

Project 2008-12: Coordinate Interchange Standards

VRF and VSL Justifications for INT-011-1

The drafting team will complete the following table, providing of analysis and justification for each VRF and VSL, for each requirement in INT-011-1—Intra-Balancing Authority Transaction Identification

VRF and VSL Justifications – INT-011-1, R1	
Proposed VRF	Lower
NERC VRF Discussion	Transfers within a Balancing Authority Area can potentially impact transmission congestion, and thus the transfers need to be communicated and accounted for in congestion management processes. 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-001-3, R1, which deals with ensuring that Arranged Interchange is submitted. This requirement 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	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A

VRF and VSL Justifications – INT-011-1, R1	
Proposed Severe VSL	The Load-Serving Entity used Point to Point Transmission Service for an intra-Balancing Authority Area transfer, and did not submit a Request for Interchange for an intra-Balancing Authority transfer that is not included in congestion management procedure(s) via an alternate method.
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	This guideline is not applicable because this is a new standard.
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 Language	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 or the transfer is not included in congestion management procedure(s) via an alternate method.
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	The VSL is assigned for a single instance of failing to submit a Request for Interchange or include the transfer in congestion management procedure(s) via an alternate method.

Project YYYY-##.# - Project Name

VRF and VSL Justifications – INT-011-1, R1

on A Single Violation, Not on A Cumulative Number of Violations	
---	--