

Project 2008-12: Coordinate Interchange Standards

VRF and VSL Justifications for INT-010-2

VRF and VSL Justifications – INT-010-2, R1	
Proposed VRF	Lower
NERC VRF Discussion	After the fact submittal of a Request For Interchange (RFI) will not impact transmission congestion but may impact the ability to adequately assess transmission conditions for future hours. 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.
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-010-1, R1, which deals with submitting Arranged Interchange after the fact, is assigned a Lower 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	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 60 minutes, but not more than 75 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.
Proposed Moderate VSL	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for

VRF and VSL Justifications – INT-010-2, R1	
	Interchange was submitted, and it was submitted with a start time more than 75 minutes, but not more than 90 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.
Proposed High VSL	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 90 minutes, but not more than 120 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.
Proposed Severe VSL	<p>The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 120 minutes following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.</p> <p>OR</p> <p>The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement did not ensure that a Request for Interchange was submitted following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.</p>
<p>FERC VSL G1</p> <p>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	The VSLs for this requirement mirror existing VSLs for this revised requirement.
<p>FERC VSL G2</p> <p>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single</p>	<p>Guideline 2a: Not applicable.</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>

VRF and VSL Justifications – INT-010-2, R1	
Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The language of the VSL directly mirrors the language in the corresponding requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of failure to ensure that the Request for Interchange was submitted, or for an RFI that was submitted with a start time more than 60 minutes following the resource loss.

VRF and VSL Justifications – INT-010-2, R2	
Proposed VRF	Lower
NERC VRF Discussion	This requirement ensures that modified RFI is submitted for any Interchange that was modified at the direction of a Reliability Coordinator. 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.
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.

VRF and VSL Justifications – INT-010-2, R2	
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> This Requirement is a revision of comparable INT-010-1, R2, which deals with submitting a modified Arrange Interchange, is assigned a Lower VRFs.
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 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.
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	This requirement is assigned a single Severe VSL and does not lower the current level of compliance.
FERC VSL G2 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	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.

VRF and VSL Justifications – INT-010-2, R2	
Language	
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The language of the VSL directly mirrors the language in the corresponding requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of ensuring that a Reliability Adjustment Arranged Interchange reflecting the modification was submitted within 60 minutes following the start of the modification.

VRF and VSL Justifications – INT-010-2, R3	
Proposed VRF	Lower
NERC VRF Discussion	This requirement ensures that modified RFI is submitted for any Interchange that was modified at the direction of a Reliability Coordinator. 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.
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> This Requirement is a revision of comparable INT-010-1, R3, which deals with submitting a modified Arrange Interchange, is assigned a Lower VRFs.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.

VRF and VSL Justifications – INT-010-2, R3	
FERC VRF G5 Discussion	<p><i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i></p> <p>This guideline is not applicable, as the requirement does not co-mingle more than one obligation.</p>
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Sink Balancing Authority did not ensure that a Request for Interchange reflecting the Interchange Schedule was submitted within 60 minutes following the start of that scheduled Interchange.
<p>FERC VSL G1</p> <p>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	This requirement is assigned a single Severe VSL and does not lower the current level of compliance.
<p>FERC VSL G2</p> <p>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>FERC VSL G3</p> <p>Violation Severity Level Assignment Should Be Consistent with the</p>	The language of the VSL directly mirrors the language in the corresponding requirement.

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VRF and VSL Justifications – INT-010-2, R3	
Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of not ensuring that a RFI was submitted within 60 minutes following the start of the scheduled Interchange.