

## Project 2008-12: Coordinate Interchange Standards

VRF and VSL Justifications for INT-004-3

VRF and VSL Justifications – INT-004-3, R1	
Proposed VRF	Lower
NERC VRF Discussion	Dynamic Schedules or Pseudo-Ties may impact transmission congestion, and thus the transfers need to be communicated and accounted for in congestion management processes. A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-001-3, R1, which deals with ensuring Arranged Interchanges is submitted, is assigned a Lower VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Purchasing-Selling Entity secured energy to serve Load via a Dynamic Schedule or Pseudo-Tie, but did not ensure that a Request for Interchange was submitted as on-time Arranged Interchange to the Sink Balancing Authority, and did not include information about the Pseudo-Tie in congestion management procedure(s) via an alternate method.

VRF and VSL Justifications – INT-004-3, R1	
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>This requirement is assigned a single Severe VSL and does not lower the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."  Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing to submit a Request for Interchange.</p>

VRF and VSL Justifications – INT-004-3, R2	
Proposed VRF	Lower
NERC VRF Discussion	Dynamic Schedules or Pseudo-Ties may impact transmission congestion, and thus the transfers need to be communicated and accounted for in congestion management processes. A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> This Requirement is a revision of comparable INT-004-2, R2, which deals with updating tagging information and is assigned a Lower VRFs.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	A deviation met or exceeded the criteria in Requirement R2 Parts 2.1-2.3 and was expected to persist, but the Purchasing-Selling Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended	This requirement is assigned a single Severe VSL and does not lower the current level of compliance.

VRF and VSL Justifications – INT-004-3, R2	
Consequence of Lowering the Current Level of Compliance	
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing to ensure the Confirmed Interchange or Pseudo-Tie was updated for the next available scheduling hour or future hours.</p>

VRF and VSL Justifications – INT-004-3, R3	
Proposed VRF	Lower
NERC VRF Discussion	Pseudo-Ties may impact transmission congestion, and thus the transfers need to be communicated and accounted for in congestion management processes. A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system.
FERC VRF G1 Discussion	<i>Guideline 1- Consistency w/ Blackout Report</i> This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	<i>Guideline 2- Consistency within a Reliability Standard</i> This guideline is not applicable, as the requirement does not have any sub-requirements.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable INT-001-3, R1, which deals with ensuring Arranged Interchanges is submitted, is assigned a Lower VRF. Also, INT-004-3, R1, which deals with submittal of RFI, is also assigned a Lower VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See “NERC VRF Discussion” above.
FERC VRF G5 Discussion	<i>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</i> This guideline is not applicable, as the requirement does not co-mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A
Proposed High VSL	N/A
Proposed Severe VSL	The Balancing Authority implemented or operated a Pseudo-Tie for that was not included in the NAESB Electric Industry Registry publication.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering	This guideline is not applicable because this is a new requirement.

VRF and VSL Justifications – INT-004-3, R3	
the Current Level of Compliance	
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."</p> <p>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The language of the VSL directly mirrors the language in the corresponding requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is assigned for a single instance of failing to implement or operate a Pseudo-Tie in the NASEB Electric Industry Registry publication.</p>