

## Project 2008-12: Coordinate Interchange Standards

VRF and VSL Justifications for INT-009-2

VRF and VSL Justifications – INT-009-2, R1	
<b>Proposed VRF</b>	Medium
NERC VRF Discussion	Agreement between Balancing Authorities regarding the magnitude and direction of Composite Confirmed Interchange is necessary to ensure that each balancing Authority is controlling their generation for the proper amount of Interchange. If the values are not agreed to, the capability of and/or the ability to effectively monitor and control the bulk electric system could be affected, but it is unlikely that such a violation would lead to instability, separation, or cascading failures.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-003-3, R1, which deals with confirming and agreeing to Interchange values prior to implementation, is assigned a Medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Balancing Authority did not reach agreement with an Adjacent Balancing Authority on the magnitude or sign of its Composite Confirmed Interchange, excluding Dynamic Schedules and including any interchange as directed by a Reliability Coordinator per INT-010-2 not yet captured in the Composite Confirmed Interchange, for that

VRF and VSL Justifications – INT-009-2, R1	
	hour.
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This requirement is assigned a single Severe VSL and does not lower the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."  Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failure to reach agreement with an Adjacent Balancing Authority on the magnitude or sign of its Composite Confirmed Interchange, excluding Dynamic Schedules and including any interchange as directed by a Reliability Coordinator per INT-010-2 not yet captured in the Composite Confirmed Interchange, for that hour.</p>

VRF and VSL Justifications – INT-009-2, R2	
<b>Proposed VRF</b>	Medium
NERC VRF Discussion	Agreement between Balancing Authorities regarding the source to be used for a Pseudo-Tie is necessary to ensure that each balancing Authority is controlling their generation for the proper amount of Interchange associated with the Pseudo-Tie. If the values are not agreed to, the capability of and/or the ability to effectively monitor and control the bulk electric system could be affected, but it is unlikely that such a violation would lead to instability, separation, or cascading failures.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-003-3, R1, which deals with confirming and agreeing to Interchange values prior to implementation, is assigned a Medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Balancing Authority failed to use a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Net Interchange Actual term of their respective control ACE (or alternate control process).
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not	This requirement is assigned a single Severe VSL and does not lower the current level of compliance.

VRF and VSL Justifications – INT-009-2, R2	
<p>Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	
<p><b>FERC VSL G2</b>                      Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties                      Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent                      Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."                      Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b>                      Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b>                      Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing to use a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Net Interchange Actual term of their respective control ACE (or alternate control process).</p>

VRF and VSL Justifications – INT-009-2, R3	
<b>Proposed VRF</b>	Medium
NERC VRF Discussion	Coordination of Interchange across HVDC is necessary to ensure that the Facility is operated within its limits and that each Balancing Authority is controlling to a correct Interchange value. If the interchange is not appropriately accounted for, the capability of and/or the ability to effectively monitor and control the bulk electric system could be affected, but it is unlikely that such a violation would lead to instability, separation, or cascading failures.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-003-3, R1, which deals with confirming and agreeing to Interchange values prior to implementation, is assigned a Medium VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Balancing Authority failed to coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the HVDC tie.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering	This requirement is assigned a single Severe VSL and does not lower the current level of compliance.

VRF and VSL Justifications – INT-009-2, R3	
the Current Level of Compliance	
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing failed to coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the HVDC tie..</p>