

May 13, 2009

VIA OVERNIGHT MAIL

David Erickson Interim President and Chief Executive Officer Alberta Electric System Operator 2500, 330 – 5 Avenue SW Calgary, Alberta T2P 0L4

Re: North American Electric Reliability Corporation

Dear Mr. Erickson:

The North American Electric Reliability Corporation ("NERC") hereby submits this notice of filing of the proposed reliability standards of NERC:

- INT-001-3 Interchange Information
- INT-004-2 Dynamic Interchange Transaction Modifications
- INT-005-2 Interchange Authority Distributes Arranged Interchange
- INT-006-2 Response to Interchange Authority
- INT-008-2 Interchange Authority Distributes Status

These proposed reliability standards were developed as two projects and only relate to the Western Electricity Coordinating Council. Reliability standards INT-001-3 and INT-004-2 are contained in Exhibit A-1, and INT-005-2, INT-006-2, and INT-008-2 are contained in Exhibit B-1 to this petition. The proposed NERC reliability standards have been approved by the NERC Board of Trustees.

NERC's reliability standard notice consists of the following:

- This transmittal letter;
- A table of contents for the entire notice:
- A narrative description justifying the proposed reliability standards;

- Five (5) Reliability Standards outlined above (Exhibit A-1 and B-1);
- The complete development record of the proposed reliability standards INT-001-3 Interchange Information and INT-004-2 Dynamic Interchange Transaction Modifications (Exhibit A-2)
- The complete development record of the proposed reliability standards INT-005-2 Interchange Authority Distributes Arranged Interchange, INT-006-2 Response to Interchange Authority, and INT-008-2 Interchange Authority Distributes Status (Exhibit B-2)
- The Standard Drafting Team roster for the project that proposed INT-005-2, INT-006-2, and INT-008-2 reliability standards (Exhibit B-3).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

Attorney for North American Electric Reliability Corporation

BEFORE THE ALBERTA ELECTRIC SYSTEM OPERATOR

NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)

NOTICE OF FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF FIVE (5) PROPOSED RELIABILITY STANDARDS

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May 13, 2009

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I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC") hereby submits notice of five (5) reliability standards:

- INT-001-3 Interchange Information
- INT-004-2 Dynamic Interchange Transaction Modifications
- INT-005-2 Interchange Authority Distributes Arranged Interchange
- INT-006-2 Response to Interchange Authority
- INT-008-2 Interchange Authority Distributes Status

These proposed standards from the interchange ("INT") family of NERC standards address changes relevant to applicable users, owners, and operators in the Western Electricity Coordinating Council ("WECC") only:

- INT-001-3 and INT-004-2 eliminates waivers for WECC entities; and,
- INT-005-2, INT-006-2, and INT-008-2 adjust reliability assessment timeframes for proposed transactions within WECC.

On May 2, 2007, the NERC Board approved INT-005-2, INT-006-2, and INT-008-2 reliability standards proposed by NERC. On October 9, 2007, the NERC Board of Trustees ("NERC Board") approved INT-001-3 and INT-004-2 reliability standards proposed by NERC.

Exhibits A-1 and B-1 to this filing set forth the proposed reliability standards. Exhibits A-2 and B-2 contain the complete development records of the five (5) proposed reliability standards that were processed as two projects. Exhibit B-3 contains the Standard Drafting Team roster for the project that proposed INT-005-2, INT-006-2, and INT-008-2 reliability standards provided in Exhibit B-1. The project associated with the reliability standards proposed in Exhibit A-1 did not require the assembly of a standard drafting team.

NERC submitted this filing with the Federal Energy Regulatory Commission ("FERC") on December 26, 2007, and is submitting this filing with the other applicable governmental authorities in Canada.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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President and Chief Executive Officer
David N. Cook
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III. <u>BACKGROUND</u>

a. Reliability Standards Development Procedure

NERC develops reliability standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC *Reliability Standards*Development Procedure, which is incorporated into the Rules of Procedure as Appendix

3A. NERC's proposed rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing reliability standards and thus satisfies certain of the criteria for approving reliability standards.

The development process is open to any person or entity with a legitimate interest in the reliability of the bulk power system. NERC considers the comments of all

stakeholders and a vote of stakeholders and the NERC Board is required to approve a reliability standard for submission to the applicable governmental authorities.

The proposed reliability standards set out in Exhibits A-1 and B-1 have been developed and approved by industry stakeholders using NERC's *Reliability Standards*Development Procedure, and were approved by the NERC Board for filing with the applicable governmental authorities.

IV. INT-001-3 — INTERCHANGE INFORMATION and INT-004-2 — DYNAMIC INTERCHANGE TRANSACTION MODIFICATIONS

c. Justification of Proposed Reliability Standards

The changes to these two Reliability Standards rescind the e-tagging waivers for WECC contained in earlier versions of the standards and were processed as a single project. NERC filed reliability standards INT-001-2 and INT-004-1 on December 5, 2006 and September 11, 2006, respectively. Those filings included the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver that exempted WECC from requirements related to tagging dynamic schedules and inadvertent payback that were in effect since November 21, 2002.

In a letter dated May 10, 2007 from Louise McCarren, WECC Chief Executive Officer, and included as part of Exhibit A-2 to this filing, WECC requested NERC to rescind the e-tagging waivers for Reliability Standards INT-001-2 and INT-004-1.

Accordingly, NERC processed WECC's request to rescind these waivers through its
Reliability Standard Development Procedure that requires permanent changes to
Reliability Standards be properly noticed to the industry and balloted. To remove these
WECC waivers, NERC implemented these changes through its urgent action process.

These waivers represent an approved mechanism to waive compliance for users, owners, and operators within WECC to the requirements in the continent-wide NERC reliability standards INT-001-2 and INT-004-1. NERC followed its *Reliability Standard Development Procedure* to effect the elimination of these waivers. By rescinding these waivers, NERC makes no structural changes to the requirements in the current version of the Reliability Standards and maintains uniformity.

b. Summary of the Reliability Standard Development Proceedings

NERC requested WECC to determine an appropriate course of action regarding its waiver. Accordingly, on May 11, 2007, NERC received a letter from WECC requesting that the tagging waivers it originally requested in 2002 be rescinded. When the waivers were originally requested, the e-Tagging requirements in former NERC Operating Policy 3 did not apply to operations in the Western Interconnection. Upon consideration of this most recent request, WECC agreed that it no longer needed to retain the waivers. WECC has developed business practices for dynamic schedules that its Board of Directors approved in late July and has taken the steps needed to comply with the e-Tagging of inadvertent payback interchange schedules. WECC also noted that it would provide assistance to those entities that would not be compliant with INT-001-2 and INT-004-1 by the effective date of these standards, June 18, 2007, in filing mitigation plans with the WECC Compliance Enforcement Department.

At its June 2007 meeting, the NERC Standards Committee approved the use of urgent action. Because the request was explicit to remove the waivers, no standard drafting team was needed to effect the proposed changes. The SAR and revised standards were posted for a 30-day pre-ballot review from June 6, 2007 – July 6, 2007.

The first ten (10)-day ballot on these revised standards was held from July 9, 2007 – July 18, 2007, but did not achieve a quorum. On re-ballot from July 20, 2007 – August 9, 2007 a quorum was established but one (1) negative vote was received with a comment. The Public Utility District No. 2 of Grant County argued that the necessary tools and procedures were not in place within the Western Interconnection to ensure compliance without the waiver. WECC responded that this was not the case. However, by procedure, this "no" vote with comment triggered the recirculation ballot that took place from August 13, 2007 – August 22, 2007. With a quorum of 90.09 %, the ballot passed with a weighted segment approval of 99.10 %.

V. INT-005-2 — INTERCHANGE AUTHORITY DISTRIBUTES ARRANGED INTERCHANGE, INT-006-2 — RESPONSE TO INTERCHANGE AUTHORITY, and INT-008-2 — INTERCHANGE AUTHORITY DISTRIBUTES STATUS

a. Justification of Proposed Reliability Standards

On September 11, 2006, NERC filed the interchange family (INT-001-1, and INT-003-1 through INT-010-1) of reliability standards. On December 5, 2006, NERC filed INT-001-2 and INT-003-2, revised versions for that replaced those filed in August 2006. This filing of proposed reliability standards addresses a specific reliability need identified by WECC. The modifications are included in the scope of Project 2009-03 in the *Reliability Standards Development Plan*: 2008-2010 filed on October 11, 2007.

Requirement R1.4 of INT-007-1 requires that each balancing authority and transmission service provider provide confirmation to the interchange authority that it has approved the transactions for implementation. This assessment timeframe is captured in column B of the timing tables of the proposed reliability standards for approval. For

WECC, the timeframe allotted for this assessment is five (5) minutes in the original version of the Reliability Standards.

The urgent action request and subsequent proposed reliability standards for INT-005-1, INT-006-1, and INT-008-1 changed an aspect of the timing table commonly contained in each reliability standard and were processed as a single project. The timeframe for applicable WECC entities to perform the reliability assessment increased from five (5) to ten (10) minutes for next hour interchange tags submitted in the first thirty (30) minutes of the hour before. This modification is needed because the majority of next hour tags in WECC are submitted between xx:00 and xx:30. The existing five (5) minute assessment window made it nearly impossible for balancing authorities and transmission service providers to review each tag before the five (5) minute assessment time expired. At that point, the tags are denied and must be resubmitted. The WECC experienced numerous instances of transactions being denied because one or more applicable reliability entities did not actively approve the tag. Interchange authorities can only approve tags that balancing authorities and transmission service providers have assessed to determine the impacts. The current structure causes frustration and process inefficiencies for entities involved in this process as requestors are required to re-create tags that are denied and reliability entities are unable to conduct assessments timely while supporting other critical duties. Further, there is no reliability basis for a five (5) minute assessment period for tags submitted at least thirty (30) minutes ahead of the ramp-in period.

WECC historically had a ten (10) minute reliability assessment period for next hour tags prior to January 1, 2007 when the new INT family of reliability standards was

implemented. The urgent action request restores assessment times back to ten (10) minutes from the current five (5) minutes for next-hour tags submitted in the first half of the hour. This timeframe for assessment is also consistent to that available to entities in other Interconnections for tags submitted in the first half of the hour for next hour tags.

Apart from the extension of the reliability assessment period from five (5) to ten (10) minutes for WECC entities, NERC makes no substantive changes to the requirements in the current version of the Reliability Standards.

b. Summary of the Reliability Standard Development Proceedings

On February 7, 2007, the WECC submitted an urgent action standards authorization request to NERC proposing changes to reliability standards INT-005-1, INT-006-1, and INT-008-1. The request proposed changes in the accompanying timing table for WECC that increased the assessment time for WECC balancing authorities and transmission service providers to conduct reliability analysis from five (5) to ten (10) minutes for next-hour transactions submitted at least thirty (30) minutes ahead of the start of the transaction ramp-in.

The Standards Committee approved the use of the urgent action process at its February 2007, meeting recognizing the potential impact to reliability and efficient operations if a balancing authority or transmission service provider does not have adequate time to perform a reliability assessment for proposed interchange transactions. The proposed changes to the INT-005-1, INT-006-1, and INT-008-1 were posted for a 30-day pre-ballot review on February 15, 2007 and an initial ballot was conducted from March 19 – March 30, 2007. The reliability standards were approved by a weighted segment average of 96.8 %, with 86.5 % of the ballot pool voting. No negative votes

were received with comments. Therefore, no recirculation ballot was required.

However, the Midwest ISO expressed concern that, although it supported the change, the urgent action process was misused and that a pressing reliability need was not identified.

The complete development records for the proposed reliability standard are available in Exhibit B-2. This record includes the proposed drafts of the reliability standards, the ballot pool and the final ballot results by registered ballot body members, stakeholder comments received during the development of the reliability standard, and how those comments were considered in developing the reliability standard. The standard drafting team roster is provided in Exhibit B-3.

Respectfully submitted,

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Exhibit A-1

INT-001-3 — Interchange Information

INT-004-2 — Dynamic Interchange Transaction Modifications

Standard INT-001-3 — Interchange Information

A. Introduction

1. Title: Interchange Information

2. Number: INT-001-3

3. Purpose:

To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.

4. Applicability:

- 4.1. Purchase-Selling Entities.
- **4.2.** Balancing Authorities.
- **5. Effective Date:** First day of first month after BOT adoption.

B. Requirements

- **R1.** The Load-Serving, Purchasing-Selling Entity shall ensure that Arranged Interchange is submitted to the Interchange Authority for:
 - **R1.1.** All Dynamic Schedules at the expected average MW profile for each hour.
- **R2.** The Sink Balancing Authority shall ensure that Arranged Interchange is submitted to the Interchange Authority:
 - **R2.1.** If a Purchasing-Selling Entity is not involved in the Interchange, such as delivery from a jointly owned generator.
 - **R2.2.** For each bilateral Inadvertent Interchange payback.

C. Measures

- M1. The Purchasing-Selling Entity that serves the load shall have and provide upon request evidence that could include but is not limited to, its Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour as specified in Requirement 1.
- M2. Each Sink Balancing Authority shall have and provide upon request evidence that could include but is not limited to, Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts, or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority as specified in Requirements 2.1 and 2.2.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

1.2. Compliance Monitoring and Reset Time Frame

One or more of the following methods will be used to assess compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

1.3. Data Retention

The Purchasing-Selling Entity that serves load and Sink Balancing Authority shall each keep 90 days of historical data (evidence).

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance for Sink Balancing Authorities:

- **2.1.** Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and R2.2.
- **2.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.

3. Levels of Non-Compliance for Purchasing-Selling Entities that Serve Load:

3.1. Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

Standard INT-001-3 — Interchange Information

- **3.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

E. Regional Differences

1. MISO Energy Flow Information Waiver effective on July 16, 2003.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by Board of Trustees	Revised
2	November 1, 2006	Adopted by Board of Trustees	Revised
3	October 9, 2007	Adopted by Board of Trustees (Remove WECC Waiver)	Revised

Standard INT-004-2 — Dynamic Interchange Transaction Modifications

A. Introduction

1. Title: Dynamic Interchange Transaction Modifications

2. Number: INT-004-2

Purpose: To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.

4. Applicability

- 4.1. Balancing Authorities
- 4.2. Reliability Coordinators
- **4.3.** Transmission Operators
- 4.4. Purchasing-Selling Entities

5. Effective Date: First day of first month after BOT approval.

B. Requirements

- **R1.** At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.
- **R2.** The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:
 - **R2.1.** The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +10%.
 - **R2.2.** The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ± 25 megawatt-hours.
 - **R2.3.** A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

C. Measures

M1. The Sink Balancing Authority shall provide evidence that the responsible Purchasing-Selling Entity revised a tag when the deviation exceeded the criteria in INT-004 Requirement 2.

D. Compliance

1. Compliance Monitoring Process

Periodic tag audit as prescribed by NERC. For the requested time period, the Sink Balancing Authority shall provide the instances when Dynamic Schedule deviation exceeded the criteria in INT-004 R2 and shall provide evidence that the responsible Purchasing-Selling Entity submitted a revised tag.

1.1. Compliance Monitoring Responsibility

Standard INT-004-2 — Dynamic Interchange Transaction Modifications

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

One calendar year without a violation from the time of the violation.

1.3. Data Retention

Three months.

1.4. Additional Compliance Information

Not specified.

2. Levels of Non-Compliance

2.1. Level 1: Not specified.

2.2. Level 2: Not specified.

2.3. Level 3: Not specified.

2.4. Level 4: Not specified.

E. Regional Differences

1. None

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Board of Trustees Approval	Revised
2	October 9, 2007	Board of Trustees Approval (Removal of WECC Waiver)	Revised

Exhibit A-2 Record of Development of INT-001-3 and INT-004-2

SAR to Remove WECC Waiver from INT-001 and INT-004

Registered Ballot Body | Reliability Standards Home Page

Status

The Board of Trustees approved removal of the WECC Waivers from INT-001-2 and INT-004-1 at its October 9, 2007 meeting.

Purpose/Industry Need

The only change proposed to INT-001-2 and INT-004-1 is to remove the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002.

FERC Order 693 included the following:

825. The Commission stressed in Order No. 672 that uniformity of Reliability Standards should be the goal and practice, "the rule rather than the exception." The Commission therefore stated in the NOPR that the absence of a tagging requirement for dynamic schedules in WECC is a matter of concern, and that for this reason it could not approve or remand this regional difference without the additional information it requested. To date the Commission has not received this information. Of particular importance in this compliance filing will be the ERO's demonstration that this practice is due to a physical difference in the system or results in a more stringent Reliability Standard. Without this information, we are unable to address Xcel's comments further. The Commission therefore directs the ERO to submit a filing within 90 days of the date of this order either withdrawing this regional difference or providing additional information.

The scope of this SAR is limited to removing WECC's Waiver to comply with FERC's directive.

Proposed Standard	Supporting Materials	Comment Period	Comments Received	Response to Comments
SAR for Removal of WECC Waiver from Reliability Standards INT-001 and INT-004 Posted for Board of Trustees Adoption INT-001 (17) INT-004 (18)				
Announcement (14)		08/13/07 - 08/22/07		Announcement (15)
SAR for Removal of				Recirculation Ballot
WECC Waiver from		Recirculation Ballot		Results (16)
Reliability Standards		Window		
INT-001 and INT-004		(closed)		

Posted for 10-day Recirculation Ballot Window				
Draft SAR Version 1 (13)				
INT-001 (11) INT-004 (12) (same as 1–3)				
Announcement (8)				Initial Ballot Results (9)
SAR for Removal of WECC Waiver from Reliability Standards INT-001 and INT-004 Posted for 10-day Ballot Window July 9 through July 19, 2007		07/07/07 - 07/18/07		Consideration of Ballot Comments (10)
Draft SAR Version 1 (7)				
INT-001 (5) INT-004 (6) (same as o1–3)				
Announcement (4 SAR for Removal of WECC Waiver from Reliability Standards INT-001 and INT-004 Posted for 30-day Preballot Review June 6 through July 6, 2007 Draft SAR Version 1 (3) INT-001 (1) INT-004		06/06/07 - 07/06/07		
(2) To download a file click on t	he file using your right	t mouse button, then save it	to your computer in a dire	ctory of your choice
				ctory or your critice.
Documents in the PDF format requi allows anyone view and print Adobe the Adobe Reader User Guide.				Get Adobe Re ader

All comments should be forwarded to sarcomm@nerc.com.

Questions? Contact Barbara Bogenrief - barbara.bogenrief@nerc.net or 609-452-8060.

Standard Authorization Request Form

Title of Proposed Standard	Revisions to INT-001 and INT-004 to eliminate WECC Waiver
Request Date	June 4, 2007

SAR Requester Information		SAR Type (Check a box for each one that applies.)	
Name Louise McCarren, WECC		New Standard	
Primary Contact Louise McCarren		Revision to existing Standard	
Telephone (801) 582-0353 Fax (801) 582-3918		Withdrawal of existing Standard	
E-mail louise@wecc.biz		Urgent Action	

Purpose (Describe what the standard action will achieve in support of bulk power system reliability.)

Removal of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002 will improve the uniformity of INT-001 and INT-004.

This is an Urgent Action because the FERC Order 693 included a directive to modify INT-001 and INT-004 within 90 days of the date of the Order and the only way to meet this schedule is through the Urgent Action Process.

Industry Need (Provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

FERC Order 693 included a directive in paragraph 825 to either justify the WECC

Brief Description (Provide a paragraph that describes the scope of this standard action.) Remove the <u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver</u> dated November 21, 2002 from INT-001 and INT-004.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR.)

The only change proposed to INT-001-2 and INT-004-1 is to remove the <u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver</u> dated November 21, 2002.

FERC Order 693 included the following:

825. The Commission stressed in Order No. 672 that uniformity of Reliability Standards

should be the goal and practice, "the rule rather than the exception." The Commission therefore stated in the NOPR that the absence of a tagging requirement for dynamic schedules in WECC is a matter of concern, and that for this reason it could not approve or remand this regional difference without the additional information it requested. To date the Commission has not received this information. Of particular importance in this compliance filing will be the ERO's demonstration that this practice is due to a physical difference in the system or results in a more stringent Reliability Standard. Without this information, we are unable to address Xcel's comments further. The Commission therefore directs the ERO to submit a filing within 90 days of the date of this order either withdrawing this regional difference or providing additional information.

The scope of this SAR is limited to removing WECC's Waiver to comply with FERC's directive.

Reliability Functions (N/A)

The Stanc	The Standard will Apply to the Following Functions (Check box for each one that applies.)		
	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.	
	Balancing Authority	Integrates resource plans ahead of time, and maintains load- interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.	
	Interchange Coordinator	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.	
	Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.	
	Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.	
	Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.	
	Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).	
	Transmission Owner	Owns and maintains transmission facilities.	
	Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.	
	Distribution Provider	Delivers electrical energy to the End-use customer.	
	Generator Owner	Owns and maintains generation facilities.	
	Generator Operator	Operates generation unit(s) to provide real and reactive power.	
	Purchasing- Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.	
	Market Operator	Interface point for reliability functions with commercial functions.	
	Load- Serving Entity	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.	

Reliability and Market Interface Principles

Appli	icable Reliability Principles (Check box for all that apply.)			
	 Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. 			
	The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.			
	 Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably. 			
	 Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented. 			
	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.			
	Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.			
	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.			
	8. Bulk power systems shall be protected from malicious physical or cyber attacks.			
	the proposed Standard comply with all of the following Market Interface ciples? (Select 'yes' or 'no' from the drop-down box.)			
	reliability standard shall not give any market participant an unfair competitive dvantage. Yes			
2. A	reliability standard shall neither mandate nor prohibit any specific market structure. Yes			
	A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes			
in	A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes			

Related Standards

Standard No.	Explanation

Related SARs

SAR ID	Explanation

Regional Variances

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

A. Introduction

1. Title: Interchange Information

2. Number: INT-001-23

3. Purpose:

To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.

4. Applicability:

- 4.1. Purchase-Selling Entities.
- 4.2. Balancing Authorities.
- 5. Effective Date: January 1, 2007First day of first month after BOT adoption.

B. Requirements

- **R1.** The Load-Serving, Purchasing-Selling Entity shall ensure that Arranged Interchange is submitted to the Interchange Authority for:
 - **R1.1.** All Dynamic Schedules at the expected average MW profile for each hour.
- **R2.** The Sink Balancing Authority shall ensure that Arranged Interchange is submitted to the Interchange Authority:
 - **R2.1.** If a Purchasing-Selling Entity is not involved in the Interchange, such as delivery from a jointly owned generator.
 - **R2.2.** For each bilateral Inadvertent Interchange payback.

C. Measures

- M1. The Purchasing-Selling Entity that serves the load shall have and provide upon request evidence that could include but is not limited to, its Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour as specified in Requirement 1.
- M2. Each Sink Balancing Authority shall have and provide upon request evidence that could include but is not limited to, Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts, or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority as specified in Requirements 2.1 and 2.2.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

1.2. Compliance Monitoring and Reset Time Frame

One or more of the following methods will be used to assess compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

1.3. Data Retention

The Purchasing-Selling Entity that serves load and Sink Balancing Authority shall each keep 90 days of historical data (evidence).

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance for Sink Balancing Authorities:

- **2.1.** Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and R2.2.
- **2.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.

3. Levels of Non-Compliance for Purchasing-Selling Entities that Serve Load:

3.1. Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

Standard INT-001-2-3 — Interchange Information

- **3.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

E. Regional Differences

- 1.WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver effective on November 21, 2002.
- **2.1.** MISO Energy Flow Information Waiver effective on July 16, 2003.

Version History

Version	Date	Action	Change Tracking		
0	April 1, 2005	Effective Date	New		
1	May 2, 2006	Adopted by Board of Trustees	Revised		
2	November 1, 2006	Adopted by Board of Trustees	Revised		

A. Introduction

1. Title: Dynamic Interchange Transaction Modifications

2. Number: INT-004-12

Purpose: To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.

4. Applicability

- 4.1. Balancing Authorities
- **4.2.** Reliability Coordinators
- 4.3. Transmission Operators
- 4.4. Purchasing-Selling Entities

5. Effective Date: January 1, 2007 First day of first month after BOT approval.

B. Requirements

- **R1.** At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.
- **R2.** The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:
 - **R2.1.** The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than $\pm 10\%$.
 - **R2.2.** The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +25 megawatt-hours.
 - **R2.3.** A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

C. Measures

M1. The Sink Balancing Authority shall provide evidence that the responsible Purchasing-Selling Entity revised a tag when the deviation exceeded the criteria in INT-004 Requirement 2.

D. Compliance

1. Compliance Monitoring Process

Periodic tag audit as prescribed by NERC. For the requested time period, the Sink Balancing Authority shall provide the instances when Dynamic Schedule deviation exceeded the criteria in INT-004 R2 and shall provide evidence that the responsible Purchasing-Selling Entity submitted a revised tag.

1.1. Compliance Monitoring Responsibility

Standard INT-004-1-2 — Dynamic Interchange Transaction Modifications

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

One calendar year without a violation from the time of the violation.

1.3. Data Retention

Three months.

1.4. Additional Compliance Information

Not specified.

2. Levels of Non-Compliance

2.1. Level 1: Not specified.

2.2. Level 2: Not specified.

2.3. Level 3: Not specified.

2.4. Level 4: Not specified.

E. Regional Differences

1. <u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002.None</u>

Version History

Version	Date	Change Tracking			
0	April 1, 2005	Effective Date	New		

Adopted by NERC Board of Trustees Effective Date: April 1, 2005



June 6, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Pre-ballot Window and Ballot Pool Open June 6, 2007

The Standards Committee (SC) announces the following standards actions:

Pre-ballot Window and Ballot Pool for Withdrawal of "WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver" Open June 6, 2007

The FERC Order 693 did not include approval of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002, which is included in reliability standards INT-001-2 and INT-004-1. To remove this waiver as rapidly as possible, the Standards Committee authorized an <u>Urgent Action SAR to Withdraw the WECC Waiver</u>. The proposed modifications to <u>INT-001</u> and <u>INT-004</u> are limited to removal of the WECC waiver.

A new <u>ballot pool</u> to vote on the removal of the WECC waiver from INT-001 and INT-004 has been formed and will remain open up until 8 a.m. (EDT) on Friday, July 6, 2007. During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is called: <u>bp-sar_wecc_in@nerc.com</u>

The initial ballot for the removal of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver will be conducted from 8 a.m. (EDT) on Friday, July 6, 2007 through 8 p.m. (EDT) on Monday, July 16, 2007.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely,

Maareen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster



July 9, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Ballot Window for Withdrawal of WECC Waiver for INT-001 and INT-004; Pre-ballot Window and Ballot Pool for Interpretation of BAL-001 and BAL-003 Open July 9, 2007

The Standards Committee (SC) announces the following:

Ballot Window for Withdrawal of 'WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver' Open July 9–18, 2007

The FERC Order 693 did not include approval of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002, which is included in reliability standard INT-001-2 — Interchange Information and INT-004-1 — Dynamic Interchange Transaction Modifications. To remove this waiver as rapidly as possible, the Standards Committee authorized an <u>Urgent Action SAR to Withdraw the WECC Waiver</u>. The proposed modifications to <u>INT-001</u> and <u>INT-004</u> are limited to removal of the WECC waiver. The <u>ballot</u> will be open through 8 p.m. (EDT) on Wednesday, July18, 2007.

Pre-ballot Window and Ballot Pool for Interpretation of BAL-001-0, Requirement 1 and BAL-003-0, Requirement 3 both Open July 9, 2007

The Western Electricity Coordinating Council (WECC) submitted a <u>Request for an Interpretation</u> of BAL-001-0 — Real Power Balancing Control Performance and BAL-003-0 — Frequency Response and Bias. The request asked if the use of the WECC Automatic Time Error Correction (WATEC) procedure violates Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003-0.

The <u>Interpretation</u> clarifies that use of the WATEC procedure does not violate either Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003.

A new <u>ballot pool</u> to vote on this interpretation has been formed and will remain open up until 8 a.m. (EDT) Tuesday, August 7, 2007. During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is: bp-interpret bal-001 in@nerc.com

The initial ballot for this interpretation will begin at 8 a.m. (EDT) on Tuesday, August 7, 2007.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely.

Maureen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster Untitled Page Page 1 of 4

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NERC Home

Ballot Results						
Ballot Name:	SAR for Removal of WECC Waiver from INT-001 and INT- 004_rb					
Ballot Period:	7/20/2007 - 8/9/2007					
Ballot Type:	re-ballot					
Total # Votes:	100					
Total Ballot Pool:	111					
Quorum:	90.09 % The Quorum has been reached					
Weighted Segment Vote:	99.10 %					
Ballot Results:	The standard will proceed to recirculation ballot.					

Summary of Ballot Results													
		Segment Weight		Affirmative			Negative			Abstain			
Segment	Ballot Pool			# Votes	Fr	action	v	# otes	Fraction		# Votes		No Vote
1 - Segment	1.	32	1	:	25		1		0	0		3	4
2 - Segment 2	2.	6	0.5		5	0.	5		0		0	0	1
3 - Segment	3.	25	1	•	18	0.94	7		1	0.053		3	3
4 - Segment	4.	4	0.4		4	0.	4		0		0	0	0
5 - Segment !	5.	19	1		14		1		0		0	4	1
6 - Segment	6.	14	0.9		9	0.	9		0		0	3	2
7 - Segment	7.	1	0.1		1	0.	1		0	0		0	0
8 - Segment	8.	3	0.3		3	0.	3	0			0	0	0
9 - Segment	9.	3	0.3		3 0.		3		0		0	0	0
10 - Segment	10.	4	0.4		4	0.	4		0	0		0	0
Totals		111	5.9	8	36	5.84	7		1	0.0	53	13	11

Individual Ballot Pool Results									
Segment		Organization	Member	llot	Cor	omments			
1		Service Corp Transmission tem AEP	Scott P. Moore	Scott P. Moore					
1	Ame	eren Services Company	Kirit S Shah	Affirmative					
1	Ame	erican Public Power Association	E. Nick Henery	Affirmative					
1	Avis	ta Corp.	Scott Kinney	Affirma	tive				
1	Bon	neville Power Administration	Donald S. Watki	ns	Affirma	tive			
1	Duq	uesne Light Co.	Bob McClelland						
1		Florida Keys Electric Cooperative Dennis Mint							
1	Hyd	ro One Networks, Inc.	Ajay Garg	Absta	in				
1	Idar	no Power Company	Ronald D. Schell	lberg	Affirma	tive			

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1 Kansas City Power & Light Co. 1 Koyspan LIPA Richard J. Bolbrock Affirmative 1 Lincoln Electric System Doug Bantam 1 Municipal Electric Authority of Georgia 1 New York Power Authority Ralph Rufrano Abstain 1 NorthWestern Energy Ted Williams Affirmative 1 Ohio Valley Electric Corp. Robert Mattey Affirmative 1 Ohio Valley Electric Corp. Robert Mattey Affirmative 1 Ohio Valley Electric Delivery Charles W. Jenkins 1 Otter Tail Power Company Lawrence R. Larson Affirmative 1 PacifiCorp Robert Williams Affirmative 2 Ray Mammarella Affirmative 2 Ray Mammarella Affirmative 3 Sacramento Municipal Utility District Dilip Mahendra Affirmative 2 Sacramento Municipal Utility District Dilip Mahendra Affirmative 3 Sartee Cooper Terry L. Blackwell Affirmative 1 Saettle City Light Christopher M. Turner Affirmative 2 Seattle City Light Christopher M. Turner Affirmative 3 Seattle City Light Christopher M. Turner Affirmative 4 Southern California Edison Co. 4 Dana Cabbell Affirmative 5 Southern Company Services, Inc. 6 Southern Company Services, Inc. 7 Southern Company Services, Inc. 8 Tri-State G & T Association Inc. 9 Tri-State G & T Association Inc. 1 Trucson Electric Power Co. 2 Robati Affirmative Phil Park 2 California ISO 3 Independent Electricity System Operator 4 New Brunswick System Operator Corporation Gregory L. Pleper Affirmative 5 David Hawkins Affirmative 6 New York Independent System Operator Gregory Campoll Operator Service Co. 3 Atlantic City Electric Company Avista Corp. 4 Robati Affirmative Affirmative 5 Bonneville Power Afministration Gregory Campoll Operator Gorgory Campoll Opera			1		ı
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3 Hydro One Networks, Inc. 3 Lincoln Electric System 3 Louisville Gas and Electric Co. 4 Mississippi Power 5 New York Power Authority 6 Platte River Power Authority 7 Public Service Electric and Gas Co. 7 Public Utility District No. 2 of Grant County 7 Control Mississippi Power 8 Public Service Flectric Agrantative 9 Public Utility District No. 2 of Grant County 9 Salt River Project 9 Mississippi Power 9 Don Horsley 9 Christopher Lawrence Abstain 9 Christopher Lawrence Abstain 9 Christopher Lawrence Abstain 9 Affirmative 9 Affirmative 9 Christopher Lawrence Abstain 9 Christopher Law					
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3 Salt River Project John T. Underhill Affirmative	3	•		Negative	View
	3	Salt River Project	John T. Underhill	Affirmative	
3 San Diego Gas & Electric Scott Peterson Affirmative	3	San Diego Gas & Electric	Scott Peterson	Affirmative	

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3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold		
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Abstain	<u>View</u>
5	Avista Corp.	Edward F. Groce	Affirmative	
5	BC Hydro and Power Authority	Clement Ma	Affirmative	
5	Black Hills Power	Pamela Pahl	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	Conectiv Energy Supply, Inc.	Richard K Douglass	Affirmative	
5	Constellation Generation Group	Michael F. Gildea	Abstain	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
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5	Seminole Electric Cooperative, Inc.	Brenda K Atkins	Abstain	<u>View</u>
5	Southern Company Services, Inc.	Roger D. Green	Affirmative	
5	Tampa Electric Co.	Bill Smotherman		
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
6	AEP Service Corp.	Dana E. Horton	Abstain	
6	Black Hills Power	Larry Williamson	Affirmative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Constellation Energy Commodities Group	Donald Schopp	Affirmative	
6	Florida Municipal Power Agency	Robert C. Williams		
6	Lincoln Electric System	Eric Ruskamp	Abstain	
6	New York Power Authority	Thomas Papadopoulos	Abstain	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern Company Generation and Energy Marketing	J. Roman Carter	Affirmative	
6	Tampa Electric Co.	Jose Benjamin Quintas	Affirmative	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
7	Eastman Chemical Company	Lloyd Webb	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	North Carolina Utilities Commission Public Staff	Jack Floyd	Affirmative	
8	Prague Power, LLC	William Lohrman	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	<u>View</u>
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Affirmative	
9	Wyoming Public Service Commission	Kathleen A. Lewis	Affirmative	
10	Electric Reliability Council of Texas, Inc.	Sam R. Jones	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Southwest Power Pool	Charles H. Yeung	Affirmative	

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1 10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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Response: Agreed.

Consideration of Comments on Re-ballot for Removal of WECC Waiver from INT-001 and INT-004

Summary Consideration: There was a single comment submitted with a negative ballot for the removal of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver. The negative comment suggested that the tools and procedures are not in place to ensure compliance with INT-001 and INT-004 without this waiver. WECC believes that the tools and procedures are in place and no changes were made to the request to withdraw this waiver.

Segment:	3					
Organization:	Public Utility District No. 2 of Grant County					
Member:	Greg Lange					
Comment:	: The necessary tools and procedures are not in place in the Western Interconnection to ensure compliance without the waiver.					
Response: The necessary tools and procedures are currently in place to ensure compliance in the Western Interconnection without the waiver. For example, with the WIT implementation on January 24, 2007, all transactions, including dynamic schedules, are required to be e-Tagged. As for Inadvertent Payback schedules, this waiver was needed prior to our current procedures that are in place with the Western Automatic Time Error Correction (ATEC) standard that has been submitted to NERC for approval. Even though the ATEC standard is not mandatorily enforceable at this time, it is a WECC Board approved criteria, and as such all entities in the WECC are expected to comply.						
Segment:	5					
Organization:	AEP Service Corp.					
Member:	Brock Ondayko					
Comment:	AEP's abstain vote is based on the understanding this regional difference only applies to dynamic schedules in WECC and does not apply to dynamic schedules that cross into other Interconnect regions.					
Response: The	Response: The waiver did impact only WECC.					
Segment:	9					
Organization:	California Energy Commission					
Member:	William Mitchell Chamberlain					
Comment:	FERC disapproved this waiver and WECC has taken steps to make it no					

longer necessary. Approval of this is a mere formality at this point.



August 13, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement of Re-ballot Results and Opening of Recirculation Ballot Window

The Standards Committee (SC) announces the following:

Re-ballot Results and Opening of Re-circulation Ballot Window for Withdrawal of "WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver"

The re-ballot for the <u>Urgent Action SAR to Withdraw the WECC Waiver</u> (Tagging Dynamic Schedules and Inadvertent Payback Waiver) from INT-001 and INT-004 was conducted from 8 a.m. (EDT) on Friday, July 20 through 8 p.m. (EDT) on Thursday, August 9, 2007.

The re-ballot did achieve a quorum however there was a negative ballot with a comment, initiating the need for a re-circulation ballot. (Detailed Ballot Results) All members of the ballot pool are encouraged to review the comments submitted with the re-ballot, and the requester's responses to those comments.

The re-circulation ballot is open through 8 p.m. (EDT) Wednesday, August 22, 2007.

Quorum: 90.09 % Approval: 99.10%

Members of the ballot pool may:

- Reconsider and change their vote from the first ballot.
- Vote in the second ballot even if they did not vote on the first ballot.
- Take no action if they do not want to change their original vote.

In the re-circulation ballot, votes are counted by exception only — if members don't indicate a revision to their original votes, the vote remains the same as in the first ballot.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely,

Maareen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster



August 23, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Recirculation Ballot Window Opens and Final Ballot Results

The Standards Committee (SC) announces the following:

Recirculation Ballot Window for Interpretation of BAL-001-0 Requirement 1 and BAL-003-0 Requirement 3 Opens August 23, 2007

The Western Electricity Coordinating Council (WECC) submitted a Request for an Interpretation of BAL-001-0 — Real Power Balancing Control Performance and BAL-003-0 — Frequency Response and Bias. The request asked if the use of the WECC Automatic Time Error Correction (WATEC) procedure violates Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003-0.

The <u>Interpretation</u> clarifies that use of the WATEC procedure does not violate either Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003. The initial ballot for this interpretation was conducted from August 7–16, 2007 and achieved a quorum; however, there was a negative ballot with a comment, initiating the need for a recirculation ballot. The drafting team that developed the Interpretation has considered these comments and posted its responses. All members of the ballot pool are encouraged to review the comments submitted with the initial ballot and the responses to those comments.

The recirculation ballot is open through 8 p.m. (EDT) Saturday, September 1, 2007.

Members of the ballot pool may:

- Reconsider and change their vote from the first ballot.
- Vote in the second ballot even if they did not vote on the first ballot.
- Take no action if they do not want to change their original vote.

In the recirculation ballot, votes are counted by exception only — if members don't indicate a revision to their original votes, the vote remains the same as in the first ballot.

Final Ballot Results for Removal of WECC Waiver from INT-001 and INT-004

The recirculation ballot for the <u>Urgent Action SAR to Withdraw the WECC Waiver</u> (Tagging Dynamic Schedules and Inadvertent Payback Waiver) from INT-001 and INT-004 was conducted from August 13–22, 2007 and the ballot was approved. (Detailed Ballot Results)

Quorum: 78.57 % Approval: 99.17% REGISTERED BALLOT BODY August 23, 2007 Page Two

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely,

Maareen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster Untitled Page Page 1 of 4

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NERC Home

	Ballot Results				
Ballot Name:	SAR for Removal of WECC Waiver from INT-001 and INT- 004_rc				
Ballot Period:	8/13/2007 - 8/22/2007				
Ballot Type:	recirculation				
Total # Votes:	88				
Total Ballot Pool:	112				
Quorum:	78.57 % The Quorum has been reached				
Weighted Segment Vote:	99.17 %				
Ballot Results:	The Standard has Passed				

	Summary of Ballot Results												
				Affir	m	ative		Neg	gati	ve	Αb	stain	
	Ballot Pool		ment eight	# Votes	Fı	action	v	# 'otes	Fra	ction	V	# otes	No Vote
							T						
1 - Segment 1	1.	32	1	:	21	0.95	5		1	0.0)45	4	6
2 - Segment 2	2.	6	0.4		4	0.	4		0		0	1	1
3 - Segment 3	3.	25	1		18		1		0		0	3	4
4 - Segment 4	4.	4	0.3		3	0.	3		0		0	0	1
5 - Segment 5	5.	19	1	•	12		1		0		0	2	5
6 - Segment 6	6.	15	0.8		8	0.	8		0		0	2	5
7 - Segment 7	7.	1	0		0		0		0		0	0	1
8 - Segment 8	8.	3	0.3		3	0.	3		0		0	0	0
9 - Segment 9	9.	3	0.2		2	0.	2		0		0	0	1
10 - Segment	10.	4	0.4		4	0.	4		0		0	0	0
Totals		112	5.4	7	75	5.35	5		1	0.0	45	12	24

Individual Ballot Pool Results							
Segm	ent	Organization	Member	Ва	Ballot		mments
1		Service Corp Transmission tem AEP	Scott P. Moore		Affirma	tive	
1	Ame	eren Services Company	Kirit S Shah		Affirma	tive	
1	Ame	erican Public Power Association	E. Nick Henery				
1	Avis	ta Corp.	Scott Kinney		Affirma	tive	
1	Bon	neville Power Administration	Donald S. Watki	ns	Affirma	tive	
1	Duq	uesne Light Co.	Bob McClelland				
1	Florida Keys Electric Cooperative Assoc.		Dennis Minton		Negati	ive	
1	Hyd	ro One Networks, Inc.	Ajay Garg				
1	Idah	no Power Company	Ronald D. Schell	berg	Affirma	tive	

Untitled Page 2 of 4

1	Kansas City Power & Light Co.	Jim Useldinger	Affirmative
1	Keyspan LIPA	Richard J. Bolbrock	Abstain
1	Lincoln Electric System	Doug Bantam	Abstain
1	Municipal Electric Authority of Georgia	Jerry J Tang	7.Loctom
1	New York Power Authority	Ralph Rufrano	Abstain
1	NorthWestern Energy	Ted Williams	Affirmative
1	Ohio Valley Electric Corp.	Robert Mattey	Affirmative
1	Oncor Electric Delivery	Charles W. Jenkins	Affirmative
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative
1	PacifiCorp	Robert Williams	7 iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative
1	PP&L, Inc.	Ray Mammarella	Abstain
1	Sacramento Municipal Utility District	<u> </u>	Affirmative
<u>'</u> 1		-	Affirmative
	Santee Cooper	Terry L. Blackwell	
1	Seattle City Light	Christopher M. Turner	Affirmative
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative
1	Southern California Edison Co.	Dana Cabbell	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative
1	Southwest Transmission Coop., Inc.	Alan H. Wilkinson	Affirmative
1	Tennessee Valley Authority	Larry G. Akens	Affirmative
1	Tri-State G & T Association Inc.	Bruce A Sembrick	Affirmative
1	Tucson Electric Power Co.	Ronald P. Belval	Affirmative
1	Xcel Energy, Inc.	Gregory L. Pieper	Affirmative
2	British Columbia Transmission Corporation	Phil Park	Affirmative
2	California ISO	David Hawkins	Affirmative
2	Independent Electricity System Operator	Don Tench	Affirmative
2	New Brunswick System Operator	Alden Briggs	
2	New York Independent System Operator	Gregory Campoli	Abstain
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative
3	Alabama Power Company	Robin Hurst	Affirmative
3	Arizona Public Service Co.	Thomas R. Glock	
3	Atlantic City Electric Company	James V. Petrella	Affirmative
3	Avista Corp.	Robert Lafferty	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative
3	Consumers Energy Co.	David A. Lapinski	Affirmative
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative
3	Farmington Electric Utility System	Alan Glazner	Affirmative
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative
3	Florida Municipal Power Agency	Michael Alexander	Affirmative
3	Georgia Power Company	Leslie Sibert	Affirmative
3	Gulf Power Company	William F. Pope	Affirmative
	· •	Michael D. Penstone	Ammanve
3	Hydro One Networks, Inc.	Bruce Merrill	Abetain
	Lincoln Electric System		Abstain
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative
3	Mississippi Power New York Power Authority	Don Horsley Christopher Lawrence	Affirmative Abstain
	Diette Diver Device Anthony	de Graffenried	A 66 i mar a bis : -
3	Platte River Power Authority	Terry L Baker	Affirmative
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative
3	Salt River Project	John T. Underhill	Affirmative
	San Diego Gas & Electric	Scott Peterson	Affirmative

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· ·	Santos Cooper	Zack Dusanhum	Affirmative
3	Santee Cooper	Zack Dusenbury	Affirmative
3	Seattle City Light	Dana Wheelock	Affirmative
3	Xcel Energy, Inc.	Michael Ibold	
4	Northern California Power Agency	Fred E. Young	Affirmative
4	Old Dominion Electric Coop.	Mark Ringhausen	
4	Seattle City Light	Hao Li	Affirmative
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative
5	AEP Service Corp.	Brock Ondayko	Abstain
5	Avista Corp.	Edward F. Groce	Affirmative
5	BC Hydro and Power Authority	Clement Ma	Affirmative
5	Black Hills Power	Pamela Pahl	Affirmative
5	Bonneville Power Administration	Francis J. Halpin	Affirmative
5	Conectiv Energy Supply, Inc.	Richard K Douglass	Affirmative
5	Constellation Generation Group	Michael F. Gildea	
5	Detroit Edison Company	Ronald W. Bauer	
 5	Entegra Power Group, LLC	Kenneth Parker	Affirmative
5			Affirmative
	Florida Municipal Power Agency	Douglas Keegan	
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5	Tampa Electric Co.	Bill Smotherman	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative
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6	Bonneville Power Administration	Brenda S. Anderson	
6	Constellation Energy Commodities Group	Donald Schopp	Affirmative
6	Florida Municipal Power Agency	Robert C. Williams	
6	Lincoln Electric System	Eric Ruskamp	Abstain
6	New York Power Authority	Thomas Papadopoulos	Abstain
	<u> </u>	Mike Hummel	Abstairi
6	Salt River Project		A 661 A 11
6	Santee Cooper	Suzanne Ritter	Affirmative
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative
6	Southern Company Generation and Energy Marketing	J. Roman Carter	Affirmative
6	Tampa Electric Co.	Jose Benjamin Quintas	
6	Tennessee Valley Authority	Katherine E York	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative
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9	California Energy Commission	William Mitchell Chamberlain	Affirmative
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Affirmative
9	Wyoming Public Service Commission	Kathleen A. Lewis	
10	Electric Reliability Council of Texas, Inc.	Sam R. Jones	Affirmative
10	New York State Reliability Council	Alan Adamson	Affirmative
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Untitled Page Page 4 of 4

10	Southwest Power Pool	Charles H. Yeung	Affirmative	
1 10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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Standard INT-001-3 — Interchange Information

A. Introduction

1. Title: Interchange Information

2. Number: INT-001-3

3. Purpose:

To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.

4. Applicability:

- 4.1. Purchase-Selling Entities.
- **4.2.** Balancing Authorities.
- **5. Effective Date:** First day of first month after BOT adoption.

B. Requirements

- **R1.** The Load-Serving, Purchasing-Selling Entity shall ensure that Arranged Interchange is submitted to the Interchange Authority for:
 - **R1.1.** All Dynamic Schedules at the expected average MW profile for each hour.
- **R2.** The Sink Balancing Authority shall ensure that Arranged Interchange is submitted to the Interchange Authority:
 - **R2.1.** If a Purchasing-Selling Entity is not involved in the Interchange, such as delivery from a jointly owned generator.
 - **R2.2.** For each bilateral Inadvertent Interchange payback.

C. Measures

- M1. The Purchasing-Selling Entity that serves the load shall have and provide upon request evidence that could include but is not limited to, its Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour as specified in Requirement 1.
- M2. Each Sink Balancing Authority shall have and provide upon request evidence that could include but is not limited to, Interchange Transaction tags operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts, or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority as specified in Requirements 2.1 and 2.2.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

1.2. Compliance Monitoring and Reset Time Frame

One or more of the following methods will be used to assess compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

1.3. Data Retention

The Purchasing-Selling Entity that serves load and Sink Balancing Authority shall each keep 90 days of historical data (evidence).

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor,

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance for Sink Balancing Authorities:

- **2.1.** Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and R2.2.
- **2.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.
- **2.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R2.1 and 2.2.

3. Levels of Non-Compliance for Purchasing-Selling Entities that Serve Load:

3.1. Level 1: One instance of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

Standard INT-001-3 — Interchange Information

- **3.2.** Level 2: Two instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.3.** Level 3: Three instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.
- **3.4.** Level 4: Four or more instances of not submitting Arranged Interchange to the Interchange Authority as specified in R1.

E. Regional Differences

1. MISO Energy Flow Information Waiver effective on July 16, 2003.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by Board of Trustees	Revised
2	November 1, 2006	Adopted by Board of Trustees	Revised
3	October 9, 2007	Adopted by Board of Trustees (Remove WECC Waiver)	Revised

Standard INT-004-2 — Dynamic Interchange Transaction Modifications

A. Introduction

1. Title: Dynamic Interchange Transaction Modifications

2. Number: INT-004-2

Purpose: To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.

4. Applicability

- 4.1. Balancing Authorities
- 4.2. Reliability Coordinators
- **4.3.** Transmission Operators
- 4.4. Purchasing-Selling Entities

5. Effective Date: First day of first month after BOT approval.

B. Requirements

- **R1.** At such time as the reliability event allows for the reloading of the transaction, the entity that initiated the curtailment shall release the limit on the Interchange Transaction tag to allow reloading the transaction and shall communicate the release of the limit to the Sink Balancing Authority.
- **R2.** The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:
 - **R2.1.** The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +10%.
 - **R2.2.** The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than ± 25 megawatt-hours.
 - **R2.3.** A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.

C. Measures

M1. The Sink Balancing Authority shall provide evidence that the responsible Purchasing-Selling Entity revised a tag when the deviation exceeded the criteria in INT-004 Requirement 2.

D. Compliance

1. Compliance Monitoring Process

Periodic tag audit as prescribed by NERC. For the requested time period, the Sink Balancing Authority shall provide the instances when Dynamic Schedule deviation exceeded the criteria in INT-004 R2 and shall provide evidence that the responsible Purchasing-Selling Entity submitted a revised tag.

1.1. Compliance Monitoring Responsibility

Standard INT-004-2 — Dynamic Interchange Transaction Modifications

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

One calendar year without a violation from the time of the violation.

1.3. Data Retention

Three months.

1.4. Additional Compliance Information

Not specified.

2. Levels of Non-Compliance

2.1. Level 1: Not specified.

2.2. Level 2: Not specified.

2.3. Level 3: Not specified.

2.4. Level 4: Not specified.

E. Regional Differences

1. None

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Board of Trustees Approval	Revised
2	October 9, 2007	Board of Trustees Approval (Removal of WECC Waiver)	Revised

Exhibit B-1

INT-005-2 — Interchange Authority Distributes Arranged Interchange

INT-006-2 — Response to Interchange Authority

INT-008-2 — Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. **Number:** INT-005-2

3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability:

4.1. Interchange Authority.

5. Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

E. Regional Differences

None

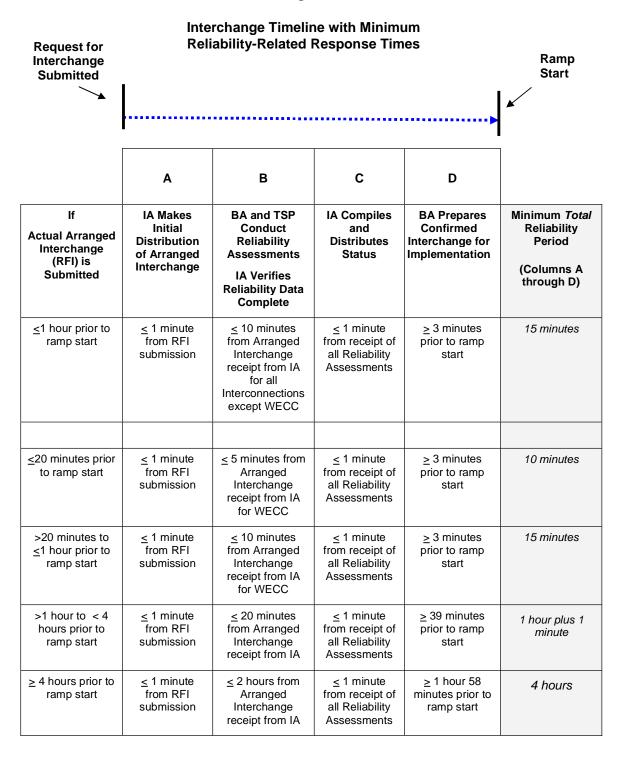
Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

Timing Table



A. Introduction

1. Title: Response to Interchange Authority

2. **Number:** INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability:

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1. Compliance Monitoring Responsibility** Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- **1.4.6** For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority

- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4. Level 4:** Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None.

Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

Timing Table

Interchange Timeline with Minimum Reliability-Related Response Times



	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤20 minutes prior to ramp start	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to ≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

A. Introduction

1. Title: Interchange Authority Distributes Status

2. **Number:** INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability:

4.1. Interchange Authority.

5. Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

- 1. Compliance Monitoring Process
 - 1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.

-

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-008-2 — Interchange Authority Distributes Status

- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None.

Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

Timing Table

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times				Ramp Start
	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤20 minutes prior to ramp start	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to ≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Exhibit B-2

Record of Development of INT-005-2, INT-006-2, and INT-008-2

SAR Coordinate Interchange - Timing Table (Project 2007-14)

Registered Ballot Body | Related Files | Reliability Standards Home Page

Status

The Standards Committee is posting for comment the first draft of a SAR to make permanent changes to the Coordinate Interchange standards timing table.

The Standards Committee has posted the ballot results for the Urgent Action SAR and its consideration of the comments.

The Board of Trustees will consider the Urgent Action Coordinate Interchange standards at its May 2, 2007 meeting.

Purpose/Industry Need

An Urgent Action SAR to modify the Timing Table in three of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR modified the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start. Under the Reliability Standards Development Procedure, a change made to a standard with the Urgent Action process is not "permanent" — an urgent action change to a standard expires unless that change is vetted through the full standards development process.

The new SAR proposes to make the above changes to the timing table permanent, and also proposes to add the following to the timing table to bring the timing table into alignment with the categories (On-time, Late, After-the-fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
- WECC pre-schedule late (Pre-late) submittal definition

Proposed Standard	Supporting Documents	Comment Period	Comments Received	Response to Comments
Urgent Action Coordinate Interchange Standards Posted for Board of Trustees Approval May 2, 2007				
INT-005-2, INT-006-2,				

INT-008-2				
Clean (14) Redline to last posting (15)				
Announcement (13)		04/20/07 - 05/21/07		
SAR for Permanent Changes to CI Timing Table (11)		Comment Form (12)		
Announcement (8)				Initial Ballot Results (9)
Urgent Action SAR Posted for 10-day Ballot Review March 19 through March 30, 2007		03/19/07 - 03/30/07		Consideration of Comments (10)
Urgent Action SAR (7)		10-day Ballot Window		
INT-005-2, INT-006-2, INT-008-2		Closed		
Clean (6) Redline to last posting (5)				
Announcement (4)				
Urgent Action SAR Posted for 30-day Pre- ballot Review February 15 through March 16, 2007		02/15/07 - 03/16/07		
Urgent Action SAR (3)		Pre-ballot Review		
INT-005-2, INT-006-2, INT-008-2		Closed		
Clean (1) Redline to last posting (2)				
To download a file click on the file using your right mouse button, then save it to your computer in a directory of your choice.				
Documents in the PDF format req software allows anyone view and information download the Adobe	print Adobe Portable			Get Adobe Reader

All comments should be forwarded to sarcomm@nerc.com.

Questions? Contact Barbara Bogenrief - barbara.bogenrief@nerc.net or 609-452-8060.

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

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Proposed Effective Date: Upon Approval of Board of Trustees

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

E. Regional Differences

None

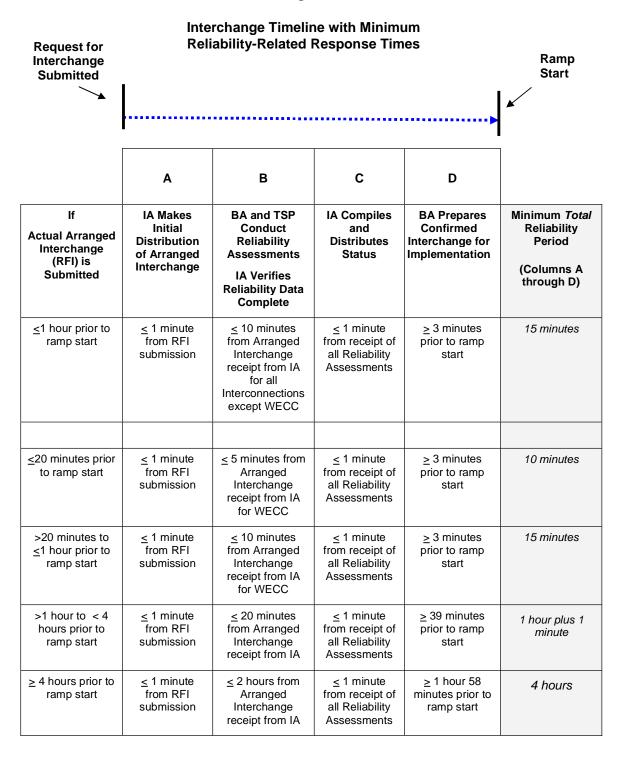
Version History

Version	Date	Action	Change Tracking

Draft: February 15, 2007
Proposed Effective Date: Upon Approval of Board of Trustees

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Timing Table



A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Proposed Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes

Draft: February 15, 2007 Page 1 of 4

effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None

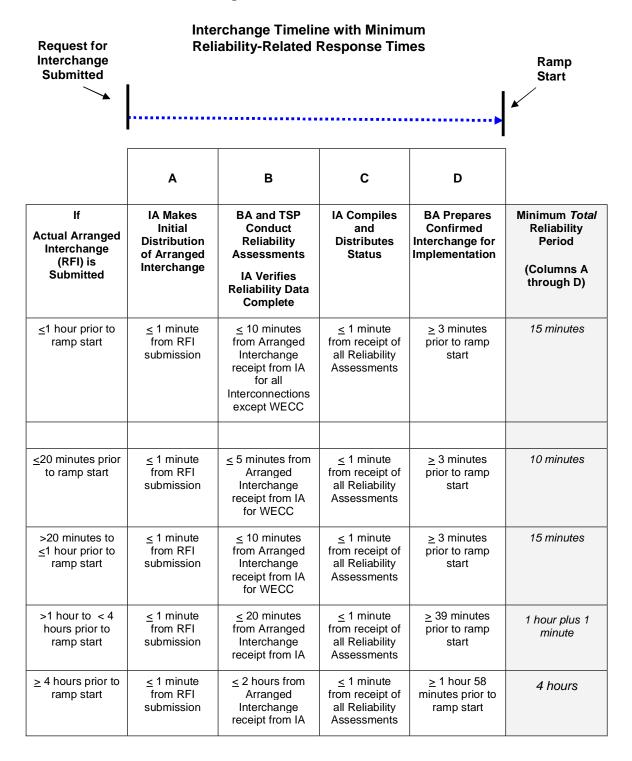
Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority				

Timing Table



A. Introduction

1. Title: Interchange Authority Distributes Status

2. **Number:** INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None

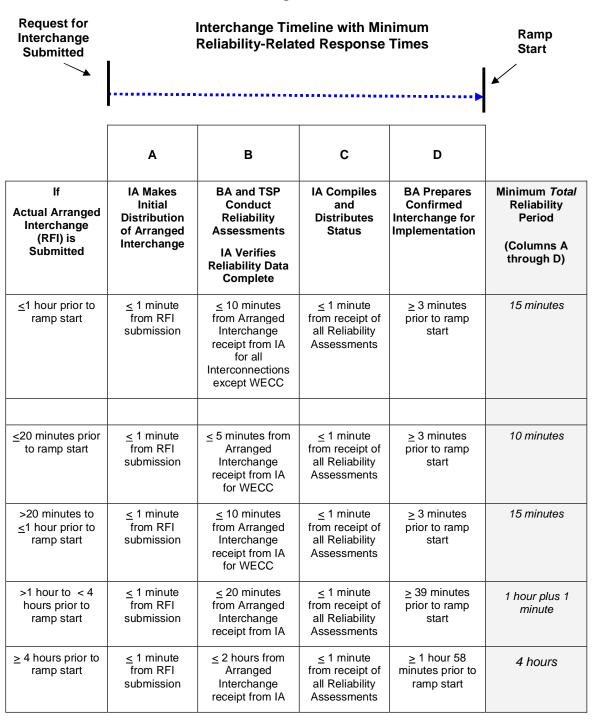
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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking

Timing Table



A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

E. Regional Differences

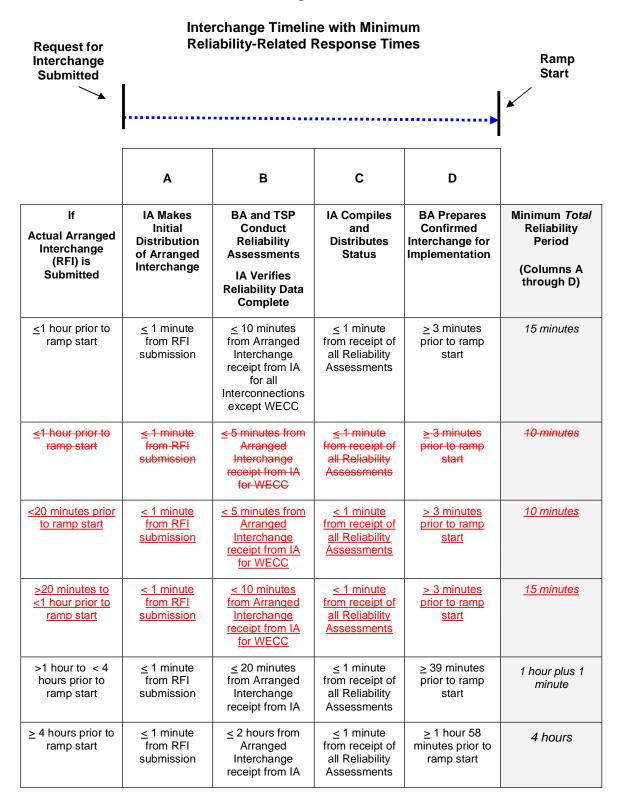
None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Timing Table



Stand	Standard INT-005-1-2 — Interchange Authority Distributes Arranged Interchange				
I					

A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-12

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- 5. <u>Proposed</u> Effective Date: <u>January 1, 2007Upon approval of Board of Trustees.</u>

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1.** Compliance Monitoring Responsibility Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

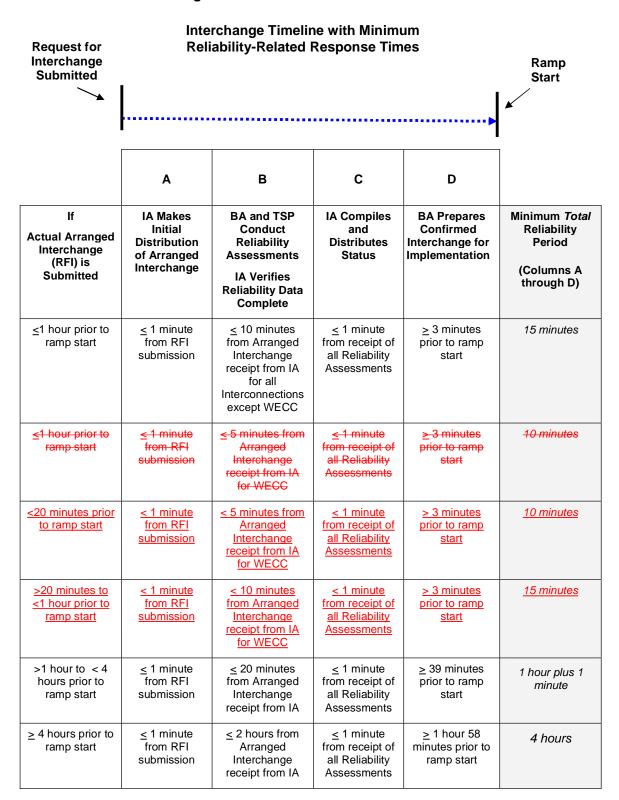
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking

Timing Table





Standard INT-008-1-2 — Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Status

2. Number: INT-008-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking

Timing Table

Request for Interchange Submitted		Ramp Start			
	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤1 hour prior to ramp start	≤1-minute from RFI submission	≤-5 minutes from Arranged Interchange receipt from IA for WECC	≤1 minute from receipt of all Reliability Assessments	≥3 minutes prior to ramp start	10 minutes
<20 minutes prior to ramp start	< 1 minute from RFI submission	< 5 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to <1 hour prior to ramp start	< 1 minute from RFI submission	< 10 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standard INT-008-1-2	- Interchange Authority Distributes Status

Standard Authorization Request Form

Title of Proposed Standard	Emergency Revision to INT Standard's Timing Table for WECC
Request Date	February 7, 2007

SAR Requestor Information		1	Type (Check a box for each one applies.)
Name Accounting S	WECC Interchange Scheduling and ubcommittee (WECC ISAS)		New Standard
Primary Cont	act Jim Hansen	\boxtimes	Revision to existing Standards:
			INT-005-1
			INT-006-1
			INT-008-1
Telephone	206-706-0165		Withdrawal of existing Standard
Fax	206-706-0183		
E-mail	james.hansen@seattle.gov		Urgent Action

Purpose (Describe the purpose of the standard — what the standard will achieve in support of reliability.)

Modify the Assessment Period for WECC from 5 minutes to 10 minutes for e-Tags submitted between 1 hour and 20 minutes prior to ramp start. Default ramp start for transactions beginning at the top of the hour is 10 minutes prior to the top of the hour with 20 minute duration. The effect in most cases would be to increase the assessment period from 5 minutes to 10 minutes for e-Tags created between xx:00 and xx:30 that have start times of xx+1:00. The Timing Table appears in INT-005-1, INT-006-1, and INT-008-1.

Industry Need (Provide a detailed statement justifying the need for the proposed standard, along with any supporting documentation.)

The WECC members on the Coordinate Interchange Drafting Team focused on minimizing changes from existing business practices when they put the timing tables together for WECC. The new coordinate interchange timing table (INT-005,006,008-001), in row 2, contains a 5 minute assessment period for WECC only, for RFI's submitted < 1 hour prior to ramp start. This short assessment period was defined in order to allow schedules to be submitted up to xx:40 without being late (maintaining existing scheduling procedures). The WECC members of the drafting team believed that the 10 minute duration (total of all columns) was the assessment period, not just the 5 minutes in column 2, thus reflecting no change from existing practices. From a technical interpretation, Column 2 is defined as 5 minutes however, even if the actions associated with Column 1, 3, and 4 occur much more quickly. This short of an assessment window is not necessary until xx:35 for maintaining the existing scheduling timing. The 5 minute assessment period has been causing a problem within the WECC. In combination with the removal of passive approval for reliability entities (passive denial instead), the short assessment period is resulting in reliability entities scrambling to more quickly assess and approve e-Tags. Many entities require that this be done manually. Most "realtime" e-Tags are submitted between xx:00 and xx:30, a time period in which 10 minute assessments would work well for both marketers and reliability entities. Unfortunately, with only 5 minutes to assess, many e-Tags were unassessed and transitioned to passive DENIED. The marketers are frustrated because they need to re-create the e-Tags and the reliability entities are frustrated because they do not have enough time to conduct assessments and also continue their other critical duties.

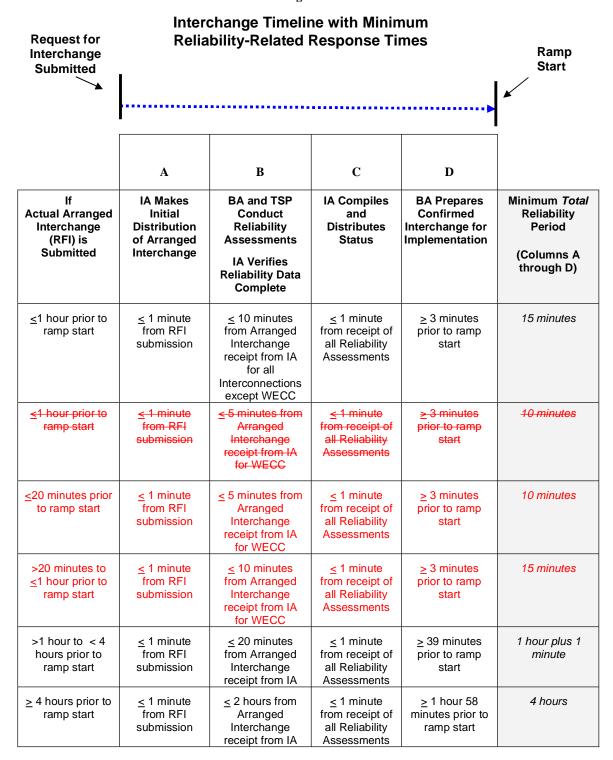
WECC Interchange Scheduling and Accounting Subcommittee members held an emergency conference call to consider and vote upon new e-Tag timing. The revised timing table included with this SAR reflects the majority vote of the WECC members.

Brief Description (Describe the proposed standard in sufficient detail to clearly define the scope in a manner that can be easily understood by others.)

Please see the proposed revised timing table with the changes to the approved table shown in red on the next page. Assessment period increased from 5–10 minutes for first half of hour (for next hour transactions) and left at 5 minutes after that.

The only change needed to the standards is to replace the existing timing table with the proposed timing table.

Timing Table



Reliability Functions

The Standard will Apply to the Following Functions (Check box for each one that applies.)					
Reliability Coordinator	Ensures the reliability of the bulk transmission system within its Reliability Coordinator area. This is the highest reliability authority.				
Balancing Authority	Integrates resource plans ahead of time, and maintains load- interchange-resource balance within its metered boundary and supports system frequency in real time.				
Interchange Authority	Authorizes valid and balanced Interchange Schedules.				
Planning Authority	Plans the Bulk Electric System.				
Resource Planner	Develops a long-term (>one year) plan for the resource adequacy of specific loads within a Planning Authority area.				
Transmission Planner	Develops a long-term (>one year) plan for the reliability of transmission systems within its portion of the Planning Authority area.				
Transmission Service Provider	Provides transmission services to qualified market participants under applicable transmission service agreements				
Transmission Owner	Owns transmission facilities.				
Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders.				
Distribution Provider	Provides and operates the "wires" between the transmission system and the customer.				
Generator Owner	Owns and maintains generation unit(s).				
Generator Operator	Operates generation unit(s) and performs the functions of supplying energy and Interconnected Operations Services.				
Purchasing-Selling Entity	The function of purchasing or selling energy, capacity, and all necessary Interconnected Operations Services as required.				
Market Operator	Integrates energy, capacity, balancing, and transmission resources to achieve an economic, reliability-constrained dispatch.				

Standards Authorization Request Form

Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user.

Reliability and Market Interface Principles

Applicable Reliability Principles (Check box for all that apply.)					
	 Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. 				
	The frequency and voltage of interconnected bulk electric systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.				
	 Information necessary for the planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably. 				
	 Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented. 				
\boxtimes	 Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems. 				
	 Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions. 				
	 The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis. 				
	the proposed Standard comply with all the following Market Interface ciples? (Select "yes" or "no" from the drop-down box.)				
	ne planning and operation of bulk electric systems shall recognize that reliability is an assential requirement of a robust North American economy. Yes				
2. An Organization Standard shall not give any market participant an unfair competitive advantage. Yes					
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes					
	4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes				
in	5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes				

Related Standards

Standard No.	Explanation
INT-005-1	Contains timing table
INT-006-1	Contains timing table
INT-008-1	Contains timing table

Related SARs

SAR ID	Explanation

Regional Differences

Region	Explanation		
ERCOT	This request does not impact ERCOT		
FRCC	This request does not impact FRCC		
MRO	This request does not impact MRO		
NPCC	This request does not impact NPCC		
SERC	This request does not impact SERC		
RFC	This request does not impact RFC		
SPP	This request does not impact SPP		
WECC	This request impacts WECC only		



February 15, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement Three Pre-ballot Windows and Ballot Pools Open February 15, 2007

The Standards Committee (SC) announces the following standards actions:

Pre-ballot Window and Ballot Pool for Balance Resources and Demand Standards Open February 15, 2007

The following <u>Balance Resources and Demand</u> standards are posted for a 30-day pre-ballot review:

BAL-007-1 — Balance of Resources and Demand

BAL-008-1 — Frequency and Area Control Error

BAL-009-1 — Actions to Return Frequency to within Frequency Trigger Limits

BAL-010-1 — Frequency Bias Settings

BAL-011-1 — Frequency Limits

The ballot for the above set of standards also includes the Balance Resources and Demand Implementation Plan. These standards require entities to maintain interconnection scheduled frequency within a predefined frequency profile under all conditions (i.e., normal and abnormal) to prevent unwarranted load shedding and to prevent frequency-related cascading collapse of the interconnected grid.

A new <u>ballot pool</u> to vote on this set of standards has been formed and will remain open until 8 a.m. (EST) Monday, March 19, 2007. (The ballot pool used to ballot these standards during the fall of 2006 has been dissolved.) During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is called: <u>bp-bal resources demand in@nerc.com</u>

The initial ballot for this set of standards will be conducted from 8 a.m. (EST) on Monday, March 19 through 8 p.m. (EST) on Friday, March 30, 2007.

Pre-ballot Window and Ballot Pool for Nuclear Plant Interface Coordination Standard (NUC-001) both Open February 15, 2007

The <u>Nuclear Plant Interface Coordination</u> standard is posted for a 30-day pre-ballot review. The ballot for this standard also includes the Nuclear Plant Interface Coordination <u>Implementation Plan</u>. This standard requires coordination between nuclear plant generator operators and transmission entities to ensure safe operation and shutdown of nuclear plants. The drafting team will hold a Webcast to provide highlights of this standard on March 8 from 1–3 p.m. EST.

REGISTERED BALLOT BODY February 15, 2007 Page Two

A new <u>ballot pool</u> to vote on this standard has been formed and will remain open until 8 a.m. (EST) Monday, March 19, 2007. During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is called: <u>bp-nuclear interface in@nerc.com</u>.

The initial ballot for this standard will be conducted from 8 a.m. (EST) on Monday, March 19 through 8 p.m. (EST) on Friday, March 30, 2007.

Pre-ballot Window and Ballot Pool for Urgent Action SAR to modify Coordinate Interchange Standards (INT-005, INT-006, and INT-008) both Open February 15, 2007

An <u>Urgent Action SAR</u> for Modifications to Timing Tables in the following Coordinate Interchange standards is posted for a 30-day pre-ballot review.

INT-005-2 — Interchange Authority Distributes Arranged Interchange

INT-006-2 — Response to Interchange Authority

INT-008-2 — Interchange Authority Distributes Status

This Urgent Action SAR will correct an error in the timing table that appears in all three standards. Under some conditions, the error in the timing table doesn't give reliability entities within the Western Electricity Coordinating Council enough time to conduct a reliability-related review of e-tags.

A new <u>ballot pool</u> to vote on the modifications to these standards has been formed and will remain open until 8 a.m. (EST), Monday, March 19, 2007. During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is called: <u>bp-ua_sar_int_in@nerc.com</u>.

The initial ballot for this set of standards will be conducted from 8 a.m. (EST) on Monday, March 19 through 8 p.m. (EST) on Friday, March 30, 2007.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely,

Maureen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

E. Regional Differences

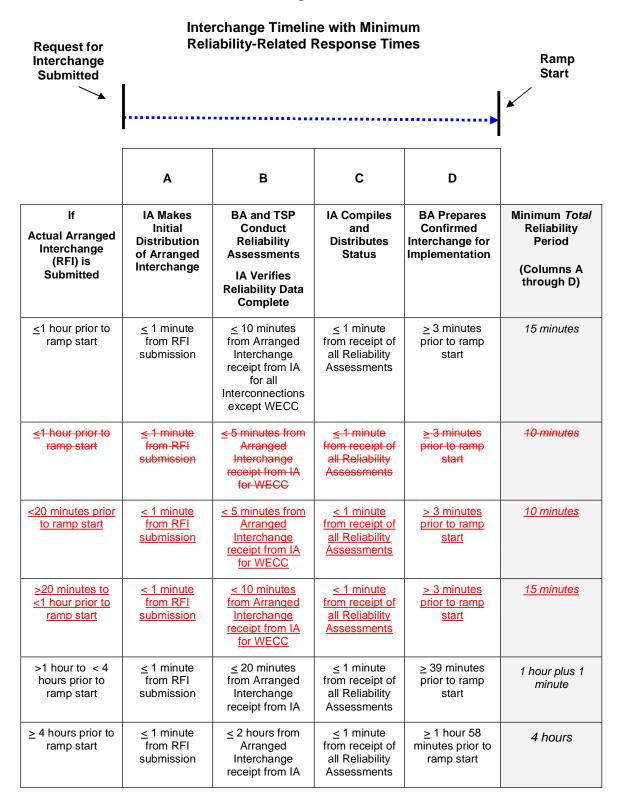
None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Timing Table



Standard INT-005-1-2 — Interchange Authority Distributes Arranged Interchange						
I						

A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-12

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- 5. <u>Proposed</u> Effective Date: <u>January 1, 2007Upon approval of Board of Trustees.</u>

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1.** Compliance Monitoring Responsibility Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

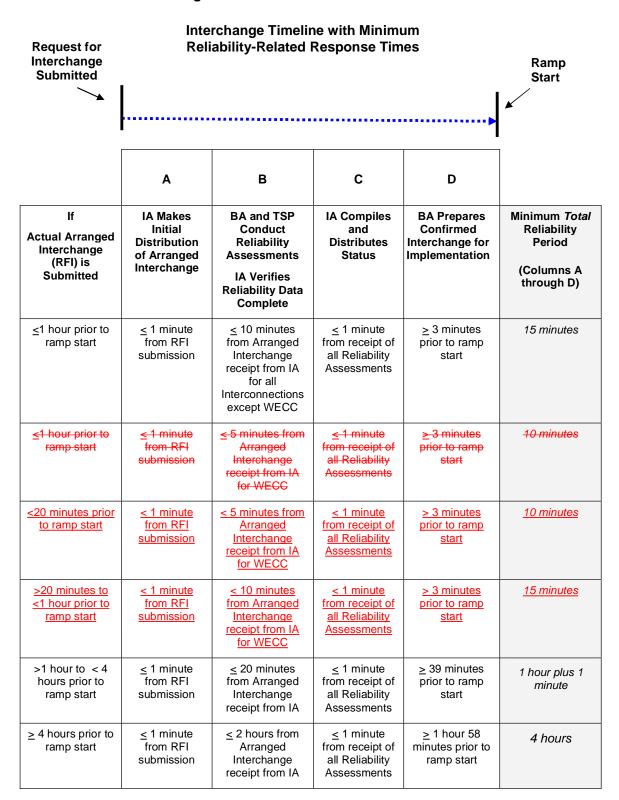
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking





Standard INT-008-1-2 — Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Status

2. Number: INT-008-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times			Ramp Start	
	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤1 hour prior to ramp start	≤1-minute from RFI submission	≤-5 minutes from Arranged Interchange receipt from IA for WECC	≤1 minute from receipt of all Reliability Assessments	≥3 minutes prior to ramp start	10 minutes
<20 minutes prior to ramp start	< 1 minute from RFI submission	< 5 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to <1 hour prior to ramp start	< 1 minute from RFI submission	< 10 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standard INT-008-1-2	- Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

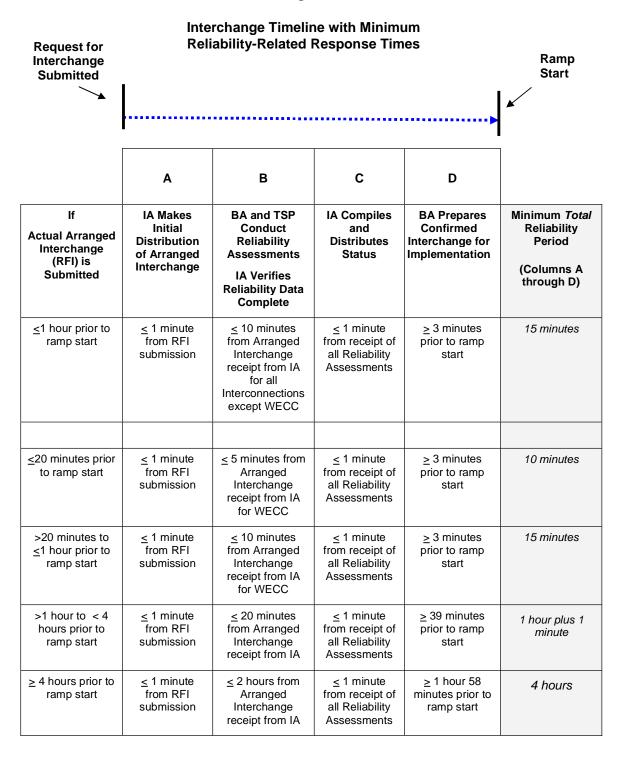
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.



A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Proposed Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes

Draft: February 15, 2007 Page 1 of 4

effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

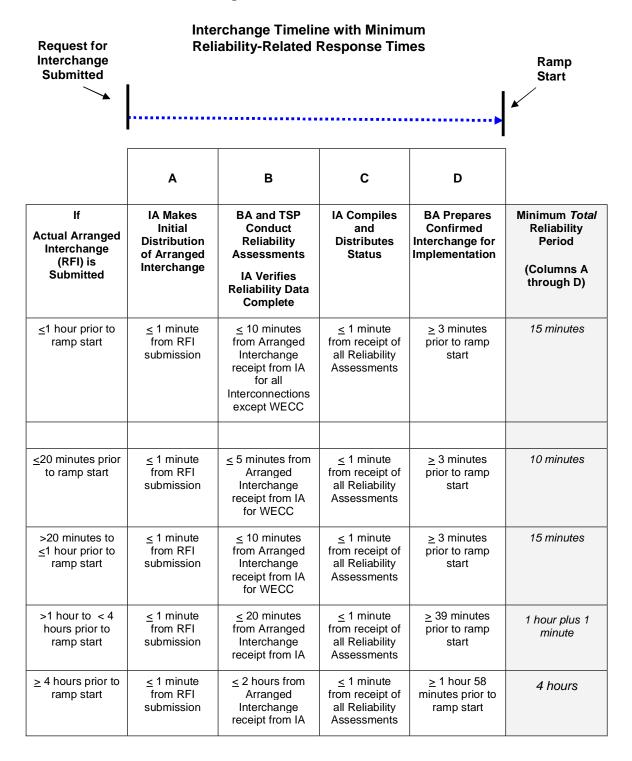
None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority			



A. Introduction

1. Title: Interchange Authority Distributes Status

2. Number: INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

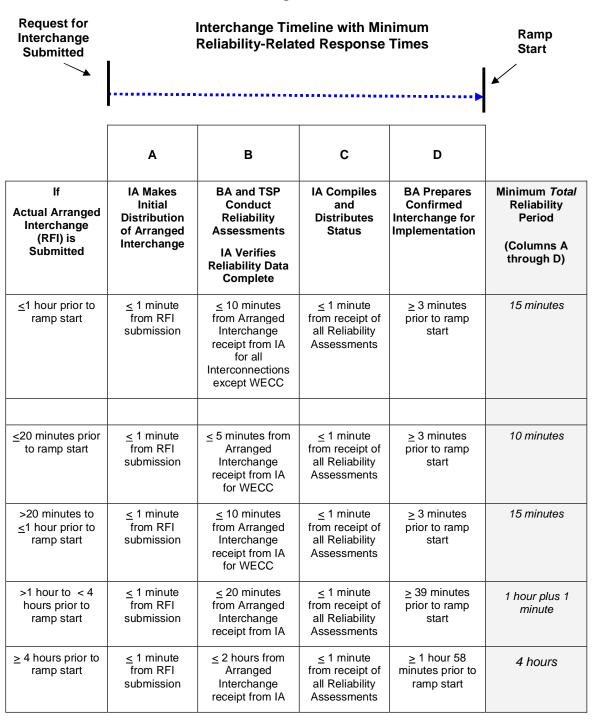
None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking



Standard Authorization Request Form

Title of Proposed Standard	Revisions to INT-001 and INT-004 to eliminate WECC Waiver
Request Date	June 4, 2007

SAR Requester Information		SAR Type (Check a box for each one that applies.)	
Name Louise McCarren, WECC		New Standard	
Primary Contact Louise McCarren		Revision to existing Standard	
Telephone (801) 582-0353 Fax (801) 582-3918		Withdrawal of existing Standard	
E-mail louise@wecc.biz		Urgent Action	

Purpose (Describe what the standard action will achieve in support of bulk power system reliability.)

Removal of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002 will improve the uniformity of INT-001 and INT-004.

This is an Urgent Action because the FERC Order 693 included a directive to modify INT-001 and INT-004 within 90 days of the date of the Order and the only way to meet this schedule is through the Urgent Action Process.

Industry Need (Provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

FERC Order 693 included a directive in paragraph 825 to either justify the WECC

Brief Description (Provide a paragraph that describes the scope of this standard action.) Remove the <u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver</u> dated November 21, 2002 from INT-001 and INT-004.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR.)

The only change proposed to INT-001-2 and INT-004-1 is to remove the <u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver</u> dated November 21, 2002.

FERC Order 693 included the following:

825. The Commission stressed in Order No. 672 that uniformity of Reliability Standards

should be the goal and practice, "the rule rather than the exception." The Commission therefore stated in the NOPR that the absence of a tagging requirement for dynamic schedules in WECC is a matter of concern, and that for this reason it could not approve or remand this regional difference without the additional information it requested. To date the Commission has not received this information. Of particular importance in this compliance filing will be the ERO's demonstration that this practice is due to a physical difference in the system or results in a more stringent Reliability Standard. Without this information, we are unable to address Xcel's comments further. The Commission therefore directs the ERO to submit a filing within 90 days of the date of this order either withdrawing this regional difference or providing additional information.

The scope of this SAR is limited to removing WECC's Waiver to comply with FERC's directive.

Reliability Functions (N/A)

The Stanc	The Standard will Apply to the Following Functions (Check box for each one that applies.)			
	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.		
	Balancing Authority	Integrates resource plans ahead of time, and maintains load- interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.		
	Interchange Coordinator	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.		
	Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.		
	Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.		
	Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.		
	Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).		
	Transmission Owner	Owns and maintains transmission facilities.		
	Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.		
	Distribution Provider	Delivers electrical energy to the End-use customer.		
	Generator Owner	Owns and maintains generation facilities.		
	Generator Operator	Operates generation unit(s) to provide real and reactive power.		
	Purchasing- Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.		
	Market Operator	Interface point for reliability functions with commercial functions.		
	Load- Serving Entity	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.		

Reliability and Market Interface Principles

Appli	icable Reliability Principles (Check box for all that apply.)					
	 Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. 					
	The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.					
	 Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably. 					
	 Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented. 					
	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.					
	Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.					
	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.					
	8. Bulk power systems shall be protected from malicious physical or cyber attacks.					
	the proposed Standard comply with all of the following Market Interface ciples? (Select 'yes' or 'no' from the drop-down box.)					
	reliability standard shall not give any market participant an unfair competitive dvantage. Yes					
2. A	A reliability standard shall neither mandate nor prohibit any specific market structure. Yes					
	3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes					
in	4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes					

Related Standards

Standard No.	Explanation

Related SARs

SAR ID	Explanation

Regional Variances

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	



July 9, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Ballot Window for Withdrawal of WECC Waiver for INT-001 and INT-004; Pre-ballot Window and Ballot Pool for Interpretation of BAL-001 and BAL-003 Open July 9, 2007

The Standards Committee (SC) announces the following:

Ballot Window for Withdrawal of 'WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver' Open July 9–18, 2007

The FERC Order 693 did not include approval of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver dated November 21, 2002, which is included in reliability standard INT-001-2 — Interchange Information and INT-004-1 — Dynamic Interchange Transaction Modifications. To remove this waiver as rapidly as possible, the Standards Committee authorized an <u>Urgent Action SAR to Withdraw the WECC Waiver</u>. The proposed modifications to <u>INT-001</u> and <u>INT-004</u> are limited to removal of the WECC waiver. The <u>ballot</u> will be open through 8 p.m. (EDT) on Wednesday, July18, 2007.

Pre-ballot Window and Ballot Pool for Interpretation of BAL-001-0, Requirement 1 and BAL-003-0, Requirement 3 both Open July 9, 2007

The Western Electricity Coordinating Council (WECC) submitted a <u>Request for an Interpretation</u> of BAL-001-0 — Real Power Balancing Control Performance and BAL-003-0 — Frequency Response and Bias. The request asked if the use of the WECC Automatic Time Error Correction (WATEC) procedure violates Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003-0.

The <u>Interpretation</u> clarifies that use of the WATEC procedure does not violate either Requirement 1 of BAL-001-0 or Requirement 3 of BAL-003.

A new <u>ballot pool</u> to vote on this interpretation has been formed and will remain open up until 8 a.m. (EDT) Tuesday, August 7, 2007. During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." The list server for this ballot pool is: bp-interpret bal-001 in@nerc.com

The initial ballot for this interpretation will begin at 8 a.m. (EDT) on Tuesday, August 7, 2007.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely.

Maureen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster



Reliability Standards

Ballot Results				
Ballot Name: Urgent Action SAR - Coordinate Interchange_in				
Ballot Period: 3/19/2007 - 3/30/2007				
Ballot Type:	Initial			
Total # Votes:	180			
Total Ballot Pool:	208			
Quorum:	86.54 % The Quorum has been reached			
Weighted Segment Vote:	96.82 %			
Ballot Results:	The Standard has Passed			

Summary of Ballot Results								
	Ballot	Segment	Affirr	native	Nega	ative	Abstain	No
Segment	Pool	Weight	# Votes	Fraction	# Votes	Fraction	#	Vote
1 - Segment 1.	67	1	44	0.978	1	0.022	11	11
2 - Segment 2.	ç	0.8	8	0.8	0	0	1	0
3 - Segment 3.	48	1	33	0.943	2	0.057	7	6
4 - Segment 4.	10	0.7	7	0.7	0	0	3	0
5 - Segment 5.	31	1	17	0.944	1	0.056	6	7
6 - Segment 6.	23	3 1	13	1	0	0	6	4
7 - Segment 7.	2	0.2	2	0.2	0	0	0	0
8 - Segment 8.	4	0.4	4	0.4	0	0	0	0
9 - Segment 9.	7	0.7	6	0.6	1	0.1	0	0
10 - Segment 10.	7	0.6	6	0.6	0	0	1	0
Totals	208	7.4	140	7.165	5	0.235	35	28

Individual Ballot Pool Results							
Ballot							
Segment	Organization	Member		Comments			
1	AEP Service Corp Transmission System AEP	Scott P. Moore	Affirmative				
1	Allegheny Power	Rodney Phillips Affirmat					
1	Alliant Energy	Kenneth Goldsmith Affirmative					
1	Ameren Services Company	Peggy Ladd	Affirmative				
1	American Public Power Association	E. Nick Henery	Affirmative				
1	Avista Corp.	Scott Kinney	Affirmative				
1	Basin Electric Power Cooperative	Mike Risan Affirmative					
1	Bonneville Power Administration	Donald S. Watkins	Affirmative				

1	Central Maine Power Company	David Mark Conroy	Abstain
1	Consolidated Edison Co. of New York	Edwin E. Thompson PE	Affirmative
1	Duke Energy	Doug Hils	Abstain
1	Duquesne Light Co.	Bob McClelland	
1	East Kentucky Power Coop.	George S. Carruba	Affirmative
1	Empire District Electric Co.	Ralph Frederick Meyer	
1	Entergy Corporation	George R. Bartlett	Abstain
1	Exelon Energy	John J. Blazekovich	Affirmative
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative
1	Florida Power & Light Co.	C. Martin Mennes	Affirmative
1	Gainesville Regional Utilities	Luther E. Fair	Affirmative
1	Great River Energy	Gordon Pietsch	Abstain
1	Hoosier Energy Rural Electric Cooperative, Inc.	Damon Holladay	Affirmative
<u>'</u> 1	Hydro One Networks, Inc.	Ajay Garg	Affirmative
<u>'</u> 1	Idaho Power Company	Ronald D. Schellberg	Affirmative
<u>'</u> 1	ITC Transmission	Brian F. Thumm	Affirmative
_ <u>'</u> 1	JEA	Ted E. Hobson	
<u>'</u> 1	The state of the s	Jim Useldinger	Affirmative Affirmative
	Kansas City Power & Light Co.		
1	Keyspan LIPA	Richard J. Bolbrock	Affirmative
1	LG&E Energy Transmission Services	Bradley Young	
1	Lincoln Electric System	Doug Bantam	1
1	Manitoba Hydro	Robert G. Coish	Affirmative
1	Minnesota Power, Inc.	Carol Gerou	Abstain
1	Municipal Electric Authority of Georgia	Jerry J Tang	Affirmative
1	National Grid USA	Herbert Schrayshuen	Affirmative
1	New Brunswick Power Transmission Corporation	Wayne N. Snowdon	Affirmative
1	New York Power Authority	Ralph Rufrano	Affirmative
1	Northeast Utilities	David H Boguslawski	Abstain
1	Northern Indiana Public Service Co.	Joseph Dobes	Affirmative
1	Ohio Valley Electric Corp.	Robert Mattey	Affirmative
1	Oklahoma Gas and Electric Co.	Melvin H. Perkins	Negative
1	Oncor	Charles W. Jenkins	Affirmative
1	Otter Tail Power Company	Lawrence R. Larson	
1	Pacific Gas and Electric Company	Chifong L. Thomas	Abstain
1	PacifiCorp	Robert Williams	Affirmative
1	Portland General Electric Co.	Frank F. Afranji	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative
1	PP&L, Inc.	Ray Mammarella	Affirmative
1	Progress Energy Carolinas	Verne B. Ingersoll	Abstain
1	Public Service Electric and Gas Co.	Colin Loxley	Affirmative
1	Sacramento Municipal Utility District	Dilip Mahendra	Affirmative
1	Salt River Project	Robert Kondziolka	Affirmative
1	San Diego Gas & Electric	Linda Brown	
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	SaskPower	Wayne Guttormson	Abstain
1	Seattle City Light	Christopher M. Turner	Affirmative
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative
1	South Carolina Electric & Gas Co.	Lee N. Xanthakos	
1	Southern California Edison Co.	Dana Cabbell	Abstain
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative
1	Southern Illinois Power Coop.	William G. Hutchison	
1	Southwest Transmission Coop., Inc.	Alan H. Wilkinson	

1	Southwestern Power Administration	Stanley Mason	Affirmative	
1	Tampa Electric Co.	Paul Michael Davis	Affirmative	
1	Tennessee Valley Authority	Larry G. Akens	Affirmative	
1	Tri-State G & T Association Inc.	Bruce A Sembrick		
1	Westar Energy	Allen Klassen	Abstain	<u>View</u>
1	Xcel Energy, Inc.	Gregory L. Pieper	Affirmative	
2	Alberta Electric System Operator	Anita Lee	Affirmative	
2	British Columbia Transmission Corporation	Phil Park	Affirmative	
2	California ISO	David Hawkins	Affirmative	
2	Independent Electricity System Operator	Don Tench	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Terry Bilke	Affirmative	View
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli	Abstain	
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
3	Alabama Power Company	Robin Hurst	Affirmative	
3	Allegheny Power	Bob Reeping	Affirmative	
3	Arizona Public Service Co.	Thomas R. Glock	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	Avista Corp.		Affirmative	
3	Blue Ridge Power Agency	Robert Lafferty Duane S. Dahlquist	Affirmative	
3		· ·		
	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Tallahassee	Rusty S. Foster	A CC'	
3	City Public Service of San Antonio	Edwin Les Barrow	Affirmative	
3	Cleco Utility Group	Bryan Y Harper	Abstain	
3	Commonwealth Edison Co.	Stephen Lesniak		
3	Constellation Energy	Carolyn Ingersoll	Affirmative	
3	Consumers Energy Co.	David A. Lapinski	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy	Henry Ernst-Jr	Abstain	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative	
3	Florida Municipal Power Agency	Michael Alexander	Abstain	
3	Florida Power & Light Co.	W.R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster		
3	Georgia Power Company	Leslie Sibert	Affirmative	
3	Gulf Power Company	William F. Pope	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner		
3	Lincoln Electric System	Bruce Merrill	Abstain	
3	Louisville Gas and Electric Co.	Charles A. Freibert		
3	Manitoba Hydro	Ronald Dacombe	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Abstain	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Christopher Lawrence de Graffenried	Affirmative	View
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Oklahoma Gas and Electric Co.	Gary Clear		
			Negative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Abstain	
3	Platte River Power Authority	Terry L Baker	Affirmative	

3	Progress Energy Carolinas	Sam Waters	Negative
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative
3	Salt River Project	John T. Underhill	Affirmative
3	San Diego Gas & Electric	Scott Peterson	
3	Santee Cooper	Zack Dusenbury	Affirmative
3	Seattle City Light	Dana Wheelock	Affirmative
3	Tampa Electric Co.	Ronald L. Donahey	Affirmative
3	Tennessee Valley Authority	Cynthia Herron	Affirmative
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative
3	Xcel Energy, Inc.	Michael Ibold	Affirmative
4	American Municipal Power - Ohio	Chris Norton	Abstain
4	Consumers Energy Co.	David Frank Ronk	Affirmative
4	Florida Municipal Power Agency	William S. May	Abstain
4	Municipal Energy Agency of Nebraska	John Krajewski	Affirmative
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative
4	Public Utility District No. 2 of Grant County	Kevin J. Conway	Affirmative
4	Reedy Creek Improvement District	Doug Wagner	Affirmative
4	Seattle City Light	Hao Li	Affirmative
4		Steven R. Wallace	
	Seminole Electric Cooperative, Inc.		Abstain
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative
5	AEP Service Corp.	Brock Ondayko	Affirmative
5	Avista Corp.	Edward F. Groce	Affirmative
5	Black Hills Power	Pamela Pahl	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative
5	City of Tallahassee	Alan Gale	
5	Conectiv Energy Supply, Inc.	Richard K Douglass	Affirmative
5	Constellation Generation Group	Michael F. Gildea	Affirmative
5	Dairyland Power Coop.	Warren Schaefer	Affirmative
5	Detroit Edison Company	Ronald W. Bauer	Affirmative
5	Dominion Energy	Harold W. Adams	Affirmative
5	East Kentucky Power Coop.	Gerard Bordes	Affirmative
5	Entergy Operations, Inc.	Thomas Barnett	Abstain
5	Florida Municipal Power Agency	Steve McElhaney	
5	Florida Power & Light Co.	Robert A. Birch	Affirmative
5	Gainesville Regional Utilities	Mark L. Bennett	Abstain
5	JEA	Donald Gilbert	Abstain
5	Lincoln Electric System	Dennis Florom	Abstain
5	Louisville Gas and Electric Co.	Charlie Martin	Abstant
5	Manitoba Hydro	Mark Aikens	Affirmative
5	Oklahoma Gas and Electric Co.	Kim Morphis	Negative
5	PPL Generation LLC	Mark A. Heimbach	
			Affirmative
5	Progress Energy Carolinas	Wayne Lewis	Abstain
5	PSEG Power LLC	Thomas Piascik	
5	Reedy Creek Energy Services	Bernie Budnik	a.cc
5	Salt River Project	Glen Reeves	Affirmative
5	Southeastern Power Administration	Douglas Spencer	Abstain
5	Southern Company Services, Inc.	Roger Green	
5	Tenaska, Inc.	Scott M. Helyer	Affirmative
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative
5	Xcel Energy, Inc.	Stephen J. Beuning	Affirmative

6	AEP Service Corp.	Dana E. Horton	Affirmative
6	Black Hills Power	Larry Williamson	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative
6	Constellation Energy Commodities Group	Donald Schopp	Affirmative
6	Dominion Energy Marketing	Lou Oberski	Affirmative
6	Duke Energy	Walter Yeager	
6	Exelon Power Team	Pulin Shah	
6	FirstEnergy Solutions	Edward C. Stein	Affirmative
6	Florida Municipal Power Agency	Robert C. Williams	Abstain
6	Lincoln Electric System	Eric Ruskamp	Abstain
6	Louisville Gas and Electric Co.	Daryn Barker	Abstain
6	Manitoba Hydro	Daniel Prowse	Affirmative
6	Progress Energy Carolinas	James Eckelkamp	Abstain
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Affirmative
6	Sacramento Municipal Utility District	Robert D. Schwermann	Affirmative
6	Santee Cooper	Suzanne Ritter	Affirmative
6	Seminole Electric Cooperative, Inc.		Abstain
	South Carolina Electric & Gas Co.	Trudy S. Novak	Affirmative
6		Matt Hammond	Ammauve
6	Southern Company Generation and Energy Marketing	J. Roman Carter	Affirmative
6	Split Rock Energy LLC	Donna Stephenson	Abstain
6	Tampa Electric Co.	Jose Benjamin Quintas	Affirmative
6	Western Area Power Administration - UGP Marketing	John Stonebarger	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative
7	Eastman Chemical Company	Lloyd Webb	Affirmative
7	Praxair Inc.	David Meade	Affirmative
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative
8	Missouri Office of Public Counsel	Ryan Kind	Affirmative
8	Other	Michehl R. Gent	Affirmative
8	Pennsylvania Office of Consumer Advocate	Sonny Popowsky	Affirmative
9	California Energy Commission	William Mitchell Chamberlain	Affirmative
9	Massachusetts Department of Telecommunications and Energy	Donald E. Nelson	Affirmative
9	Minnesota Public Utilities Commission	Ken Wolf	Negative
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Affirmative
9	New York State Public Service Commission	James T. Gallagher	Affirmative
9	North Carolina Utilities Commission	Sam Watson	Affirmative
9	Public Utilities Commission of Ohio	Klaus Lambeck	Affirmative
10	Electric Reliability Council of Texas, Inc.	Sam R. Jones	Affirmative
10	Florida Reliability Coordinating Council	Linda Campbell	Affirmative
10	Midwest Reliability Organization	Larry Brusseau	Abstain
10	New York State Reliability Council	Alan Adamson	
	j		Affirmative
10	Northeast Power Coordinating Council, Inc.	Edward A. Schwerdt	Affirmative
10	ReliabilityFirst Corporation	Timothy R. Gallagher	Affirmative
10	Southwest Power Pool	Charles H. Yeung	Affirmative

Consideration of Comments on Initial Ballot of Urgent Action Change to Coordinate Interchange Timing Tables

Voter	Entity	Comment
Allen Klassen	Westar Energy	WECC only
esponse: The	e changes made to the tir	Response: The changes made to the timing table do apply solely to WECC.
Terry Bilke	Midwest ISO, Inc.	
		While we do not have an issue with the proposed change, this appears to be a misuse of the Urgent
		Action process. The process should be used when there is urgency to preserve reliability, not for
		expediency of the standards process. This is particularly important given the safeguards (such as
		sunset) have been removed from the Urgent Action process.
esponse: The	Response: The requestor did provide a	reliability-related justification for this Urgent Action – the error in the existing timing table does not
provide the re	liability entities with suffic	provide the reliability entities with sufficient time to conduct a reliability analysis of the Arranged Interchange.
hristopher	Christopher New York Power	
Lawrence de Authority	Authority	
Graffenried		CP-9 agrees with this SAR
esponse: The	Response: The requestor thanks you for your support.	r your support.

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

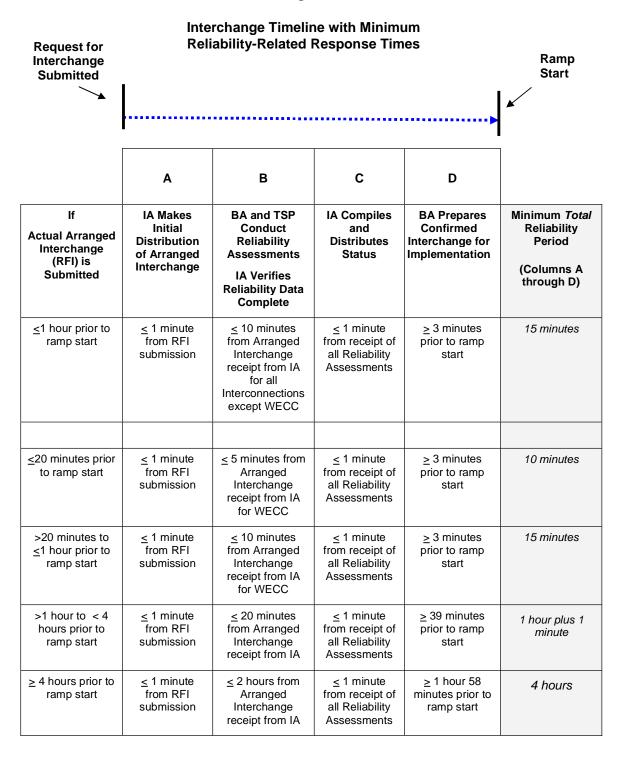
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.



A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Proposed Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes

effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

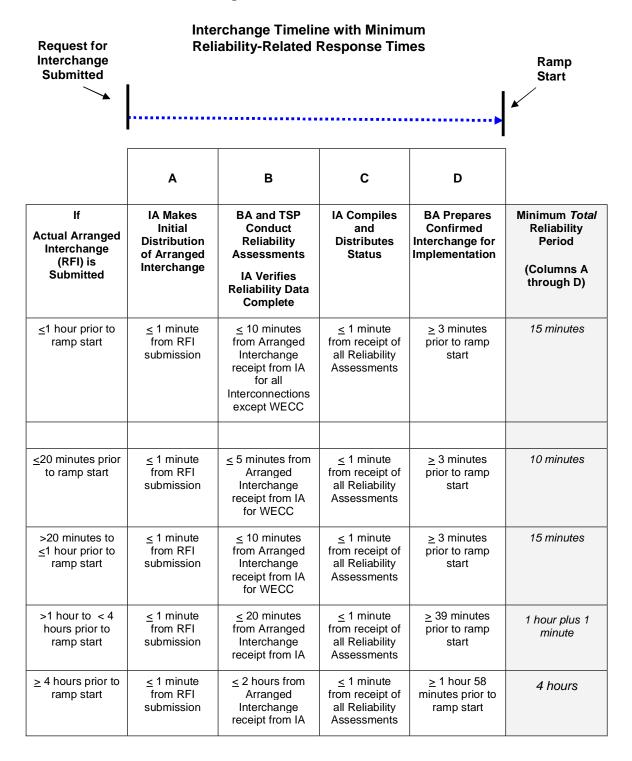
None

Version History

Version Date		Action	Change Tracking

¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority							



A. Introduction

1. Title: Interchange Authority Distributes Status

2. **Number:** INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

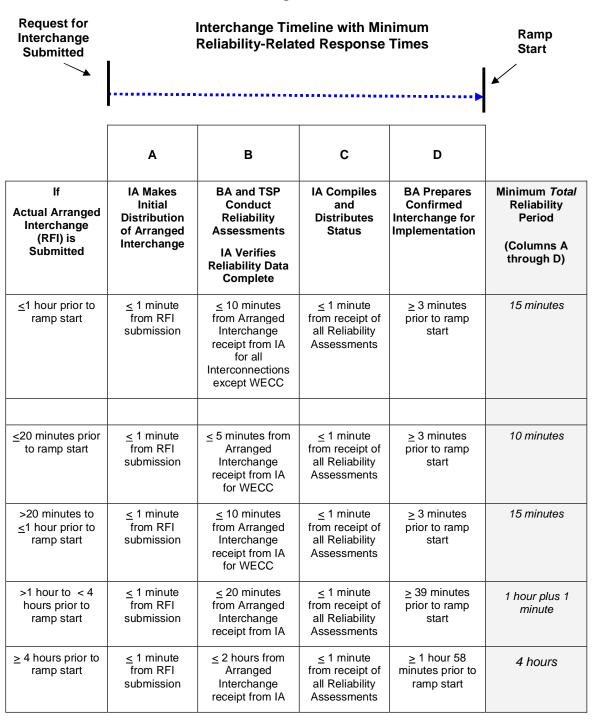
None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking	



A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

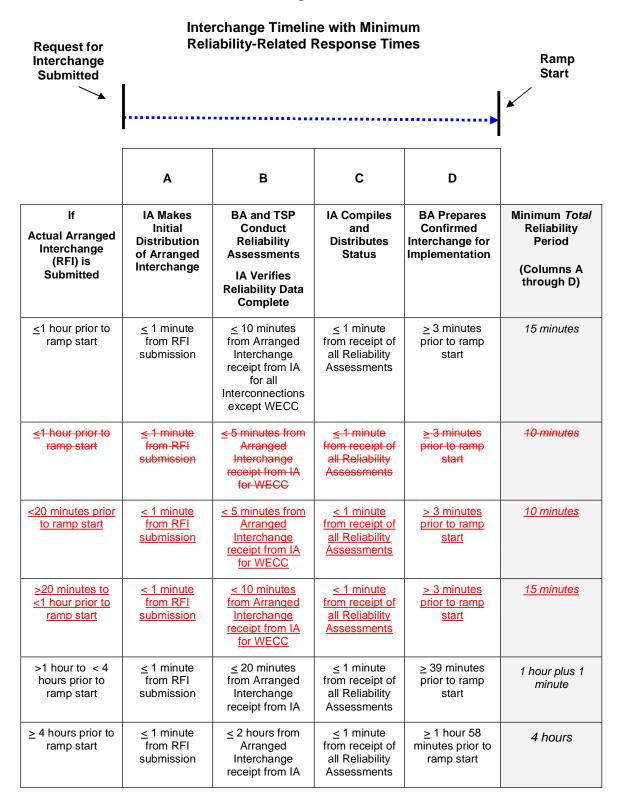
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking	

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.



Stand	Standard INT-005-1-2 — Interchange Authority Distributes Arranged Interchange					
I						

A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-12

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- 5. <u>Proposed</u> Effective Date: <u>January 1, 2007Upon approval of Board of Trustees.</u>

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1.** Compliance Monitoring Responsibility Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

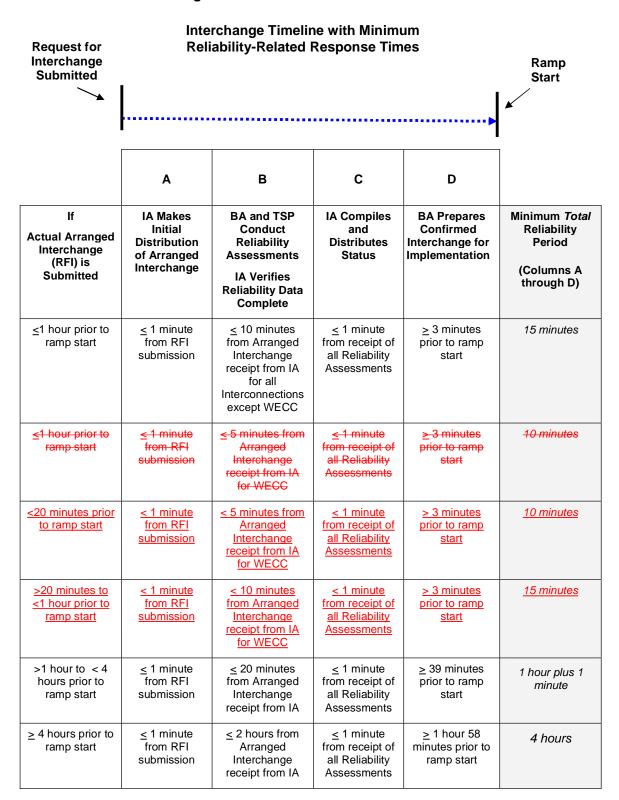
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None

Version History

Version Date		Action	Change Tracking	





Standard INT-008-1-2 — Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Status

2. Number: INT-008-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking	

Request for Interchange Submitted		Ramp Start			
	D				
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤1 hour prior to ramp start	≤1-minute from RFI submission	≤-5 minutes from Arranged Interchange receipt from IA for WECC	≤1 minute from receipt of all Reliability Assessments	≥3 minutes prior to ramp start	10 minutes
<20 minutes prior to ramp start	< 1 minute from RFI submission	< 5 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to <1 hour prior to ramp start	< 1 minute from RFI submission	< 10 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standard INT-008-1-2	Interchange Authority Distributes Status				



April 20, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

Announcement: Comment Periods Open

The Standards Committee (SC) announces the following standards action:

SAR for Generator Verification (Project 2007-09) Posted for 30-day Comment Period April 20–May 21, 2007

The SAR for <u>Project 2007-09</u> proposes completing the following four Phase III & IV standards that have been field tested but require additional modifications beyond the scope of their original SAR:

- PRC-019 Coordination of Generator Voltage Regulator Controls with Unit Capabilities and Protection
- PRC-024 Generator Performance During Frequency and Voltage Excursions
- MOD-026 Verification of Models and Data for Generator Excitation System Functions
- MOD-027 Verification of Generator Unit Frequency Response

The SAR also involves revising the following two already-approved Phase III & IV standards:

- MOD-024 Verification of Generator Gross and Net Real Power Capability
- MOD-025 Verification of Generator Gross and Net Reactive Power Capability

The modifications will address issues raised by FERC and stakeholders about these standards, and will bring the standards into conformance with the ERO Sanctions Guidelines and the latest version of the Reliability Standards Development Procedure. Please use the <u>comment form</u> to provide comments on this SAR.

SAR for Permanent Changes to the Timing Table in the Coordinate Interchange Standards (Project 2007-14) Posted for 30-day Comment Period April 20–May 21, 2007

An Urgent Action SAR to modify the Timing Table in some of the Coordinate Interchange standards (INT-005, INT-006, and INT-008) was approved by its ballot pool on March 30, 2007. The Urgent Action SAR made modifications to the timing table so that the reliability assessment period for WECC was lengthened from 5 minutes to 10 minutes for e-tags submitted less than 1 hour and greater than 20 minutes prior to ramp start.

REGISTERED BALLOT BODY April 20, 2007 Page Two

The new SAR for <u>Permanent Changes to the Coordinate Interchange Table</u> proposes to make the above changes permanent and also proposes to add the following to the timing table to bring the timing table into alignment with the categories (On-time, Late, After-the-Fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an arranged interchange.

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact requests
- WECC pre-schedule late (Pre-late) submittal definition

Please use the <u>comment form</u> to provide comments on this SAR.

Standards Development Process

The <u>Reliability Standards Development Procedure</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or <u>maureen.long@nerc.net</u>.

Sincerely,

Maureen E. Long

cc: Registered Ballot Body Registered Users Standards Mailing List NERC Roster

A. Introduction

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

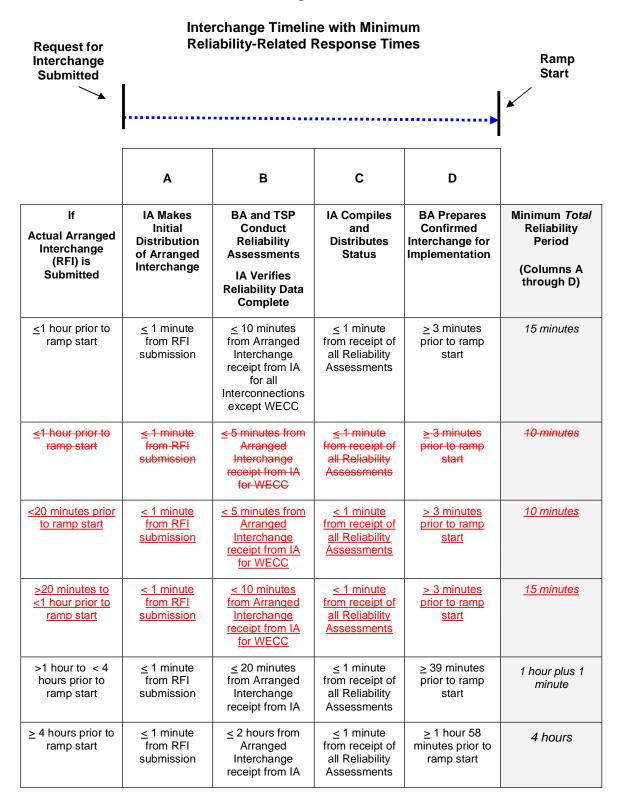
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking	

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.



Stand	Standard INT-005-1-2 — Interchange Authority Distributes Arranged Interchange					
I						

A. Introduction

1. Title: Response to Interchange Authority

2. Number: INT-006-12

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- 5. <u>Proposed</u> Effective Date: <u>January 1, 2007Upon approval of Board of Trustees.</u>

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1.** Compliance Monitoring Responsibility Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
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 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

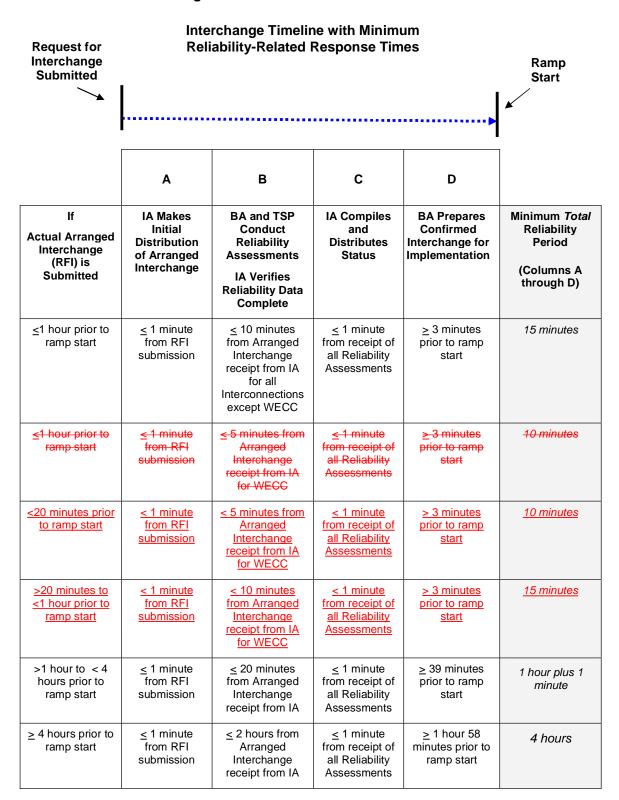
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking





Standard INT-008-1-2 — Interchange Authority Distributes Status

A. Introduction

1. Title: Interchange Authority Distributes Status

2. Number: INT-008-12

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: January 1, 2007 Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking	

Request for Interchange Submitted		Ramp Start			
	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤1 hour prior to ramp start	≤1-minute from RFI submission	≤-5 minutes from Arranged Interchange receipt from IA for WECC	≤1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
<20 minutes prior to ramp start	< 1 minute from RFI submission	< 5 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to <1 hour prior to ramp start	< 1 minute from RFI submission	< 10 minutes from Arranged Interchange receipt from IA for WECC	< 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standard INT-008-1-2_	- Interchange Authority Distributes Status

1. Title: Interchange Authority Distributes Arranged Interchange

2. Number: INT-005-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.

- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

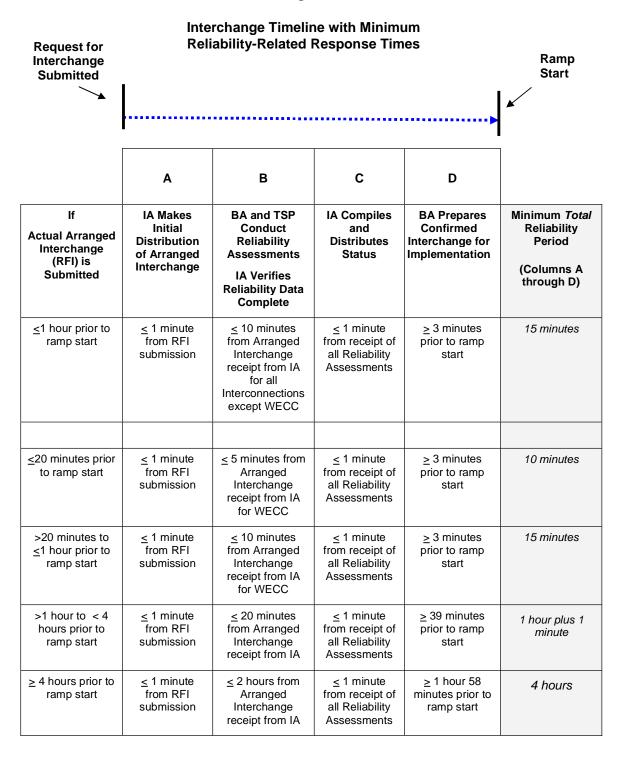
E. Regional Differences

None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.



1. Title: Response to Interchange Authority

2. Number: INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Proposed Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes

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effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- 1.4.6 For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

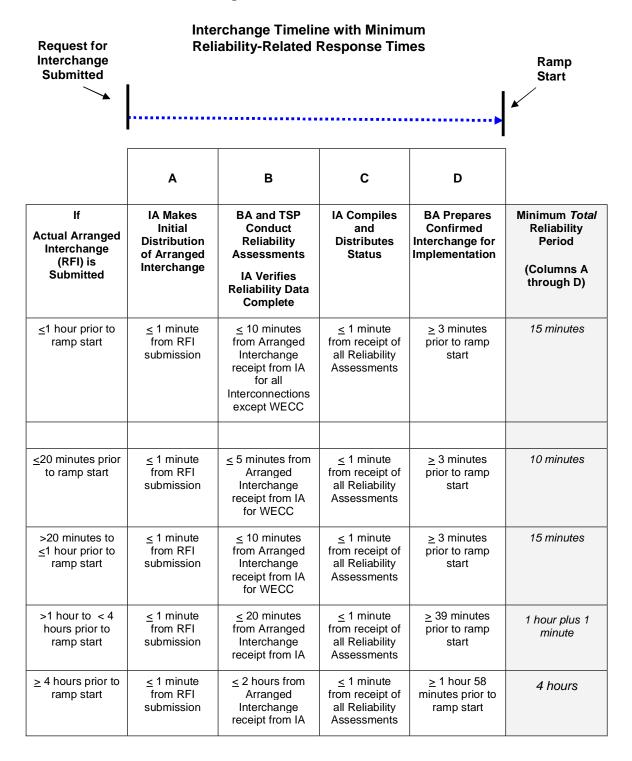
None

Version History

Version	Date	Action	Change Tracking

¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority					



1. Title: Interchange Authority Distributes Status

2. **Number:** INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability

4.1. Interchange Authority.

5. Proposed Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

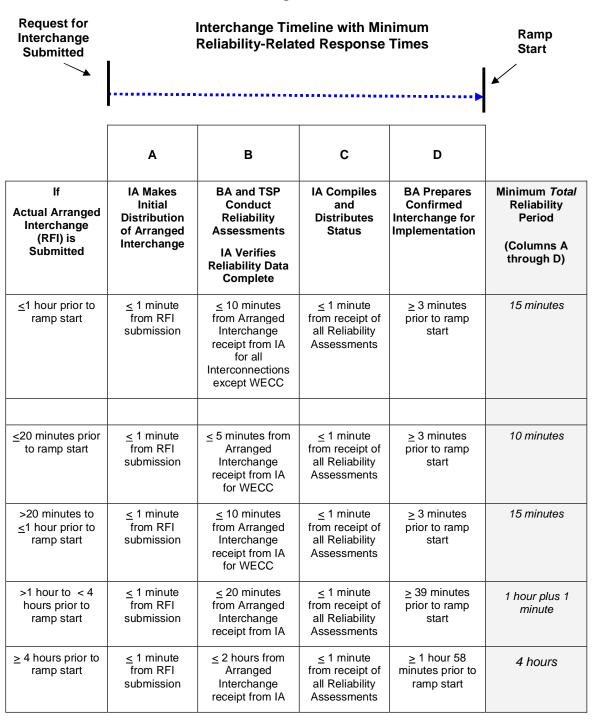
None

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version History

Version	Date	Action	Change Tracking



1. Title: Interchange Authority Distributes Arranged Interchange

2. **Number:** INT-005-2

3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.

4. Applicability:

4.1. Interchange Authority.

5. Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all reliability entities involved in the Interchange.
 - **R1.1.** When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

C. Measures

M1. For each Arranged Interchange, the Interchange Authority shall be able to provide evidence that it has distributed the Arranged Interchange information to all reliability entities involved in the Interchange within the applicable time frame.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a specific complaint of failure to perform R1. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange information to all reliability entities involved in an Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Interchange Authority.
- **1.4.6** For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange information to all reliability entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences¹ of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

E. Regional Differences

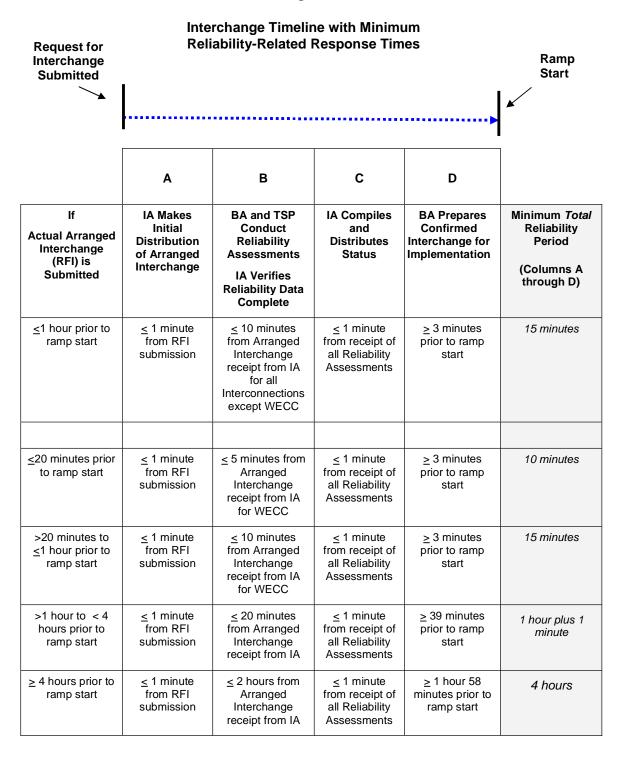
None

Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees



1. Title: Response to Interchange Authority

2. **Number:** INT-006-2

3. Purpose: To ensure that each Arranged Interchange is checked for reliability before it is implemented.

4. Applicability:

- **4.1.** Balancing Authority.
- **4.2.** Transmission Service Provider.
- **5. Effective Date:** Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing Authority and Transmission Service Provider shall respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
 - **R1.1.** Each involved Balancing Authority shall evaluate the Arranged Interchange with respect to:
 - **R1.1.1.** Energy profile (ability to support the magnitude of the Interchange).
 - **R1.1.2.** Ramp (ability of generation maneuverability to accommodate).
 - **R1.1.3.** Scheduling path (proper connectivity of Adjacent Balancing Authorities).
 - **R1.2.** Each involved Transmission Service Provider shall confirm that the transmission service arrangements associated with the Arranged Interchange have adjacent Transmission Service Provider connectivity, are valid and prevailing transmission system limits will not be violated.

C. Measures

M1. The Balancing Authority and Transmission Service Provider shall each provide evidence that it responded, relative to transitioning an Arranged Interchange to a Confirmed Interchange, to each request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B.

D. Compliance

- 1. Compliance Monitoring Process
 - **1.1. Compliance Monitoring Responsibility** Regional Reliability Organization.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to Requirement 1.

1.3. Data Retention

The Balancing Authority and Transmission Service Provider shall each keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

The Balancing Authority and Transmission Service Provider shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance may be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of non-compliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. The Compliance Monitor will evaluate complaints.
 - The Balancing Authority, and Transmission Service Provider shall make the following available for inspection by the Compliance Monitor upon request:
- 1.4.5 For compliance audits and spot checks, relevant data and system log records and agreements for the audit period which indicate a reliability entity identified in R1 responded to all instances of the Interchange Authority's communication under Reliability Standard INT-005 Requirement 1 concerning the pending transition of an Arranged Interchange to Confirmed Interchange. The Compliance Monitor may request up to a three month period of historical data ending with the date the request is received by the Balancing Authority, or Transmission Service Provider.
- **1.4.6** For specific complaints, agreements and those data and system log records associated with the specific Interchange event contained in the complaint which indicates a reliability entity identified in R1 has responded to the Interchange Authority's communication under INT-005 R1 concerning the pending transition of Arranged Interchange to Confirmed Interchange for that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not responding to the Interchange Authority as described in R1.

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¹ This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

Standard INT-006-2 — Response to Interchange Authority

- **2.3.** Level 3: Three occurrences¹ of not responding to the Interchange Authority as described in R1.
- **2.4. Level 4:** Four or more occurrences¹ of not responding to the Interchange Authority as described in R1 or no evidence provided.

E. Regional Differences

None.

Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

Interchange Timeline with Minimum Reliability-Related Response Times



	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤20 minutes prior to ramp start	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to ≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

1. Title: Interchange Authority Distributes Status

2. **Number:** INT-008-2

3. Purpose: To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

4. Applicability:

4.1. Interchange Authority.

5. Effective Date: Upon approval of Board of Trustees.

B. Requirements

- **R1.** Prior to the expiration of the time period defined in the Timing Table, Column C, the Interchange Authority shall distribute to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange has transitioned to a Confirmed Interchange.
 - **R1.1.** For Confirmed Interchange, the Interchange Authority shall also communicate:
 - **R1.1.1.** Start and stop times, ramps, and megawatt profile to Balancing Authorities.
 - **R1.1.2.** Necessary Interchange information to NERC-identified reliability analysis services.

C. Measures

- M1. For each Arranged Interchange, the Interchange Authority shall provide evidence that it has distributed the final status and Confirmed Interchange information specified in Requirement 1 to all Balancing Authorities, Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange within the time period defined in the Timing Table, Column C. If denied, the Interchange Authority shall tell all involved parties that approval has been denied.
 - M1.1 For each Arranged Interchange that includes a direct current tie, the Interchange Authority shall provide evidence that it has communicated the final status to the Balancing Authorities on both sides of the direct current tie, even if the Balancing Authorities are neither the Source nor Sink for the Interchange.

D. Compliance

- 1. Compliance Monitoring Process
 - 1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Performance-Reset Period shall be twelve months from the last non-compliance to R1.

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1.3. Data Retention

The Interchange Authority shall keep 90 days of historical data. The Compliance Monitor shall keep audit records for a minimum of three calendar years.

1.4. Additional Compliance Information

Each Interchange Authority shall demonstrate compliance to the Compliance Monitor within the first year that this standard becomes effective or the first year the entity commences operation by self-certification to the Compliance Monitor.

Subsequent to the initial compliance review, compliance will be:

- **1.4.1** Verified by audit at least once every three years.
- **1.4.2** Verified by spot checks in years between audits.
- **1.4.3** Verified by annual audits of noncompliant Interchange Authorities, until compliance is demonstrated.
- **1.4.4** Verified at any time as the result of a complaint. Complaints must be lodged within 60 days of the incident. Complaints will be evaluated by the Compliance Monitor.

Each Interchange Authority shall make the following available for inspection by the Compliance Monitor upon request:

- 1.4.5 For compliance audits and spot checks, relevant data and system log records for the audit period which indicate the Interchange Authority's distribution of all Arranged Interchange final status and Confirmed Interchange information to all entities involved in an Interchange per R1. The Compliance Monitor may request up to a three-month period of historical data ending with the date the request is received by the Interchange Authority
- 1.4.6 For specific complaints, only those data and system log records associated with the specific Interchange event contained in the complaint which indicate that the Interchange Authority distributed the Arranged Interchange final status and Confirmed Interchange information to all entities involved in that specific Interchange.

2. Levels of Non-Compliance

- **2.1.** Level 1: One occurrence of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences¹ of not distributing final status and information as described in R1.

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¹ This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

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- **2.3.** Level 3: Three occurrences¹ of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences¹ of not distributing final status and information as described in R1 or no evidence provided.

E. Regional Differences

None.

Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Approved by Board of Trustees: May 2, 2007 Effective Date: Upon Approval of Board of Trustees

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times			Ramp Start	
	A	В	С	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum <i>Total</i> Reliability Period (Columns A through D)
≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≤20 minutes prior to ramp start	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10 minutes
>20 minutes to ≤1 hour prior to ramp start	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Exhibit B-3

Standard Drafting Team Roster for INT-005-2, INT-006-2, and INT-008-2

Permanent Changes to the Coordinate Interchange Timing Table Standard Drafting Team

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Drafting Team Roster October, 2007