

May 5, 2009

# VIA ELECTRONIC FILING

Ms. Erica Hamilton, Commission Secretary British Columbia Utilities Commission Box 250, 900 Howe Street Sixth Floor Vancouver, B.C. V6Z 2N3

Re: North American Electric Reliability Corporation

Dear Ms. Hamilton:

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 BRITISH COLUMBIA UTILITIES COMMISSION OF THE PROVINCE OF BRITISH COLUMBIA

# 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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Rick Sergel President and Chief Executive Officer David N. Cook Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile david.cook@nerc.net Rebecca J. Michael Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net

May 5, 2009

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# I. <u>INTRODUCTION</u>

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:

Rick Sergel	Rebecca J. Michael
President and Chief Executive Officer	Attorney
David N. Cook	North American Electric Reliability
Vice President and General Counsel	Corporation
North American Electric Reliability Corporation	1120 G Street, N.W.
116-390 Village Boulevard	Suite 990
Princeton, NJ 08540-5721	Washington, D.C. 20005-3801
(609) 452-8060	(202) 393-3998
(609) 452-9550 – facsimile	(202) 393-3955 – facsimile
david.cook@nerc.net	rebecca.michael@nerc.net

# 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.

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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

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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

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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,

Rick Sergel President and Chief Executive Officer David N. Cook Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile david.cook@nerc.net <u>/s/ Rebecca J. Michael</u> Rebecca J. Michael Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net

# Exhibit A-1

# INT-001-3 — Interchange Information

# **INT-004-2** — Dynamic Interchange Transaction Modifications

### 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 noncompliance.

### 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.

- **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. <u>MISO Energy Flow Information Waiver</u> effective on July 16, 2003.

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

# **Version History**

### A. Introduction

- 1. Title: Dynamic Interchange Transaction Modifications
- **2. Number:** INT-004-2
- **3. 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  $\pm 10\%$ .
  - **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  $\pm 25$  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**

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) SAR for Removal of		08/13/07 - 08/22/07		Announcement (15) Recirculation Ballot
WECC Waiver from Reliability Standards INT-001 and INT-004		Recirculation Ballot Window (closed)		Results (16)

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 Pre- ballot Review June 6 through July 6, 2007		06/06/07 - 07/06/07		
Draft SAR Version 1 (3)				
INT-001 (1)   INT-004 (2)				
To download a file click on	the file using your right	t mouse button, then save it	t to your computer in a dire	ctory of your choice.
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.

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# 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	<b>SAR Type</b> (Check a box for each one that applies.)	
Name Louise McCarren, WECC		New Standard
Primary Contact Louise McCarren	$\square$	Revision to existing Standard
Telephone (801) 582-0353 Fax (801) 582-3918		Withdrawal of existing Standard
E-mail louise@wecc.biz	$\boxtimes$	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</u> <u>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 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

Appl	icak	ble Reliability Principles (Check box for all that apply.)		
	1.	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.		
	2.	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.		
	3.	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.		
	4.	Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.		
	5.	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.		
	6.	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.		
		e proposed Standard comply with all of the following Market Interface es? (Select 'yes' or 'no' from the drop-down box.)		
		ability standard shall not give any market participant an unfair competitive ntage. Yes		
2. A	2. A reliability standard shall neither mandate nor prohibit any specific market structure. Yes			
		ability standard shall not preclude market solutions to achieving compliance with that lard. 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	

## A. Introduction

- 1. Title: Interchange Information
- **2. Number:** INT-001-2<u>3</u>

### 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 noncompliance.

### 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.

- **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.**<u>WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver effective on</u> November 21, 2002.

**<u>2.1. MISO Energy Flow Information Waiver</u> 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-<u>12</u>
- **3. 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  $\pm 25$  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

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</u> 21, 2002.<u>None</u>

### Version History

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



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</u> <u>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: <u>bp-interpret\_bal-001\_in@nerc.com</u>

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,

Maareen E. Long

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

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### **Reliability Standards**

User Name	<b></b>												
	Ballot Results												
Password	Ballot	<u> </u>	SAR for Removal of WECC Waiver from INT-001 and INT- 004_rb										
	Ballot	<b>d:</b> 7/2	7/20/2007 - 8/9/2007										
Log in	Ballo	e: re-l	ballot										
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Register	Total Ball	<b>bl:</b> 111											
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Reliability Standards Home Announcements BOT Approved Standards	Weighted Segment Vote:												
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Ballot Pools													
Current Ballots	Summary of Ballot Results												
Ballot Results Registered Ballot Body					Affirma		ative Ne		Negative		Abstain		
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	2 - Segment	2.	6	0.5		5	0.5	5	0		0	0	1
	3 - Segment	3.	25	1	-	18	0.94	7	1	0.0	053	3	3
	4 - Segment 4.		4	0.4		4	0.4	4	0		0	0	0
	5 - Segment 5.		19	1		14		1	0		0	4	1
	6 - Segment 6.		14 1	0.9		9 1	0.0	+	0		0	3 0	2 0
	7 - Segment 7. 8 - Segment 8.		3	0.1		3	0.	_	0		0	0	0
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	AEP Service C			Corp Transmission			Scott P. Moore			Ab	stain		
	System AEP												
				vices Company blic Power Association			Kirit S Shah E. Nick Henery			Affirmative			
		ta Corp					Scott Kinney		Affirmative Affirmative				
				ower Administration			Donald S. Watkins			-	mative		
			sne Light Co.				Bob McClelland						
	1         Florida Keys Electric Coop           1         Assoc.				perative								
	1 Hydro One Ne			etworks, Inc.			Ajay Garg			Ab	stain		
	1 Idah	o Powe	er Com	Company		R	Ronald D. Schellberg			Affirmative			
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https://standards.nerc.net/BallotResults.aspx?BallotGUID=cec32ac3-4000-4e41-8a4a-f561... 8/13/2007

1	Kansas City Power & Light Co.	Jim Useldinger	Affirmative	
1	Keyspan LIPA	Richard J. Bolbrock	Affirmative	
1	Lincoln Electric System	Doug Bantam		
1	Municipal Electric Authority of Georgia	Jerry J Tang	Affirmative	
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		
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Robert Williams	Affirmative	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PP&L, Inc.	Ray Mammarella	Affirmative	
1	Sacramento Municipal Utility District		Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	Seattle City Light		Affirmative	
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen	Affirmative	
1		Williamson	A FEirman a thur	
1	Southwest Transmission Coop., Inc.		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	View
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	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
3	Alabama Power Company	Robin Hurst	Affirmative	
3	Arizona Public Service Co.	Thomas R. Glock	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	Avista Corp.	Robert Lafferty	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl		
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	
3	Hydro One Networks, Inc.	Michael D. Penstone	Abstain	
3	-	Bruce Merrill	Abstain	
3	Lincoln Electric System Louisville Gas and Electric Co.	Charles A. Freibert	ANSIGIII	
			Affirmative	
3	Mississippi Power New York Power Authority	Don Horsley Christopher Lawrence	Affirmative Abstain	
		de Graffenried		
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	Negative	View
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson	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	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Abstain	View
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	
5	Entegra Power Group, LLC	Kenneth Parker	Affirmative	
5	Florida Municipal Power Agency	Douglas Keegan	Affirmative	
5	Lincoln Electric System	Dennis Florom	Abstain	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Reliant Energy Services	Thomas J. Bradish	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	
5 5	Seminole Electric Cooperative, Inc.	Brenda K Atkins	Abstain	Viev
5 5	Southern Company Services, Inc.	Roger D. Green	Affirmative	VIEV
5 5	Tampa Electric Co.	Bill Smotherman	Anninative	
5		Linda Horn	Affirmative	
-	Wisconsin Electric Power Co.			
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	0.1	
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	Viev
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	
		i	t	
10	New York State Reliability Council	Alan Adamson	Affirmative	

10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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## 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:	<b>Comment:</b> The necessary tools and procedures are not in place in the Western Interconnection to ensure compliance without the waiver.						
in the Western Ir implementation of required to be e- prior to our curre Correction (ATEC ATEC standard is criteria, and as s Segment:	<b>Response</b> : 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						
	AEP Service Corp. Brock Ondayko						
	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	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.						
Response: Agre	ed.						



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 <u>ballot</u> 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

> 116-390 Village Boulevard, Princeton, New Jersey 08540-5721 Phone: 609.452.8060 • Fax: 609.452.9550 • www.nerc.com



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 <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. 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 <u>ballot</u> 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. (<u>Detailed Ballot Results</u>)

Quorum: 78.57 % Approval: 99.17%

> 116-390 Village Boulevard, Princeton, New Jersey 08540-5721 Phone: 609.452.8060 • Fax: 609.452.9550 • www.nerc.com

## **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 Regions | Committees | Meetings | Search | Site Map | Contact Us



#### **Reliability Standards**

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Idaho Power Company

1

Ronald D. Schellberg

Affirmative

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	
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	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative
1	PP&L, Inc.	Ray Mammarella	Abstain
1	Sacramento Municipal Utility District	Dilip Mahendra	Affirmative
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	Seattle City Light		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.		Affirmative
1 1	Southwest Transmission Coop., Inc.		
	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		· · · · ·	
ა	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
3	Hydro One Networks, Inc.	Michael D. Penstone	
3	Lincoln Electric System	Bruce Merrill	Abstain
3	Louisville Gas and Electric Co.	Charles A. Freibert	Abstain
3	Mississippi Power	Don Horsley	Affirmative
3	New York Power Authority	Christopher Lawrence de Graffenried	Abstain
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
3	San Diego Gas & Electric	Scott Peterson	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	Florida Municipal Power Agency	Douglas Keegan	Affirmative
5	Lincoln Electric System	Dennis Florom	Abstain
5	PPL Generation LLC	Mark A. Heimbach	Affirmative
5	Reliant Energy Services	Thomas J. Bradish	Affirmative
5	Salt River Project	Glen Reeves	
5	Seattle City Light	Michael J. Haynes	Affirmative
5	Seminole Electric Cooperative, Inc.	Brenda K Atkins	
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	Affirmative
6	Black Hills Power	Larry Williamson	Affirmative
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
6	Salt River Project	Mike Hummel	
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
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative
7	Eastman Chemical Company	Lloyd Webb	
, 8	JDRJC Associates	Jim D. Cyrulewski	Affirmative
8	North Carolina Utilities Commission Public Staff	Jack Floyd	Affirmative
8	Prague Power, LLC	William Lohrman	Affirmative
		William Mitchell	
9	California Energy Commission	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

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

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#### 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 noncompliance.

#### 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.

- **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. <u>MISO Energy Flow Information Waiver</u> effective on July 16, 2003.

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

- 1. Title: Dynamic Interchange Transaction Modifications
- **2. Number:** INT-004-2
- **3. 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  $\pm 10\%$ .
  - **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  $\pm 25$  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**

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	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

- 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 noncompliance 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<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

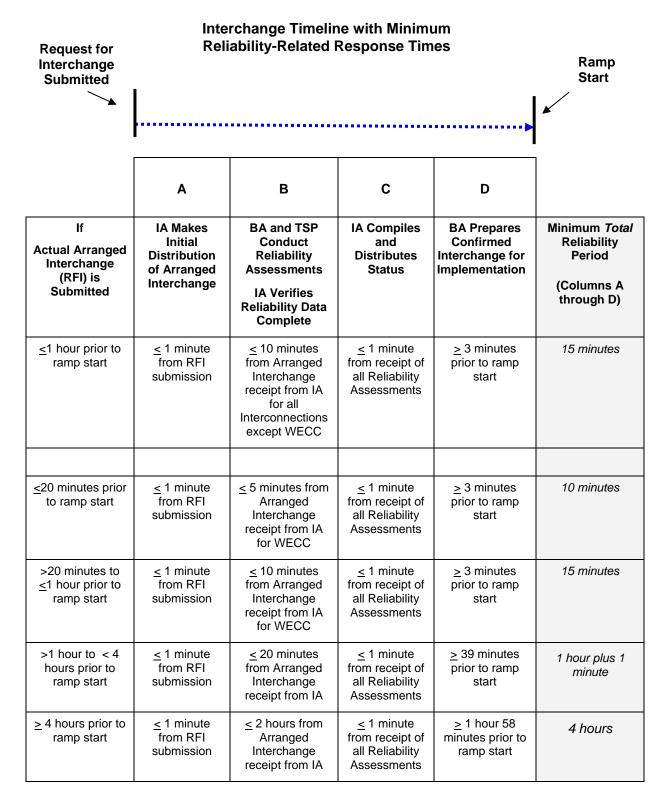
## E. Regional Differences

None

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

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

#### **Timing Table**



- 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

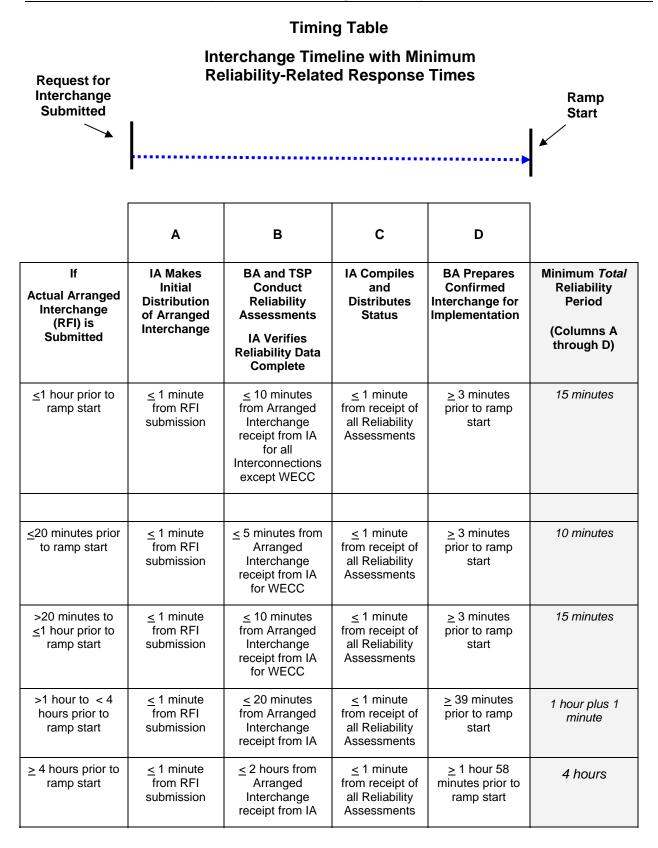
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

## E. Regional Differences

None.

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



- 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 noncompliance 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

## E. Regional Differences

None.

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

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times				Ramp Start
	А	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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	<u>&lt;</u> 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

## **Timing Table**

# 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

#### <u>Status</u>

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				
1111-000-2				
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 choice.	save it to your computer	in a directory of your
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.

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- 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<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

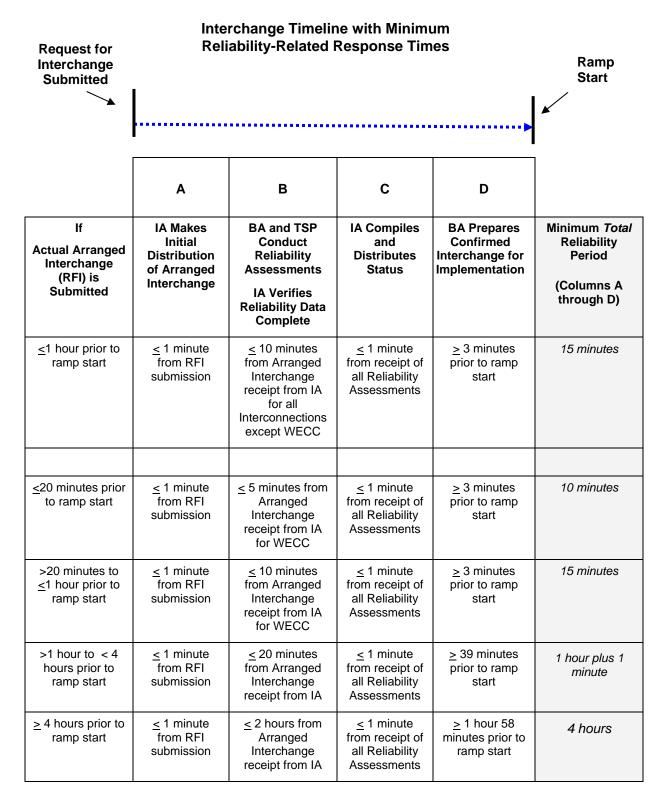
#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

#### **Timing Table**



- 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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

- 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

#### E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
	Α	В	С	D	
lf 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	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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 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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

#### **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

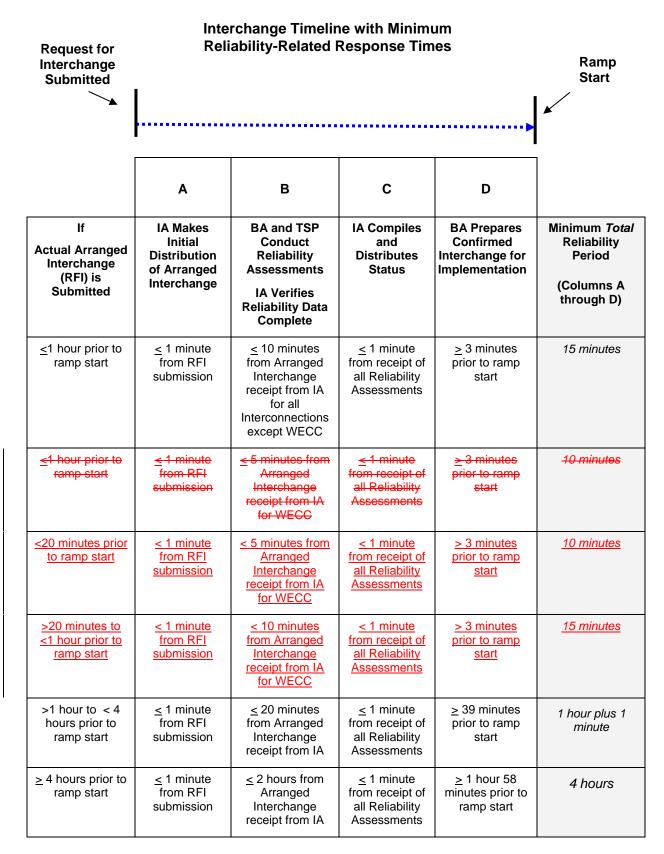
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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-<u>12</u>
- **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 Effective Date: 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

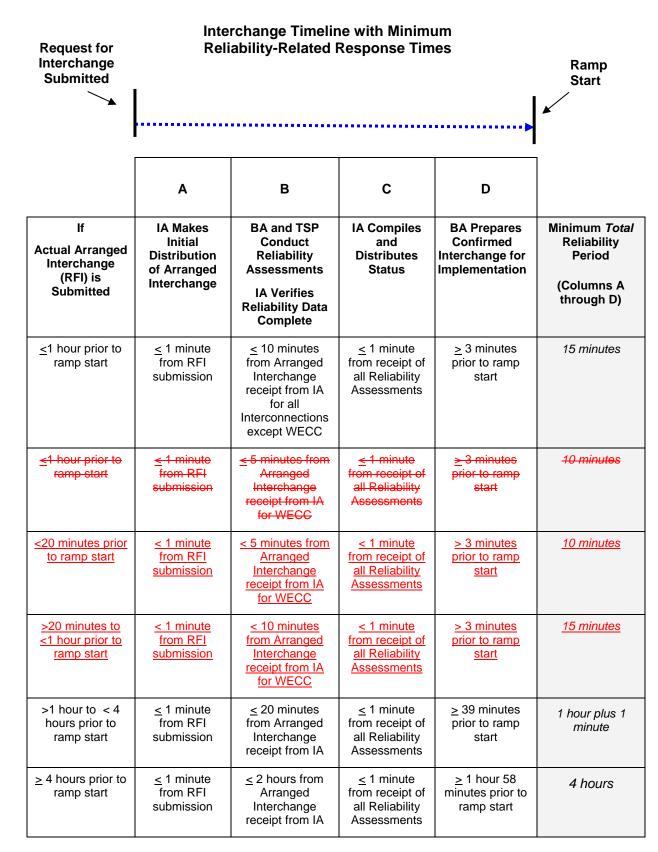
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

#### E. Regional Differences

None

Version	Date	Action	Change Tracking



- 1. Title: Interchange Authority Distributes Status
- 2. Number: INT-008-<u>12</u>
- **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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

#### **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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

#### E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

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

Version	Date	Action	Change Tracking

Request for Interchange Submitted				Ramp Start	
lf	A IA Makes	B BA and TSP	C IA Compiles	D BA Prepares	Minimum <i>Total</i>
Actual Arranged Interchange (RFI) is Submitted	Initial Distribution of Arranged Interchange	Conduct Reliability Assessments IA Verifies Reliability Data Complete	and Distributes Status	Confirmed Interchange for Implementation	Reliability Period (Columns A through D)
<u>≤</u> 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
<u>&lt;1 hour prior to</u> ramp start	<u> </u>	<u>&lt;5 minutes from</u> Arranged Interchange receipt from IA for WECC	<u>4 minute</u> from receipt of all Reliability Assessments	<u>≻ 3 minutes</u> prior to ramp start	<del>10 minutes</del>
<20 minutes prior to ramp start	< <u>1 minute</u> from RFI submission	< 5 minutes from <u>Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< 1 minute from receipt of all Reliability Assessments	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>10 minutes</u>
>20 minutes to <1 hour prior to ramp start	<u>&lt; 1 minute</u> <u>from RFI</u> <u>submission</u>	< <u>10 minutes</u> <u>from Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< <u>1 minute</u> from receipt of <u>all Reliability</u> <u>Assessments</u>	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>15 minutes</u>
>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 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		<b>SAR Type</b> ( <i>Check a box for each one that applies.</i> )	
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 Fax	206-706-0165 206-706-0183		Withdrawal of existing Standard
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.)

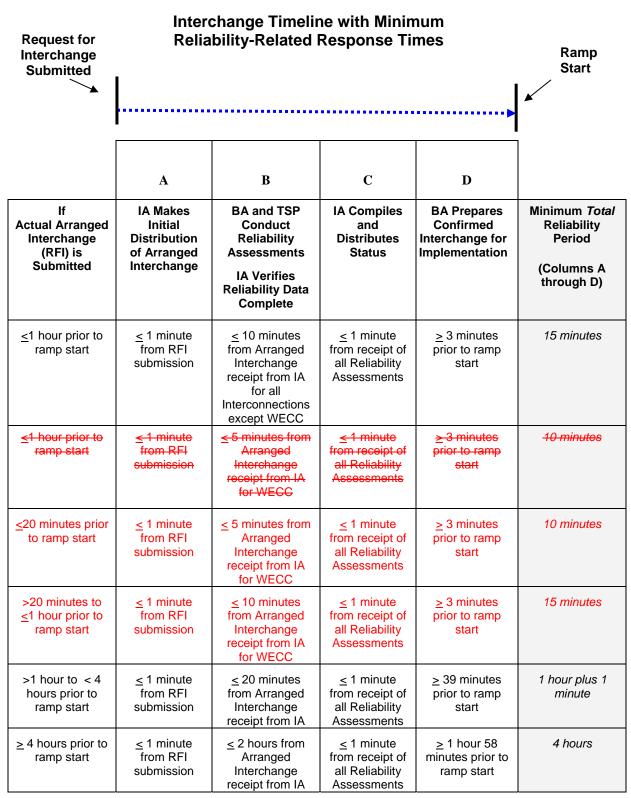
The WECC members on the Coordinate Interchange Drafting Team focused on minimizing changes from existing business practices when they put the timing tables together for WECC. The new coordinate interchange timing table (INT-005,006,008-001), in row 2, contains a 5 minute assessment period for WECC only, 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.



The	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.			

#### Reliability Functions

Load-Serving Entity Secures energy and transmission (and relate services) to serve the end user.	ed generation
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#### Reliability and Market Interface Principles

Applicable Reliability Principles (Check box for all that apply.)						
$\boxtimes$	<ol> <li>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.</li> </ol>					
	2. 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.					
	<ol> <li>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.</li> </ol>					
	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.					
	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.					
	<ol> <li>Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.</li> </ol>					
	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.					
	s the proposed Standard comply with all the following Market Interface ciples? (Select "yes" or "no" from the drop-down box.)					
<ol> <li>The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes</li> </ol>						
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						
	<ol> <li>An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes</li> </ol>					
ii	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 <u>Implementation Plan</u>. 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</u> <u>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.

116-390 Village Boulevard, Princeton, New Jersey 08540-5721 Phone: 609.452.8060 • Fax: 609.452.9550 • www.nerc.com 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

- 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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

#### **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

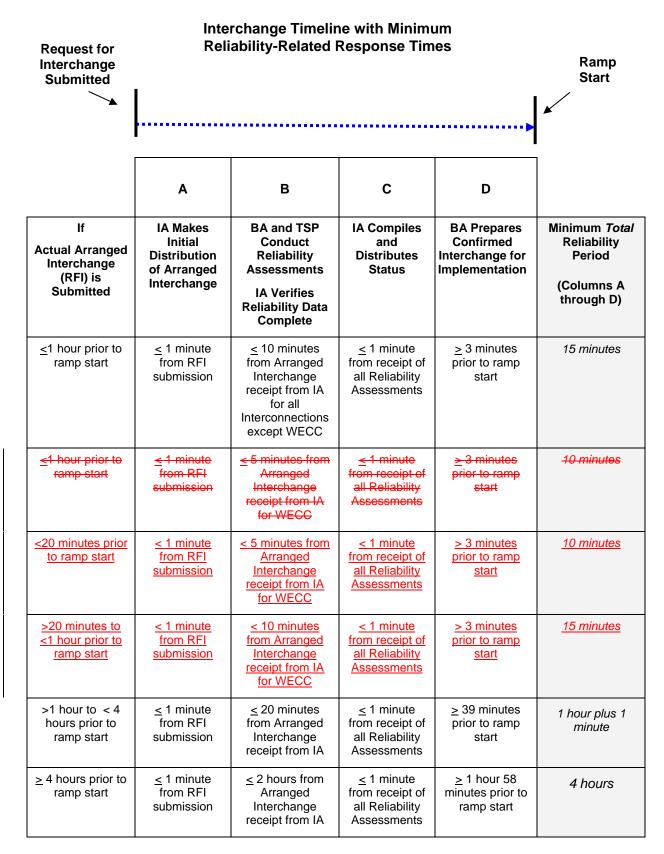
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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-<u>12</u>
- **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 Effective Date: 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

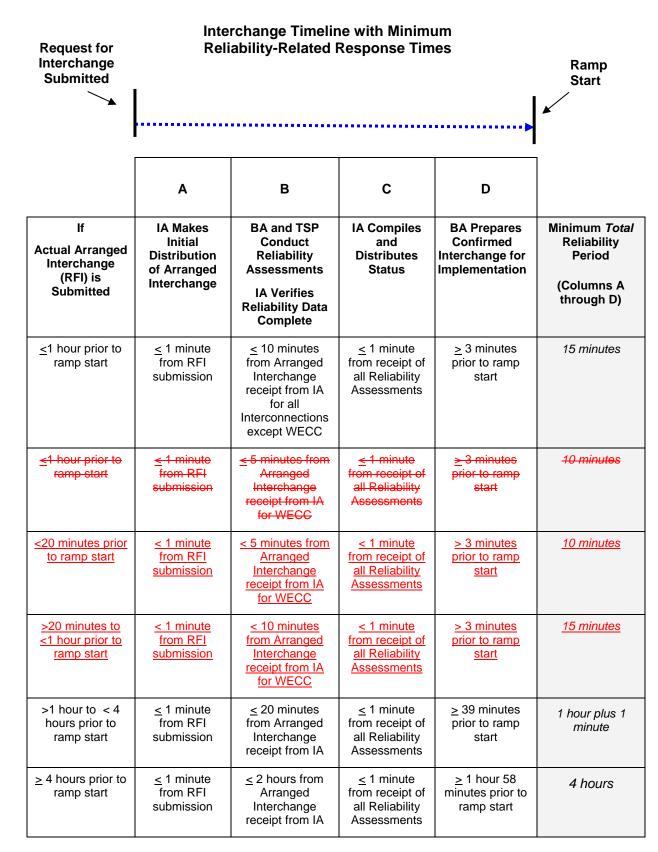
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

#### E. Regional Differences

None

Version	Date	Action	Change Tracking



- 1. Title: Interchange Authority Distributes Status
- 2. Number: INT-008-<u>12</u>
- **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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

#### **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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

#### E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

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

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
lf	A IA Makes	B BA and TSP	C IA Compiles	D BA Prepares	Minimum <i>Total</i>
Actual Arranged Interchange (RFI) is Submitted	Initial Distribution of Arranged Interchange	Conduct Reliability Assessments IA Verifies Reliability Data Complete	and Distributes Status	Confirmed Interchange for Implementation	Reliability Period (Columns A through D)
<u>≤</u> 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
<u>&lt;1 hour prior to</u> ramp start	<u> </u>	<u>&lt; 5 minutes from</u> Arranged Interchange receipt from IA for WECC	<u>4 minute</u> from receipt of all Reliability Assessments	<u>≻ 3 minutes</u> prior to ramp start	<del>10 minutes</del>
<20 minutes prior to ramp start	< <u>1 minute</u> from RFI submission	< 5 minutes from <u>Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< 1 minute from receipt of all Reliability Assessments	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>10 minutes</u>
>20 minutes to <1 hour prior to ramp start	<u>&lt; 1 minute</u> <u>from RFI</u> <u>submission</u>	< <u>10 minutes</u> <u>from Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< <u>1 minute</u> from receipt of <u>all Reliability</u> <u>Assessments</u>	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>15 minutes</u>
>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 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

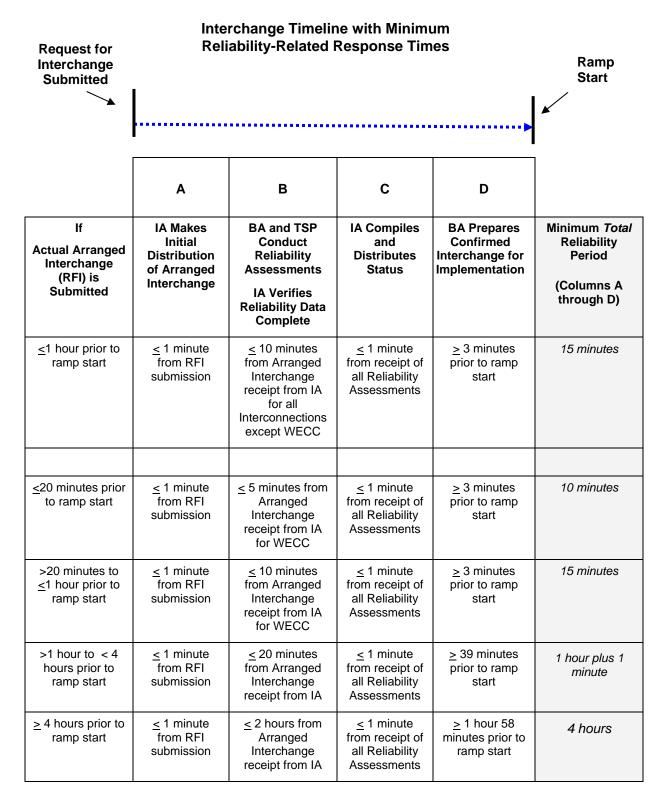
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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

- 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

#### E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
	Α	В	С	D	
lf 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	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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 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		<b>SAR Type</b> (Check a box for each one that applies.)	
Name Louise McCarren, WECC		New Standard	
Primary Contact Louise McCarren	$\square$	Revision to existing Standard	
Telephone (801) 582-0353 Fax (801) 582-3918		Withdrawal of existing Standard	
E-mail louise@wecc.biz	$\boxtimes$	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</u> <u>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)

ard will Apply t	o 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

Appl	icak	ble Reliability Principles (Check box for all that apply.)			
	1.	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.			
	2.	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.			
	3.	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.			
	4.	Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.			
	5.	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.			
	6.	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.			
		e proposed Standard comply with all of the following Market Interface es? (Select 'yes' or 'no' from the drop-down box.)			
		ability standard shall not give any market participant an unfair competitive ntage. Yes			
2. A	2. 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	nforr	ability standard shall not require the public disclosure of commercially sensitive nation. All market participants shall have equal opportunity to access commercially 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</u> <u>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: <u>bp-interpret\_bal-001\_in@nerc.com</u>

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,

Maareen E. Long

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

> 116-390 Village Boulevard, Princeton, New Jersey 08540-5721 Phone: 609.452.8060 • Fax: 609.452.9550 • www.nerc.com



# **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 Segmen	Segment	t Affirmative		Negative		Abstain	No
Segment	Pool	Weight	# Votes	Fraction	# Votes	Fraction	#	Vote
1 - Segment 1.	67	7 1	44	0.978	1	0.022	11	11
2 - Segment 2.	q	0.8	8	0.8	0	0	1	0
3 - Segment 3.	48	3 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 1	17	0.944	1	0.056	6	7
6 - Segment 6.	23	3 1	13	1	0	0	6	4
7 - Segment 7.		0.2	2	0.2	0	0	0	0
8 - Segment 8.	4	4 0.4	4	0.4	0	0	0	0
9 - Segment 9.		0.7	6	0.6	1	0.1	0	0
10 - Segment 10.		0.6	6	0.6	0	0	1	0
Totals	208	3 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	Affirmative				
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
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative
1	Idaho Power Company	Ronald D. Schellberg	Affirmative
1	ITC Transmission	Brian F. Thumm	Affirmative
1	JEA	Ted E. Hobson	Affirmative
1	Kansas City Power & Light Co.	Jim Useldinger	Affirmative
1	Keyspan LIPA	Richard J. Bolbrock	Affirmative
1	LG&E Energy Transmission Services	Bradley Young	
1	Lincoln Electric System	Doug Bantam	
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
	New Brunswick Power Transmission Corporation	Wayne N. Snowdon	Affirmative
1	· · ·		
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 1

1Tenne1Tri-St1Westa1Xcel E2Albert2British2Califo2Indep2ISO N2INGW2New F2New F2New N2PJM II3Alaba3Allegh3Allegh3Allegh3Allegh3City P3City P3Cleco3Consu3Consu3Consu3Domin3Florid3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3Manit	ba Electric Co. essee Valley Authority tate G & T Association Inc. ar Energy Energy, Inc. ta Electric System Operator h Columbia Transmission Corporation ornia ISO bendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ama Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Paul Michael DavisLarry G. AkensBruce A SembrickAllen KlassenGregory L. PieperAnita LeePhil ParkDavid HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. GlockJames V. Petrella	Affirmative	<u>View</u>
1Tri-St1Westa1Xcel E2Albert2Britisl2Califo2Indep2ISO N2ISO N2New E2New F2PJM H3Alaba3Allegh3Atlant3Allegh3Atlant3City o3City o3City o3Const3Const3Domin3Domin3Florid3Florid3Florid3Florid3Florid3Stissin3Lincol3Lincol3Manit3Manit3Manit	tate G & T Association Inc. ar Energy Energy, Inc. ta Electric System Operator h Columbia Transmission Corporation ornia ISO bendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ama Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Bruce A SembrickAllen KlassenGregory L. PieperAnita LeePhil ParkDavid HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	AbstainAffirmative	
1Westa1Xcel E2Albert2British2Califo2Indep2ISO N2ISO N2New E2New Y2PJM H3Alaba3Alegh3Alaba3Alegh3Alaba3Alegh3Alegh3Alegh3City C3City C3City C3Const3Const3Const3Domin3Const3Florid3Florid3Florid3Florid3Florid3JEA3Lincol3Louisy3Manit3Manit	ar Energy Energy, Inc. ta Electric System Operator h Columbia Transmission Corporation ornia ISO pendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ma Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Allen KlassenGregory L. PieperAnita LeePhil ParkDavid HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	Affirmative	
1Xcel E2Albert2Britisl2Califo2Indep2ISO N2Midwe2New F2New N2PJM In3Alaba3Allegh3Allegh3Allegh3Alista3Blue F3City C3City P3City P3Const3Const3Domin3Domin3Florid3Florid3Florid3Florid3Stissin3Lincol3Lincol3Manit3Manit	Energy, Inc. ta Electric System Operator h Columbia Transmission Corporation ornia ISO bendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. Ima Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Gregory L. Pieper Anita Lee Phil Park David Hawkins Don Tench Kathleen Goodman Terry Bilke Alden Briggs Gregory Campoli Tom Bowe Robin Hurst Bob Reeping Thomas R. Glock	Affirmative	
2Albert2Britisl2Califo2Indep2ISO N2Midwa2New F2New Y2PJM H3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3City o3City o3City o3Cleco3Consu3Dolma3Domin3Domin3FirstE3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3Maitr	ta Electric System Operator h Columbia Transmission Corporation ornia ISO bendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ama Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Anita LeePhil ParkDavid HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	AffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmative	View
2Britisl2Califo2Indep2ISO N2New F2New N2PJM H3Alaba3Allegh3Allegh3Atlant3Atlant3Blue F3City o3City o3City o3Const3Const3Domin3Domin3Florid3Florid3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3Manit	h Columbia Transmission Corporation prnia ISO pendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ma Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Phil ParkDavid HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	AffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmative	View
2Califo2Indep2ISO N2Midwa2New F2New Y2PJM H3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Cleco3City P3Cleco3Const3Const3Const3Domin3Domin3Florid3Florid3Florid3Florid3JEA3Lincol3Louisy3Manit3Manit	ornia ISO pendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ma Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	David HawkinsDon TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	AffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAbstainAffirmativeAffirmativeAffirmative	View
2Indep2ISO N2Midwe2New N2PJM II3Alaba3Alaba3Alaba3Alaba3Alaba3Aliegh3Aliegh3Aliegh3Aliegh3Aliegh3Aliegh3Aliegh3City D3City D3City D3Const3Const3Domin3Domin3Domin3Florid3Florid3Florid3Florid3JEA3Lincol3Manit3Manit3MidAr	bendent Electricity System Operator New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator Interconnection, L.L.C. Ima Power Company heny Power Ina Public Service Co. tic City Electric Company a Corp.	Don TenchKathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	AffirmativeAffirmativeAffirmativeAffirmativeAffirmativeAbstainAffirmativeAffirmativeAffirmative	View
2ISO N2Midwa2New F2New Y2PJM F3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Alaba3Arizor3Arizor3City C3City C3Cleco3Const3Const3Delma3Domin3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3MidAr	New England, Inc. est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. Ima Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Kathleen GoodmanTerry BilkeAlden BriggsGregory CampoliTom BoweRobin HurstBob ReepingThomas R. Glock	Affirmative Affirmative Affirmative Abstain Affirmative Affirmative	View
2Midwe2New F2New Y2PJM H3Alaba3Allegh3Alaba3Allegh3Arizor3Atlant3Atlant3Atlant3Atlant3Atlant3Atlant3Atlant3City o3City o3City o3Const3Const3Const3Domin3Domin3Domin3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3MidAr	est ISO, Inc. Brunswick System Operator York Independent System Operator nterconnection, L.L.C. ama Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Terry Bilke Alden Briggs Gregory Campoli Tom Bowe Robin Hurst Bob Reeping Thomas R. Glock	Affirmative Affirmative Abstain Affirmative Affirmative	View
2New F2New Y2PJM II3Alaba3Alaba3Aliegh3Arizor3Allegh3Arizor3Atlant3Avista3Blue F3Bonne3City C3City F3Cleco3Const3Const3Const3Delma3Doniid3Florid3Florid3Florid3Florid3Georg3JEA3Lincol3Louisv3Manit3Manit	Brunswick System Operator York Independent System Operator nterconnection, L.L.C. Ima Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Alden Briggs Gregory Campoli Tom Bowe Robin Hurst Bob Reeping Thomas R. Glock	Affirmative Abstain Affirmative Affirmative	<u>view</u>
2New2PJM II3Alaba3Allegh3Allegh3Arizor3Atlant3Avista3Blue F3Blue F3City C3City C3City C3Cleco3Const3Const3Const3Delma3Domin3FirstE3Florid3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3Manit	York Independent System Operator nterconnection, L.L.C. ma Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Gregory Campoli Tom Bowe Robin Hurst Bob Reeping Thomas R. Glock	AbstainAffirmativeAffirmative	
2PJM II3Alaba3Allegh3Arizor3Arizor3Arizor3Atlant3Avista3Blue I3Avista3Blue I3City o3City o3Cleco3Const3Const3Const3Domin3Domin3Domin3FirstE3Florid3Florid3Florid3Florid3JEA3Lincol3Louisv3Manit3MidAr	nterconnection, L.L.C. ama Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Tom Bowe Robin Hurst Bob Reeping Thomas R. Glock	Affirmative Affirmative	
3Alaba3Allegh3Arizor3Atlant3Atlant3Avista3Blue f3Bonne3City c3City c3City c3City c3City c3City c3Const3Const3Const3Domin3Domin3Domin3Florid3Florid3Florid3Florid3Georg3JEA3Lincol3Louisv3Manit3MidAr	ima Power Company heny Power na Public Service Co. tic City Electric Company a Corp.	Robin Hurst Bob Reeping Thomas R. Glock	Affirmative	
3Allegh3Arizor3Atlant3Atlant3Avista3Blue f3Blue f3Blue f3City f3City f3City f3City f3Const3Const3Const3Domin3Domin3Domin3Florid3Florid3Florid3Georg3Gulf f3JEA3Lincol3Louisv3Manit3MidAr	heny Power na Public Service Co. tic City Electric Company a Corp.	Bob Reeping Thomas R. Glock		
3Arizor3Atlant3Avista3Blue f3Blue f3City c3City f3City f3City f3Cleco3Const3Const3Const3Delma3Domin3Delma3FirstE3Florid3Florid3Florid3Georg3JEA3Lincol3Louisv3Manit3MidAr	na Public Service Co. tic City Electric Company a Corp.	Thomas R. Glock		
3Atlant3Avista3Blue I3Blue I3City c3City P3Cleco3Cleco3Const3Const3Const3Delma3Domin3Domin3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3Lincol3Louisv3Manit3MidAr	tic City Electric Company a Corp.		Affirmative	
3Avista3Blue F3Bonne3City c3City f3Cleco3Const3Const3Const3Delma3Domin3Domin3Domin3Florid3Florid3Florid3Florid3Georg3JEA3Lincol3Louisv3Manit3MidAr	a Corp.	Hamos V. Dotrolla	Affirmative	
3Blue I3Bonne3City C3City P3Cleco3Const3Const3Const3Delma3Domin3Domin3Domin3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3Lincol3Louisv3Manit3MidAr			Affirmative	
3Bonne3City c3City F3Cleco3Const3Const3Const3Delma3Domin3Domin3Domin3FirstE3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr		Robert Lafferty	Affirmative	
3City of3City P3Cleco3Const3Const3Const3Delma3Delma3Delma3Domin3FirstE3Florid3Florid3Florid3Georg3Glif P3JEA3Lincol3Louisv3Manit3MidAr	Ridge Power Agency	Duane S. Dahlquist	Affirmative	
3City F3Cleco3Comm3Const3Const3Delma3Domin3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	eville Power Administration	Rebecca Berdahl	Affirmative	
3Cleco3Comn3Const3Const3Delma3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3JEA3Lincol3Louisv3Manit3Manit	of Tallahassee	Rusty S. Foster		
3Comm3Const3Const3Delma3Delma3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	Public Service of San Antonio	Edwin Les Barrow	Affirmative	
3Const3Consu3Delma3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	Utility Group	Bryan Y Harper	Abstain	
3Consulation3Delma3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	nonwealth Edison Co.	Stephen Lesniak		
3Delma3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	tellation Energy	Carolyn Ingersoll	Affirmative	
3Domin3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Lincol3Louisv3Manit3MidAr	umers Energy Co.	David A. Lapinski	Affirmative	
3Duke3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisy3Manit	arva Power & Light Co.	Michael R. Mayer	Affirmative	
3FirstE3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	nion Resources, Inc.	Jalal (John) Babik	Affirmative	
3Florid3Florid3Florid3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	Energy	Henry Ernst-Jr	Abstain	
3Florid3Florid3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	Energy Solutions	Joanne Kathleen Borrell	Affirmative	
3Florid3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisy3Manit3MidAr	la Municipal Power Agency	Michael Alexander	Abstain	
3Georg3Gulf F3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	la Power & Light Co.	W.R. Schoneck	Abstain	
3Gulf F3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	la Power Corporation	Lee Schuster		
3Hydro3JEA3Kissin3Lincol3Louisv3Manit3MidAr	gia Power Company	Leslie Sibert	Affirmative	
3JEA3Kissin3Lincol3Louisv3Manit3MidAr	Power Company	William F. Pope	Affirmative	
3Kissin3Lincol3Louisv3Manit3MidAr	o One Networks, Inc.	Michael D. Penstone	Affirmative	
3Lincol3Louisv3Manit3MidAr		Garry Baker	Affirmative	
3 Louisv 3 Manit 3 MidAr	nmee Utility Authority	Gregory David Woessner		
3 Manit 3 MidAr	In Electric System	Bruce Merrill	Abstain	
3 MidAr	ville Gas and Electric Co.	Charles A. Freibert		
	toba Hydro	Ronald Dacombe	Affirmative	
	merican Energy Co.	Thomas C. Mielnik	Abstain	
3 Missis	ssippi Power	Don Horsley	Affirmative	
		Christopher Lawrence de Graffenried	Affirmative	<u>View</u>
-	York Power Authority	Michael Schiavone	Affirmative	
	ara Mohawk (National Grid Company)	William SeDoris	Affirmative	
	ara Mohawk (National Grid Company) nern Indiana Public Service Co.	Gary Clear	Negative	
	ara Mohawk (National Grid Company) nern Indiana Public Service Co. noma Gas and Electric Co.		Abstain	
3 Platte 3 Poton	ara Mohawk (National Grid Company) nern Indiana Public Service Co. noma Gas and Electric Co. ndo Utilities Commission	Ballard Keith Mutters 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	Seminole Electric Cooperative, Inc.	Steven R. Wallace	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	Ammative
			Affirmenting
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	
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	
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.	Trudy S. Novak	Abstain
6	South Carolina Electric & Gas Co.	Matt Hammond	Affirmative
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
<del>9</del> 10	Electric Reliability Council of Texas, Inc.	Sam R. Jones	Affirmative
10	Florida Reliability Coordinating Council	Linda Campbell	Affirmative
10	Midwest Reliability Organization		Abstain
		Larry Brusseau	
10	New York State Reliability Council	Alan Adamson	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

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

Voter	Entity	Comment
Allen	Westar Energy	
Klassen		WECC only
Response: The	e changes made to the tir	ming 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.
		reliability-related justification for this Urgent Action – the error in the existing timing table does not cient time to conduct a reliability analysis of the Arranged Interchange.
Christopher	New York Power	
Lawrence de	Authority	
Graffenried		CP-9 agrees with this SAR
Response: The	e requestor thanks you fo	r your support.

- 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

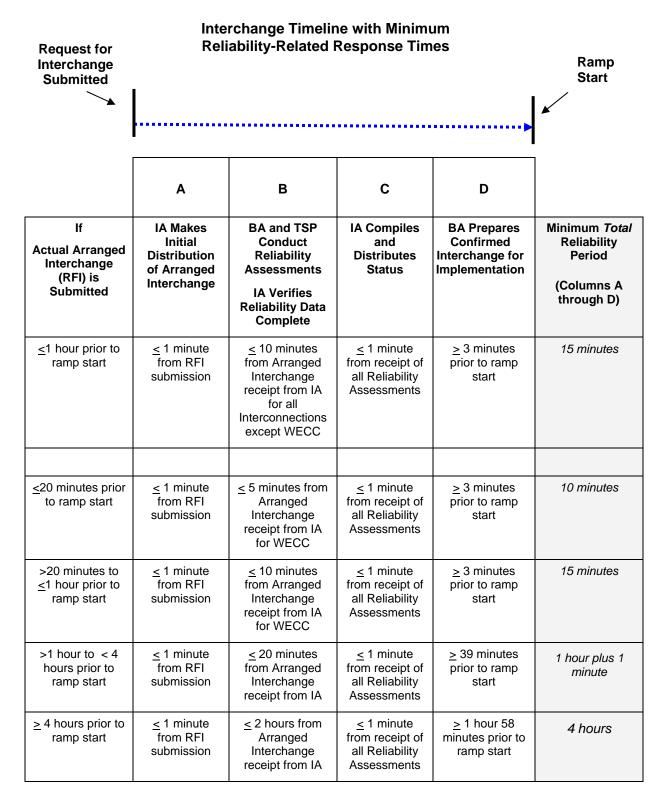
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

## E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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

- 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

## E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
	Α	В	С	D	
lf 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	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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 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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

## **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

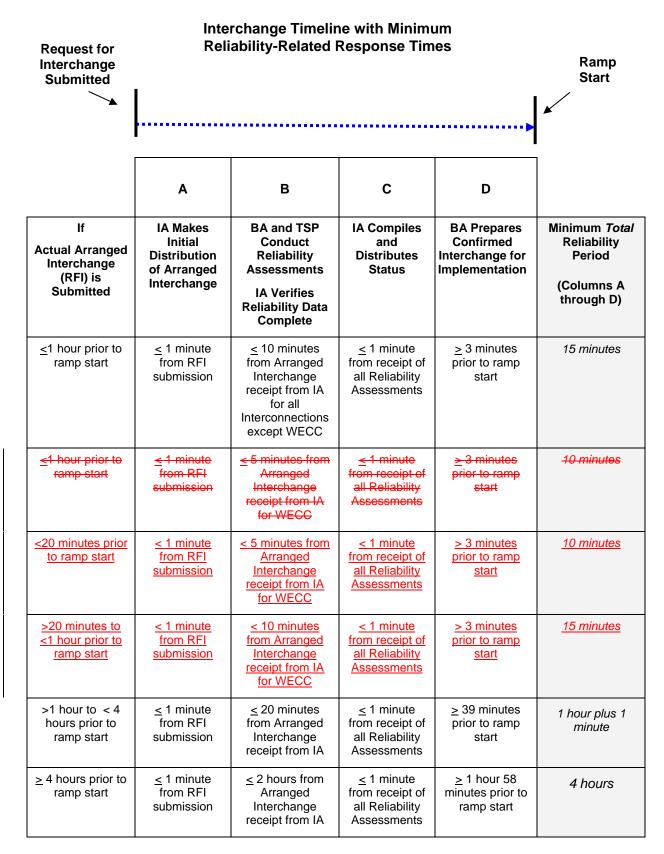
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

## E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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-<u>12</u>
- **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 Effective Date: 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

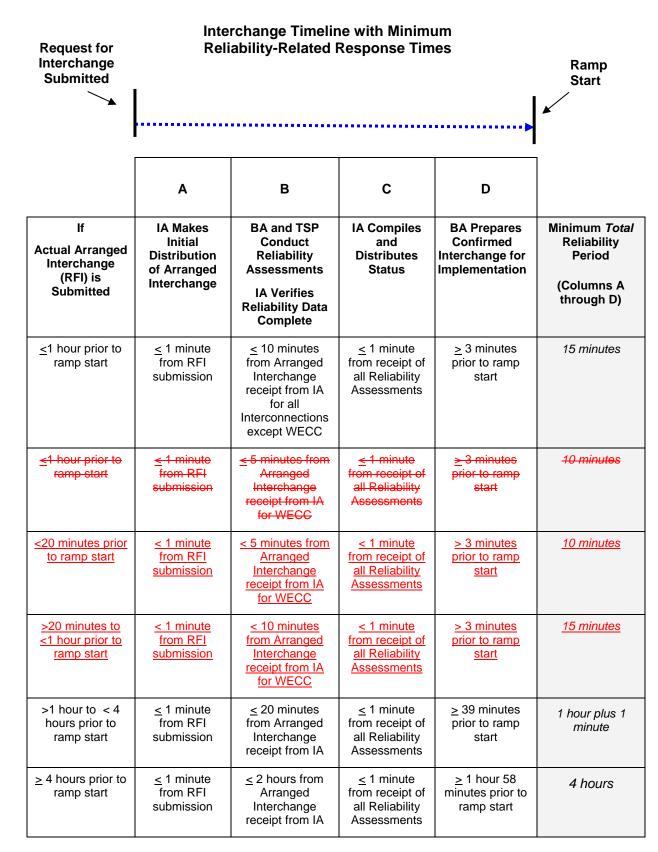
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

## E. Regional Differences

None

Version	Date	Action	Change Tracking



- 1. Title: Interchange Authority Distributes Status
- 2. Number: INT-008-<u>12</u>
- **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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

## **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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

## E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

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

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
lf	A IA Makes	B BA and TSP	C IA Compiles	D BA Prepares	Minimum <i>Total</i>
Actual Arranged Interchange (RFI) is Submitted	Initial Distribution of Arranged Interchange	Conduct Reliability Assessments IA Verifies Reliability Data Complete	and Distributes Status	Confirmed Interchange for Implementation	Reliability Period (Columns A through D)
<u>≤</u> 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
<u>&lt;1 hour prior to</u> ramp start	<u> </u>	<u>&lt; 5 minutes from</u> Arranged Interchange receipt from IA for WECC	<u>4 minute</u> from receipt of all Reliability Assessments	<u>≻ 3 minutes</u> prior to ramp start	<del>10 minutes</del>
<20 minutes prior to ramp start	< <u>1 minute</u> from RFI submission	< 5 minutes from <u>Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< 1 minute from receipt of all Reliability Assessments	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>10 minutes</u>
>20 minutes to <1 hour prior to ramp start	<u>&lt; 1 minute</u> <u>from RFI</u> <u>submission</u>	< <u>10 minutes</u> <u>from Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< <u>1 minute</u> from receipt of <u>all Reliability</u> <u>Assessments</u>	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>15 minutes</u>
>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



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.

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,

Maareen E. Long

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

- 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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

## **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

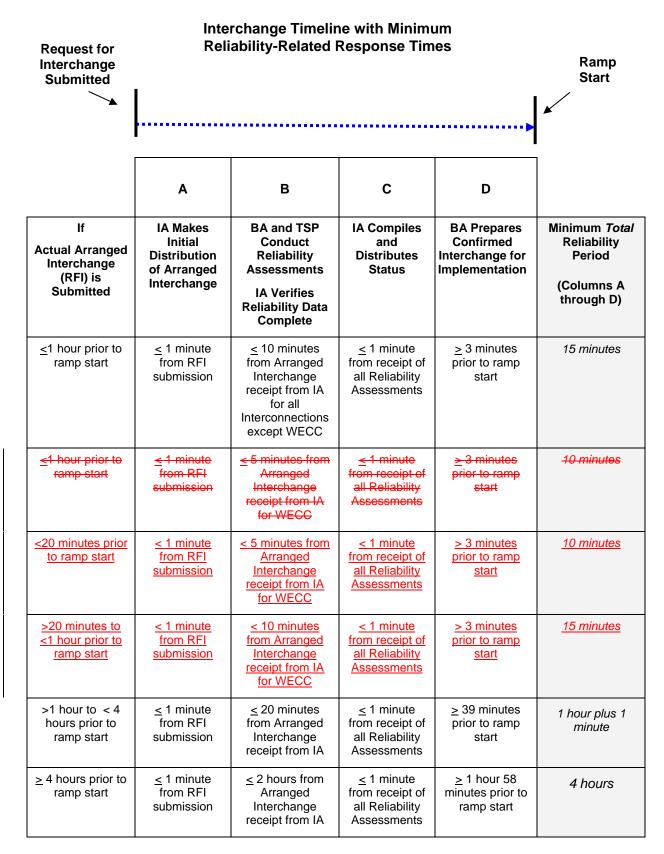
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

## E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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-<u>12</u>
- **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 Effective Date: 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

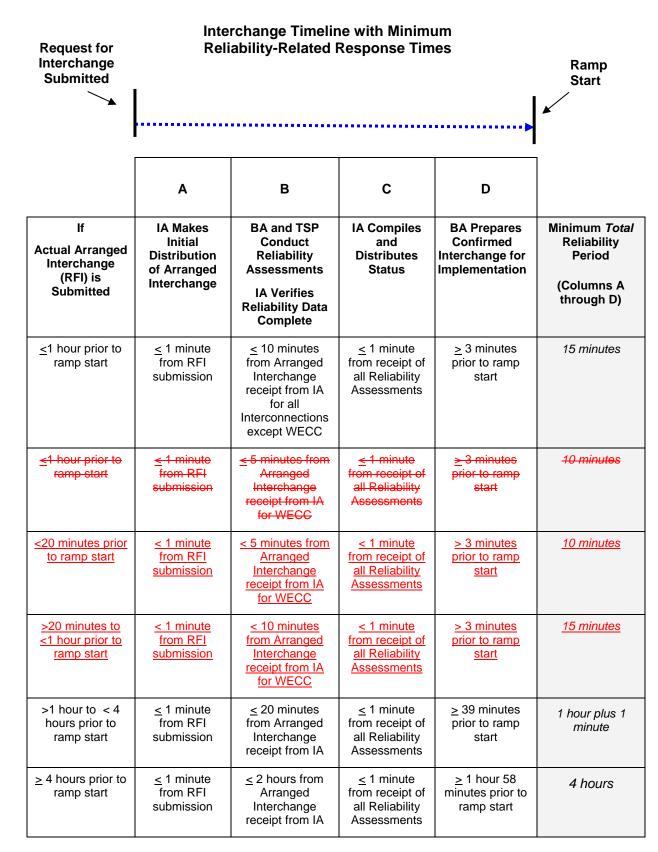
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

## E. Regional Differences

None

Version	Date	Action	Change Tracking



- 1. Title: Interchange Authority Distributes Status
- 2. Number: INT-008-<u>12</u>
- **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. <u>Proposed Effective Date: January 1, 2007Upon approval of Board of Trustees.</u>

## **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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

## E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

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

Version	Date	Action	Change Tracking

Request for Interchange Submitted		Ramp Start			
lf	A IA Makes	B BA and TSP	C IA Compiles	D BA Prepares	Minimum <i>Total</i>
Actual Arranged Interchange (RFI) is Submitted	Initial Distribution of Arranged Interchange	Conduct Reliability Assessments IA Verifies Reliability Data Complete	and Distributes Status	Confirmed Interchange for Implementation	Reliability Period (Columns A through D)
<u>≤</u> 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
<u>&lt;1 hour prior to</u> ramp start	<u> </u>	<u>&lt;5 minutes from</u> Arranged Interchange receipt from IA for WECC	<u>4 minute</u> from receipt of all Reliability Assessments	<u>≻ 3 minutes</u> prior to ramp start	<del>10 minutes</del>
<20 minutes prior to ramp start	< <u>1 minute</u> from RFI submission	< 5 minutes from <u>Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< 1 minute from receipt of all Reliability Assessments	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>10 minutes</u>
>20 minutes to <1 hour prior to ramp start	<u>&lt; 1 minute</u> <u>from RFI</u> <u>submission</u>	< <u>10 minutes</u> <u>from Arranged</u> <u>Interchange</u> <u>receipt from IA</u> <u>for WECC</u>	< <u>1 minute</u> from receipt of <u>all Reliability</u> <u>Assessments</u>	<u>&gt; 3 minutes</u> prior to ramp <u>start</u>	<u>15 minutes</u>
>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 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

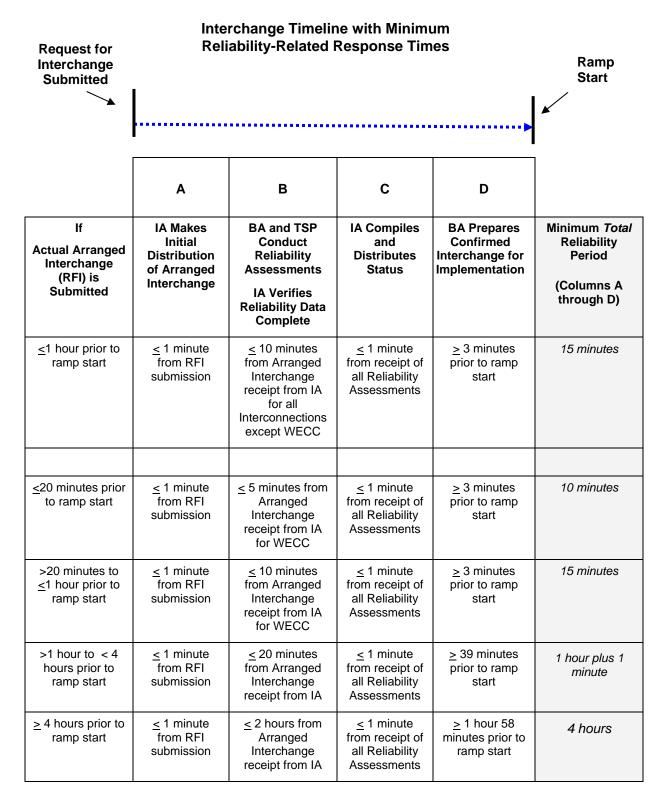
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

#### E. Regional Differences

None

Version	Date	Action	Change Tracking

<sup>&</sup>lt;sup>1</sup> 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

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

- 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

#### E. Regional Differences

None

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

Version	Date	Action	Change Tracking

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times				Ramp Start
	Α	В	С	D	
lf 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	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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 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 noncompliance 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

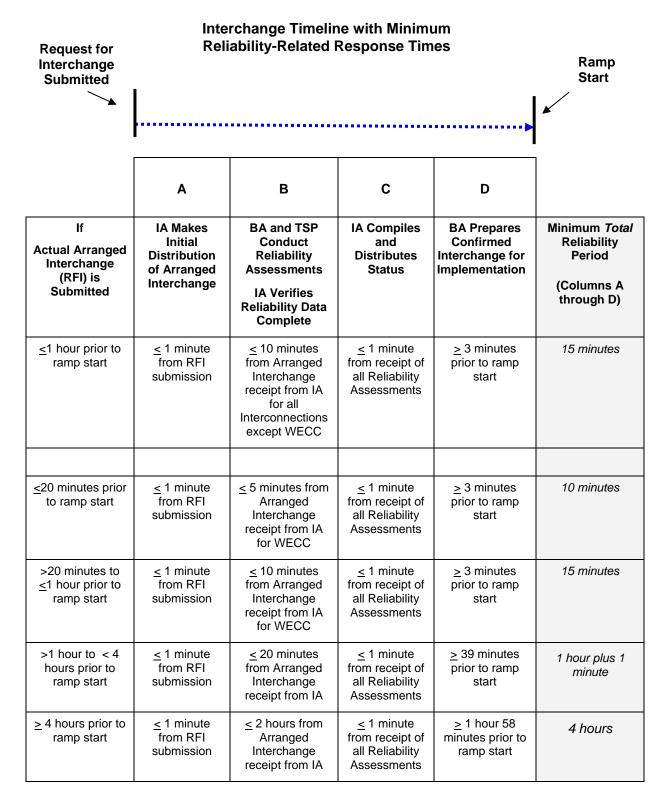
- **2.1.** Level 1: One occurrence<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing information to all involved reliability entities as described in R1.
- **2.3.** Level 3: Three occurrences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

## E. Regional Differences

None

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

<sup>&</sup>lt;sup>1</sup> 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. 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 noncompliance 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<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.

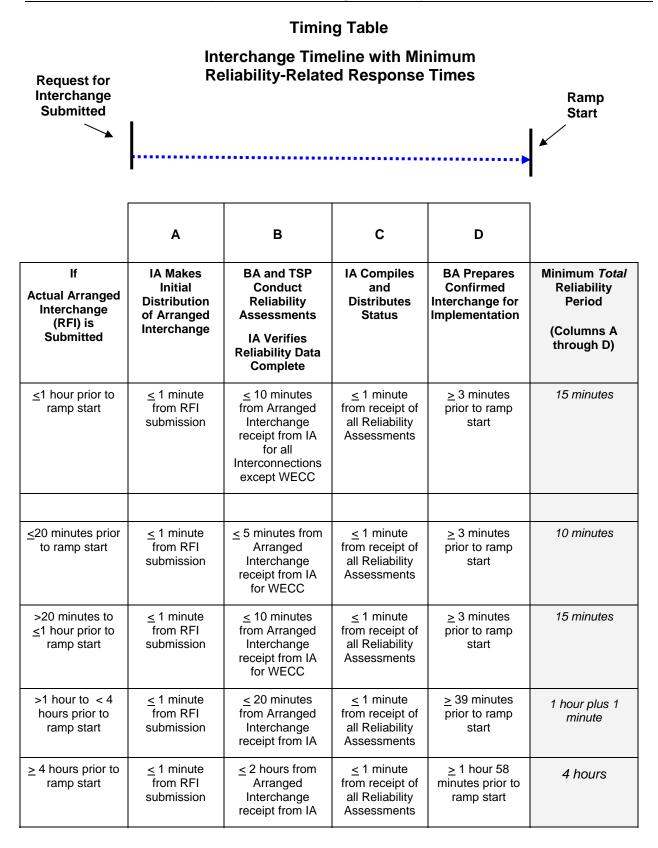
<sup>&</sup>lt;sup>1</sup> This does not include instances of not responding due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not responding to the Interchange Authority as described in R1 or no evidence provided.

## E. Regional Differences

None.

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



- 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 noncompliance 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<sup>1</sup> of not distributing final status and information as described in R1.
- **2.2.** Level 2: Two occurrences<sup>1</sup> of not distributing final status and information as described in R1.

<sup>&</sup>lt;sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

- **2.3.** Level 3: Three occurrences<sup>1</sup> of not distributing final status and information as described in R1.
- **2.4.** Level 4: Four or more occurrences<sup>1</sup> of not distributing final status and information as described in R1 or no evidence provided.

## E. Regional Differences

None.

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

Request for Interchange Submitted	Interchange Timeline with Minimum Reliability-Related Response Times				Ramp Start
	А	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	<u>&lt;</u> 1 minute from RFI submission	<u>&lt;</u> 20 minutes from Arranged Interchange receipt from IA	<u>&lt;</u> 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	<u>&lt;</u> 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	<u>&lt;</u> 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

Roman Carter Project Manager, Energy

**OASIS** Trading Manager

Robert H. Harshbarger - Chair

Edward J Davis

Brett Fisher IT Specialist

Marilyn Franz Transmission Scheduler-MS-S3B05

Larry Goins Manager, Operations Support

James Michael Hansen Strategic Advisor

Gordon Matthews

Jeremy West

Stephen Crutchfield NERC Standards Development Coordinator

Maureen E. Long NERC Standards Process Manager Puget Sound Energy, Inc. Mailstop: EST-06S P.O. Box 97034 Bellevue, Washington 98009

Southern Company Generation and Energy Marketing 600 North 18th Street GS-8259 P.O. Box 2641 Birmingham, Alabama 35291

L-ENT-24A 639 Loyola Ave New Orleans, Louisiana 70113

Western Area Power Administration

Sierra Pacific Power Co. P.O. Box 10100 6100 Neil Road Reno, Nevada 89511

Tennessee Valley Authority 1101 Market Street Chattanooga, Tennessee 37402

Seattle City Light 614 NW 46th Street Seattle, Washington 98107

Bonneville Power Administration TSPB-DITT-1 P.O. Box 491 Vancouver, Washington 98666

Entergy Services, Inc. 5201 W. Barraque Street Pine Bluff, Arkansas 71602

North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, New Jersey 08540-5721

North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, New Jersey 08540-5721 (425) 462-3049 Fx robert.harshbarger@pse.com

(205) 257-6027 jrcarter@southernco.com

504-576-3029 edavis@entergy.com

(970) 461-7275 (970) 461-7213 Fx bfisher@wapa.gov

(775) 834-5388 (775)834-4296 Fx mfranz@sppc.com

(423) 751-8103 (423) 751-3433 Fx lmgoins@tva.gov

(206) 706-0165 (206) 706-0183 Fx james.hansen@seattle.gov

(360) 418-2754 ghmtthews@bpa.gov

(870) 541-4548 jwest2@entergy.com

(609) 452-8060 (609) 452-9550 Fx stephen.crutchfield@nerc.net

(609) 452-8060 (609) 452-9550 Fx maureen.long@nerc.net