Standard Development Timeline

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

Development Steps Completed

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

Description of Current Draft

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

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

Effective Dates

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

Version History

Version	Date	Action	Change Tracking
1	TBD		New

Definitions of Terms Used in Standard

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

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

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

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

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

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

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

Proposed new definitions:

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

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

A. Introduction

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

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

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

4. **Applicability:**

   4.1. Balancing Authority

   ~~**4.2.** Transmission Service Provider~~

   ~~**4.3.**~~**4.2.** ~~Reliability Coordinator~~

5. **Background:**

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

   - R1 is modified to ~~eliminate the prerequisite that a Balancing Authority experience a loss of resources covered by an energy sharing agreement with respect to requirement applicability.~~replace "request for Arranged Interchange" with the correct term "Request for Interchange".
   - R2 and R3 are modified to shift compliance from the Reliability Coordinator to the Sink Balancing Authority.
   - ~~R4 is created to ensure that Reliability Adjustment Arranged Interchanges are initiated only for reliability related reasons.~~
   - ~~R5 was created from INT-005-3 R1.1 describing the restricted list of entities that have approval rights on a Reliability Adjustment Arranged Interchange~~
   - ~~R6~~R4 was created to address the fact that when a Reliability Adjustment Arranged Interchange is approved for a Pseudo-Tie or Dynamic Schedule, action is required by the Balancing Authority to ensure that the data source feeding the Net Interchange value of ACE value ~~is adjusted in accordance~~does not exceed the MW value of the Reliability Adjustment Arranged Interchange.

B. Requirements and Measures

R1. ~~Each Sink~~The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement shall ensure that a Request for Interchange ~~is created within 60 minutes of the start of the energy sharing, and~~(RFI) is submitted with a start time no more than 60 minutes beyond the ~~start~~resource loss. If the use of the energy sharing ~~for Interchange scheduled in duration of more than 60 minutes as part of an energy sharing agreement,~~.agreement does not exceed 60 minutes from the time of the resource loss,

no RFI is required [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]

M1. The ~~Sink~~ Balancing Authority that uses its energy sharing agreement where the duration exceeds 60 minutes shall have evidence such as dated and time-stamped RFI, electronic logs or other similar evidence that ~~when it participated in energy sharing pursuant to the subject sharing agreement lasting longer than 60 minutes, it ensured that a RFI was created within 60 minutes of the start of the energy sharing, and with a start time no more than 60 minutes beyond the start of the energy sharing.~~it submitted an RFI per Requirement R1. (R1)

R2. Each Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchange reflecting that modification is ~~created~~submitted within 60 minutes of the start of the modification if a Reliability Coordinator directs the modification of a Confirmed Interchange or Implemented Interchange for actual or anticipated reliability-related reasons. [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]

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

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

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

~~R4.~~ Each ~~Reliability Coordinator,~~ Balancing Authority involved in a Pseudo-Tie or ~~Transmission Service Provider that initiates~~Dynamic Schedule shall ensure the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange ~~must have experienced one or more of the following: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning, Same Day Operations, Real Time Operations*]~~

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

4.1. The loss or non-performance of generation supplying the Interchange.

4.2. The loss of Load served by the Interchange.

4.3. The loss of one or more Transmission Facilities.

4.4. An actual or potential System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance.

4.5. Any real-time reliability concern related to a specific Confirmed Interchange.

M4. Each applicable entity shall have evidence such as dated and time-stamped logs, voice recordings, electronic records, or other similar evidence that when it created a Reliability Adjustment Arranged Interchange subject to this requirement, one or more of the following were true: generation supplying the Interchange was lost or didis not perform; Load being served by the Interchange was lost; one or more Transmission Facilities were lost; an actual or potential SOL or IROL exceedance was experienced; or the entity experienced a real-time reliability concern related to a specific confirmed Interchange. (R4)

R5.R4. Each Sink Balancing Authority shall distribute any Reliability Adjustment Arranged Interchange only to the Source Balancing Authority for reliability assessment.exceeded in their ACE equation. [*Violation Risk Factor: Medium*] [*Time Horizon: Real Time Operations*]

M5.M4. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that it distributed, following any Reliability Adjustment Arranged Interchange only toon a Pseudo-Tie or Dynamic Schedule, it ensured the Source Balancing Authority for reliability assessment. (R5MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange was not exceeded in their ACE equation. (R4)

~~**R6.** Each Balancing Authority involved in a Reliability Adjustment Arranged Interchange involving a Dynamic Schedule shall use agreed upon values that ensure any limit established by the Reliability Adjustment Arranged Interchange is not exceeded. [*Violation Risk Factor: Medium*] [*Time Horizon: Real Time Operations*]~~

~~**M6.** The Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that following any Reliability Adjustment Arranged Interchange involving a Dynamic Schedule it used agreed upon values that ensured any limit established by the Reliability Adjustment Arranged Interchange was not exceeded. (R6)~~

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Evidence Retention

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

- The Balancing Authority shall maintain evidence to show compliance with R1, R2, R3, ~~R4, R5~~ and ~~R6 for~~R4for the most recent three calendar months plus the current month.
- ~~The Reliability Coordinator and Transmission Service provider shall maintain evidence to show compliance with R4 for the most recent three calendar months plus the current month.~~
- If a ~~Reliability Coordinator,~~ Balancing Authority~~, or Transmission Service Provider~~ is found non-compliant, it shall keep information related to the non-compliance until found compliant.

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

1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit~~s~~

Self-Certification~~s~~

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

1.4. Additional Compliance Information

None

Table of Compliance Elements

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

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						a RFI was ~~created~~submitted within 60 minutes following the start of the scheduled Interchange.
~~R4~~	~~Operations Planning, Same Day Operations, Real Time Operations~~	~~Lower~~	~~N/A~~	~~N/A~~	~~N/A~~	~~The responsible entity initiated a Reliability Adjustment Arranged Interchange and did not experience one of the elements listed in Requirement R4 Parts 4.1 – 4.5.~~
~~R5~~	~~Real Time Operations~~	~~Medium~~	~~N/A~~	~~N/A~~	~~N/A~~	~~The responsible entity failed to distribute any Reliability Adjustment Arranged Interchange to the Source Balancing Authority for reliability assessment.~~
~~R6~~R4	Real Time Operations	Lower	N/A	N/A	N/A	The ~~responsible entity~~ Balancing Authority involved in a Pseudo-Tie or Dynamic Schedule failed to ~~use an agreed upon~~ensure that the MW value ~~that ensured any limit established by the~~from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange ~~involving a Dynamic Schedule is~~was not exceeded in its ACE

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						equation.

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Guidelines and Technical Basis

General Considerations for Curtailments of Dynamic Transfers

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

For Dynamic Schedules:

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

For Pseudo-ties:

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

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

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

Requirement R1:

Requirement R2:

Requirement R3: