Source	Standard No.	Project No	Issue	Response
FERC Order 693	INT-001-1	2009-03	Regional Difference to INT-001/4: WECC Tagging Dynamic Schedules and Inadvertent Payback: Submit a filing within 90 days of the Order that provides the needed information or withdraws the regional variance.	Regional differences removed prior to SDT creation.
FERC Order 693	INT-001-2	2009-03	Consider Santa Clara's comments about the applicability of the LSE in the standard as part of the standards development process. "Santa Clara submits that LSEs should be applicable entities under proposed revised INT-001-2 to ensure that they have adequate notice of the requirements of this Reliability Standard. It states that the actions of LSEs are implicated in Requirement R1 of this proposed Reliability Standard."	The SDT has considered these comments. By tightening the language in INT-009 regarding implementation of interchange, the SDT believes that an LSE will have an incentive to provide the information required in the standard, making it effectively a self-policing standard.
FERC Order 693	INT-001-2	2009-03	Include a requirement that interchange information must be submitted for all point-to-point transfers entirely within a balancing authority area, including all grandfathered and "non-Order No. 888" transfers.	The SDT believes this is inappropriate, as these transactions are not "INTERCHANGE." The SDT provided this explanation to FERC staff, and FERC staff seemed to understand the issue and was open to alternate proposals. Following discussions with FERC staff, the SDT will investigate creating a modification to the IRO standards that explicitly requires the currently informal practice of RC's requiring the tagging of internal transactions that have a significant reliability impact to congested parts of their systems.
FERC Order 693	INT-004-1	2009-03	Consider adding levels of non-compliance to the standard.	The SDT will add VSLs and VRFs to the standards in a future posting.
FERC Order 693	INT-005-2	2009-03	Consider adding levels of non-compliance to the standard.	The SDT will add VSLs and VRFs to the standards in a future posting.
FERC Order 693	INT-006-1	2009-03	Consider the suggestions made by EEI and TVA and address questions raised by Entergy and Northern Indiana as part of the standard development process. EEI: "EEI states that the "wide-area reliability impact" review envisioned by the Commission, which involves review of the composite energy interchange transactions, probably already takes place under Reliability Standards INT-005 through INT-009 in a cost-effective manner. EEI explains that since most transactions submitted by wholesale markets to the transactions tagging process span multiple hours with varying sizes (in MW), and are often submitted days before transaction start times, the wide-area review consists of ensuring that sufficient generator ramping capability exists, as well as examining	EEI - Wide-area view provisions for the RC and TO have been added, and not allowed to occur more than 48 hours ahead of time. TVA - The team did not use "composite" interchange in its requirement – instead, the team used "aggregated" interchange. Entergy - The changes as written by the team will not require significant tagging rewrites, as no new approval process is being required. Northern Indiana - The team did not require RCs and TOs to validate interchange, but to "review and identify."

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			for limits on transfer capabilities. This review is generally considered sufficient to the extent that analyses are taking place on the basis of projected system conditions. EEI suggests that the Commission-proposed review and validation of composite energy interchange transactions by reliability coordinators might be more effectively addressed through "near real-time" system review. It explains that, at this time, the broad range of system condition parameters is better known, and the reliability coordinators can make use of the TLR process to maintain system reliability."	
			TVA: "TVA suggests that the term "composite Tag" should be defined as part of the proposed modifications. CAISO also questions the meaning of "composite Tag" and seeks clarification on that issue. TVA notes that depending on the type of reliability analysis required to validate a "composite Tag," it may prove impractical to conduct this evaluation for hourly transactions."	
			Entergy: "Entergy disagrees with the Commission's proposed modifications. It contends that they will require substantial changes to the tagging specifications. Entergy believes that the Commission's concerns may already be addressed by Reliability Standards INT-005 through INT-009."	
			Northern Indiana: "Northern Indiana contends that the NOPR's discussion of INT-006-1 is unclear and confusing. It states that it does not understand what the Commission means by "validate" when the Commission proposes that reliability coordinators and transmission operators review and validate composite arranged interchanges. Northern Indiana also questions whether both reliability coordinators and transmission operators would be required to validate and approve the Tags and what the basis for approval would be. It questions what falls within the term "potential detrimental reliability impact," what happens if a Tag is not validated within 20 minutes to the hour, and whether all schedules are canceled outright or passively approved."	
FERC Order 693	INT-006-1	2009-03	Require reliability coordinators and transmission operators to review energy interchange transactions from the wide-area and local area reliability viewpoints respectively and, where their review indicates a potential detrimental reliability impact, communicate to the sink	Requirements to take action were added in INT-006 as R8 and R9. Requirements for the analysis are already addressed in IRO-008 R1 and TOP-008 R4.

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			balancing authorities necessary transaction modifications before implementation.	
FERC Order 693	INT-006-1	2009-03	Include reliability coordinators and transmission operators as applicable entities.	This was addressed as part of adding requirements as described above in INT-006 as R8 and R9
FERC Order 693	INT-008-2	2009-03	Consider APPA's suggestion to clarify what reliability entity the standard applies as part of the standard development process.	Considered and clarified. All tasks assigned to specific entities, none of which are the IA.
FERC Order 693	INT-009-1	2009-03	Consider APPA's suggestion to clarify what reliability entity the standard applies as part of the standard development process.	Considered and clarified. All tasks assigned to specific entities, none of which are the IA.
FERC Order 693	INT-010-1	2009-03	Consider Northern Indiana's and ISO-NE's suggestions in the standards development process.	Language has been modified to make it clear these exemptions are for schedule changes which are then followed up by tagging changes. As such, this is an appropriate tool for IROLs, as it does not require tagging before schedule changes are made.
NERC Audit Observation Team	INT-006-2	2009-03	Does confirmed action mean direct action needs to be taken or, does confirmed action mean that a process has been put in place that will take action and, the entity agrees with such since they have employed the program.	SDT believes language has been clarified.
NERC/NAESB Coordination	INT-001-2	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-003-2	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-004-1	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB	INT-005-2	2008-12	NERC/NAESB Coordination • The SDT review the	Coordination to be undertaken if needed.

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Coordination			definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	
NERC/NAESB Coordination	INT-006-2	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-007-1	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-008-2	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-009-1	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
NERC/NAESB Coordination	INT-010-1	2008-12	NERC/NAESB Coordination • The SDT review the definitions of the following terms and coordinate with NAESB so that the definition of each term is consistent between NERC and NAESB: Interchange Schedule Interchange Transaction Interchange Transaction Tag (Tag) Request for Interchange Source BA Sink BA	Coordination to be undertaken if needed.
Version 0 Team	INT-001-1	2009-03	R1 – Who tags dynamic schedules?	Specified now in INT-004.
Version 0 Team	INT-001-1	2009-03	Load PSE responsibility is new restriction	No longer restricted.
Version 0 Team	INT-001-1	2009-03	R1 - Too stringent	R1 has been modified since version 0. In this version, has been moved to INT-004 and only applies to Dynamic

Source	Standard No.	Project No	Issue	Response
				Schedules.
Version 0 Team	INT-001-1	2009-03	Lack of compliance	Comment unclear. Compliance to be rewritten in future revision.
Version 0 Team	INT-001-1	2009-03	More commercial problem than reliability	Comment unclear.
Version 0 Team	INT-001-1	2009-03	Onerous to BA's	Comment unclear.
Version 0 Team	INT-001-1	2009-03	Question on generation scheduling	Comment unclear.
Version 0 Team	INT-001-1	2009-03	R2.2 – 60 minute time frame questioned	Assuming this is regarding 60 minutes specified in INT-010, time is to allow after-the-fact tagging within a reasonable time frame to ensure reliability analysis tools have up-to-date information following emergency action.
Version 0 Team	INT-001-1	2009-03	Clarify tagging of reserves	Standard does not address tagging.
Version 0 Team	INT-004-1	2009-03	Use WECC criteria	Comment unclear.
Version 0 Team	INT-004-1	2009-03	Non-compliance based on %	Comment unclear. Compliance to be rewritten in future revision.
Version 0 Team	INT-004-1	2009-03	Suggested non-compliance levels	Comment unclear. Compliance to be rewritten in future revision.
Version 0 Team	INT-004-1	2009-03	Need to address tag curtailment	Comment unclear.
Version 0 Team	INT-004-1	2009-03	Replace TSP with TOP	Comment unclear. Standard no longer refers to TSP.
VRFs Team	INT-001-1	2009-03	R1, 1.1, 2, 2.1, 2.2 – commercial and administrative	SDT disagrees on R1, and has moved to INT-004. SDT agrees R2 is not needed,
VRFs Team	INT-003-1	2009-03	R1, 1.1, 1.1.2, 1.2 – commercial and administrative	SDT disagrees, and has moved to INT-009.
VRFs Team	INT-004-1	2009-03	R2, 2.2, 2.3 – commercial and administrative	SDT disagrees, and has included in INT-006 now.
VRFs Team	INT-005-2	2009-03	R5 – administrative	SDT disagrees, and has included in INT-006 now.
VRFs Team	INT-007-1	2009-03	R1, 1.1, 1.3, 1.3.1, 1.3.2, 1.3.3, 1.3.4, 1.4 – administrative	SDT disagrees, and has incorporated into INT-006.
VRFs Team	INT-008-2	2009-03	R1.1.1 & 1.1.2 – commercial and administrative	SDT disagrees, and has incorporated into INT-006.
VRFs Team	INT-010-1	2009-03	R1 & 3 – administrative	SDT disagrees.