to the Sink BA by the definition of Arranged Interchange. Simply changing the name of Reliability Adjustment Arranged Interchange will avoid much of this confusion.
Response: Thank you for your comment. The CISDT believes that this is the correct term because a revision to any Confirmed Interchange or Implemented Interchange is an Arranged Interchange.		
Colorado Spings Utilities	No	
PJM Interconnection	Yes	PJM supports the new term Reliability Adjustment Arranged Interchange , but asks the drafting team to formally comment on the difference between this new definition and the existing definition Reliability Adjustment RFI and why it is necessary to replace the current term. This explanation was not apparent in the materials posted for review.
Response: Thank you for your comment. The CISDT changed this from RFI to Arranged Interchange because a revision to any Confirmed Interchange or Implemented Interchange is an Arranged Interchange and RFI is a new request for Interchange.		
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		
Northeast Power Coordinating Council	Yes	

Organization	Yes or No	Question 16 Comment
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
Duke Energy	Yes	
Dominion NERC Compliance Policy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	

Organization	Yes or No	Question 16 Comment
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	

17. Definitions: The CISDT proposed a new defined term Composite Confirmed Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has made no changes to the definition of Composite Confirmed Interchange and it will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 17 Comment
PacifiCorp	No	See PacifiCorp's comments under INT-009 (above).
Response: Please see our response to the comments under INT-009 above.		
ACES Standards Collaborators	No	(1) Because INT-009 R1 is redundant with BAL-006 R4 and this is the only use of Composite Confirmed Interchange, we cannot support the definition. The requirement is unnecessary and obviates the need for the definition. (2) The Composite Confirmed Interchange definition is not clear. The definition could be the total aggregate Confirmed Interchange for a given BA or between BAs. Is it intended to have this flexibility? Since the definition is not limited to a single BA or any specific number of BAs, it could be interpreted as the aggregate of all Confirmed Interchange in an Interconnection which would be whatever Interchange is flowing across the DC ties. We recommend adding more details to the definition for clarity.
Response: Thank you for your comment. **1) The CISDT does not believe that INT-009 R1 is redundant. BAL-006 R4 does not have an exclusion for dynamic schedules and does not have an inclusion for INT-010 R1-R3.** **2) The CISDT thanks you for the proposed revision but believes that stakeholder consensus has been achieved with respect to this definition.**		

Organization	Yes or No	Question 17 Comment
Colorado Spings Utilities	No	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		
Northeast Power Coordinating Council	Yes	
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	

Organization	Yes or No	Question 17 Comment
Florida Municipal Power Agency	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Powerex Corp.	Yes	
PJM Interconnection	Yes	

18. Definitions: The CISDT proposed a new defined term Attaining Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected typos in the definition of Attaining Balancing Authority, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 18 Comment
ISO/RTO Standards Review Committee	No	Recommend revising the definition to add the phrase "within an Interconnection" at the end of the definition.
Response: The CISDT thanks you for the proposed revision but believes that stakeholder consensus has been achieved with respect to this definition.		
Duke Energy	No	Duke Energy questions why Attaining BA was used instead of Sink BA. They appear to have the same meaning.
Response: Thank you for your comment. This definition is used to align more with the terms used in the NAESB standards.		
ACES Standards Collaborators	No	We suggest that "dynamic transfer" should be changed to Pseudo-Tie in the definition for clarity. After all, it is a Pseudo-Tie that changes the metered boundaries of the Balancing Authority Area. We also suggest changing "effective control boundaries" to "Balancing Authority Area" for clarity. BAA is the correct term and is more clear.
Response: Thank you for your comment. We have changed this term to "Dynamic Transfer" which includes both Dynamic Schedules and Pseudo-Ties.		

Organization	Yes or No	Question 18 Comment
American Electric Power	No	Please see our response to Question 1.
Response: Please see the CISDT's response to Question 1.		
Colorado Spings Utilities	No	
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	
Florida Municipal Power Agency	Yes	
Bonneville Power	Yes	

Organization	Yes or No	Question 18 Comment
Administration		
MRO NERC Standards Review Forum	Yes	
PJM Interconnection	Yes	PJM supports the new term but asks the drafting team to formally comment on the rationale as to how this definition is materially different from the term Sink Balancing Authority and why it is necessary.
Response: Thank you for your comment. This definition is used to align more with the terms used in the NAESB standards.		
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		

19. Definitions: The CISDT proposed a new defined term Native Balancing Area. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

Summary Consideration:

The CISDT thanks all commenters for their feedback. The CISDT has corrected typos in the definition of Native Balancing Area, but has otherwise not changed it. It will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 19 Comment
Duke Energy	No	Duke Energy questions why Native BA was used instead of Source BA. They appear to have the same meaning.
Response: Thank you for your comment. This definition is used to align more with the terms used in the NAESB standards.		
ACES Standards Collaborators	No	We suggest that "dynamic transfer" should be changed to Pseudo-Tie in the definition for clarity. After all, it is a Pseudo-Tie that changes the metered boundaries of the Balancing Authority Area. We also suggest changing "effective control boundaries" to "Balancing Authority Area" for clarity. BAA is the correct term and is more clear.
Response: Thank you for your comment. We have changed this term to "Dynamic Transfer" which includes both Dynamic Schedules and Pseudo-Ties.		
American Electric Power	No	Please see our response to Question 1.
Response: Please see the CISDT's response to Question 1.		
Colorado Spings Utilities	No	
PJM Interconnection	Yes	PJM assumes this question is specific to the new defined term Native Balancing Authority not Area. PJM supports the new term but asks the drafting team to

Organization	Yes or No	Question 19 Comment
		formally comment on the rationale as to how this definition is materially different from the term Source Balancing Authority and why it is necessary.
Response: Thank you for your comment. This definition is used to align more with the terms used in the NAESB standards.		
ISO/RTO Standards Review Committee	Yes	Recommend revising the definition to add the phrase “within an Interconnection” at the end of the definition.
Response: The CISDT thanks you for the proposed revision but believes that stakeholder consensus has been achieved with respect to this definition.		
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
SERC OC Review Group	Yes	
Dominion NERC Compliance Policy	Yes	

Organization	Yes or No	Question 19 Comment
Florida Municipal Power Agency	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
Powerex Corp.	Yes	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: See the response to Seattle City Light.		

20. FERC Directives from Order 693, Paragraph 866: The CISDT has proposed revisions to the definition of Operational Planning Analysis. Do you agree with this proposed defined term? If not, please provide specific substantive suggestions for improvements to the definitions.

Summary Consideration: The CISDT thanks all commenters for their feedback. The CISDT has made no changes to the definition of Operational Planning Analysis and it will proceed to final ballot. Individual comments are addressed below.

Organization	Yes or No	Question 20 Comment
Duke Energy	No	Duke Energy recommends revising the definition as follows, "Operational Planning Analysis: An analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as but not limited to load forecast(s), generation output levels, expected Interchange, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.). "
Response: The CISDT thanks you for the proposed revision but believes that stakeholder consensus has been achieved with respect to this definition.		
Dominion NERC Compliance Policy	No	While we can support the proposed revision to the term Operational Planning Analysis, for the reasons provided by SDT, we can do so only if corresponding changes are made to the term Real-time Assessment. We believe that Interchange needs to be in both definitions or neither definition. We also suggest that SDT consider revising the SAR and/or the Implementation Plans to more explicitly indicate that they are proposing revisions to the defined terms Operational Planning Analysis and Real-time Assessment which are used in (identify all standards where these terms are used).
Response: Thank you for your comment. The CISDT considered adding the term "Interchange" to "Real-time Assessment" but declined to include it. Real-time Assessments are performed using Real-time information and flows which inherently includes the impacts of Interchange.		

Organization	Yes or No	Question 20 Comment
Colorado Spings Utilities	No	
PJM Interconnection	No	PJM was unable to find mention of this revised term in the materials posted for comment.
Response: We are sorry that you were unable to find this information. It was included in the Comment Form.		
ACES Standards Collaborators	Yes	While we believe the proposed modification to the definition of OPA is unnecessary and provides no additional clarification for what is required, we can support the change if it addresses a FERC concern. We ultimately believe the change is unnecessary because the definition includes expected generation output levels. How could expected generation output levels not include the impact of Interchange? Interchange is implicitly included.
Response: This revision is based on a FERC directive to "*require reliability coordinators and transmission operators to review energy interchange transactions from the wide-area and local area reliability viewpoints respectively.*" Based on feedback from the NERC Operating Committee as well as team input, the proposed equally efficient and effective method addresses the directive by revising an existing, approved term contained in the NERC Glossary of Terms.		
Northeast Power Coordinating Council	Yes	
ISO/RTO Standards Review Committee	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern	Yes	

Organization	Yes or No	Question 20 Comment
Company Generation and Energy Marketing		
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
City of Austin dba Austin Energy		City of Austin dba Austin Energy (AE) supports Seattle City Light's comments on this standard.
Response: Please see the response to Seattle City Light.		

21. VRFs and VSLs for INT-004-3: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

Summary Consideration:

The SDT thanks all commenters who submitted feedback on the VRFs and VSLs. Per stakeholder comments, the SDT modified the VSLs for INT-004-3 R1, R2, and R3, INT-006-4 R1, R2, and R5, INT-009-2 R1, and INT-010-2 R1 and R2 to ensure that the VSL language is consistent with the language in the respective requirements. Some commenters questioned the Severe VSLs assigned to many requirements, and the SDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."

Organization	Yes or No	Question 21 Comment
ISO/RTO Standards Review Committee	No	Under the VRF justifications language, it is stated that: A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. Why then are there no lower VSLs under severe? Propose a tiered VSL level for operational impact.
Response: Thank you for your comment. VRFs measure the impact to reliability of violating a specific requirement. VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees		

Organization	Yes or No	Question 21 Comment
of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."		
SPP Standards Review Group	No	We suggest the Severe VSL for R1 be changed to read:'The Load-Serving Entity secured energy to serve Load via a Dynamic Schedule or Pseudo-Tie but did not ensure that a Request for Interchange...'
Response: Thank you for your comment. As suggested, the CISDT has added "but" before "…did not ensure."		
SERC OC Review Group	No	In the Table of Compliance, R2 the current draft language is: A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3, but the Load-Serving Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours Suggested addition to Table of Compliance, R2 to make the Severe VSL consistent to the requirements: A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3, but the Load-Serving Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours ADD: is expected to persist.
Response: Thank you for your comment. The CISDT has made the suggested change to ensure that the VSL is consistent with the requirement language.		
ACES Standards Collaborators	No	(1) The VSL for R2 is inconsistent with the requirement. The requirement states that the Confirmed Interchange associated with the Dynamic Schedule must be updated if the deviation is expected to persist. However, the VSL mentions nothing about the persistence of the deviation. From reading the VSL, one might conclude that the Confirmed Interchange is required to be updated even if the deviation is not expected to persist which is contrary to the requirement. (2) Because R3 is a business practice and should not be a requirement, we cannot support the VRF for this requirement. The requirement should be struck.
Response: Thank you for your comment. The CISDT has added "…and was expected to persist" to the VSL for R2 to ensure		

Organization	Yes or No	Question 21 Comment
consistency with the requirement language. The CISDT continues to believe that R3 will be necessary for transparency, ensuring proper modeling by all impacted entities and proper coordination with the NAESB Electric Industry Registry publication.		
Colorado Spings Utilities	No	
Northeast Power Coordinating Council	Yes	
Manitoba Hydro	Yes	(a) VSLs, R1, seems to be missing the word 'but' after the word 'Pseudo-tie'
Response: Thank you for your comment. The CISDT has added the "but."		
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	The VSL for INT-004-3 R2 states, "A deviation met or exceeded the criteria in Requirement R2 Parts2.1- 2.3, but the Load-Serving Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours." The reference to future hours, as written, does not have a defined time duration. One suggestion for the duration is current hours plus 2 hours. It is suggested that the VSL for Requirement 3 should have "Attaining" in front of Balancing Authority to correspond to the language of the Requirement.
Response: Thank you for your comment. The VSL mirrors the requirement language.		
PacifiCorp	Yes	
Duke Energy	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review	Yes	

Organization	Yes or No	Question 21 Comment
Forum		
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
PJM Interconnection	Yes	

22. VRFs and VSLs for INT-006-4: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

Summary Consideration:

The SDT thanks all commenters who submitted feedback on the VRFs and VSLs. Per stakeholder comments, the SDT modified the VSLs for INT-004-3 R1, R2, and R3, INT-006-4 R1, R2, and R5, INT-009-2 R1, and INT-010-2 R1 and R2 to ensure that the VSL language is consistent with the language in the respective requirements. Some commenters questioned the Severe VSLs assigned to many requirements, and the SDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."

Organization	Yes or No	Question 22 Comment
Northeast Power Coordinating Council	No	In Section B1.2 - Evidence Retention, R2 in the first bullet should read R3, the R3 in the next bullet should read R2 since R3 applies to BA while R2 applies to the TSP.
Response: Thank you for your comment and for catching this error. It has been corrected.		
Independent Electricity System Operator	No	In Section B1.2 - Evidence Retention, we believe the R2 in the first bullet should read R3, whereas the R3 in the next bullet should read R2 since R3 applies to BA while R2 applies to the TSP.
Response: Thank you for your comment and for catching this error. It has been corrected.		
Texas Reliability Entity	No	1. Requirement R1 VSL: Need to add language to cover the "curtail Confirmed

Organization	Yes or No	Question 22 Comment
		Interchange" concept from the requirement. 2. Requirement R5 High VSL - As written it is unclear and ambiguous. As we understand the intent, this should say "notified less than all of the entities." The Severe VSL should say "did not notify any of the entities." Also after OR the Severe VSL should say "did not notify one or more entities in time..."
Response: Thank you for your comment. The CISDT has modified the VSL for R1 to better reflect the language in the requirement. The CISDT has also modified the Severe VSL to add the clarity you suggest.		
City of Austin dba Austin Energy	No	The VSLs for INT-006-4 go straight to severe in many cases. We request that the SDT consider a more graduated approach to the VSLs.
Response: Thank you for your comment. Certain requirements are assigned only a Severe VSL because those requirements are pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."		
Colorado Spings Utilities	Yes	Thank you standard drafting team for all of your efforts. Please revise the VSL levels for this standard. The Violation Severity Levels are inappropriately high and disproportional to the risk to the Bulk Electric System.
Response: Thank you for your comment. VRFs, not VSLs, measure the risk to the Bulk Electric System. All of the requirements in INT-006-4 are assigned a Lower VRF, indicating that violating the requirements would not be expected to adversely affect the electrical state or capability of the Bulk Electric System. VSLs measure the degree of noncompliance, and the Severe VSLs simply indicate that the requirement is pass/fail. All pass/fail ("binary") VSLs must be assigned as Severe.		
Manitoba Hydro	Yes	(a) VSLs, R1, R2 - the words 'transition to Confirmed Interchange' do not reflect the language of the requirement and should be deleted (b) VSLs, R1 - there is no VSL related to the failure of the Balancing Authority to curtail a Confirmed Interchange

Organization	Yes or No	Question 22 Comment
		(c) VSLs, R5, High VSL vs. Severe VSL - it's currently difficult to decipher the difference between these two. Is the Severe VSL meant to be the failure to notify any of the entities?
Response: Thank you for your comment. The CISDT has deleted the words "transitioned to Confirmed Interchange" in the VSLs for R1 and R2 to better reflect the language in the requirement. The CISDT has also added language about curtailing a Confirmed Interchange to the R1 VSL. You are correct that the Severe VSL was intended to refer to the failure to notify any of the entities, and it has been modified to better indicate that.		
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
SPP Standards Review Group	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
ACES Standards Collaborators	Yes	
Bonneville Power Administration	Yes	

Organization	Yes or No	Question 22 Comment
MRO NERC Standards Review Forum	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
PJM Interconnection	Yes	

23. VRFs and VSLs for INT-009-2: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

Summary Consideration:

The SDT thanks all commenters who submitted feedback on the VRFs and VSLs. Per stakeholder comments, the SDT modified the VSLs for INT-004-3 R1, R2, and R3, INT-006-4 R1, R2, and R5, INT-009-2 R1, and INT-010-2 R1 and R2 to ensure that the VSL language is consistent with the language in the respective requirements. Some commenters questioned the Severe VSLs assigned to many requirements, and the SDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."

Organization	Yes or No	Question 23 Comment
SPP Standards Review Group	No	We suggest deleting the phrase '…for that hour.' at the end of the Severe VSL for R1.
Response: Thank you for your comment. The CISDT agrees that deleting "…for that hour" makes the VSL consistent with the requirement language and has modified it accordingly. The CISDT has also added the phrase "at mutually agreed upon time intervals" after the first clause to reflect the time element to which the requirement refers.		
Florida Municipal Power Agency	No	INT-009 essentially describes inputs into the ACE equation, which are only Medium risk for 12 month rolling averages and 90% of clock ten minute periods during a month (BAL-001 R1 and R2) and Low (BAL-001 R3) VRFs; hence, each individual hourly input should be Low risk VRF. In addition, the BAL-001 standards adopt a non-zero defect approach (e.g., 90% of clock ten-minute interval during a month, 12 month rolling average) whereas the VSLs for INT-009 are zero-defect. This is

Organization	Yes or No	Question 23 Comment
		inconsistent treatment of an input to the ACE equation versus the ACE equation itself.
Response: Thank you for your comment. The requirements of INT-009 map directly from currently mandatory and enforceable standards INT-003-1 and INT-009-1. Each of those requirements is assigned a medium VRF. With regard to the VSLs, each requirement in INT-009-2 specifies performance which is binary in nature. For example, Requirement R3 states that the Balancing Authority shall coordinate operation of an HVDC tie for each Confirmed Interchange prior to its implementation. Either the Balancing Authority coordinated or they didn't. Similar conditions exist for R1 and R2. The CISDT does not believe that there is any way to gradate the VSLs and therefore must assign a binary VSL which is severe.		
ACES Standards Collaborators	No	(1) Because R1 and R2 are redundant with BAL-006 R4 and BAL-005 R12 and R12.3 respectively, we cannot support the VRFs for these requirements. The requirements should be struck. (2) If INT-009-2 R1 persists, the VRF should be classified as a Lower VRF. The requirement is redundant with BAL-006 R4 which has a Lower VRF. FERC guidelines for VRFs would require similar requirements to have the same VRFs and FERC has already approved the VRF for BAL-006 R4.
Response: Thank you for your comment. **1) BAL does not have an exclusion for Dynamic Schedules and does not have an inclusion for INT-010 R1-R3 and therefore the requirements are not redundant.** **2) Requirement R1 maps from the currently mandatory and enforceable INT-009-1, Requirement R1. This requirement has a medium VRF.**		
Colorado Spings Utilities	No	
Manitoba Hydro	Yes	(a) VSLs, R1 - the last words of this VSL is 'for that hour' but that concept doesn't appear in the requirement or standard. The requirement refers to 'mutually agreed upon time interval' and the VSL should reflect that.

Organization	Yes or No	Question 23 Comment
Response: Thank you for your comment. The CISDT agrees and has modified the VSL for R1 to delete "for that hour" and add "at mutually agreed upon time intervals" after the first clause to reflect the time element to which the requirement refers.		
Northeast Power Coordinating Council	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	

Organization	Yes or No	Question 23 Comment
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
PJM Interconnection	Yes	

24. VRFs and VSLs for INT-010-2: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

Summary Consideration:

The SDT thanks all commenters who submitted feedback on the VRFs and VSLs. Per stakeholder comments, the SDT modified the VSLs for INT-004-3 R1, R2, and R3, INT-006-4 R1, R2, and R5, INT-009-2 R1, and INT-010-2 R1 and R2 to ensure that the VSL language is consistent with the language in the respective requirements. Some commenters questioned the Severe VSLs assigned to many requirements, and the SDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."

Organization	Yes or No	Question 24 Comment
SPP Standards Review Group	No	We suggest changing the wording of the Severe VSL for R2 to:The Sink Balancing Authority did not ensure that a Reliability Adjustment Arranged Interchange reflecting a modification was submitted within 60 minutes following the start of that modification.
Response: Thank you for your comment. The CISDT agrees that these slight changes add clarity and has made them.		
Colorado Spings Utilities	No	
Northeast Power Coordinating Council	Yes	

Organization	Yes or No	Question 24 Comment
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	The VSL for INT-010-2 R4 states, "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." The VSL does not include a duration of time. It is suggested that a period of time be included in the VSL.
Response: Thank you for your comment. The CISDT has deleted R4 based on stakeholder comments, so its accompanying compliance elements have been deleted as well.		
PacifiCorp	Yes	
Duke Energy	Yes	
SERC OC Review Group	Yes	
ACES Standards Collaborators	Yes	
Bonneville Power Administration	Yes	
MRO NERC Standards Review Forum	Yes	
Manitoba Hydro	Yes	
ReliabilityFirst Corporation	Yes	
MISO	Yes	

Organization	Yes or No	Question 24 Comment
MidAmerican Energy	Yes	
Kansas City Power & Light	Yes	
Independent Electricity System Operator	Yes	
PJM Interconnection	Yes	

25. VRFs and VSLs for INT-011-1: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

Summary Consideration:

The SDT thanks all commenters who submitted feedback on the VRFs and VSLs. Per stakeholder comments, the SDT modified the VSLs for INT-004-3 R1, R2, and R3, INT-006-4 R1, R2, and R5, INT-009-2 R1, and INT-010-2 R1 and R2 to ensure that the VSL language is consistent with the language in the respective requirements. Some commenters questioned the Severe VSLs assigned to many requirements, and the SDT reminds these commenters that VRFs measure the impact to reliability of violating a specific requirement and VSLs measure the degree to which a standard was violated. A standard can have a Lower VRF, because violating it would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, and still have Severe VSL, indicating that the requirement is pass/fail. As the VSL Guidelines state, "If the required performance cannot be broken down to categorize degrees of noncompliant performance that at least partially meet the reliability objective of the requirement, any noncompliance with the requirement will have only one VSL – Severe."

Organization	Yes or No	Question 25 Comment
SERC OC Review Group	Yes	Yes. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.
Response: Thank you.		
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power	Yes	Yes, we agree with these compliance elements.

Organization	Yes or No	Question 25 Comment
Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
Response: Thank you for your support.		
SPP Standards Review Group	Yes	
Duke Energy	Yes	
PacifiCorp	Yes.	
Northeast Power Coordinating Council		Agree with the VRFs and VSLs.
ACES Standards Collaborators		Since the purpose of tagging intra-BA transactions is address commercial equity issues, we believe the requirement is a business practice and unnecessary for a reliability standard. Thus, we do not support the VRFs and VSLs.
Response: Thank you for your comment. As discussed throughout the comment report, in the rationale boxes in the standards, and elsewhere, the CISDT and a majority of other stakeholders believe that the standards are necessary for reliability.		

END OF REPORT