Unofficial Comment Form

Project 2017-04 INT Periodic Review

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the **Project 2017-04 Interchange Scheduling and Coordination Periodic Review Templates**. The electronic form must be submitted by **8 p.m. Eastern, Friday, February 23, 2018.**

Additional information about this project is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2017-04-Periodic-Review-of-Interchange-Scheduling-and-Coordination-Standards.aspx). If you have questions, contact Senior Standards Developer, Laura Anderson at (404) 446-9671.

**Background Information**

The SME stakeholder team completed a comprehensive review of INT-004-3.1, INT-006-4, INT-009-2.1 and INT-010-2.1. The SME stakeholder team seeks industry comment which will be used to make a final recommendation on these standards.

The North American Electric Reliability Corporation (NERC) is required to conduct a periodic review of each NERC Reliability Standard at least once every ten years. Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards was included in the current cycle of periodic reviews.

The NERC Standards Committee (SC) appointed eight industry SMEs to serve on the Project 2017-04 Interchange Scheduling and Coordination Standards SME stakeholder team on July 19, 2017. The SME stakeholder team used background information on the standards and the questions set forth in the Periodic Review Template developed by NERC and approved by the SC, along with associated worksheets and reference documents, to determine whether INT-004-3.1, INT-006-4, INT-009-2.1, and INT-010-2.1 should be: (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn.

As a result of that examination, the SME stakeholder team is making the recommendation to **RETIRE** INT-004-3.1 and INT-010-2.1 and **REVISE** INT-006-4 and INT-009-2.1. The purpose of all documents contained in this posting is to elicit feedback from industry on the SME stakeholder team’s recommendations.

The SME stakeholder team applied the criteria specified in Attachment 2: Paragraph 81 Criteria in reviewing INT-004-3.1, INT-006-4, INT-009-2.1, and INT-010-2.1. As that document more fully explains, for a NERC Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy both an overarching criterion; specifically, whether the requirement does little, if anything, to benefit or protect the reliable operation of the Bulk Electric System (BES), and at least one other criterion specified therein. The SME stakeholder team concluded that ten (10) requirements should be retired under Paragraph 81 concepts, as detailed in Table 1:

| **Table 1 – SME stakeholder team Recommended Paragraph 81 Retirements** |
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| **Requirement** | **Rationale** |
| INT-004-3.1, Requirement R1 | The requirement is redundant to another FERC-approved governmental regulation, as it is covered within the proposed and existing North American Energy Standards Board (NAESB) WEQ-004-1, WEQ-004-1.8, and WEQ-004-5. Therefore, this requirement is redundant and does little, if anything, to benefit or protect the reliable operation of the Bulk Electric System (BES). Additionally, the Purchasing-Selling-Entity (PSE) is no longer a NERC Reliability Entity and cannot have requirements associated with it.  |
| INT-004-3.1, Requirement R2 | The requirement is redundant to another FERC-approved governmental regulation as it is covered within the proposed NAESB WEQ-004-23. Therefore, this requirement is redundant and does little, if anything, to benefit or protect the reliable operation of the BES. Additionally, the PSE is no longer a NERC Reliability Entity and cannot have requirements associated with it.  |
| INT-004-3.1, Requirement R3 | This requirement qualifies for Paragraph 81 retirement, as it obligates entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact. The pseudo-tie coordination is already guided and more clearly explained within the NERC Pseudo-Tie Coordination Reference Document. Reliability Coordinator (RC) visibility to Pseudo-Ties is provided under existing NERC Standard IRO-010-2 R2. Therefore, this requirement is redundant and does little, if anything, to benefit or protect the reliable operation of the BES. |
| INT-006-4, Requirement R3, Part 3.1 | The SME stakeholder team finds little to no effect on reliability in requiring the RC being notified when a Reliability Adjustment Arranged Interchange has been denied. Additionally, RCs are notified via the electronic tag when a Reliability Adjustment Arranged Interchange is denied as required in the NAESB e-Tagging Specifications. Therefore, this requirement is redundant and requires responsible entities to conduct an activity that does little, if anything, to benefit or protect the reliable operation of the BES. |
| INT-006-4, Requirement R4 | The requirement is redundant to another FERC-approved governmental regulation as it is covered within the NAESB e-Tagging Specifications, Section 1.3, Request State and Section 1.6.3.1. Requirement R4 and the requirement parts are accomplished through a Balancing Authority’s (BA’s) e-Tag Authority Service. Therefore, this requirement is redundant and does little, if anything, to benefit or protect the reliable operation of the BES.  |
| INT-006-4, Requirement R5 | The requirement is redundant to another FERC-approved governmental regulation as it is covered within the NAESB e-Tagging Specifications, Section 1.6.4. Requirement R5 and the requirement parts are accomplished through a BA’s e-Tag Authority Service. Therefore, this requirement is redundant and does little, if anything, to benefit or protect the reliable operation of the BES.  |
| INT-009-2.1,Requirement R2 | Retire under Paragraph 81 Criteria B7. The SME stakeholder team recommends Requirement R2 for retirement as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. |
| INT-010-2.1, Requirement R1 | The requirement provides conditions when a Request for Interchange (RFI) would not be required to be submitted. In the absence of this requirement, all Interchange would have an RFI submitted for it, which is the more beneficial and prevalent existing outcome. The submittal of an RFI after Interchange has begun is for commercial purposes rather than reliability issues. The requirement to submit an RFI exists in the NAESB Business Practice Standards. Therefore, this requirement is duplicative and does little, if anything, to benefit or protect the reliable operation of the BES.  |
| INT-010-2.1, Requirement R2 | In the absence of this requirement, all Reliability Adjustment Arranged Interchange would have a modification submitted for it, which is the more beneficial and prevalent existing outcome. The submittal of a modification to a RFI after the modification has begun is for commercial purposes rather than reliability issues. The requirement to modify an RFI exists in the NAESB Business Practice Standards. Therefore, this requirement is duplicative and does little, if anything, to benefit or protect the reliable operation of the BES.  |
| INT-010-2.1, Requirement R3 | In the absence of this requirement, all Interchange would have an RFI submitted for it, which is the more beneficial and prevalent existing outcome. The submittal of an RFI after Interchange has begun is for commercial purposes rather than reliability issues. The requirement to submit an RFI exists in the NAESB Business Practice Standards. Therefore, this requirement is duplicative and does little, if anything, to benefit or protect the reliable operation of the BES.  |

**INT-004-3.1**

The SME stakeholder team has completed its review of INT-004 and concluded that all requirements may be retired due to their existing or proposed inclusion in the NAESB Business Practice Standards, the NERC Pseudo-Tie Coordination Reference Document, NERC Standard IRO-010-2, and that they do little, if anything, to benefit or protect the reliable operation of the BES.

**INT-006-4**

The SME stakeholder team has completed its review of INT-006-4 and concluded that two full requirements and one requirement part can be retired under Paragraph 81 criteria as illustrated above. Additionally, the SME stakeholder team proposes certain revisions the remaining requirements and measurements. The SME stakeholder team recommendations for INT-006-4 are:

1. **Requirement R1 and R2**: The SME stakeholder team recommends that the undefined and ambiguous terms “emergency” and “on-time” be removed from the requirements as they bring no reliability benefit to the requirements. The SME stakeholder team recommends that the term “Reliability Assessment” be reintegrated into the requirements as it is the reliability task being performed in these requirements, as noted in the Purpose, not merely the task of approving or denying the Arranged Interchange.

**INT-009-2.1**

The SME stakeholder team has completed its review of INT-009-2.1 and concluded that one requirement can be retired under Paragraph 81 criteria as illustrated above. Additionally, the SME stakeholder team proposes certain revisions the remaining requirements and measurements. The SME stakeholder team recommendations for INT-009-2.1 are:

1. Requirement 1: As the SME stakeholder team is recommending the retirement of INT-010-2.1, Requirement R1 would need to be revised to remove references to INT-010-2.1.

 **INT-010-2.1**

The SME stakeholder team has completed its review of INT-010-2.1 and concluded that all requirements may be retired due to their inclusion in the NAESB Business Practice Standards and that they do little, if anything, to benefit or protect the reliable operation of the BES.

## Questions

1. The SME stakeholder team has completed its review of INT-004-3.1 and concluded that all requirements may be retired due to their existing or proposed inclusion in the NAESB Business Practice Standards, the NERC Pseudo-Tie Coordination Reference Document, and NERC Reliability Standard IRO-010-2; and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team has completed its review of INT-006-4 and concluded that Requirement R3, Part 3.1, Requirement R4, and Requirement R5 may be retired under Paragraph 81 criteria. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team has completed its review of INT-006-4 and concluded that the undefined and ambiguous terms “emergency” and “on-time” in Requirements R1 and R2 be removed from the requirements as they bring no reliability benefit to the requirements. In addition, the INT PRT recommends that the term “Reliability Assessment” be reintegrated into the requirements as it is the reliability task being performed in these requirements, as noted in the Purpose, not merely the task of approving or denying the Arranged Interchange. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team has completed its review of INT-009-2.1 and concluded that Requirement R2 can be retired under Paragraph 81 criteria, as the requirement is redundant with approved NERC Reliability Standard BAL-005-1, Requirement R7. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team has completed its review of INT-009-2.1 and concluded, as the SME stakeholder team is recommending the retirement of INT-010-2.1, that Requirement R1 would need to be revised to remove references to INT-010-2.1. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team has completed its review of INT-010-2.1 and concluded that all requirements may be retired due to their inclusion in the NAESB Business Practice Standards and that they do little, if anything, to benefit or protect the reliable operation of the BES. Do you agree? If not, please provide your comments and rationale.

[ ]  Yes

[ ]  No

Comments:

1. The SME stakeholder team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.

[ ]  Yes

[ ]  No

Comments: