



February 5, 2009

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**Re: *North American Electric Reliability Corporation,*  
Docket No. RM09-\_\_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits this filing in accordance with Section 215(d)(1) of the Federal Power Act (“FPA”) and Part 39.5 of the Commission’s regulations, seeking approval for three proposed Reliability Standards:

- INT-005-3 — Interchange Authority Distributes Arranged Interchange
- INT-006-3 — Response to Interchange Authority
- INT-008-3 — Interchange Authority Distributes Status

and three new terms and definitions:

- After the Fact;
- Emergency Request for Interchange (“RFI”); and
- Reliability Adjustment RFI.

contained in **Exhibit A** to this petition. These proposed Reliability Standards are submitted for the first time for Commission approval. NERC also requests

that existing Reliability Standards INT-005-2, INT-006-2 and INT-008-2 be retired upon the effective date of the new standards.

No new Violation Risk Factors or Violation Severity Levels are proposed with these standards. Accordingly, NERC requests the Commission to approve the Violation Risk Factors and Violation Severity Levels currently assigned to the existing approved Version 2 of the Reliability Standards for use in the proposed Version 3 included in this filing.

These proposed Reliability Standards and new terms were approved by the NERC Board of Trustees on October 29, 2008. NERC requests that INT-005-3, INT-006-3 and INT-008-3 and associated terms be made effective in accordance with the effective date provisions set forth in the Reliability Standards.

NERC's petition consists of the following:

- This transmittal letter;
- A table of contents for the entire petition;
- A description explaining how the proposed Reliability Standards meet the Commission's requirements;
- Reliability Standards INT-005-3, INT-006-3 and INT-008-3 submitted for approval (**Exhibit A**);
- Standard Drafting Team Roster (**Exhibit B**); and
- The complete development record of the proposed Reliability Standards (**Exhibit C**).

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*

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION ) Docket No. RM09-\_\_-000  
CORPORATION )**

**PETITION OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
FOR APPROVAL OF INT-005-3, INT-006-3 AND INT-008-3 RELIABILITY  
STANDARDS AND THREE ASSOCIATED TERMS**

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February 5, 2009

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## **I. INTRODUCTION**

The North American Electric Reliability Corporation (“NERC”)<sup>1</sup> hereby requests the Federal Energy Regulatory Commission (the “Commission” or “FERC”) to approve, in accordance with Section 215(d)(1) of the Federal Power Act (“FPA”)<sup>2</sup> and Section 39.5 of the Commission’s regulations, 18 C.F.R. § 39.5, three proposed Reliability Standards:

- INT-005-3 — Interchange Authority Distributes Arranged Interchange
- INT-006-3 — Response to Interchange Authority
- INT-008-3 — Interchange Authority Distributes Status

and three new terms and definitions:

- After the Fact – A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.
- Emergency Request for Interchange (“RFI”) – Request for Interchange to be initiated or Emergency or Energy Emergency conditions.
- Reliability Adjustment RFI – Request to modify an Implemented Interchange Schedule for reliability purposes.

NERC requests Commission approval of this version of these proposed Reliability Standards.

On October 29, 2008, the NERC Board of Trustees approved the three proposed Reliability Standards and associated terms proposed by NERC in this filing. NERC requests that the Commission approve the Reliability Standards and associated terms and make them effective in accordance with the effective date provisions set forth in the proposed Reliability Standards. NERC also requests that existing Reliability Standards INT-005-2, INT-006-2 and INT-008-2 be retired upon the effective date of the new

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<sup>1</sup> NERC has been certified by the Commission as the electric reliability organization (“ERO”) authorized by Section 215 of the Federal Power Act. The Commission certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000. 116 FERC ¶ 61,062 (2006) (“ERO Certification Order”).

<sup>2</sup> 16 U.S.C. 824o.

standards. **Exhibit A** to this filing sets forth the proposed Reliability Standards and definitions. **Exhibit B** contains the Standard Drafting Team roster. **Exhibit C** contains the complete development record of the proposed Reliability Standards.

NERC also is filing these Reliability Standards and associated terms with 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  
President and Chief Executive Officer  
David N. Cook\*  
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\*Persons to be included on the Commission's service list are indicated with an asterisk.

## **III. BACKGROUND**

### **a. Regulatory Framework**

By enacting the Energy Policy Act of 2005,<sup>3</sup> Congress entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the Nation's bulk power system, and with the duties of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission

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<sup>3</sup> Energy Policy Act of 2005, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005 (to be codified at 16 U.S.C. § 824o)).

approval. Section 215 states that all users, owners and operators of the bulk power system in the United States will be subject to the Commission-approved Reliability Standards.

**b. Basis for Approval of Proposed Reliability Standards**

Section 39.5(a) of the Commission’s regulations requires the ERO to file with the Commission for its approval each Reliability Standard that the ERO proposes to become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes to be made effective. The Commission has the regulatory responsibility to approve standards that protect the reliability of the bulk power system. In discharging its responsibility to review, approve and enforce mandatory Reliability Standards, the Commission is authorized to approve those proposed Reliability Standards that meet the criteria detailed by Congress:

The Commission may approve, by rule or order, a proposed Reliability Standard or modification to a Reliability Standard if it determines that the standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest.<sup>4</sup>

When evaluating proposed Reliability Standards, the Commission is expected to give “due weight” to the technical expertise of the ERO. Order No. 672 provides guidance on the factors the Commission will consider when determining whether proposed Reliability Standards meet the statutory criteria.<sup>5</sup>

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<sup>4</sup> Section 215(d)(2) of the FPA, to be codified at 16 U.S.C. § 824o(d)(2) (2000).

<sup>5</sup> See *Rules Concerning Certification of the Electric Reliability Organization; Procedures for the Establishment, Approval and Enforcement of Electric Reliability Standards*, FERC Stats. & Regs., ¶ 31,204 at PP 320-36 (“Order No. 672”), *order on reh’g*, FERC Stats. & Regs. ¶ 31,212 (2006) (“Order No. 672-A”).

### **c. 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. In its ERO Certification Order, the Commission found that 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.<sup>6</sup>

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 of Trustees is required to approve a Reliability Standard for submission to the Commission.

The proposed Reliability Standards and associated terms set out in **Exhibit A** has been developed and approved by industry stakeholders using NERC's *Reliability Standards Development Procedure*, and they were approved by the NERC Board of Trustees on October 29, 2008 for filing with the Commission.

### **d. Progress in Improving Proposed Reliability Standards**

NERC continues to develop new and revised Reliability Standards that address the issues NERC identified in its initial filing of proposed Reliability Standards in April 2006, the concerns noted in the Commission Staff Report issued on May 11, 2006, and the directives the Commission included in several orders pertaining to NERC's

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<sup>6</sup> Order No. 672 at PP 268 and 270.



Reliability Standards.<sup>7</sup> NERC has incorporated these activities into its Reliability Standards Development Plan: 2009-2011 that was submitted to the Commission on February 3, 2009. The Reliability Standards proposed for approval are new versions of existing Reliability Standards. NERC also requests that existing Reliability Standards INT-005-2, INT-006-2 and INT-008-2 be retired upon the effective date of the new standards.

#### **IV. JUSTIFICATION FOR APPROVAL OF PROPOSED RELIABILITY STANDARDS**

In 2007, an entity in the Western Electricity Coordinating Council (“WECC”) Region proposed an Urgent Action standards authorization request (“SAR”) to make a change to the Coordinate Interchange Timing Table (the Timing Table accompanies the then current INT-005-1, INT-006-1 and INT-008-1 Reliability Standards for WECC) to increase the reliability assessment time from five minutes to ten minutes for RFIs submitted between one hour and up to twenty minutes prior to ramp start time. With only five minutes to assess the interchange, WECC reliability entities were unable to assess many RFIs and therefore the arranged interchange was not implemented. This proposed change resulted in Version 2 of these Reliability Standards that was approved by the Board on May 2, 2007 and approved by the Commission on July 21, 2008.<sup>8</sup> Pursuant to the *Reliability Standard Development Procedure*, the permanent standards that replace those created under the urgent action process must be balloted within one year if no

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<sup>7</sup> *Mandatory Reliability Standards for the Bulk-Power System*, 118 FERC ¶ 61,218, FERC Stats. & Regs. ¶ 31,242 (2007) (“Order No. 693”), *order on reh’g, Mandatory Reliability Standards for the Bulk-Power System*, 120 FERC ¶ 61,053 (“Order No. 693-A”) (2007).

<sup>8</sup> *Modification of Interchange and Transmission Loading Relief Reliability Standards; and Electric Reliability Organization Interpretation of Specific Requirements of Four Reliability Standards*, 124 FERC ¶ 61,071 at PP 1 and 67 (“Order No. 713”) (2008).

substantive changes are made, or within two years if substantive changes occur. Version 3 of the Reliability Standards proposed in this filing includes changes in addition to those included in the original urgent action process. However, none of these changes are of sufficient substance to change the intent, scope or purpose of the Commission-approved versions of the Reliability Standards. Therefore, NERC will present a concise description of these changes and associated development history for the Commission to consider in approving Version 3 of the Reliability Standards and the three associated terms.

In the course of processing the proposed Reliability Standards and associated terms through the regular development process embodied in the *Reliability Standard Development Procedure*, Version 6.1, the standard drafting team made the following revisions to the proposed Version 3 Reliability Standards contained in this filing:

- The timing tables were separated into a WECC-specific table and an Eastern Interconnection/Electric Reliability Council of Texas/Hydro-Quebec specific table to provide better understanding of the timing requirements;
- The timing tables re-introduce the time classifications of “late” and “on-time” and include a designation for the new “After the Fact” time classification for all Interconnections. These classifications are consistent with existing e-Tag implementation in the industry;
- The timing table for WECC includes the modification to allow reliability entities up to 10 minutes to perform reliability assessment in most cases while still allowing for on-time submittal of e-Tags up to 20 minutes prior to the operating hour (consistent with the urgent action process changes);
- A change was made to Requirement R1 of INT-006-2 that clarifies applicability to “on-time” requests for interchange. Corresponding changes to the measure associated with INT-006-2 R1 were made in response to stakeholder comments;
- Additional minor clarifications were made to the requirements and timing tables in response to stakeholder comments;
- The “Minimum Total Reliability Period” column was deleted from the timing tables to clarify the table; and
- New terms and definitions were added for After the Fact, Emergency RFI and Reliability Adjustment RFI.

The complete development record for the proposed Reliability Standards is available in **Exhibit C**. This record includes the successive drafts of the Reliability

Standard, the implementation plan, the ballot pool and the final ballot results by registered ballot body members, stakeholder comments received during the development of the Reliability Standards, and how those comments were considered in developing the Reliability Standard. The standard drafting team roster is provided in **Exhibit B**.

**V. SUMMARY OF THE RELIABILITY STANDARD DEVELOPMENT PROCEEDINGS**

**a. Development History**

The SAR for this project was submitted to NERC in February, 2007 and was submitted by NERC for industry comment. The SAR was ultimately approved by the Standards Committee in August, 2007.

The SAR for the proposed Reliability Standards and associated terms was posted for a 30-day comment from April 20, 2007 through May 21, 2007. There were no significant comments to the posting of the SAR and the Standards Committee approved the SAR and authorized standards development at its August 13, 2007 meeting.

The proposed Reliability Standards were drafted and posted twice for stakeholder review and comment, initially for a 45-day comment period from January 24, 2008 to March 8, 2008 and then for a 30-day comment period from May 12, 2008 to June 10, 2008. There were 15 sets of comments from the initial posting. In response to these comments, the standard drafting team adjusted the effective date such that the proposed implementation plan requires approval in all jurisdictions before becoming effective. In addition, the tables were adjusted for those Regions where a response to arranged interchange is required. Also, the team added clarity in the measure for INT-006-3 Requirement R1 to address comment regarding ambiguity. In response to the 21 sets of comments received to the second posting, the standard drafting team added further clarity

to INT-006-3 requirement R1 and M1 and added clarity to the new terms proposed for approval. The standard drafting team then requested the Standards Committee for approval to proceed to the balloting phase. The Standards Committee agreed at its July, 2008, meeting and the proposed standards and associated terms were posted for a 30-day pre-ballot period from August 13, 2008 to September 11, 2008. NERC conducted the initial ballot from September 11, 2008 to September 22, 2008. A total of 79.74% of the 153 member ballot pool participated in the ballot and voted unanimously for the standards, with 15 abstentions. Pursuant to the *Reliability Standard Development Procedure*, no recirculation ballot was conducted.

**VI. CONCLUSION**

NERC requests that the Commission approve INT-005-3, INT-006-3 and INT-008-3 and the three new terms and definitions, which are set forth in **Exhibit A**, in accordance with Section 215(d)(1) of the FPA and Part 39.5 of the Commission's regulations. NERC requests that INT-005-3, INT-006-3 and INT-008-3 and associated terms be made effective in accordance with the effective date provisions set forth in the Reliability Standards.

Respectfully submitted,

/s/ Rebecca J. Michael  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 5th day of February, 2009.

*/s/ Rebecca J. Michael*

Rebecca J. Michael

*Attorney for North American Electric  
Reliability Corporation*

**Exhibit A**

**Reliability Standards Proposed for Approval**

## A. Introduction

1. **Title:** **Interchange Authority Distributes Arranged Interchange**
2. **Number:** INT-005-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the time period defined in the timing requirements tables in this standard, 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

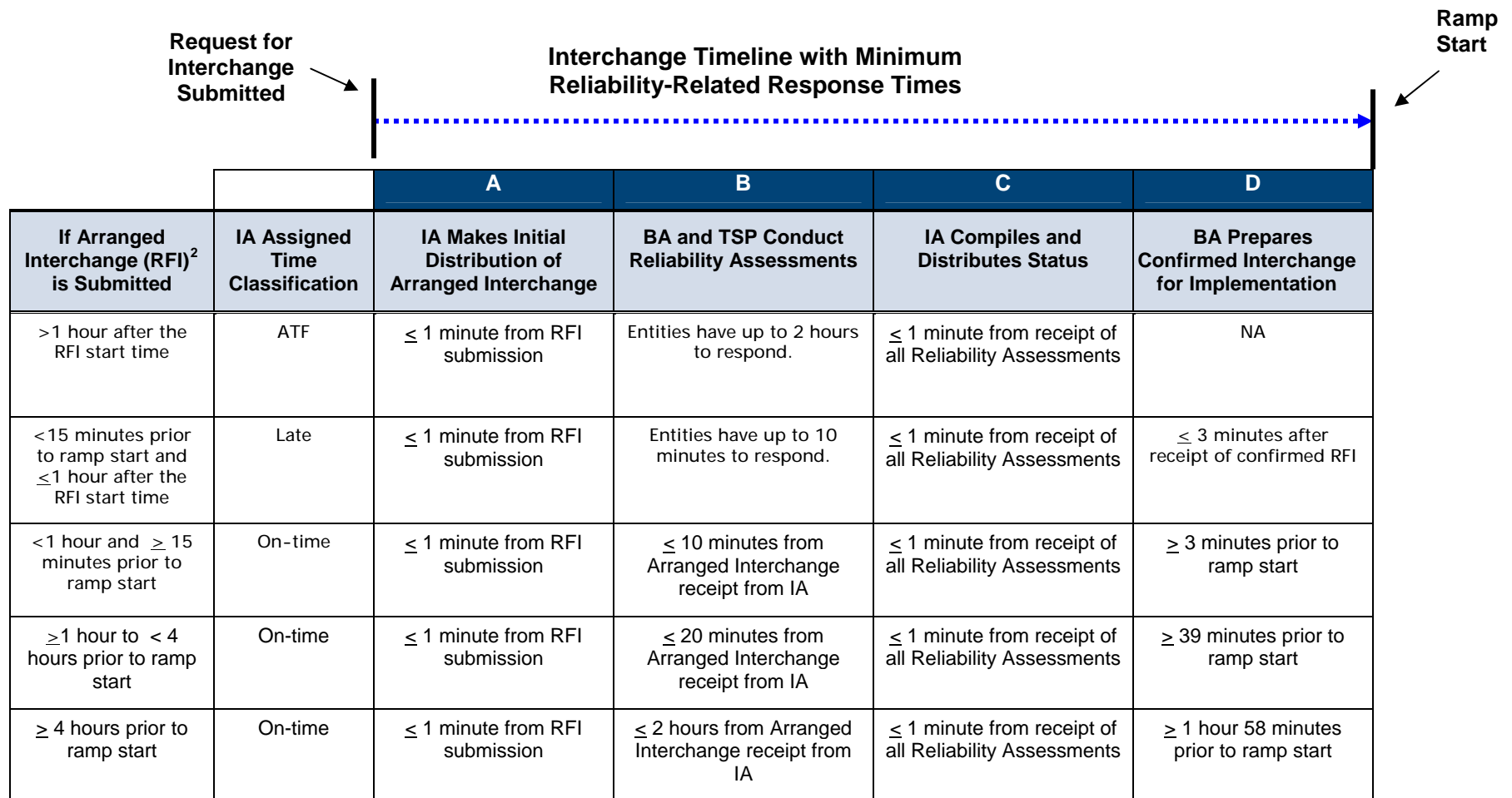
**Version History**

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

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

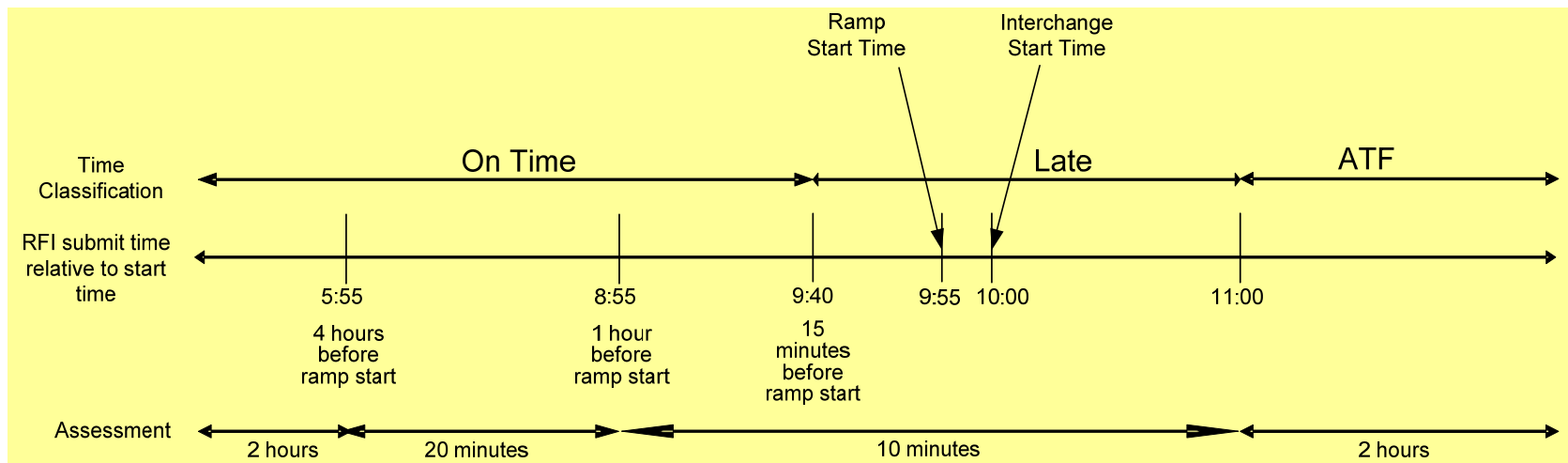


Timing Requirements for all Interconnections except WECC



<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections except WECC

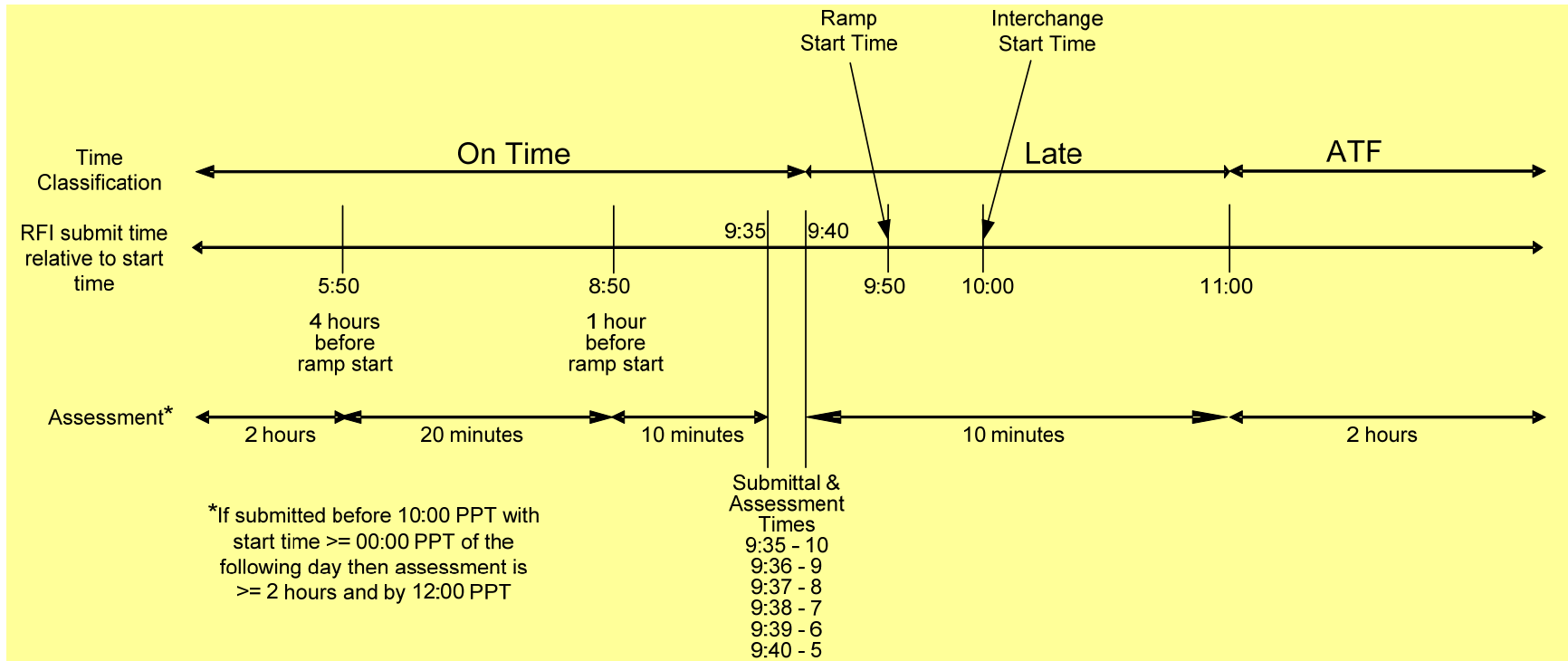


**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1hour and < 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	< 20 minutes from Arranged interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the reliability assessment period defined in the timing requirements tables in this standard, Column B, the Balancing Authority and Transmission Service Provider shall respond to each On-time Request for Interchange (RFI), and to each Emergency RFI and Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>
  - 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 On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## D. Compliance

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

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<sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

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>2</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.

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<sup>2</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.

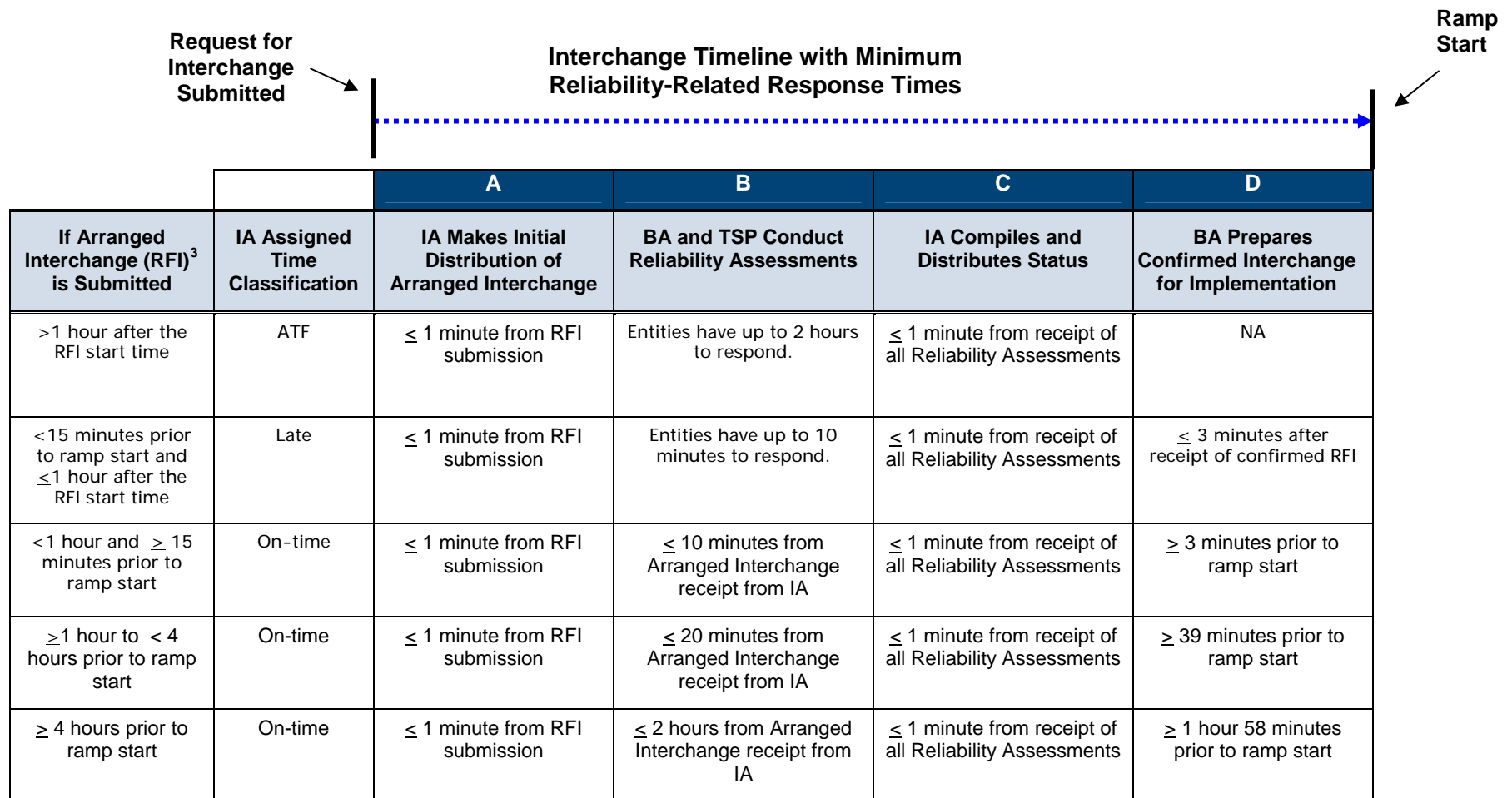
**E. Regional Differences**

None.

**Version History**

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

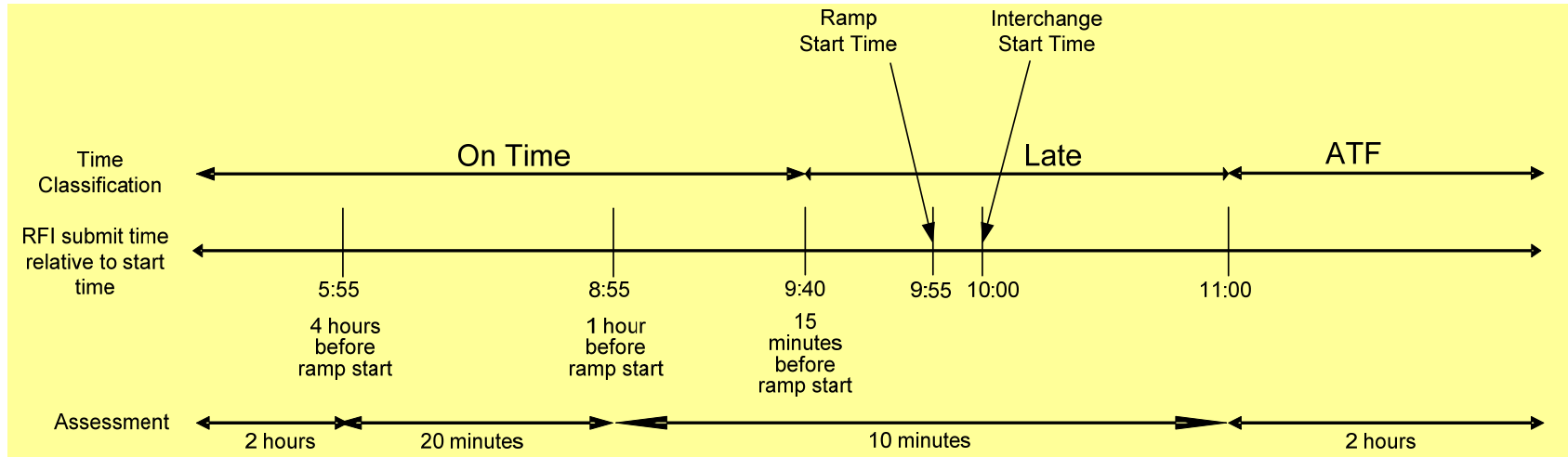
Timing Requirements for all Interconnections except WECC



<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



Example of Timing Requirements for all Interconnections except WECC

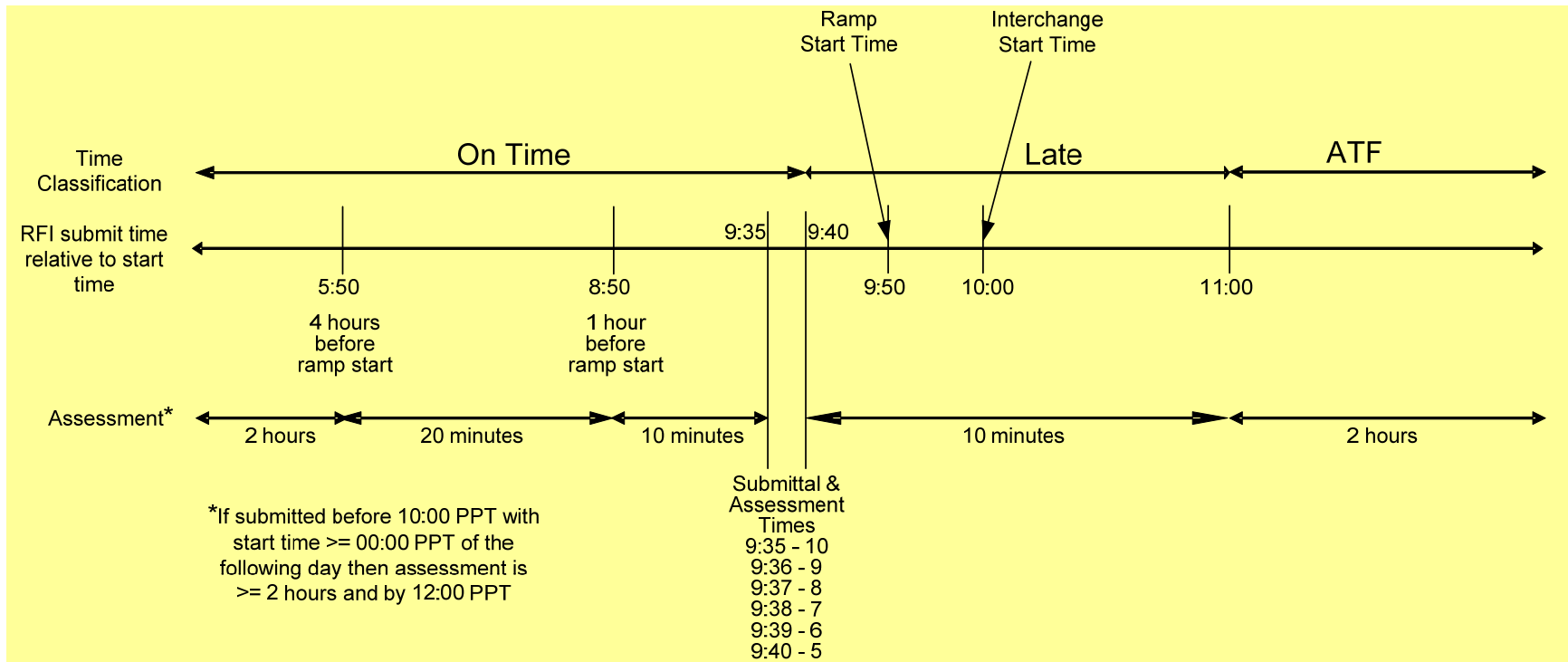


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the start time	ATF	≤ 1minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1hour and < 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	< 20 minutes from Arranged interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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.

---

<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.

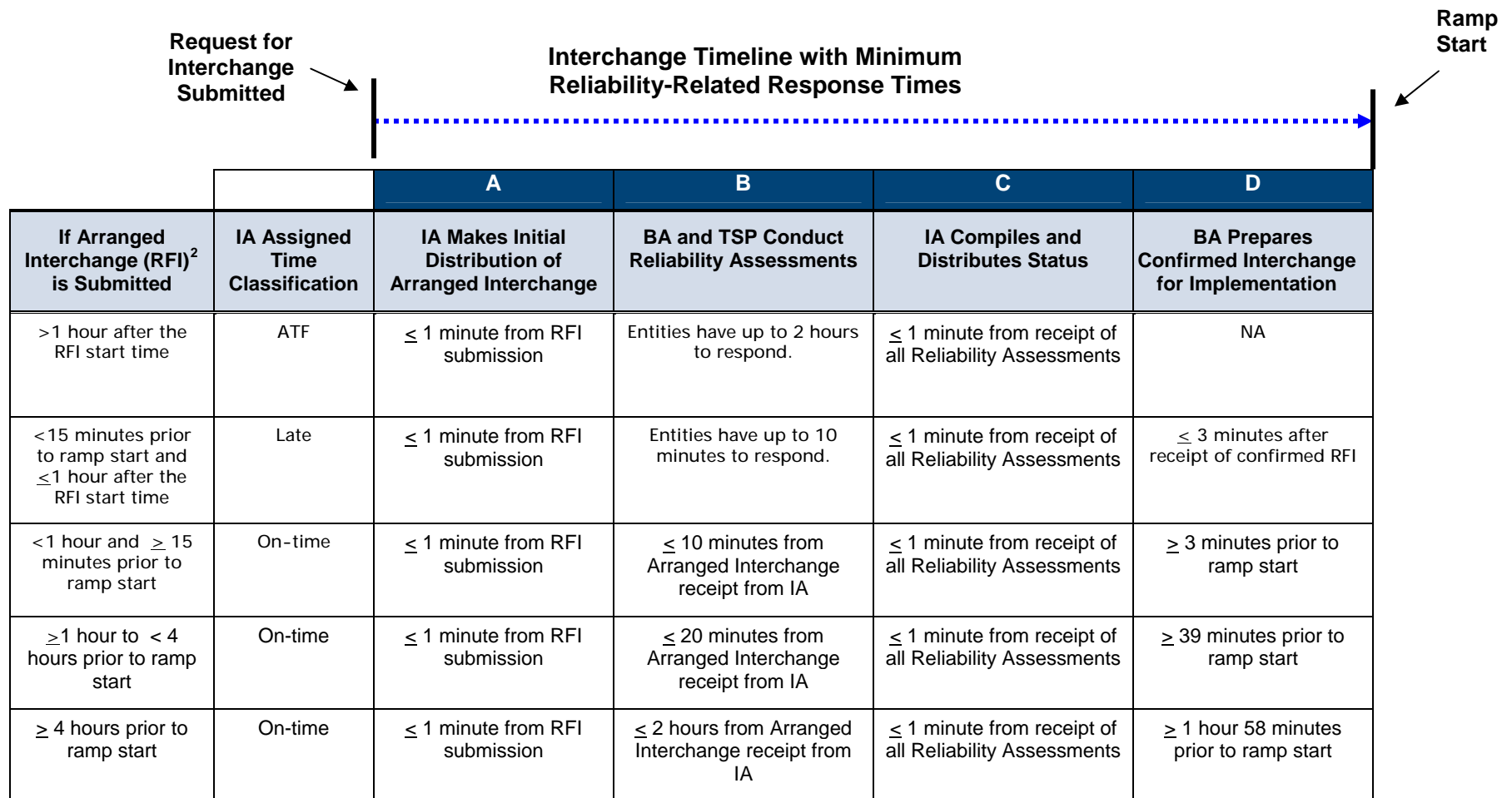
**E. Regional Differences**

None.

**Version History**

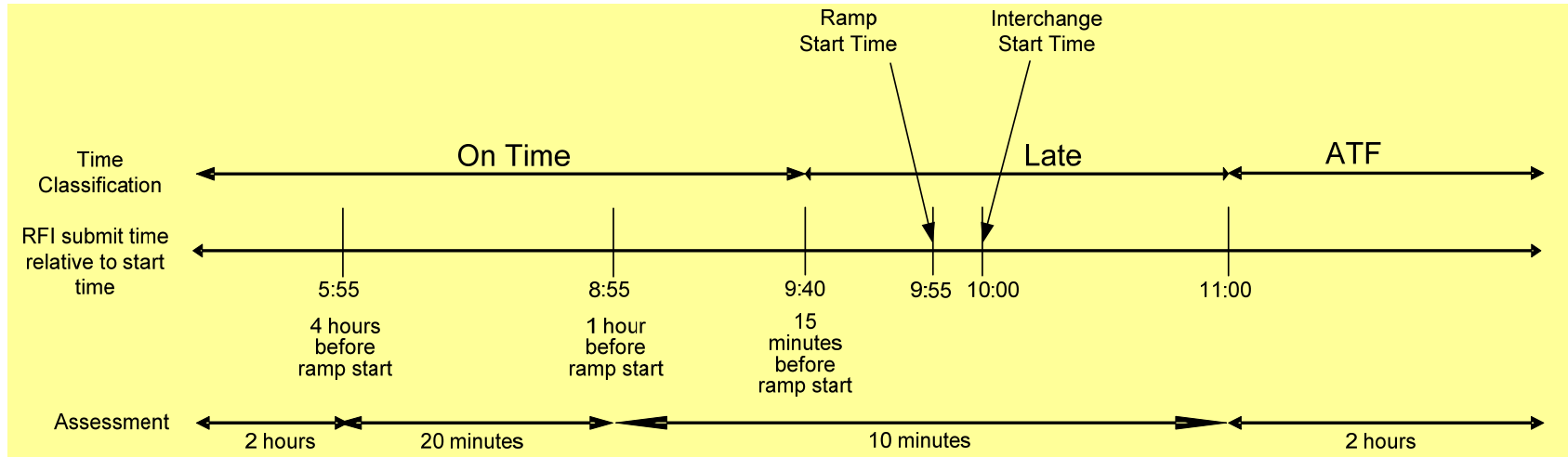
Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Timing Requirements for all Interconnections except WECC



<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections except WECC



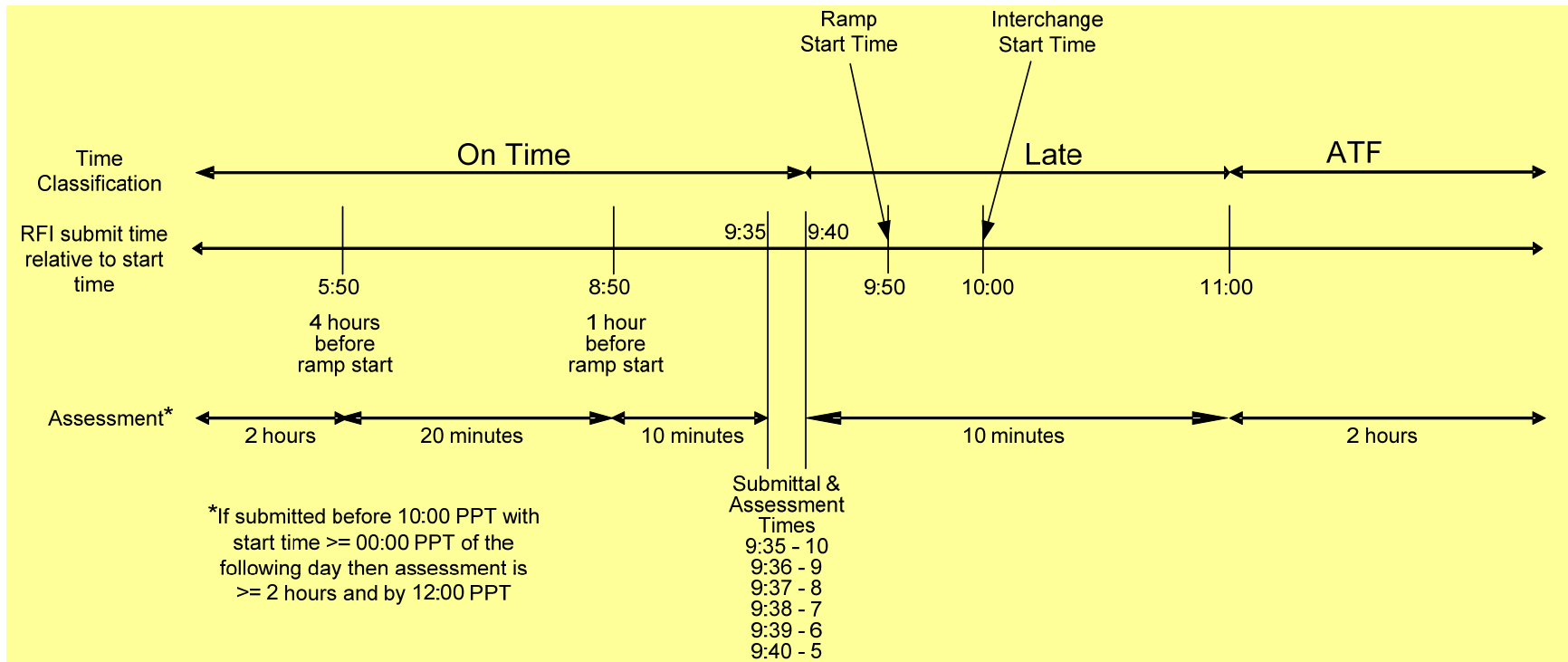


**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
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14 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1hour and < 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	< 20 minutes from Arranged interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	On-time	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



**Exhibit B**

**Standard Drafting Team Roster**

**Coordinate Interchange Timing Table Standard Drafting Team  
Project 2007-14 — CITTSDT**

Robert H. Harshbarger – Chair OASIS Trading Manager	Puget Sound Energy, Inc.
Roman Carter Reliability Standards Coordinator	Southern Company Transmission Company
Edward J. Davis Policy Consultant	Entergy Services, Inc.
Brett Fisher IT Specialist	Western Area Power Administration - Rocky Mountain Region
Marilyn Franz Transmission Scheduler-MS-S3B05	Sierra Pacific Power Co.
Larry Goins Manager, Operations Support	Tennessee Valley Authority
James Michael Hansen Strategic Advisor	Seattle City Light
Gordon Matthews	Bonneville Power Administration
Jeremy West Engineer, Transmission Business Operations	Entergy Services, Inc.
Stephen Crutchfield NERC Standards Development Coordinator	North American Electric Reliability Corporation
Maureen E. Long NERC Standards Process Manager	North American Electric Reliability Corporation
Thomas Vandervort NERC Reliability Assessment & Performance Analysis Coordinator	North American Electric Reliability Corporation

**Exhibit C**

**Record of Development of Proposed Reliability Standards**

Project 2007-14

Coordinate Interchange – Timing Table

[Registered Ballot Body](#) | [Related Files](#) | [Drafting Team Rosters](#)

**Status**

The INT-005-3, INT-006-3, and INT-008-3 standards (Permanent Changes to Coordinate Interchange Timing Tables) were approved by stakeholders with a 100% weighted segment vote.

**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 bring the timing table into alignment with the categories (On-time, Late, After-the-fact) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange.

Proposed Standard	Supporting Documents	Comment Period	Comments Received	Response to Comments
<p><a href="#">Announcement (53)</a></p> <p>Draft 3 Standards for Coordinate Interchange Timing Tables Posted for 10-day Ballot Window</p> <p>INT-005-3 <a href="#">Clean (54)</a>   <a href="#">Redline (55)</a> to previous posting</p> <p>INT-006-3 <a href="#">Clean (56)</a>   <a href="#">Redline (57)</a> to previous posting</p> <p>INT-008-3 <a href="#">Clean (58)</a>   <a href="#">Redline (59)</a> to previous posting</p>	<p><a href="#">Implementation Plan (60)</a></p>	<p>09/11/08 – 09/22/08 (closed)</p> <p>10-day Ballot Window</p>		<p><a href="#">Ballot Results (61)</a></p>

<p style="text-align: center;"><b>Announcement (45)</b></p> <p style="text-align: center;">Draft 3 Standards for Coordinate Interchange Timing Tables Posted for 30-day Pre-ballot Review</p> <p>INT-005-3 Clean (46)   Redline (47) to previous posting</p> <p>INT-006-3 Clean (48)   Redline (49) to previous posting</p> <p>INT-008-3 Clean (50)   Redline (51) to previous posting</p>	<p style="text-align: center;"><b>Implementation Plan (52)</b></p>	<p>08/13/08 – 09/11/08 (closed)</p> <p>30-day Pre- ballot Review</p>		
<p style="text-align: center;"><b>Announcement (33)</b></p> <p style="text-align: center;">Draft 2 Standards for Coordinate Interchange Timing Tables Posted for 30-day Comment Period</p> <p>INT-005-3 Clean (34)   Redline (35) to previous posting</p> <p>INT-006-3 Clean (36)   Redline (37) to previous posting</p> <p>INT-008-3 Clean (38)   Redline (39) to previous posting</p>	<p style="text-align: center;"><b>Implementation Plan</b> Clean (40)   Redline (41) to previous posting</p>	<p>05/12/08 - 06/10/08 (closed)</p> <p>Comment Form</p> <p>Comment Form in Word (42)</p>	<p style="text-align: center;"><b>Comments (43)</b></p>	<p style="text-align: center;"><b>Response to Comments (44)</b></p>

<p style="text-align: center;"><b>Announcement (22)</b></p> <p style="text-align: center;">Draft 1 Standards for Coordinate Interchange Timing Tables Posted for 45-day Comment Period</p> <p>INT-005-3 Clean (23)   Redline (24) to last approval</p> <p>INT-006-3 Clean (25)   Redline (26) to last approval</p> <p>INT-008-3 Clean (27)   Redline (28) to last approval</p>	<p><b>Implementation Plan (29)</b></p>	<p>01/24/08 - 03/08/08 (closed)</p> <p>Comment Form (30)</p>	<p>Comments (31)</p>	<p>Consideration of Comments (32)</p>
<p style="text-align: center;"><b>Announcement (20)</b></p> <p style="text-align: center;">Clean (18)   Redline (19) to last posting</p>		<p>09/19/07 - 10/03/07 (closed) Nomination Form (21)</p>		
<p style="text-align: center;"><b>Announcement (13)</b></p> <p style="text-align: center;">SAR for Permanent Changes to CI Timing Table (14)</p>		<p>04/20/07 - 05/21/07 (closed)</p> <p>Comment Form (15)</p>	<p>Comments (16)</p>	<p>Consideration of Comments (17)</p>
<p style="text-align: center;">Urgent Action Coordinate Interchange Standards Posted for Board of Trustees Approval May 2, 2007</p> <p>INT-005-2, INT-006-2, INT-008- 2</p> <p>Clean (11)   Redline (12) to last posting</p>				



<p><b>Announcement (5)</b></p> <p>Urgent Action SAR Posted for 10-day Ballot Review March 19 through March 30, 2007</p> <p><b>Urgent Action SAR (6)</b></p> <p>INT-005-2, INT-006-2, INT-008-2</p> <p><b>Clean (7)   Redline (8)</b> to last posting</p>		<p>03/19/07 - 03/30/07 (closed)</p> <p>10-day Ballot Window</p>		<p><b>Initial Ballot Results (9)</b></p> <p><b>Consideration of Comments (10)</b></p>
<p><b>Announcement (1)</b></p> <p>Urgent Action SAR Posted for 30-day Pre-ballot Review February 15 through March 16, 2007</p> <p><b>Urgent Action SAR (2)</b></p> <p>INT-005-2, INT-006-2, INT-008-2</p> <p><b>Clean (3)   Redline (4)</b> to last posting</p>		<p>02/15/07 - 03/16/07 (closed)</p> <p>Pre-ballot Review</p>		

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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 [Balance Resources and Demand](#) standards are posted for a 30-day pre-ballot review:

- BAL-007-1 — Balance of Resources and Demand
- BAL-008-1 — Frequency and Area Control Error
- BAL-009-1 — Actions to Return Frequency to within Frequency Trigger Limits
- BAL-010-1 — Frequency Bias Settings
- BAL-011-1 — Frequency Limits

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

A new [ballot pool](#) 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: [bp-bal\\_resources\\_demand\\_in@nerc.com](mailto:bp-bal_resources_demand_in@nerc.com)

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

REGISTERED BALLOT BODY

February 15, 2007

Page Two

A new [ballot pool](#) 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: [bp-nuclear\\_interface\\_in@nerc.com](mailto:bp-nuclear_interface_in@nerc.com).

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 [Urgent Action SAR](#) 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 [ballot pool](#) 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: [bp-ua\\_sar\\_int\\_in@nerc.com](mailto:bp-ua_sar_int_in@nerc.com).

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 [Reliability Standards Development Procedure](#) 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 [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

*Maureen E. Long*

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

## Standard Authorization Request Form

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

<b>SAR Requestor Information</b>	<b>SAR Type</b> <i>(Check a box for each one that applies.)</i>
Name            WECC Interchange Scheduling and Accounting Subcommittee (WECC ISAS)	<input type="checkbox"/> New Standard
Primary Contact     Jim Hansen	<input checked="" type="checkbox"/> Revision to existing Standards: INT-005-1 INT-006-1 INT-008-1
Telephone     206-706-0165 Fax             206-706-0183	<input type="checkbox"/> Withdrawal of existing Standard
E-mail            james.hansen@seattle.gov	<input checked="" type="checkbox"/> 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.

## Standards Authorization Request Form

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

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

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

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

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

Timing Table

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start

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

**Standards Authorization Request Form**

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***Reliability Functions***

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

**Standards Authorization Request Form**

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<input type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user.
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**Standards Authorization Request Form**

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***Reliability and Market Interface Principles***

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	1. 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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	3. 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.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
<b>Does the proposed Standard comply with all the following Market Interface Principles?</b> <i>(Select "yes" or "no" from the drop-down box.)</i>	
1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
2. An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes	

**Standards Authorization Request Form**

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***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>
INT-005-1	Contains timing table
INT-006-1	Contains timing table
INT-008-1	Contains timing table

***Related SARs***

<b>SAR ID</b>	<b>Explanation</b>

***Regional Differences***

<b>Region</b>	<b>Explanation</b>
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

**A. Introduction**

- 1. Title:** **Interchange Authority Distributes Arranged Interchange**
- 2. Number:** INT-005-2
- 3. Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.
- 4. Applicability**
  - 4.1.** Interchange Authority.
- 5. Proposed Effective Date:** Upon approval of Board of Trustees.

**B. Requirements**

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

**C. Measures**

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

**D. Compliance**

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

Regional Reliability Organization.
  - 1.2. Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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

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

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

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

**2. Levels of Non-Compliance**

- 2.1. Level 1:** One occurrence<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 History**

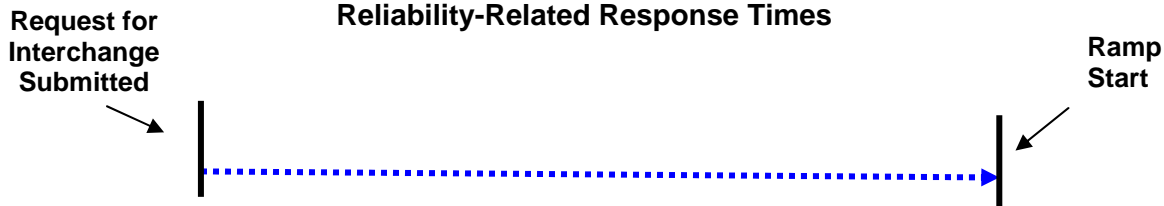
Version	Date	Action	Change Tracking

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

**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**



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

**A. Introduction**

1. **Title:** 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 History**

Version	Date	Action	Change Tracking

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<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**

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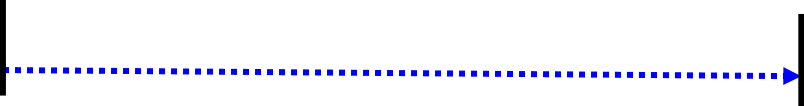



**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-2
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **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

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

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>

**Timing Table**



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-~~4~~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:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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

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

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

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

**2. Levels of Non-Compliance**

- 2.1. **Level 1:** One occurrence<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 History**

Version	Date	Action	Change Tracking

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

**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start



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





## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-~~1~~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:** ~~January 1, 2007~~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.

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<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.

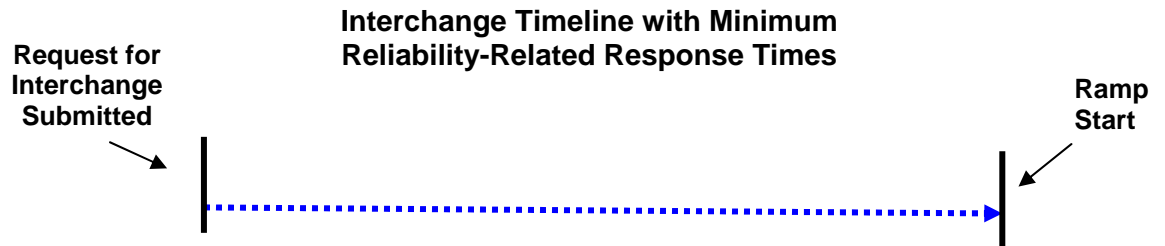
**E. Regional Differences**

None

**Version History**

Version	Date	Action	Change Tracking

Timing Table



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



## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-~~1~~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:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

#### 1.4. Additional Compliance Information

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

Subsequent to the initial compliance review, compliance will be:

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

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

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

#### 2. Levels of Non-Compliance

- 2.1. **Level 1:** One occurrence<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

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



**Version History**

Version	Date	Action	Change Tracking

Timing Table



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



March 19, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

**Announcement: Four Ballot Windows Open on March 19, 2007**

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

**Initial Ballot Window for Balance Resources and Demand Standards Opens March 19, 2007**

The initial [ballot](#) for the following set of [Balance Resources and Demand](#) standards will be conducted from 8 a.m. (EDT) on Monday, March 19 through 8 p.m. (EDT) Friday, March 30, 2007.

- 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

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. The ballot for the above set of standards also includes the Balance Resources and Demand [Implementation Plan](#).

**Initial Ballot Window for Nuclear Plant Interface Coordination Standard (NUC-001) Opens March 19, 2007**

The initial [ballot](#) for the [Nuclear Plant Interface Coordination \(NUC-001-1\)](#) standard will be conducted from 8 a.m. (EDT) on Monday, March 19 through 8 p.m. (EDT) Friday, March 30, 2007.

This standard requires coordination between nuclear plant generator operators and transmission entities to ensure safe operation and shutdown of nuclear plants. The ballot for this standard also includes the Nuclear Plant Interface Coordination [Implementation Plan](#).

**Initial Ballot Window for Urgent Action SAR to Modify Coordinate Interchange Standards (INT-005, INT-006, INT-008) Opens March 19, 2007**

The initial [ballot](#) for the [Urgent Action SAR](#) to Modify the Timing Table in the following Coordinate Interchange Standards will be conducted from 8 a.m. (EDT) on Monday, March 19 through 8 p.m. (EDT) Friday, March 30, 2007.

- INT-005-2 — Interchange Authority Distributes Arranged Interchange
- INT-006-2 — Response to Interchange Authority
- INT-008-2 — Interchange Authority Distributes Status

REGISTERED BALLOT BODY

March 19, 2007

Page Two

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 WECC enough time to conduct a reliability-related review of e-tags.

### **Initial Ballot Window for Interpretation of BAL-005 — Automatic Generation Control Requirement 17 Opens March 19, 2007**

The initial [ballot](#) for the [Interpretation of BAL-005-0 — Automatic Generation Control Requirement 17](#) will be conducted from 8 a.m. (EDT) on Monday, March 19 through 8 p.m. (EDT) Friday, March 30, 2007.

The interpretation clarifies that the Balancing Authority is required to check and calibrate its control room time error and frequency devices against a common reference at least annually, but the requirement to “annually check and calibrate” does not address any devices outside of the operations control room.

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) 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 [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

*Maureen E. Long*

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

## Standard Authorization Request Form

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

<b>SAR Requestor Information</b>	<b>SAR Type</b> <i>(Check a box for each one that applies.)</i>
Name            WECC Interchange Scheduling and Accounting Subcommittee (WECC ISAS)	<input type="checkbox"/> New Standard
Primary Contact     Jim Hansen	<input checked="" type="checkbox"/> Revision to existing Standards: INT-005-1 INT-006-1 INT-008-1
Telephone     206-706-0165 Fax             206-706-0183	<input type="checkbox"/> Withdrawal of existing Standard
E-mail            james.hansen@seattle.gov	<input checked="" type="checkbox"/> 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.

## Standards Authorization Request Form

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

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

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

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

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

Timing Table

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start

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



**Standards Authorization Request Form**

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***Reliability Functions***

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

**Standards Authorization Request Form**

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<input type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user.
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**Standards Authorization Request Form**

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***Reliability and Market Interface Principles***

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	1. 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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	3. 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.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
<b>Does the proposed Standard comply with all the following Market Interface Principles?</b> <i>(Select "yes" or "no" from the drop-down box.)</i>	
1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
2. An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
3. An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes	

**Standards Authorization Request Form**

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***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>
INT-005-1	Contains timing table
INT-006-1	Contains timing table
INT-008-1	Contains timing table

***Related SARs***

<b>SAR ID</b>	<b>Explanation</b>

***Regional Differences***

<b>Region</b>	<b>Explanation</b>
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

**A. Introduction**

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-2
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **Proposed Effective Date:** Upon approval of Board of Trustees.

**B. Requirements**

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

**C. Measures**

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

**D. Compliance**

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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

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

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

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

**2. Levels of Non-Compliance**

- 2.1. Level 1:** One occurrence<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 History**

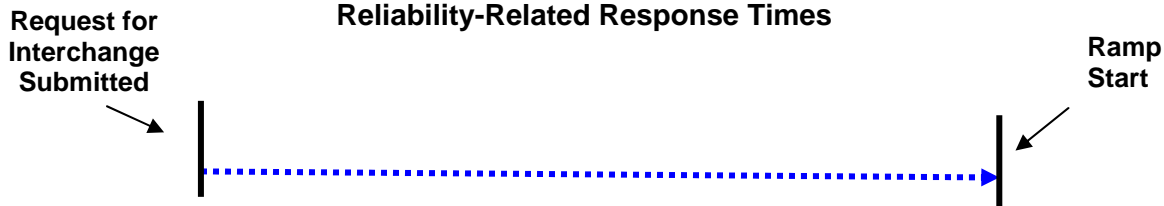
Version	Date	Action	Change Tracking

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

**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**



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

**A. Introduction**

1. **Title:** 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 History**

Version	Date	Action	Change Tracking

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<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**

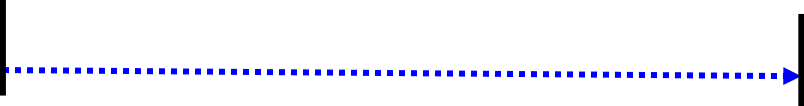
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**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-2
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **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

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

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>

**Timing Table**



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-~~42~~
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **Proposed Effective Date:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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



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

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

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

**2. Levels of Non-Compliance**

- 2.1. **Level 1:** One occurrence<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

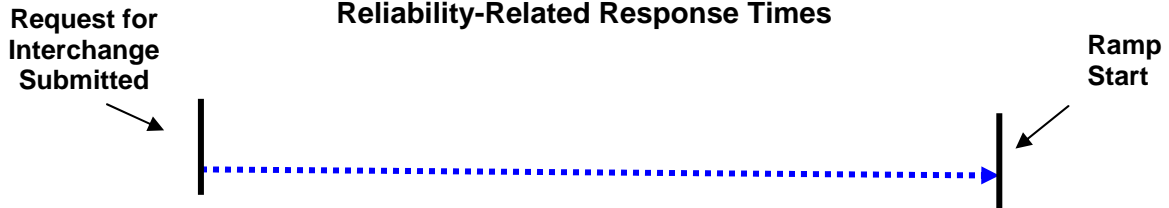
**Version History**

Version	Date	Action	Change Tracking

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

Timing Table

Interchange Timeline with Minimum Reliability-Related Response Times



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



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-~~12~~
3. **Purpose:** To ensure that each Arranged Interchange is checked for reliability before it is implemented.
4. **Applicability**
  - 4.1. Balancing Authority.
  - 4.2. Transmission Service Provider.
5. **Proposed Effective Date:** ~~January 1, 2007~~ 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.

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<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.

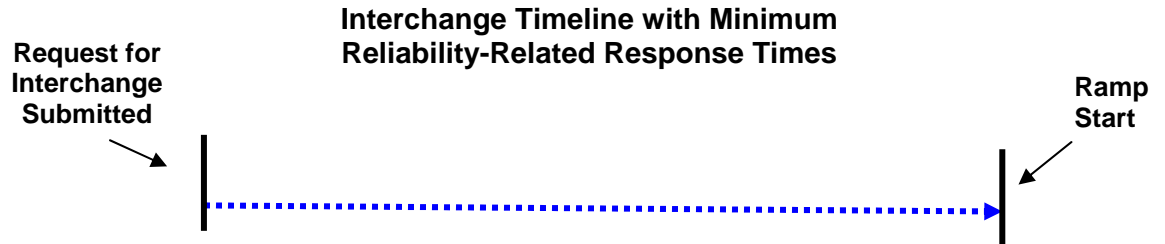
**E. Regional Differences**

None

**Version History**

Version	Date	Action	Change Tracking

Timing Table



	A	B	C	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
<del>≤1 hour prior to ramp start</del>	<del>≤ 1 minute from RFI submission</del>	<del>≤ 5 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>≤ 1 minute from receipt of all Reliability Assessments</del>	<del>≥ 3 minutes prior to ramp start</del>	<del>10 minutes</del>
<del>&lt;20 minutes prior to ramp start</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 5 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>	<del>10 minutes</del>
<del>&gt;20 minutes to &lt;1 hour prior to ramp start</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 10 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>	<del>15 minutes</del>
>1 hour to < 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours





## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-~~1~~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:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

#### 1.4. Additional Compliance Information

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

Subsequent to the initial compliance review, compliance will be:

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

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

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

#### 2. Levels of Non-Compliance

- 2.1. **Level 1:** One occurrence<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

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

**Version History**

Version	Date	Action	Change Tracking

Timing Table



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



## Reliability Standards

### Ballot Results

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

### Summary of Ballot Results

Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain	No
			# Votes	Fraction	# Votes	Fraction	#	Vote
1 - Segment 1.	67	1	44	0.978	1	0.022	11	11
2 - Segment 2.	9	0.8	8	0.8	0	0	1	0
3 - Segment 3.	48	1	33	0.943	2	0.057	7	6
4 - Segment 4.	10	0.7	7	0.7	0	0	3	0
5 - Segment 5.	31	1	17	0.944	1	0.056	6	7
6 - Segment 6.	23	1	13	1	0	0	6	4
7 - Segment 7.	2	0.2	2	0.2	0	0	0	0
8 - Segment 8.	4	0.4	4	0.4	0	0	0	0
9 - Segment 9.	7	0.7	6	0.6	1	0.1	0	0
10 - Segment 10.	7	0.6	6	0.6	0	0	1	0
<b>Totals</b>	<b>208</b>	<b>7.4</b>	<b>140</b>	<b>7.165</b>	<b>5</b>	<b>0.235</b>	<b>35</b>	<b>28</b>

### Individual Ballot Pool Results

Segment	Organization	Member	Ballot		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	
1	New Brunswick Power Transmission Corporation	Wayne N. Snowdon	Affirmative	
1	New York Power Authority	Ralph Rufrano	Affirmative	
1	Northeast Utilities	David H Boguslawski	Abstain	
1	Northern Indiana Public Service Co.	Joseph Dobs	Affirmative	
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative	
1	Oklahoma Gas and Electric Co.	Melvin H. Perkins	Negative	
1	Oncor	Charles W. Jenkins	Affirmative	
1	Otter Tail Power Company	Lawrence R. Larson		
1	Pacific Gas and Electric Company	Chifong L. Thomas	Abstain	
1	PacifiCorp	Robert Williams	Affirmative	
1	Portland General Electric Co.	Frank F. Afranji		
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PP&L, Inc.	Ray Mammarella	Affirmative	
1	Progress Energy Carolinas	Verne B. Ingersoll	Abstain	
1	Public Service Electric and Gas Co.	Colin Loxley	Affirmative	
1	Sacramento Municipal Utility District	Dilip Mahendra	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	San Diego Gas & Electric	Linda Brown		
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SaskPower	Wayne Guttormson	Abstain	
1	Seattle City Light	Christopher M. Turner	Affirmative	
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	South Carolina Electric & Gas Co.	Lee N. Xanthakos		
1	Southern California Edison Co.	Dana Cabbell	Abstain	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southern Illinois Power Coop.	William G. Hutchison		
1	Southwest Transmission Coop., Inc.	Alan H. Wilkinson		

1	Southwestern Power Administration	Stanley Mason	Affirmative	
1	Tampa Electric Co.	Paul Michael Davis	Affirmative	
1	Tennessee Valley Authority	Larry G. Akens	Affirmative	
1	Tri-State G & T Association Inc.	Bruce A Sembrick		
1	Westar Energy	Allen Klassen	Abstain	<a href="#">View</a>
1	Xcel Energy, Inc.	Gregory L. Pieper	Affirmative	
2	Alberta Electric System Operator	Anita Lee	Affirmative	
2	British Columbia Transmission Corporation	Phil Park	Affirmative	
2	California ISO	David Hawkins	Affirmative	
2	Independent Electricity System Operator	Don Tench	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Terry Bilke	Affirmative	<a href="#">View</a>
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli	Abstain	
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
3	Alabama Power Company	Robin Hurst	Affirmative	
3	Allegheny Power	Bob Reeping	Affirmative	
3	Arizona Public Service Co.	Thomas R. Glock	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	Avista Corp.	Robert Lafferty	Affirmative	
3	Blue Ridge Power Agency	Duane S. Dahlquist	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Tallahassee	Rusty S. Foster		
3	City Public Service of San Antonio	Edwin Les Barrow	Affirmative	
3	Cleco Utility Group	Bryan Y Harper	Abstain	
3	Commonwealth Edison Co.	Stephen Lesniak		
3	Constellation Energy	Carolyn Ingersoll	Affirmative	
3	Consumers Energy Co.	David A. Lapinski	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy	Henry Ernst-Jr	Abstain	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative	
3	Florida Municipal Power Agency	Michael Alexander	Abstain	
3	Florida Power & Light Co.	W.R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster		
3	Georgia Power Company	Leslie Sibert	Affirmative	
3	Gulf Power Company	William F. Pope	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner		
3	Lincoln Electric System	Bruce Merrill	Abstain	
3	Louisville Gas and Electric Co.	Charles A. Freibert		
3	Manitoba Hydro	Ronald Dacombe	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Abstain	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Christopher Lawrence de Graffenried	Affirmative	<a href="#">View</a>
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Oklahoma Gas and Electric Co.	Gary Clear	Negative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Abstain	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	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		
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 Florum	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	
10	Electric Reliability Council of Texas, Inc.	Sam R. Jones	Affirmative	
10	Florida Reliability Coordinating Council	Linda Campbell	Affirmative	
10	Midwest Reliability Organization	Larry Brusseau	Abstain	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Edward A. Schwerdt	Affirmative	
10	ReliabilityFirst Corporation	Timothy R. Gallagher	Affirmative	
10	Southwest Power Pool	Charles H. Yeung	Affirmative	



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

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Voter	Entity	Comment
Allen Klassen	Westar Energy	WECC only
<p>Response: The changes made to the timing table do apply solely to WECC.</p>		
Terry Bilke	Midwest ISO, Inc.	<p>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.</p>
<p>Response: The requestor did provide a reliability-related justification for this Urgent Action – the error in the existing timing table does not provide the reliability entities with sufficient time to conduct a reliability analysis of the Arranged Interchange.</p>		
Christopher Lawrence de Graffenried	New York Power Authority	CP-9 agrees with this SAR
<p>Response: The requestor thanks you for your support.</p>		

**A. Introduction**

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-2
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **Proposed Effective Date:** Upon approval of Board of Trustees.

**B. Requirements**

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

**C. Measures**

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

**D. Compliance**

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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

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

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

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

**2. Levels of Non-Compliance**

- 2.1. Level 1:** One occurrence<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 History**

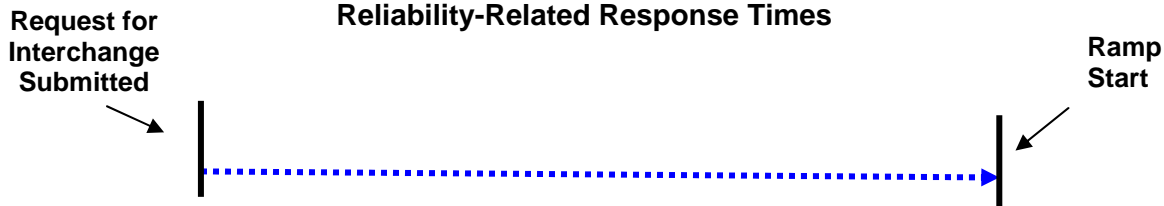
Version	Date	Action	Change Tracking

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

**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**



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

**A. Introduction**

1. **Title:** 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 History**

Version	Date	Action	Change Tracking

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<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**

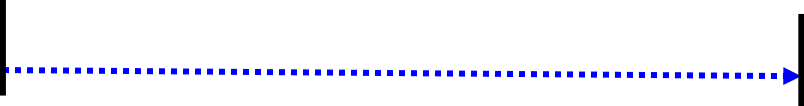
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**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**

Request for Interchange Submitted

Ramp Start



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-2
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **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

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

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>

**Timing Table**



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

## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-~~42~~
3. **Purpose:** To ensure that the implementation of Interchange between Source and Sink Balancing Authorities is distributed by an Interchange Authority such that Interchange information is available for reliability assessments.
4. **Applicability**
  - 4.1. Interchange Authority.
5. **Proposed Effective Date:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

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

Subsequent to the initial compliance review, compliance may be:

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



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

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

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

**2. Levels of Non-Compliance**

- 2.1. **Level 1:** One occurrence<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

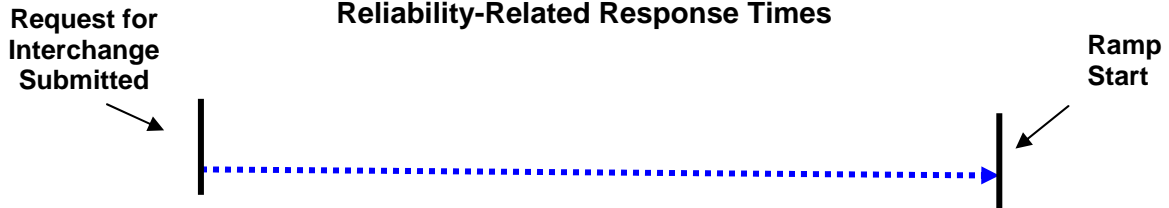
**Version History**

Version	Date	Action	Change Tracking

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

**Timing Table**

**Interchange Timeline with Minimum Reliability-Related Response Times**



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



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-~~1~~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:** ~~January 1, 2007~~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.

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<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.

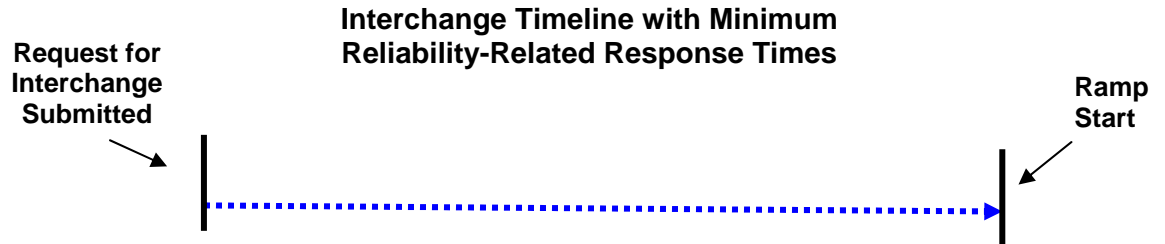
**E. Regional Differences**

None

**Version History**

Version	Date	Action	Change Tracking

Timing Table



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





## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-~~1~~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:** January 1, 2007 Upon approval of Board of Trustees.

## B. Requirements

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

## C. Measures

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

## D. Compliance

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

Regional Reliability Organization.
  - 1.2. **Compliance Monitoring Period and Reset Time Frame**

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

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

#### 1.4. Additional Compliance Information

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

Subsequent to the initial compliance review, compliance will be:

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

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

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

#### 2. Levels of Non-Compliance

- 2.1. **Level 1:** One occurrence<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

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

**Version History**

Version	Date	Action	Change Tracking

Timing Table



	A	B	C	D	
<b>If Actual Arranged Interchange (RFI) is Submitted</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>	<b>Minimum Total Reliability Period (Columns A through D)</b>
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<del>≤1 hour prior to ramp start</del>	<del>≤ 1 minute from RFI submission</del>	<del>≤ 5 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>≤ 1 minute from receipt of all Reliability Assessments</del>	<del>≥ 3 minutes prior to ramp start</del>	<del>10 minutes</del>
<del>&lt;20 minutes prior to ramp start</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 5 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>	<del>10 minutes</del>
<del>&gt;20 minutes to &lt;1 hour prior to ramp start</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 10 minutes from Arranged Interchange receipt from IA for WECC</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>	<del>15 minutes</del>
>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 [Project 2007-09](#) 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 [comment form](#) to provide comments on this SAR.

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

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

REGISTERED BALLOT BODY

April 20, 2007

Page Two

The new SAR for [Permanent Changes to the Coordinate Interchange Table](#) 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 [comment form](#) to provide comments on this SAR.

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) 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 [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

*Maureen E. Long*

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

## Standard Authorization Request Form

<b>Title of Proposed Standard</b>	<b>Permanent Revisions to Coordinate Interchange Standard's Timing Tables</b>
<b>Request Date</b>	<b>February 13, 2007</b>

<b>SAR Requestor Information</b>	<b>SAR Type</b> <i>(Check a box for each one that applies.)</i>
<b>Name</b> WECC Interchange Scheduling and Accounting Subcommittee (WECC ISAS) and the NERC/NAESB Joint Interchange Scheduling Work Group (JISWG)	<input type="checkbox"/> <b>New Standard</b> <input type="checkbox"/>
<b>Primary Contact</b> Robert Harshbarger	<input checked="" type="checkbox"/> <b>Revision to existing Standards</b>  <b>INT-005-1</b> <b>INT-006-1</b> <b>INT-008-1</b>
<b>Telephone</b> 425-462-3348 <b>Fax</b> 425-462-3049	<input type="checkbox"/> <b>Withdrawal of existing Standard</b> <input type="checkbox"/>
<b>E-mail</b> robert.harshbarger@pse.com	<input type="checkbox"/> <b>Urgent Action</b> <input type="checkbox"/>

<p><b>Purpose</b> (Describe the purpose of the standard — what the standard will achieve in support of reliability.)</p> <p>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 submitted 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.</p> <p>Update the Timing Table to Reflect 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):</p> <ul style="list-style-type: none"> <li>- Include designation of request status based on start and submittal times.</li> <li>- Include assess times for After-The-Fact (ATF) requests.</li> <li>- Include a WECC preschedule late (Pre-Late) submittal definition.</li> </ul>	
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## Standards Authorization Request Form

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

The Coordinate Interchange Drafting Team overlooked an issue when they put the timing tables together for WECC. The new coordinate interchange timing table (INT-005,006,008-001), in row 2, contain a 5 minute assessment period for WECC only, for RFIs submitted  $\leq$  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). Some members of the drafting team were under the impression that the 10 minute duration (total of all columns) was the assessment period, thus reflecting no change from existing practices. Column B is clearly defined as 5 minutes however. 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.

The timing table currently does not provide for a specification ATF, Late, and on-time requests. Addition of the initial request status assigned by the Interchange Authority would ensure a common implementation by the various scheduling entities.

The table does include specific timings for After-The-Fact requests. A clarification to vendors issued by the Joint Interchange Scheduling Work Group (JISWG) asked the vendors to implement a 2 hours assessment window for ATF submittals.

To fully support the WECC interchange tagging process, the tables include a definition for late submittals in the preschedule (i.e., next day, etc.) time frame for WECC, only. The creation of a Pre-Late status as defined in the attached table, ensures uniform treatment of all late submittals.

### **Detailed Description**

Modify the Timing Table in INT-005-1, INT-006-1 and INT-008-1 to include the information as shown on the following page. Proposed additions that go beyond those proposed in the Urgent Action SAR for Emergency Revision to INT Standard's Timing Table for WECC are highlighted in yellow.

**Standards Authorization Request Form**

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	NA	NA
<15 minutes prior to ramp start but ≤1 hour after the start time	Late	≤ 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 after receipt of confirmed RFI	15 minutes
<10 minutes prior to ramp start but ≤1 hour after the start time	Late	≤ 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 after receipt of confirmed RFI	10 minutes
<1 hour but ≥ 15 minutes prior to ramp start	On-time	≤ 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 but ≥ 10 minutes prior to ramp start	On-time	≤ 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
<1 hour but ≥ 20 minutes prior to ramp start	On-time	≤ 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 but < 4 hours prior to ramp start	On-time	≤ 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	On-time*	≤ 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
Submitted between 1500 and 1700 PPT with start time ≥ 00:00 PPT of following day	Pre-Late	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

**Reliability Functions**

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

**Reliability and Market Interface Principles**

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
Does the proposed Standard comply with all the following Market Interface Principles? <i>(Select "yes" or "no" from the drop-down box.)</i>	
The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
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	

**Standards Authorization Request Form**

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***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>
INT-005-1	Contains timing table
INT-006-1	Contains timing table
INT-008-1	Contains timing table

***Related SARs***

<b>SAR ID</b>	<b>Explanation</b>

***Regional Variances***

<b>Region</b>	<b>Explanation</b>
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### Background Information

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 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 (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

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments:

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments:

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments:

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Thad K. Ness	
Organization:	American Electric Power	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> <b>RFC</b>	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### Background Information

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 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 (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

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### You do not have to answer all questions.

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments: AEP agrees with the IA assigning the initial status based on its receipt time of submittal for it to be identified to all reliability entities. AEP does not agree with the required action perception for the reliability entities of the stated assigned status classifications that are compromised by the lack of reliability assessment period due to the Creating PSE's failure to submit in a timely manner. The Timing Table implies that Late & ATF status are ok and are to still be acted upon. Any RFI that is submitted in less than 20 minutes prior to start, which is 15 minutes prior to ramp, should be marked as late, period. Reliability entities, not having the minimum full 15 minute reliability assessment period, should not be expected to be measured for non-compliance of a reliability standard, when the industry allows the intent of the reliability period to be compromised on the front-end by the late submittal without repercussion. A 15 minute reliability assessment period still only allows 10 actual minutes of assessment due to processing. AEP agrees that different regions may be able to perform reliability assessment in a smaller time frame, but when the transaction crosses different regions, the most limiting business practice to ensure reliability should be the applied minimum requirement. The real-time reliability assessment period

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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should be expanded due to the dynamic nature of the system from changes, since the original posting of Available Transfer Capability, to perform true reliability assessment on the front-end, instead of backing out with the TLR process that may not be a timely response.

Row 2 of the timing table indicates a "Late" status for less than or equal to an hour after the start time. How can a "Late" status be assigned to an E-Tag, when it can be up to an hour after-the-fact? The same row in the timing table implies there still is a 15 minute reliability assessment period, when submittal could actually be after-the-fact. The intent of the Standard is for entities to responsibly act in a timely manner, when performing reliability assessment, but the timing table contradicts this concept and intent. The last column heading should state Reliability Process Period, instead on Reliability Period.

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:
- RFI submitted >1 hour after the start time
  - RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
  - RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments: AEP agrees with the modifications to the Timing Table that include the additions for the initial IA assigned status and stated corresponding criteria. But, AEP does not agree with any reliability assessment time period designated to the reliability entities that is under 15 minutes for measuring non-compliance, because failure to submit on the front-end in a timely manner compromises the intent of the reliability assessment period. Any passive denials with less than a 15 minute reliability assessment period should not be counted against the reliability entities, when failing to assess in under 15 minutes. This does not mean that reliability entities cannot accommodate a RFI with a less than 15 minute reliability assessment period, but it should not be expected, so as to not compromise the intent of the reliability assessment period. It should be clearly stated that "passive denials" with the assigned status of Late or ATF are not considered a measurable event for non-compliance. This is the only way to encourage those creating PSEs to provide adequate time for reliability assessment, because of the present lack of measurability against the creating PSEs to perform to accommodate a full reliability assessment period.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments:

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments:

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments: Because the basis of the entire reliability assessment process begins with the submittal of RFI by the creating PSE, why are the creating PSEs not held to a higher standard measurable requirement for submitting E-Tags. The Timing Table appears to compromise the intent of the Standard for the reliability assessment period, and puts the burden on the reliability assessment entities to always comply and reliably assess with lack of proper notification. It should be clearly stated that these requirements are the absolute minimum, and reliability entities can require more time in their regions and markets. The table implies that a late & ATF designation still puts the burden of compliance on the reliability entities, even when submittal is allowed to be late. Late should only be allowed and approved, if prior communication and assessment was already being performed by the reliability entities involved during an emergency situation. Approval of a Late designation should not be permitted, unless the source and sink have prior notification that is then somehow identified on the E-Tag as an emergency. The transmission providers must also be able to accommodate this RFI, instead of the implied assumption. To truly meet the intent of the reliability standard assessment period, an absolute minimum of 15 minutes should be maintained; the only exception should be in an emergency situation that is flagged for identification on an E-Tag for later auditing verification. This concept would prevent the



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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neglect to compromise the reliability assessment period on the front-end. The industry needs to make those submitting the RFI on the front-end more accountable, because of their impact on the reliability of the Bulk Electric System. Reliability entities are not allowed to have an excuse for non-compliance or compromise of the Electric System, but the standard compromises the need for the reliability assessment period with the perceived allowance of late submittals by the creating PSEs and requirement of the reliability entities act regardless of the submittal time. Additions to the Standard should be made to clarify the proper application of the status indications and to describe what scenarios the different statuses are for.

9. Do you have any other comments on the SAR?

Yes

No

Comments: ATF & Late submittals of RFI compromise the intent and stated Purpose of the Reliability Standard to make the information available for true reliability assessment. It is understood that the purpose of the ATF & Late designations imply that prior notification and reliability assessment should have occurred by other means with the affected reliability entities outside the E-Tag process in emergency situations, but how can this be clearly verified and communicated to all entities involved to approve during the stated reliability assessment time period? ATF designations might be needed for future hours to be captured in the reliability assessment tools, such as the NERC IDC, but isn't the ATF communication more for billing purposes, instead of reliability? Reliability entities should only be required to act upon Late or ATF designations, if an emergency is declared on E-Tag and is auditable for compliance by prior notification to the reliability entities of source, sink, and transmission provider.

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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The new SAR 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 (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

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### You do not have to answer all questions.

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments: This is a SAR, not a draft standard. We don't think it is appropriate to ask a question on whether there is agreement on the content detail of the standard. We'll reserve our comment when the standard is drafted and posted for comment.

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments: Same comments as Q3



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments: Same comments as Q3

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments: Same comments as Q3

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments: This appears to be a posting of the draft revision to a standard rather than describing the scope of standard changes. A number of questions asked in this Comment Form appear to be inappropriate.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** IRC Standards Review Committee

**Lead Contact:** Charles Yeung

**Contact Organization:** SPP

**Contact Segment:** 2

**Contact Telephone:** 832-724-6142

**Contact E-mail:** cyeung@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Calimano	NYISO	NPCC	2
Alicia Daugherty	PJM	RFC	2
Ron Falsetti	IESO	NPCC	2
Matt Goldberg	ISO-NE	NPCC	2
Brent Kingsford	CAISO	WECC	2
Steve Myers	ERCOT	ERCT	2
Anita Lee	AESO	WECC	2
Bill Phillips	MISO	RFC+	2

\* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### Background Information

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Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### You do not have to answer all questions.

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments:

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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No

Comments:

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No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments:

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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No

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Yes

No

Comments:



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Yes

No

Comments:

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Yes

No

Comments:

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Yes

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Comments:

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Telephone:		
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments:

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
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- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

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Yes

No

Comments:

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

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Yes

No

Comments:

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments:

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	NERC/NAESB Joint Interchange Scheduling Working Group	
Organization:		
Telephone:		
E-mail:	james.hansen@seattle.gov, robert.harshbarger@pse.com, Chairs of the JISWG	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** JISWG  
**Lead Contact:** Jim Hansen, Bob Harshbarger  
**Contact Organization:** see above  
**Contact Segment:**  
**Contact Telephone:**  
**Contact E-mail:** see above

Additional Member Name	Additional Member Organization	Region*	Segment*
Brett Fisher	Western Area Power Administration		
Tom Vandervort	NERC		
Clint Aymond	Entergy		
Paul Sorenson	OATI		
Andy Tritch	SunGard		
Chairs			
Bob Harshbarger	Puget Sound Energy		
Jim Hansen	Seattle Power and Light		
Dan Baisden	Southern Company		

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

---

### Background Information

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 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 (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

Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments: For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments: Attached table has a replacement row that is <1 hour and >10 minutes prior to ramp start.

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments: JISWG eliminated this row in their reformatted timing requirement tables. In its place, JISWG created a new row to focus on pre-scheduled tags for the WECC.

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments: Ramp duration and ramp start are different for the WECC.

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments: For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.

9. Do you have any other comments on the SAR?

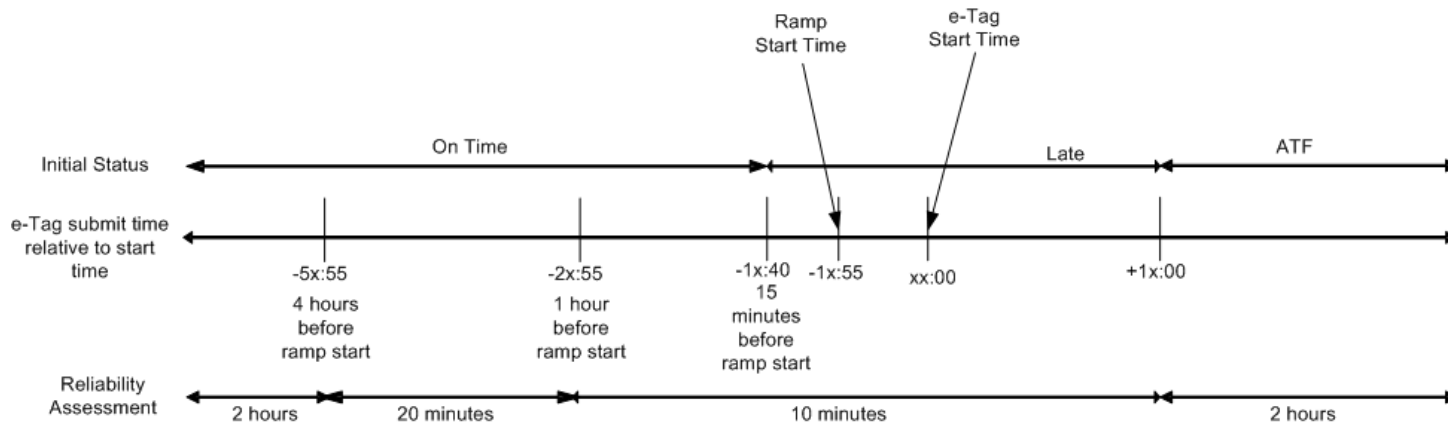
Yes

No

Comments:

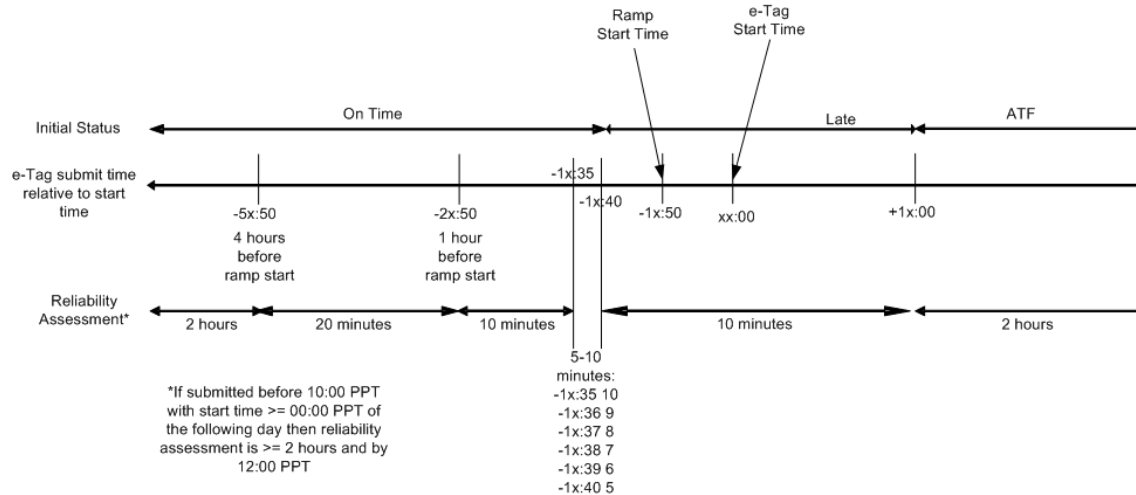
### Timing Requirements for all Interconnections except WECC

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	NA	NA
<15 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 15 minutes prior to ramp start	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≥ 1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<u>On-time</u>	≤ 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



### Timing Requirements for WECC

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	NA	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA and ≥ 4 minutes prior to ramp start	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10-15 minutes
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	Min 4 hours



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

Please use this form to submit comments on the proposed the first draft of the SAR to make permanent changes to the Timing Table in the Coordinate Interchange standards. Comments must be submitted by **May 21, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Perm CI Table**" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities





## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### Background Information

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The new SAR 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 (RFI).

- Designation of request status based on start and submittal times
- Assess times for After-the-Fact (ATF) requests
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Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments:

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments:

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments:

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments:

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	David Lemmons	
Organization:	Xcel Energy	
Telephone:	303-308-6120	
E-mail:	david.f.lemmons@xcelenergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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The new SAR 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 (RFI).

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- Assess times for After-the-Fact (ATF) requests
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Please review the SAR, answer the questions on the following page, and e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "**Perm CI Table**" by **May 21, 2007**.

## Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)

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### You do not have to answer all questions.

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

Yes

No

Comments: The scope is not limited to only the modifications made in the urgent action SAR earlier this year. There is the possibility that the urgent action standard will expire prior to this being approved due to issues unassociated with the urgent action items. Due to the time constraints, it might be better to separate the items related to the urgent action and the items related to the latest E-tag Specification.

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

Yes

No

Comments: Looking at the NERC website under the JISWG, I reviewed the most recent version 1.7 and the second draft of version 1.8. Both of these documents had three definitions related to the submission time, On Time, Late and After The Fact. The proposed timing table should be limited to these three designations. The Pre-Late designation has no reliability reason for existence. If the WECC wishes to have a cut-off time for prescheduling purposes, set a time and do not include tags submitted after that time in the preschedule checkout. In fact, based upon the Western Interchange Tool, the increased automation of scheduling packages in general, and the E-tagging process, Xcel Energy does not see any value in continuing the historical practice of a preschedule checkout. If the WECC does feel a need to continue this practice, there is no need to assume that a tag should be denied due to missing an artificially imposed

**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

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deadline for a checkout. Denials of these tags only causes duplication of effort later which is inefficient and time consuming for all parties for no reliability benefit.

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:

- RFI submitted >1 hour after the start time
- RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
- RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

Yes

No

Comments:



**Comment Form — SAR for Permanent Changes to the Timing Table in Coordinate Interchange Standards (Project 2007-14)**

---

5. Do you agree with the modification to the timing table that includes the addition of the row for the following:

- RFI submitted <1 hour but >20 minutes prior to ramp start

Yes

No

Comments:

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:

- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

Yes

No

Comments: There is no definition available to review that I have seen. Without a definition, it is impossible to support this designation.

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

Yes

No

Comments:

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

Yes

No

Comments:

9. Do you have any other comments on the SAR?

Yes

No

Comments: Neither the current WECC Business Practices nor the NERC standards address the Pre-Late status and this status is not needed for the reliable operation of the electrical grid in the WECC. This line in the timing table should be removed from the SAR.



## **Consideration of Comments for SAR for Permanent Changes to the Timing Tables in the Coordinate Interchange Standards**

The SAR requester working on the Permanent Changes in the timing tables used in Coordinate Interchange standards INT-005, INT-006, and INT-008 thanks all commenters who submitted comments on Draft 1 of the SAR. This SAR was posted for a 30-day public comment period from April 20 through May 21, 2007. The requester asked stakeholders to provide feedback on the SAR through a special SAR Comment Form. There were 8 sets of comments, including comments from 32 different people from 20 companies representing 6 of the 10 Industry Segments as shown in the table on the following pages.

Based on the stakeholder comments received, the drafting team made some modifications to the recommended timing table and is asking the Standard Committee for authorization to proceed with changes to the standards. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

[http://www.nerc.com/~filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/~filez/standards/INT_Urgent_Action.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

## Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee(G1)	AESO		✓										
2.	Thad K. Ness	American Electric Power	✓				✓	✓						
3.	Brent Kingsford(G1)	CAISO		✓										
4.	Clint Aymond (G3)	Entergy												
5.	Steve Myers(G1)	ERCOT		✓										
6.	Ron Falsetti (I) (G1)	IESO		✓										
7.	Matt Goldberg(G1)	ISO-NE		✓										
8.	Robert Coish	Manitoba Hydro	✓		✓		✓	✓						
9.	Bill Phillips(G1)	MISO		✓										
10.	Tom Vandervort (G3)	NERC												
11.	Mike Calimano(G1)	NYISO		✓										
12.	Paul Sorenson (G3)	OATI												
13.	Alicia Daugherty(G1)	PJM		✓										
14.	Phil Riley (G2)	PSC SC											✓	
15.	Mignon L. Clyburn (G2)	PSC SC											✓	
16.	Elizabeth B. Fleming (G2)	PSC SC											✓	
17.	G. O'Neal Hamilton (G2)	PSC SC											✓	
18.	John E. Howard (G2)	PSC SC											✓	
19.	Randy Mitchell (G2)	PSC SC											✓	
20.	C. Robert Moseley (G2)	PSC SC											✓	
21.	David A. Wright (G2)	PSC SC											✓	
22.	Bob Harshbarger (G3)	Puget Sound Energy												

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
23.	Jim Hansesn (G3)	Seattle City Light											
24.	Roman Carter (G4)	Southern Co. Transmission	✓										
25.	Marc Butts (G4)	Southern Co. Transmission	✓										
26.	JT Wood (G4)	Southern Co. Transmission	✓										
27.	Jim Busbin (G4)	Southern Co. Transmission	✓										
28.	Mike Oatts (G4)	Southern Co. Transmission	✓										
29.	Dan Baisden (G3)	Southern Company											
30.	Charles Yeung (G1)	SPP		✓									
31.	Andy Tritch (G3)	SunGard						✓					
32.	David Lemmons	Xcel Energy											

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – IRC Standards Review Committee (IRC SRC)

G2 – Public Service Commission of South Carolina (PSC South Carolina)

G3 – Joint NERC/NAESB Joint Interchange Scheduling Working Group (JISWG)

G4 – Southern Company Transmission

**Index to Questions, Comments, and Responses**

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.....5

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area. ....6

3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?' .....8

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following: ..... 10

5. Do you agree with the modification to the timing table that includes the addition of the row for the following: ..... 12

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following: ..... 13

7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area. .... 14

8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?..... 15

9. Do you have any other comments on the SAR?..... 17

Attachment 1 - Proposed Timing Table from JISWG ..... 19

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

---

1. The modifications made to the timing table in the Coordinate Interchange standards, using the "Urgent Action" process, were approved (by the associated ballot pool) on March 30, 2007. These modifications will expire unless a SAR is entered into the full standards development process. The modification made to the timing table was made to provide sufficient time for reliability entities to do an analysis of the arranged interchange. This SAR would make those changes permanent and would also 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). Do you agree that there is a reliability-related need for the proposed standards action? If not, please explain in the comment area.

**Summary Consideration:** All commenters agreed that there is a reliability-related need for the proposed standard action.

Question #1			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

2. Do you agree with the scope of this SAR which is limited to making changes to the Timing Tables in the Coordinate Interchange Standards INT-005, INT-006, INT-008? If not, please explain in the comment area.

**Summary Consideration:** All commenters indicated agreement with the scope – and one commenter indicated that consideration should be given to further refining the scope to just the changes that were also in the Urgent Action SAR because of a concern that the changes made under the Urgent Action SAR could expire before a ballot pool approves the new set of modifications. The Reliability Standards Development Procedure manual includes the following language relative to the expiration of a modification to a standard that is made using the ‘Urgent Action’ process:

If a standard is adopted through an urgent or emergency action, one of the following three actions must occur:

- If the urgent or emergency action standard is to be made permanent without substantive changes, then the standard must proceed through the regular standards development process to be balloted by stakeholders within one year of the urgent or emergency action approval by stakeholders.
- If the urgent or emergency action standard is to be substantively revised or replaced by a new standard, then a request for the new or revised standard must be initiated as soon as practical after the urgent or emergency action ballot and the standard must proceed through the regular standards development process to be balloted by stakeholders as soon as practical within two years of the urgent or emergency action approval by stakeholders.
- The urgent or emergency action standard may be withdrawn through the regular process by a ballot of the stakeholders within two years.

It is our interpretation that the changes proposed with this SAR go beyond those in the Urgent Action SAR and fall under the second bullet above and need to be completed within two years. The Requester believes the proposed changes can be balloted within that two-year period.

Question #2			
Commenter	Yes	No	Comment
Xcel Energy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The scope is not limited to only the modifications made in the urgent action SAR earlier this year. There is the possibility that the urgent action standard will expire prior to this being approved due to issues unassociated with the urgent action items. Due to the time constraints, it might be better to separate the items related to the urgent action and the items related to the latest E-tag Specification.
<p><b>Response:</b> As you suggested, the proposed changes go beyond those included in the Urgent Action SAR and therefore fall under the category of Urgent Action modifications that would expire two years from the date of ballot pool approval. The</p>			

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

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<b>Question #2</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
Requester believes the proposed changes can be balloted within that two-year period.			
AEP	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		



**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

- 3. Do you agree with the modification to the Timing Table that includes the new the column that is labeled, 'IA assigns initial status?'

**Summary Consideration:** Based on stakeholder comments, the 'pre-late' designation has been removed.

Question #3			
Commenter	Yes	No	Comment
AEP		<input checked="" type="checkbox"/>	<p>AEP agrees with the IA assigning the initial status based on its receipt time of submittal for it to be identified to all reliability entities. AEP does not agree with the required action perception for the reliability entities of the stated assigned status classifications that are compromised by the lack of reliability assessment period due to the Creating PSE's failure to submit in a timely manner. The Timing Table implies that Late &amp; ATF status are ok and are to still be acted upon. Any RFI that is submitted in less than 20 minutes prior to start, which is 15 minutes prior to ramp, should be marked as late, period. Reliability entities, not having the minimum full 15 minute reliability assessment period, should not be expected to be measured for non-compliance of a reliability standard, when the industry allows the intent of the reliability period to be compromised on the front-end by the late submittal without repercussion. A 15 minute reliability assessment period still only allows 10 actual minutes of assessment due to processing. AEP agrees that different regions may be able to perform reliability assessment in a smaller time frame, but when the transaction crosses different regions, the most limiting business practice to ensure reliability should be the applied minimum requirement. The real-time reliability assessment period should be expanded due to the dynamic nature of the system from changes, since the original posting of Available Transfer Capability, to perform true reliability assessment on the front-end, instead of backing out with the TLR process that may not be a timely response.</p> <p>Row 2 of the timing table indicates a "Late" status for less than or equal to an hour after the start time. How can a "Late" status be assigned to an E-Tag, when it can be up to an hour after-the-fact? The same row in the timing table implies there still is a 15 minute reliability assessment period, when submittal could actually be after-the-fact. The intent of the Standard is for entities to responsibly act in a timely manner, when performing reliability assessment, but the timing table contradicts this concept and intent. The last column heading should state Reliability Process Period, instead on Reliability Period.</p>
<p><b>Response:</b> The label "Late" has no functionality within the e-Tag specification. In addition, the INT standards do not require any particular action by reliability entities for e-Tag that are assigned the Late status. The proposed timing tables do not represent a major change to existing e-Tag system regarding the Late status, they merely document current implementation.</p>			

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
JISWG		<input checked="" type="checkbox"/>	For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.
<b>Response:</b> The proposed changes from JISWG provide additional clarity to the tables. The SAR will utilize these tables.			
Xcel Energy		<input checked="" type="checkbox"/>	Looking at the NERC website under the JISWG, I reviewed the most recent version 1.7 and the second draft of version 1.8. Both of these documents had three definitions related to the submission time, On Time, Late and After The Fact. The proposed timing table should be limited to these three designations. The Pre-Late designation has no reliability reason for existence. If the WECC wishes to have a cut-off time for prescheduling purposes, set a time and do not include tags submitted after that time in the preschedule checkout. In fact, based upon the Western Interchange Tool, the increased automation of scheduling packages in general, and the E-tagging process, Xcel Energy does not see any value in continuing the historical practice of a preschedule checkout. If the WECC does feel a need to continue this practice, there is no need to assume that a tag should be denied due to missing an artificially imposed deadline for a checkout. Denials of these tags only causes duplication of effort later which is inefficient and time consuming for all parties for no reliability benefit.
<b>Response:</b> We agree, the pre-late designation will be removed.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	This is a SAR, not a draft standard. We don't think it is appropriate to ask a question on whether there is agreement on the content detail of the standard. We'll reserve our comment when the standard is drafted and posted for comment.
<b>Response:</b> The intent of this question was to see if the expanded scope of the SAR was acceptable to stakeholders before moving the SAR forward to standard drafting.			
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		

## Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

4. Do you agree with the modifications to the Timing Table that include the addition of the rows for the following:
- RFI submitted >1 hour after the start time
  - RFI submitted <15 minutes prior to ramp start but <1 hour after the start time
  - RFI submitted <10 minutes prior to ramp start but <1 hour after the start time

**Summary Consideration:** Most commenters indicated agreement with the proposed modifications to the Timing Table.

Question #4			
Commenter	Yes	No	Comment
AEP		<input checked="" type="checkbox"/>	AEP agrees with the modifications to the Timing Table that include the additions for the initial IA assigned status and stated corresponding criteria. But, AEP does not agree with any reliability assessment time period designated to the reliability entities that is under 15 minutes for measuring non-compliance, because failure to submit on the front-end in a timely manner compromises the intent of the reliability assessment period. Any passive denials with less than a 15 minute reliability assessment period should not be counted against the reliability entities, when failing to assess in under 15 minutes. This does not mean that reliability entities cannot accommodate a RFI with a less than 15 minute reliability assessment period, but it should not be expected, so as to not compromise the intent of the reliability assessment period. It should be clearly stated that "passive denials" with the assigned status of Late or ATF are not considered a measurable event for non-compliance. This is the only way to encourage those creating PSEs to provide adequate time for reliability assessment, because of the present lack of measurability against the creating PSEs to perform to accommodate a full reliability assessment period.
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
<p><b>Response:</b> We hope that AEP is able to participate in the standard development process to address this issue with other industry members. Regarding the comment on passive denials being treated as a compliant action for Late e-Tags, this is beyond the scope of this SAR. INT-006 clearly requires reliability assessment entities to actively respond to all assessment requests from the Interchange Authority.</p>			
IRC SRC	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

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<b>Question #4</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
Manitoba Hydro			No comment.

## Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

5. Do you agree with the modification to the timing table that includes the addition of the row for the following:
- RFI submitted <1 hour but >20 minutes prior to ramp start

**Summary Consideration:** Most commenters agreed with the proposed modification – the NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the modifications to the timing table provided a new update for this row and instead of the proposed language, the revised SAR adopts the language proposed by the JISWG: RFI submitted <1 hour and >10 minutes prior to ramp start. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #5			
Commenter	Yes	No	Comment
JISWG		<input checked="" type="checkbox"/>	Attached table has a replacement row that is <1 hour and >10 minutes prior to ramp start.
<a href="#">Response: The requester agrees with the JISWG changes.</a>			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
<a href="#">Response: Please see the response to your comments on Q3.</a>			
AEP	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		
So. Co. Transmission	<input checked="" type="checkbox"/>		
Xcel Energy	<input checked="" type="checkbox"/>		

## Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

6. Do you agree with the modification to the Timing Table that includes the row (just for WECC) for the following:
- RFI submitted between 1500 and 1700 PPT with start time >00:00 PPT of following day

**Summary Consideration:** The NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the modifications to the timing table provided a new update to the timing table and this row is no longer included. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #6			
Commenter	Yes	No	Comment
JISWG		<input checked="" type="checkbox"/>	JISWG eliminated this row in their reformatted timing requirement tables. In its place, JISWG created a new row to focus on pre-scheduled tags for the WECC.
<b>Response:</b> The requester agrees with JISWG changes.			
Xcel Energy		<input checked="" type="checkbox"/>	There is no definition available to review that I have seen. Without a definition, it is impossible to support this designation.
<b>Response:</b> This row was removed from the revised SAR.			
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments on Q3.
<b>Response:</b> Please see the response to your comments on Q3.			
AEP	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
PSC South Carolina	<input checked="" type="checkbox"/>		

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

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7. Are you aware of any regional variances that we should consider with this SAR? If not, please explain in the comment area.

**Summary Consideration:** No regional variances were identified.

<b>Question #7</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	
Xcel Energy		<input checked="" type="checkbox"/>	
AEP	<input checked="" type="checkbox"/>		
JISWG	<input checked="" type="checkbox"/>		Ramp duration and ramp start are different for the WECC.
<b>Response:</b> Agreed – and these have been built into the standard.			

**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

- 8. Are you aware of any modifications that need to be made to any associated business practices — or any new business practices that we should consider with this SAR?

**Summary Consideration:** The NERC/NAESB Joint Interchange Scheduling Working Group (JISWG) that initiated the changes to the timing table indicated that the timing table modification is needed for both NERC and NAESB and the recommended changes have already been submitted to NAESB. The latest version of the proposed timing table has been attached to this document and is included in the revised SAR.

Question #8			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		Because the basis of the entire reliability assessment process begins with the submittal of RFI by the creating PSE, why are the creating PSEs not held to a higher standard measurable requirement for submitting E-Tags. The Timing Table appears to compromise the intent of the Standard for the reliability assessment period, and puts the burden on the reliability assessment entities to always comply and reliably assess with lack of proper notification. It should be clearly stated that these requirements are the absolute minimum, and reliability entities can require more time in their regions and markets. The table implies that a late & ATF designation still puts the burden of compliance on the reliability entities, even when submittal is allowed to be late. Late should only be allowed and approved, if prior communication and assessment was already being performed by the reliability entities involved during an emergency situation. Approval of a Late designation should not be permitted, unless the source and sink have prior notification that is then somehow identified on the E-Tag as an emergency. The transmission providers must also be able to accommodate this RFI, instead of the implied assumption. To truly meet the intent of the reliability standard assessment period, an absolute minimum of 15 minutes should be maintained; the only exception should be in an emergency situation that is flagged for identification on an E-Tag for later auditing verification. This concept would prevent the neglect to compromise the reliability assessment period on the front-end. The industry needs to make those submitting the RFI on the front-end more accountable, because of their impact on the reliability of the Bulk Electric System. Reliability entities are not allowed to have an excuse for non-compliance or compromise of the Electric System, but the standard compromises the need for the reliability assessment period with the perceived allowance of late submittals by the creating PSEs and requirement of the reliability entities act regardless of the submittal time. Additions to the Standard should be made to clarify the proper application of the status indications and to describe what scenarios the different statuses are for.

**Response:** To address concerns above, it should be pointed out that reliability entities that participate in the assessment of



**Consideration of Comments for SAR for Permanent Changes in CI Timing Tables**

<b>Question #8</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
<p>an e-Tag are required to actively respond to the Interchange Authority's request. That response can be either Approved or Denied. If there is insufficient time to properly assess a RFI, it seems prudent for the reliability entity to Deny the transaction. The proposed timing tables are meant to document parameters used in the e-Tag implementation. Regional and individual practices on processing Late tags are beyond the scope of this SAR.</p>			
JISWG	<input checked="" type="checkbox"/>		For this question, please see the attached table. Changes were made to the table at the May 16, 2007 JISWG meeting. The same changes are being submitted to NAESB under Request R07007. JISWG believes the changes made to the table provide clarity for timing requirements. While the majority of changes are formatting in nature, therefore leaving the intent as is, these formatting changes provide a better understanding of the timing requirements.
<p><b>Response:</b> The requester agrees with the JISWG changes.</p>			
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	
Xcel Energy		<input checked="" type="checkbox"/>	

## Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

9. Do you have any other comments on the SAR?

Question #9			
Commenter	Yes	No	Comment
AEP	<input checked="" type="checkbox"/>		ATF & Late submittals of RFI compromise the intent and stated Purpose of the Reliability Standard to make the information available for true reliability assessment. It is understood that the purpose of the ATF & Late designations imply that prior notification and reliability assessment should have occurred by other means with the affected reliability entities outside the E-Tag process in emergency situations, but how can this be clearly verified and communicated to all entities involved to approve during the stated reliability assessment time period? ATF designations might be needed for future hours to be captured in the reliability assessment tools, such as the NERC IDC, but isn't the ATF communication more for billing purposes, instead of reliability? Reliability entities should only be required to act upon Late or ATF designations, if an emergency is declared on E-Tag and is auditable for compliance by prior notification to the reliability entities of source, sink, and transmission provider.
<p><b>Response:</b> The primary purpose of the ATF designation is to uniquely identify e-Tags that do not impact reliability but do help support the after the fact communication of interchange scheduling data. The current e-Tag paradigm supports both commercial and reliability needs. Both NERC and NAESB standards for interchange communication and coordination need to use common timing tables and protocols. Assessment of compliance with INT-006 for late and ATF tags is beyond the scope of this SAR.</p>			
Xcel Energy	<input checked="" type="checkbox"/>		Neither the current WECC Business Practices nor the NERC standards address the Pre-Late status and this status is not needed for the reliable operation of the electrical grid in the WECC. This line in the timing table should be removed from the SAR.
<p><b>Response:</b> Pre-Late has been removed.</p>			
IESO	<input checked="" type="checkbox"/>		This appears to be a posting of the draft revision to a standard rather than describing the scope of standard changes. A number of questions asked in this Comment Form appear to be inappropriate.
<p><b>Response:</b> The intent in asking these questions was to see if there is support for expanding the scope of the SAR beyond the changes included in the Urgent Action SAR.</p>			
IRC SRC		<input checked="" type="checkbox"/>	
Manitoba Hydro		<input checked="" type="checkbox"/>	
PSC South Carolina		<input checked="" type="checkbox"/>	
JISWG		<input checked="" type="checkbox"/>	
So. Co. Transmission		<input checked="" type="checkbox"/>	

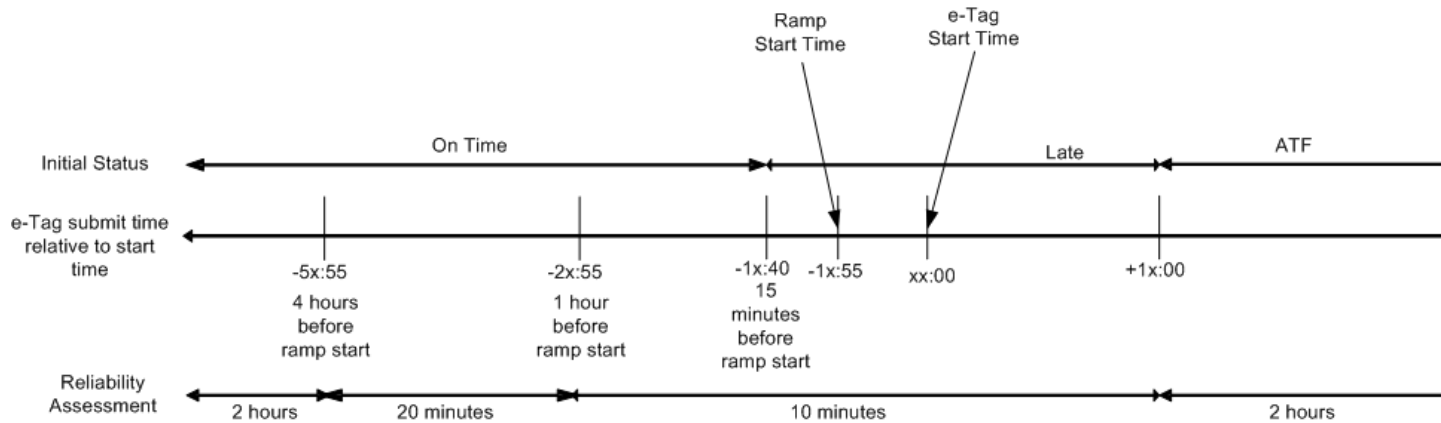


Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

Attachment 1 - Proposed Timing Table from JISWG

Timing Requirements for all Interconnections except WECC

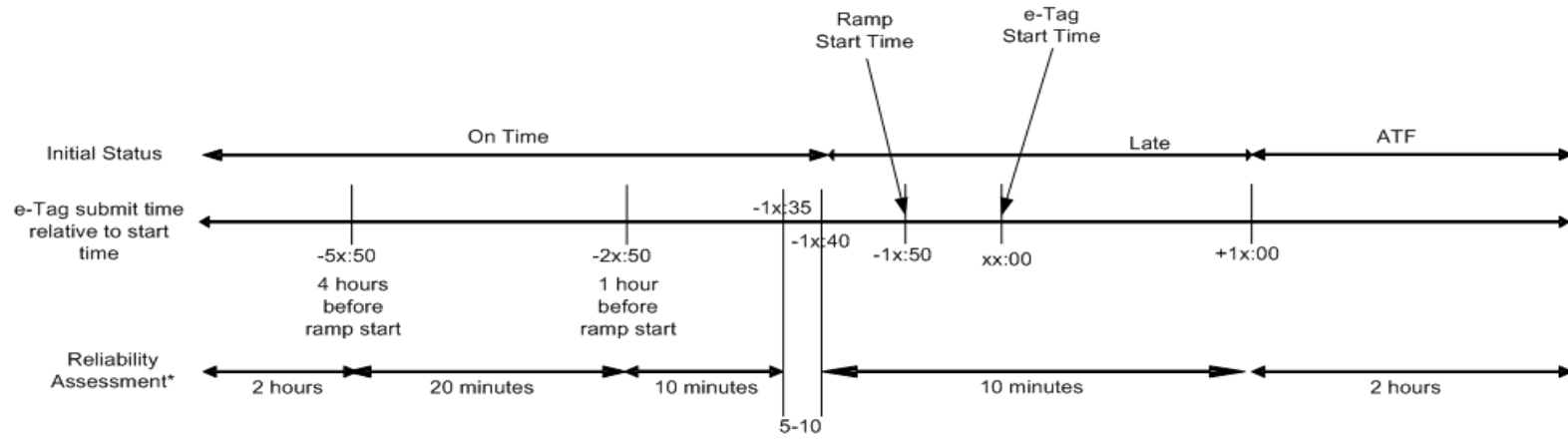
		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	Minimum Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	NA	NA
<15 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 15 minutes prior to ramp start	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	15 minutes
≥ 1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<u>On-time</u>	≤ 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



Consideration of Comments for SAR for Permanent Changes in CI Timing Tables

Timing Requirements for WECC

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	NA	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA and ≥ 4 minutes prior to ramp start	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10-15 minutes
≥ 1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	Min 4 hours



\*If submitted before 10:00 PPT with start time >= 00:00 PPT of the following day then reliability assessment is >= 2 hours and by 12:00 PPT

## Standard Authorization Request Form

<b>Title of Proposed Standard</b>	<b>Permanent Revisions to Coordinate Interchange Standard's Timing Tables</b>
<b>Request Date</b>	<b>February 13, 2007</b>
<b>Revised Date</b>	<b>August 3, 2007</b>

SAR Requestor Information	SAR Type <i>(Check a box for each one that applies.)</i>
<b>Name</b> WECC Interchange Scheduling and Accounting Subcommittee (WECC ISAS) and the NERC/NAESB Joint Interchange Scheduling Work Group (JISWG)	<input type="checkbox"/> New Standard <input type="checkbox"/>
<b>Primary Contact</b> Robert Harshbarger	<input checked="" type="checkbox"/> Revision to existing Standards INT-005-1 INT-006-1 INT-008-1
<b>Telephone</b> 425-462-3348 <b>Fax</b> 425-462-3049	<input type="checkbox"/> Withdrawal of existing Standard <input type="checkbox"/>
<b>E-mail</b> robert.harshbarger@pse.com	<input type="checkbox"/> Urgent Action <input type="checkbox"/>

**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 submitted 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.

Update the Timing Table to Reflect the Categories (On-time, Late, and After-the-fact) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI):

- Include designation of request status based on start and submittal times.
- Include assess times for After-The-Fact (ATF) requests.

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

The Coordinate Interchange Drafting Team overlooked an issue when they put the timing tables together for WECC. The new coordinate interchange timing table (INT-005,006,008-001), in row 2, contain a 5 minute assessment period for WECC only, for RFI's submitted  $\leq$  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). Some members of the drafting team were under the impression that the 10 minute duration (total of all columns) was the assessment period, thus reflecting no change from existing practices. Column B is clearly defined as 5 minutes however. 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.

The timing table currently does not provide for a specification ATF, Late, and on-time requests. Addition of the initial request status assigned by the Interchange Authority would ensure a common implementation by the various scheduling entities.

The table does include specific timings for After-The-Fact requests. A clarification to vendors issued by the Joint Interchange Scheduling Work Group (JISWG) asked the vendors to implement a 2 hours assessment window for ATF submittals.

To fully support the WECC interchange tagging process, the tables include a definition for late submittals in the preschedule (i.e., next day, etc.) time frame for WECC, only. The creation of a Pre-Late status as defined in the attached table, ensures uniform treatment of all late submittals.

**Detailed Description**

Modify the Timing Table in INT-005-1, INT-006-1 and INT-008-1 to include the information as shown on the last page.

**Reliability Functions**

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



**Reliability and Market Interface Principles**

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
Does the proposed Standard comply with all the following Market Interface Principles? <i>(Select "yes" or "no" from the drop-down box.)</i>	
The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
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	

**Standards Authorization Request Form**

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***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>
INT-005-1	Contains timing table
INT-006-1	Contains timing table
INT-008-1	Contains timing table

***Related SARs***

<b>SAR ID</b>	<b>Explanation</b>

***Regional Variances***

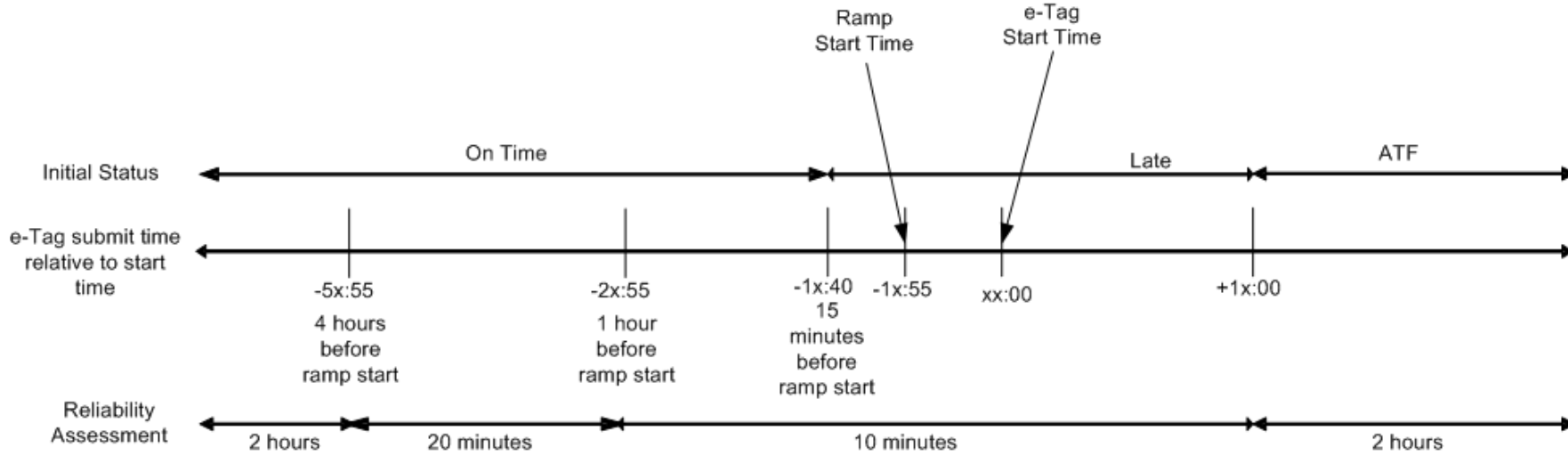
<b>Region</b>	<b>Explanation</b>
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

**Standards Authorization Request Form**

<b>Timing Requirements for all Interconnections except WECC</b>						
		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATE</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	NA	NA
<15 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 15 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥3 minutes prior to ramp start	15 minutes
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standards Authorization Request Form

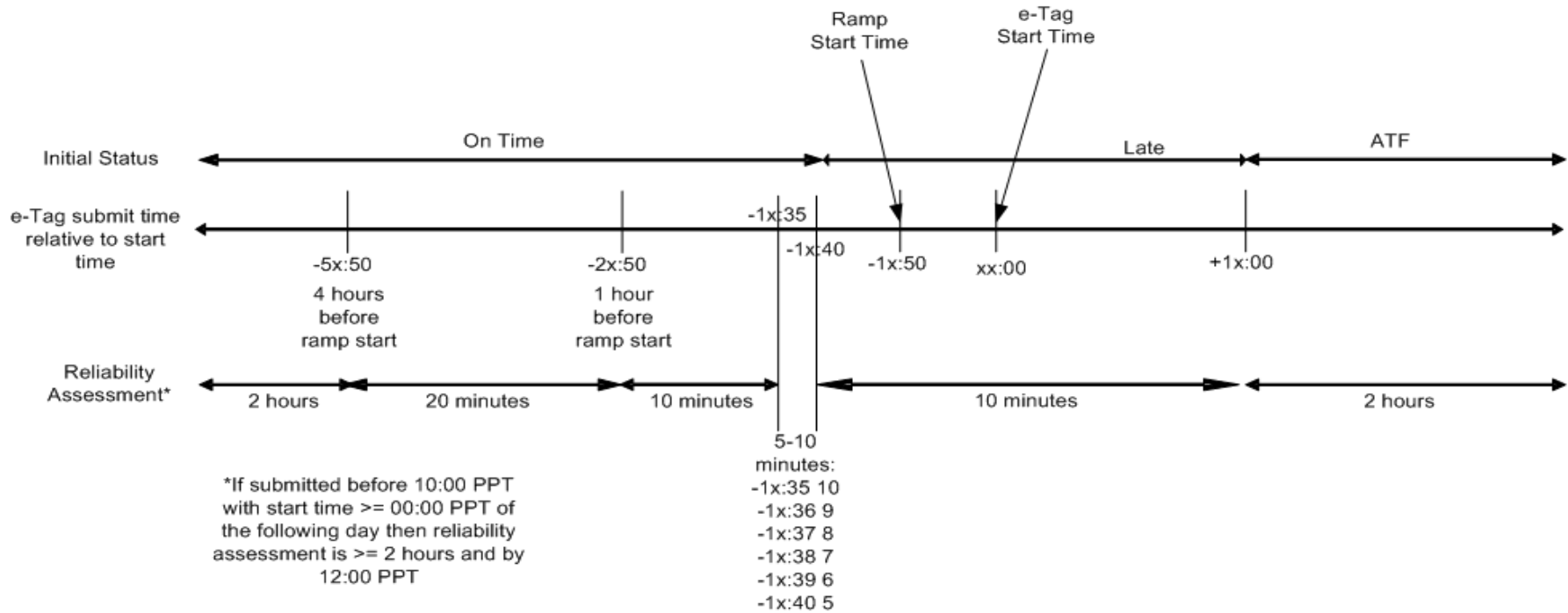
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**Standards Authorization Request Form**

<b>Timing Requirements for WECC Interconnection</b>						
		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	NA	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA and ≥ 4 minutes prior to ramp start	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10-15 minutes
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	Min 4 hours

Standards Authorization Request Form



## Standard Authorization Request Form

<b>Title of Proposed Standard</b>	<b>Permanent Revisions to Coordinate Interchange Standard's Timing Tables</b>
<b>Request Date</b>	<b>February 13, 2007</b>
<b>Revised Date</b>	<b>August 3, 2007</b>

SAR Requestor Information	SAR Type <i>(Check a box for each one that applies.)</i>
<b>Name</b> WECC Interchange Scheduling and Accounting Subcommittee (WECC ISAS) and the NERC/NAESB Joint Interchange Scheduling Work Group (JISWG)	<input type="checkbox"/> New Standard
	<input type="checkbox"/>
<b>Primary Contact</b> Robert Harshbarger	<input checked="" type="checkbox"/> Revision to existing Standards  INT-005-1 INT-006-1 INT-008-1
<b>Telephone</b> 425-462-3348 <b>Fax</b> 425-462-3049	<input type="checkbox"/> Withdrawal of existing Standard  <input type="checkbox"/>
<b>E-mail</b> robert.harshbarger@pse.com	<input type="checkbox"/> Urgent Action  <input type="checkbox"/>

**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 submitted 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.

Update the Timing Table to Reflect the Categories (On-time, Late, and After-the-fact) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI):

- Include designation of request status based on start and submittal times.
- Include assess times for After-The-Fact (ATF) requests.

- Deleted:** , and Pre-late
- Deleted:** Include a WECC preschedule late (Pre-Late) submittal definition.
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116-390 Village Boulevard, Princeton, New Jersey 08540-5721

Phone: 609.452.8060 • Fax: 609.452.9550 • [www.nerc.com](http://www.nerc.com)

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

The Coordinate Interchange Drafting Team overlooked an issue when they put the timing tables together for WECC. The new coordinate interchange timing table (INT-005,006,008-001), in row 2, contain a 5 minute assessment period for WECC only, for RFI's submitted  $\leq$  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). Some members of the drafting team were under the impression that the 10 minute duration (total of all columns) was the assessment period, thus reflecting no change from existing practices. Column B is clearly defined as 5 minutes however. 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.

The timing table currently does not provide for a specification ATF, Late, and on-time requests. Addition of the initial request status assigned by the Interchange Authority would ensure a common implementation by the various scheduling entities.

The table does include specific timings for After-The-Fact requests. A clarification to vendors issued by the Joint Interchange Scheduling Work Group (JISWG) asked the vendors to implement a 2 hours assessment window for ATF submittals.

To fully support the WECC interchange tagging process, the tables include a definition for late submittals in the preschedule (i.e., next day, etc.) time frame for WECC, only.

**Deleted:** The creation of a Pre-Late status as defined in the attached table, ensures uniform treatment of all late submittals.

**Detailed Description**

Modify the Timing Table in INT-005-1, INT-006-1 and INT-008-1 to include the information as shown on the last pages.

**Deleted:** following

**Deleted:** Proposed additions that go beyond those proposed in the Urgent Action SAR for Emergency Revision to INT Standard's Timing Table for WECC are highlighted in yellow.



**Reliability Functions**

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

**Reliability and Market Interface Principles**

<b>Applicable Reliability Principles</b> (Check box for all that apply.)	
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems.
<input type="checkbox"/>	Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis.
Does the proposed Standard comply with all the following Market Interface Principles? ( <i>Select "yes" or "no" from the drop-down box.</i> )	
The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes	
An Organization Standard shall not give any market participant an unfair competitive advantage. Yes	
An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes	
An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes	
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 Variances*

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	

**Standards Authorization Request Form**

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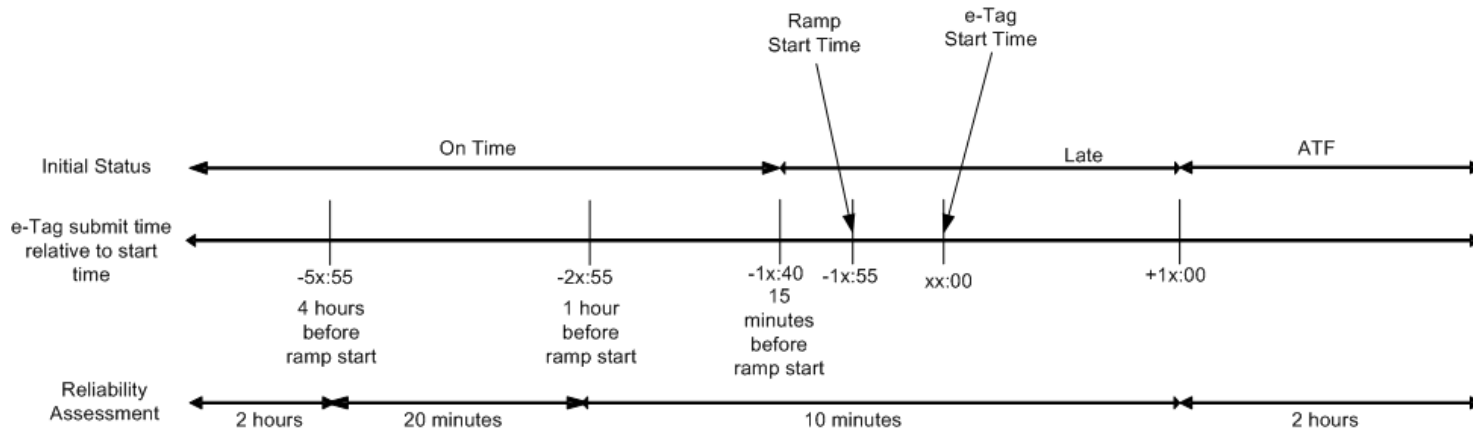
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**Timing Requirements for all Interconnections except WECC**

		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
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<15 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 15 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥3 minutes prior to ramp start	15 minutes
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours

Standards Authorization Request Form

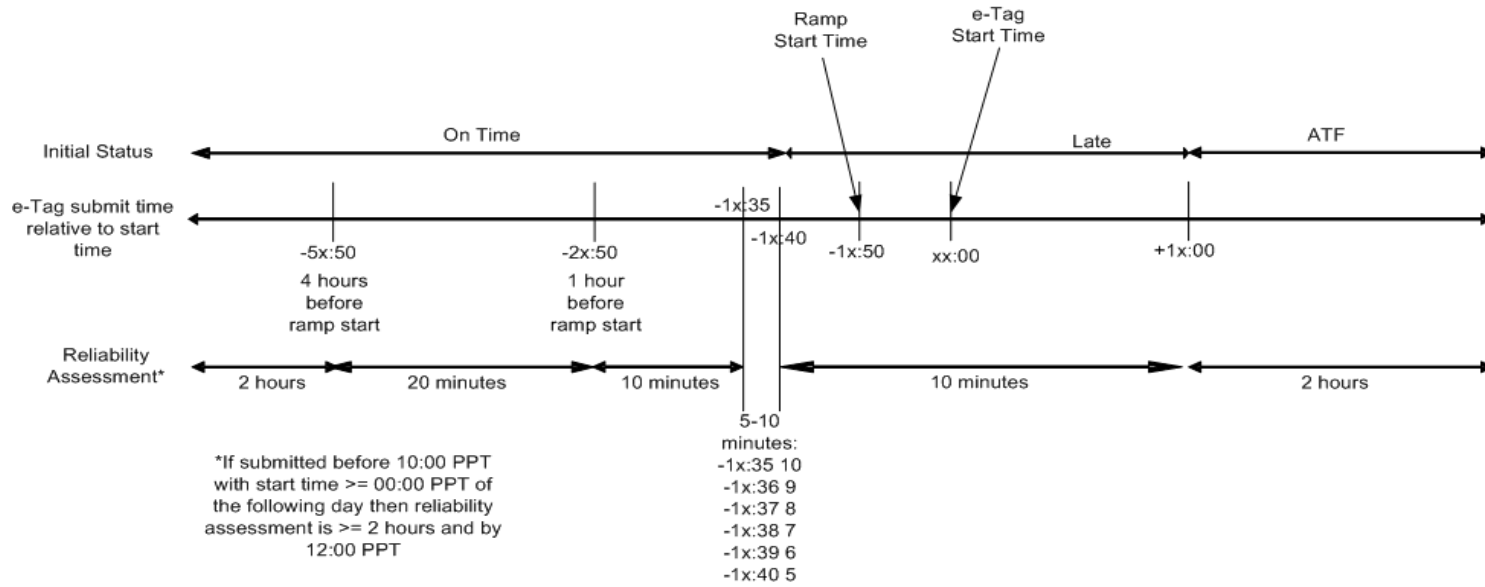


Standards Authorization Request Form

Timing Requirements for WECC Interconnection						
		A	B	C	D	
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	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 Total Reliability Period (Columns A through D)
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<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	15 minutes
<1 hour and ≥ 10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA and ≥ 4 minutes prior to ramp start	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	10-15 minutes
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start	1 hour plus 1 minute
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	4 hours
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start	Min 4 hours

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Standards Authorization Request Form



		A	B	C
If Actual Arranged Interchange (RFI) is Submitted	IA Assigns Initial Status of	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments IA Verifies Reliability Data Complete	IA Compiles and Distributes Status
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments
<15 minutes prior to ramp start but ≤1 hour after the start time	Late	≤ 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
<10 minutes prior to ramp start but ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments
<1 hour but ≥ 15 minutes prior to ramp start	On-time	≤ 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
<20 minutes but ≥ 10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments
<1 hour but ≥ 20 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments
≥1 hour but < 4 hours prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments
≥ 4 hours prior to ramp start	On-time*	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments
Submitted between 1500 and 1700 PPT with start time ≥ 00:00 PPT of following day	Pre-Late	≤ 1 minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA for WECC	≤ 1 minute from receipt of all Reliability Assessments



September 19, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

**Announcement: Nomination Periods Open for Standard Drafting Team**

**The Standards Committee announces the following standards action:**

**Nominations for Project 2007-14 Permanent Changes to Coordinate Interchange Timing Tables Standards Drafting Team (September 19–October 3, 2007)**

The Standards Committee is seeking industry experts to serve on the Permanent Changes to the [Coordinate Interchange Timing Tables](#) Standards Drafting Team. The drafting team will work to develop revised timing tables for inclusion in the following Coordinate Interchange standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

If you are interested in serving on this standard drafting team, please complete this [nomination form](#) and return it to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by October 3, 2007 with “CI Timing Tables SDT” in the subject line. For questions, please contact Ed Dobrowolski at 609-947-3673 or at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net).

**Standards Development Process**

The [Reliability Standards Development Procedure](#) 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 [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

*Maureen E. Long*

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



## **Nomination Form for Permanent Changes to Coordinate Interchange Timing Tables Standards Drafting Team (Project 2007-14)**

Please return this form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by October 3, 2007 with the words "CI Timing Tables SDT" in the subject line. If you have any questions, please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

**All candidates should be prepared to participate actively at these meetings.**

Name:
Organization:
Address:
Office Telephone:
E-mail:
<b>Please briefly describe your experience and qualifications to serve on the Permanent Changes to Coordinate Interchange Timing Tables Standards Drafting Team. Prefer experience in managing activities associated with the Coordinate Interchange standards. Previous experience working on or applying NERC or IEEE standards is beneficial, but not a requirement.</b>

**Nomination Form for Permanent Changes to Coordinate Interchange Timing Tables  
Standard Drafting Team (Project 2007-14)**

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<p><b>I represent the following NERC Reliability Region(s) (check all that apply):</b></p>	<p><b>I represent the following Industry Segments (check all that apply):</b></p>																				
<input type="checkbox"/> ERCOT <input type="checkbox"/> FRCC <input type="checkbox"/> MRO <input type="checkbox"/> NPCC <input type="checkbox"/> RFC <input type="checkbox"/> SERC <input type="checkbox"/> SPP <input type="checkbox"/> WECC <input type="checkbox"/> NA – Not Applicable	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 20px; text-align: center;"><input type="checkbox"/></td><td>1 – Transmission Owners</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>2 – RTOs, ISOs</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>3 – Load-serving Entities</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>4 – Transmission-dependent Utilities</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>5 – Electric Generators</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>6 – Electricity Brokers, Aggregators, and Marketers</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>7 – Large Electricity End Users</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>8 – Small Electricity End Users</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>9 – Federal, State, and Provincial Regulatory or other Government Entities</td></tr> <tr><td style="text-align: center;"><input type="checkbox"/></td><td>10 – Regional Reliability Organizations and Regional Entities</td></tr> </table>	<input type="checkbox"/>	1 – Transmission Owners	<input type="checkbox"/>	2 – RTOs, ISOs	<input type="checkbox"/>	3 – Load-serving Entities	<input type="checkbox"/>	4 – Transmission-dependent Utilities	<input type="checkbox"/>	5 – Electric Generators	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers	<input type="checkbox"/>	7 – Large Electricity End Users	<input type="checkbox"/>	8 – Small Electricity End Users	<input type="checkbox"/>	9 – Federal, State, and Provincial Regulatory or other Government Entities	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities
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<input type="checkbox"/>	9 – Federal, State, and Provincial Regulatory or other Government Entities																				
<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities																				
<p><b>Which of the following Function(s)<sup>1</sup> do you have expertise or responsibilities:</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px; vertical-align: top;"> <input type="checkbox"/> Balancing Authority  <input type="checkbox"/> Compliance Monitor  <input type="checkbox"/> Distribution Provider  <input type="checkbox"/> Generator Operator  <input type="checkbox"/> Generator Owner  <input type="checkbox"/> Interchange Authority  <input type="checkbox"/> Load-serving Entity  <input type="checkbox"/> Market Operator                 </td> <td style="width: 50%; padding: 5px; vertical-align: top;"> <input type="checkbox"/> Planning Coordinator  <input type="checkbox"/> Transmission Operator  <input type="checkbox"/> Transmission Owner  <input type="checkbox"/> Transmission Planner  <input type="checkbox"/> Transmission Service Provider  <input type="checkbox"/> Purchasing-selling Entity  <input type="checkbox"/> Resource Planner  <input type="checkbox"/> Reliability Coordinator                 </td> </tr> </table>		<input type="checkbox"/> Balancing Authority <input type="checkbox"/> Compliance Monitor <input type="checkbox"/> Distribution Provider <input type="checkbox"/> Generator Operator <input type="checkbox"/> Generator Owner <input type="checkbox"/> Interchange Authority <input type="checkbox"/> Load-serving Entity <input type="checkbox"/> Market Operator	<input type="checkbox"/> Planning Coordinator <input type="checkbox"/> Transmission Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Transmission Planner <input type="checkbox"/> Transmission Service Provider <input type="checkbox"/> Purchasing-selling Entity <input type="checkbox"/> Resource Planner <input type="checkbox"/> Reliability Coordinator																		
<input type="checkbox"/> Balancing Authority <input type="checkbox"/> Compliance Monitor <input type="checkbox"/> Distribution Provider <input type="checkbox"/> Generator Operator <input type="checkbox"/> Generator Owner <input type="checkbox"/> Interchange Authority <input type="checkbox"/> Load-serving Entity <input type="checkbox"/> Market Operator	<input type="checkbox"/> Planning Coordinator <input type="checkbox"/> Transmission Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Transmission Planner <input type="checkbox"/> Transmission Service Provider <input type="checkbox"/> Purchasing-selling Entity <input type="checkbox"/> Resource Planner <input type="checkbox"/> Reliability Coordinator																				
<p><b>Provide the names and contact information for two references who could attest to your technical qualifications and your ability to work well in a group.</b></p>																					
<p>Name:</p>	<p>Office Telephone:</p>																				
<p>Organization:</p>	<p>E-mail:</p>																				
<p>Name:</p>	<p>Office Telephone:</p>																				
<p>Organization:</p>	<p>E-mail:</p>																				

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<sup>1</sup> These functions are defined in the NERC Functional Model, which is downloadable from the NERC Web site.

January 24, 2007

## Re: Comment Periods Open

The Standards Committee announces the following standards actions:

### Proposed Revisions to Timing Tables in INT-005-2, INT-006-2, and INT-008-2 Posted for 45-day Comment Period

A set of [proposed modifications](#) to INT-005-1 — Interchange Authority Distributes Arranged Interchange, INT-006-1 — Response to Interchange Authority, and INT-008-1 — Interchange Authority Distributes Status, have all been posted for a 45-day comment period from January 24–March 8, 2008.

In 2007, stakeholders approved a set of Urgent Action modifications to the Timing Tables in INT-005-1, INT-006-1, and INT-008-1.

The modifications lengthened the reliability assessment period for WECC 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*, these Urgent Action modifications will expire unless they are replaced with permanent changes that go through the full standards development procedure.

The Coordinate Interchange Timing Table Standard Drafting Team made additional modifications to the timing tables in response to stakeholder comments and made a minor clarification to INT-006-2, Requirement R1. The revised standards have been posted for comment.

Please use this [comment form](#) to submit comments on the proposed modifications.

### SAR to Revise FAC-010-1 and FAC-011-1 and Proposed Changes to FAC-010-1 and FAC-011-1 to Comply with FERC Order 705 Posted for 45-day Comment Period

A new [SAR for Project 2008-04](#) and proposed changes to modify FAC-010-1 — System Operating Limits Methodology for the Planning Horizon and FAC-011-1 — System Operating Limits Methodology for the Operations Horizon have all been posted for a 45-day comment period from January 24–March 8, 2008.

In [Order 705](#), FERC approved FAC-010-1 — System Operating Limits Methodology for the Planning Horizon, FAC-011-1 — System Operating Limits Methodology for the Operations Horizon, and FAC-014-1 — Establish and Communicate System Operating Limits, and directed NERC to make changes to each of these standards. The changes fall into two categories — those that are subject to stakeholder input and those that are not subject to stakeholder input. The SAR is limited to addressing the directives in Order 705 that are subject to stakeholder input — retiring a definition; removing an example from a requirement; and adding a footnote for clarity to both standards.

Please use this [comment form](#) to submit comments on this SAR.

### **SAR to Revise FAC-011-1 to Address Credible Multiple Contingencies Posted for 30-day Comment Period**

A new SAR for [Project 2008-05](#) to Modify FAC-011-1 — System Operating Limits Methodology for the Operations Horizon has been posted for a 30-day comment period from January 24–February 22, 2008.

The SAR proposes modifying FAC-011-1 to require consideration of credible multiple element contingency events for determining SOLs in the operating horizon, as required by TPL-003-0 and FAC-010-1 for the planning horizon.

Please use this [comment form](#) to submit comments on this SAR.

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) 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 [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

## A. Introduction

1. **Title:** **Interchange Authority Distributes Arranged Interchange**
2. **Number:** **INT-005-3**
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:** First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustee adoption.

## 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 History**

Version	Date	Action	Change Tracking

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

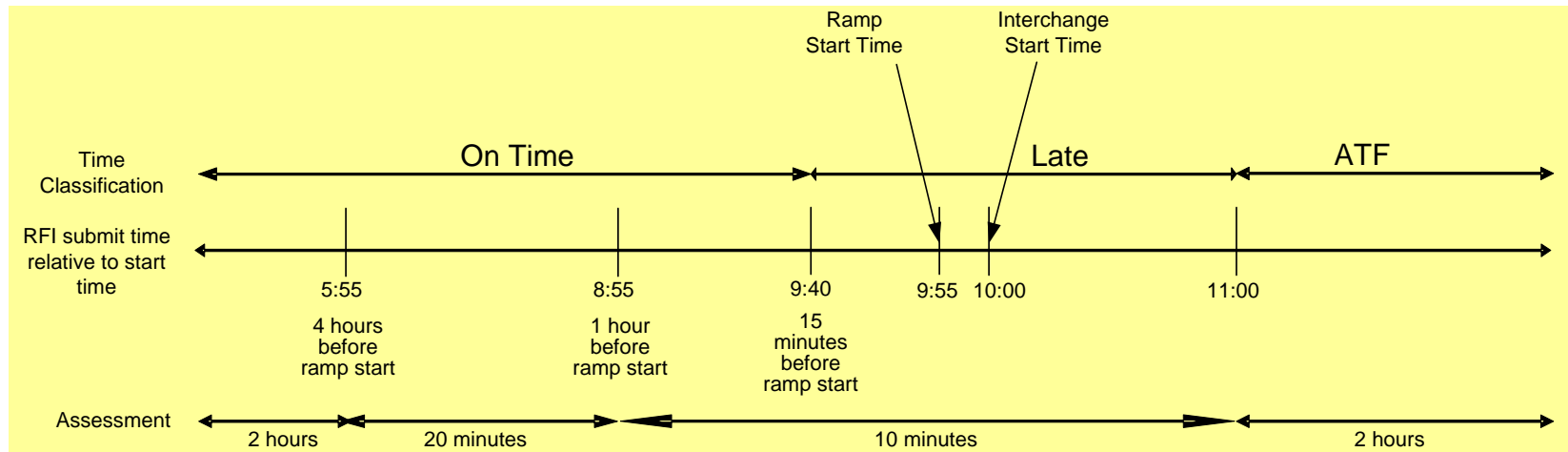
**Timing Requirements for all Interconnections except WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Actual Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>If Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
> 1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Response not required Entities have up to 2 hours to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	N/A
< 15 minutes prior to ramp start and ≤ 1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Response not required Entities have up to 10 minutes to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



### Timing Requirements for all Interconnections except WECC



Timing Requirements for WECC

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	<u>Response not required.</u> <u>Entities have up to 2 hours to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	<u>Response not required.</u> <u>Entities have up to 10 minutes to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start

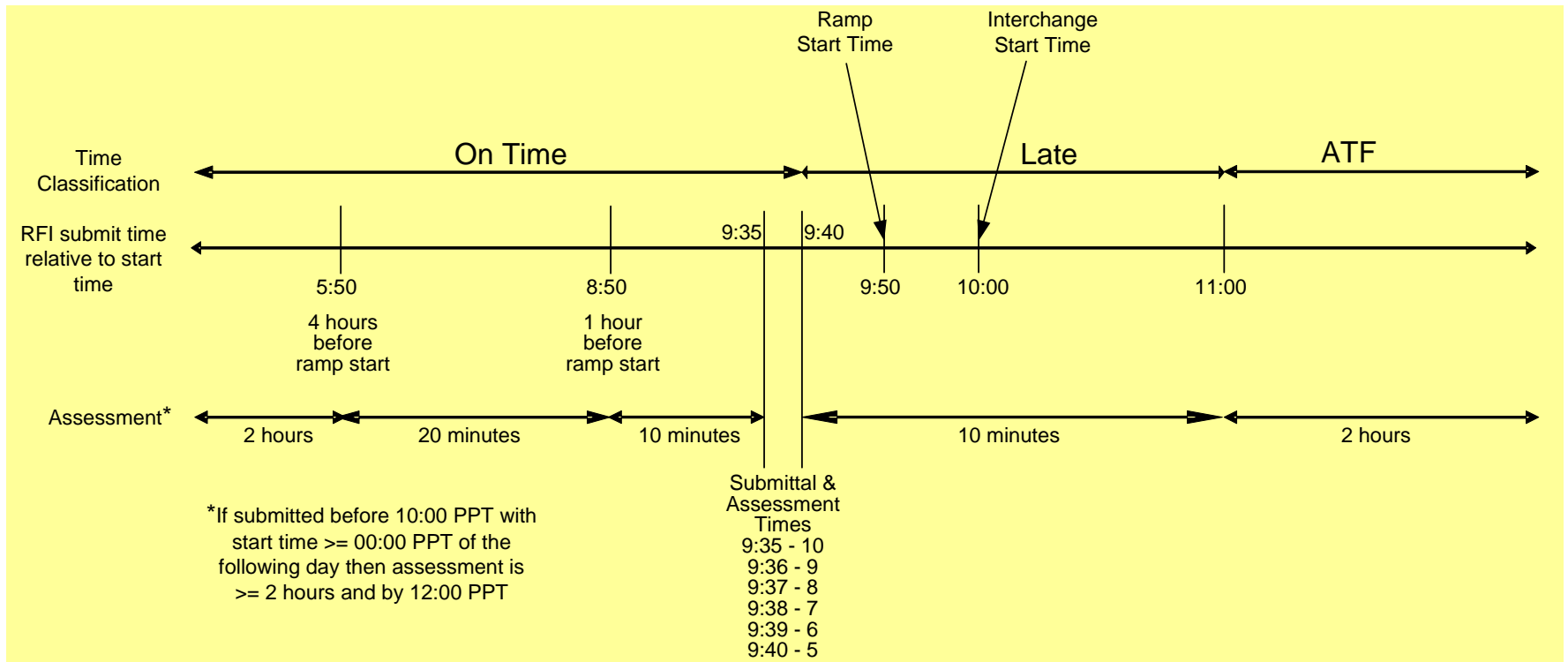
<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Timing Requirements for WECC, Continued

		A	B	C	D
If Arranged Interchange (RFI) <sup>4</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Timing Requirements for WECC



## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-23
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~~ First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustees adoption.

## 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.

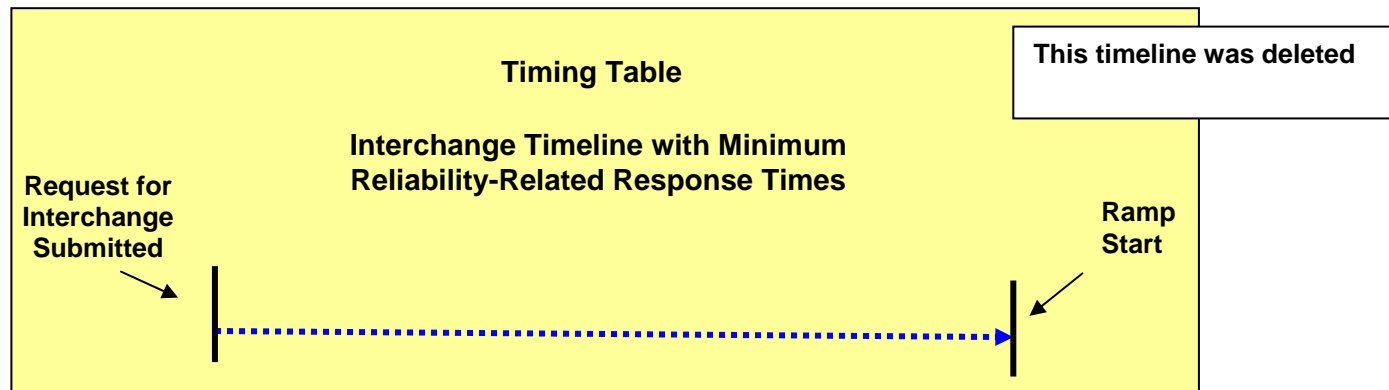
**E. Regional Differences**

None

**Version History**

Version	Date	Action	Change Tracking

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



**Timing Requirements for all Interconnections Except WECC**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>2</sup> is Submitted	<u>If Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments <del>IA Verifies Reliability Data Complete</del>	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	<del>Minimum Total Reliability Period</del>  (Columns A through D)
<u>≤ 1 hour prior to ramp start &gt; 1 hour after the RFI start time</u>	<u>ATF</u>	≤ 1 minute from RFI submission	<u>&lt; 10 minutes from Arranged Interchange receipt from IA for all Interconnections except WECC</u> <u>Response not required</u>  <u>Entities have up to 2 hours to respond if they choose</u>	≤ 1 minute from receipt of all Reliability Assessments	<u>≥ 3 minutes prior to ramp start</u> <u>N/A</u>	<u>15 minutes</u>

<sup>2</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

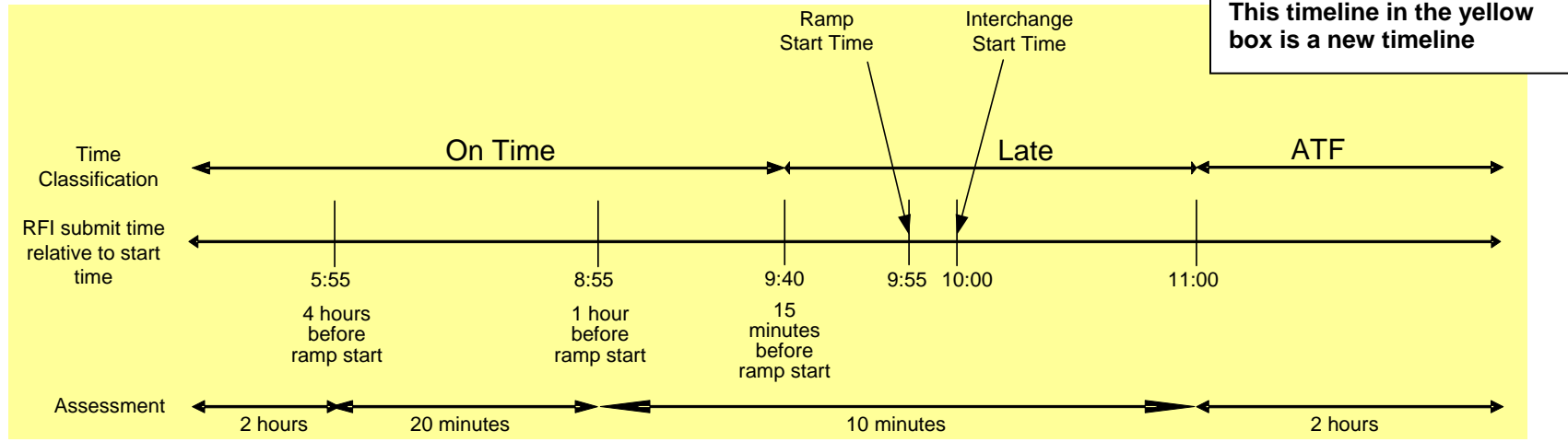
**Timing Requirements for all Interconnections Except WECC, continued**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>3</sup> is Submitted	<u>If Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	
<del>≤ 20 minutes prior to ramp start</del> < 15 minutes prior to ramp start and < 1 hour after the RFI start time	<u>Late</u>	≤ 1 minute from RFI submission	<del>≤ 5 minutes from Arranged Interchange receipt from IA for WECC</del> Response not required  Entities have up to 10 minutes to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	<del>≤ 3 minutes prior to ramp start</del> 3 minutes after receipt of confirmed RFI	<del>10 minutes</del>
< ≥ 20 minutes to ≤ 1 hour prior to ramp start 1 hour and > 15 minutes prior to ramp start	<u>On-time</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	<del>15 minutes</del>
≥ 1 hour to < 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<del>1 hour plus 1 minute</del>
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<del>4 hours</del>

<sup>3</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



**Timing Requirements for all Interconnections Except WECC**



**Timing Requirements for WECC**

		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
<u>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</u>	<u>IA Assigned Time Classification</u>	<u>IA Makes Initial Distribution of Arranged Interchange</u>	<u>BA and TSP Conduct Reliability Assessments</u>	<u>IA Compiles and Distributes Status</u>	<u>BA Prepares Confirmed Interchange for Implementation</u>
<u>&gt;1 hour after the start time</u>	<u>ATF</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 2 hours to respond if they choose. .</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>NA</u>
<u>&lt;10 minutes prior to ramp start and &lt;1 hour after the start time</u>	<u>Late</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 10 minutes to respond if they choose.</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&lt; 3 minutes after receipt of confirmed RFI</u>
<u>10 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 5 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>11 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 6 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>12 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 7 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>13 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 8 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

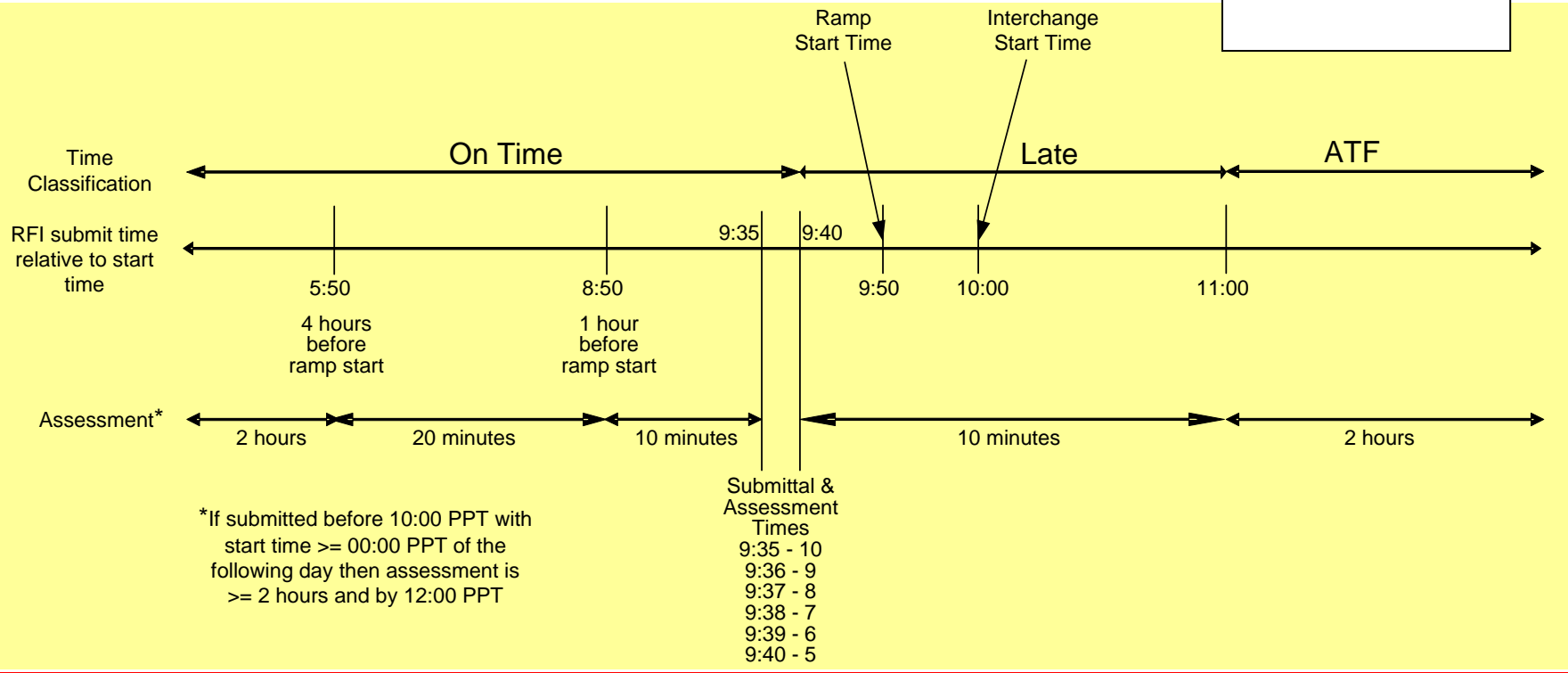
**Timing Requirements for WECC, Continued**

		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
<u>If Arranged Interchange (RFI)<sup>5</sup> is Submitted</u>	<u>IA Assigned Time Classification</u>	<u>IA Makes Initial Distribution of Arranged Interchange</u>	<u>BA and TSP Conduct Reliability Assessments</u>	<u>IA Compiles and Distributes Status</u>	<u>BA Prepares Confirmed Interchange for Implementation</u>
<u>&gt;1 hour and &lt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 20 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 39 minutes prior to ramp start</u>
<u>&gt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 2 hours from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 1 hour 58 minutes prior to ramp start</u>
<u>Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 1 hour 58 minutes prior to ramp start</u>

<sup>5</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

**Timing Requirements for WECC**

This is a new timeline



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustee adoption.

## 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 an On-time 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 On-time 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

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

**Version History**

Version	Date	Action	Change Tracking

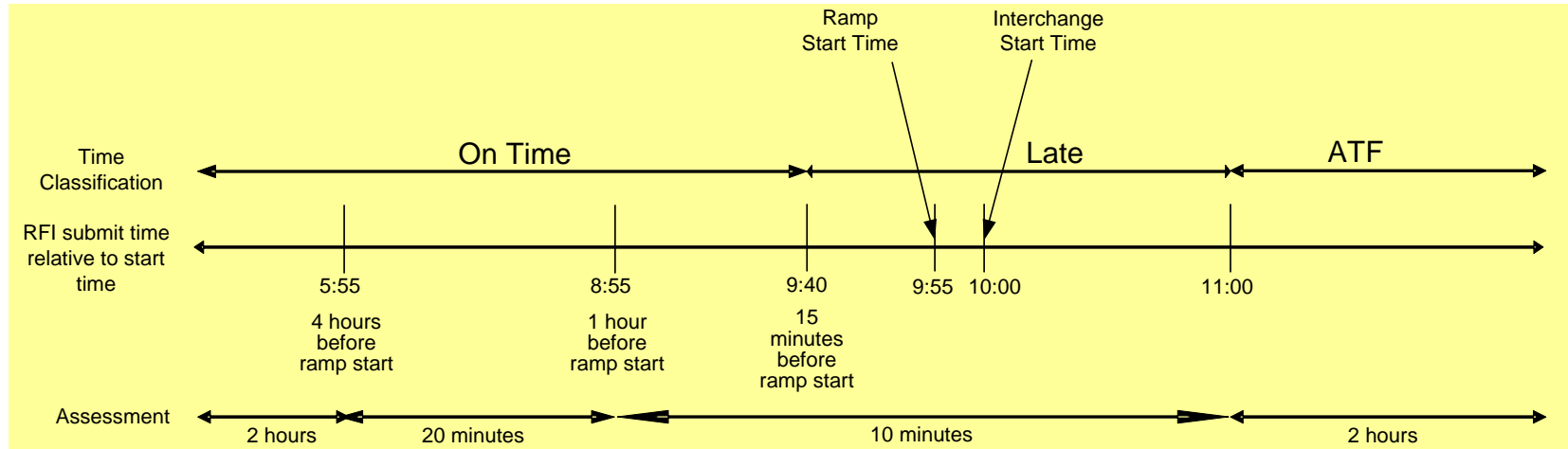
**Timing Requirements for all Interconnections except WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Actual Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>If Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
> 1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Response not required Entities have up to 2 hours to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	N/A
< 15 minutes prior to ramp start and ≤ 1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Response not required Entities have up to 10 minutes to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
< 1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



### Timing Requirements for all Interconnections except WECC



Timing Requirements for WECC

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	<u>Response not required. Entities have up to 2 hours to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	<u>Response not required. Entities have up to 10 minutes to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start

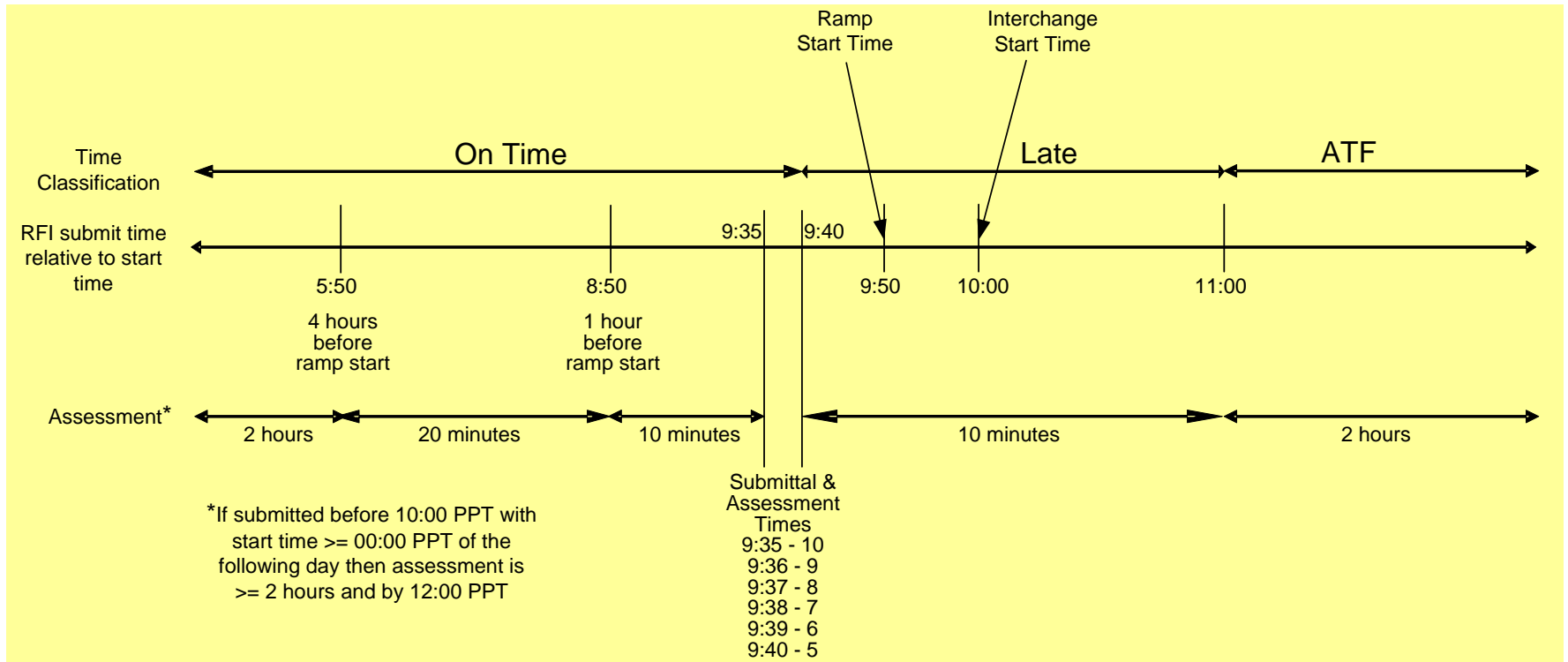
<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Timing Requirements for WECC, Continued

		A	B	C	D
If Arranged Interchange (RFI) <sup>4</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Timing Requirements for WECC



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-~~23~~
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.~~ First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustee adoption.

## 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 an On-time 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 On-time 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

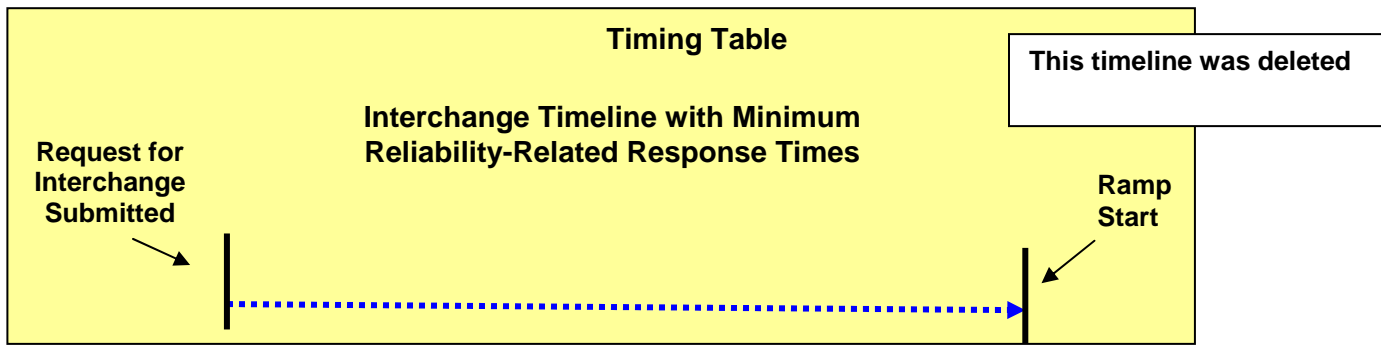
**Version History**

Version	Date	Action	Change Tracking

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

**Standard INT-006-~~2~~3— Response to Interchange Authority**

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**Timeline Requirements for all Interconnections except WECC**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>2</sup> is Submitted	<u>IA Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments <del>IA Verifies Reliability Data Complete</del>	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	<del>Minimum Total Reliability Period (Columns A through D)</del>
<del>≤1 hour prior to ramp start &gt; 1 hour after the RFI start time</del>	<u>ATF</u>	≤ 1 minute from RFI submission	<del>&lt; 10 minutes from Arranged Interchange receipt from IA for all interconnections except WECC</del> <del>Response not required</del>  <u>Entities have up to 2 hours to respond if they choose</u>	≤ 1 minute from receipt of all Reliability Assessments	<del>≥ 3 minutes prior to ramp start</del> <u>N/A</u>	<del>15 minutes</del>
<del>≤20 minutes prior to ramp start &lt; 15 minutes prior to ramp start and &lt; 1 hour after the RFI start time</del>	<u>Late</u>	≤ 1 minute from RFI submission	<del>&lt; 5 minutes from Arranged Interchange receipt from IA for WECC</del> <del>Response not required</del>  <u>Entities have up to 10 minutes to respond if they choose</u>	≤ 1 minute from receipt of all Reliability Assessments	<del>≤ &gt; 3 minutes prior to ramp start</del> <u>3 minutes after receipt of confirmed RFI</u>	<del>10 minutes</del>

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged interchange.



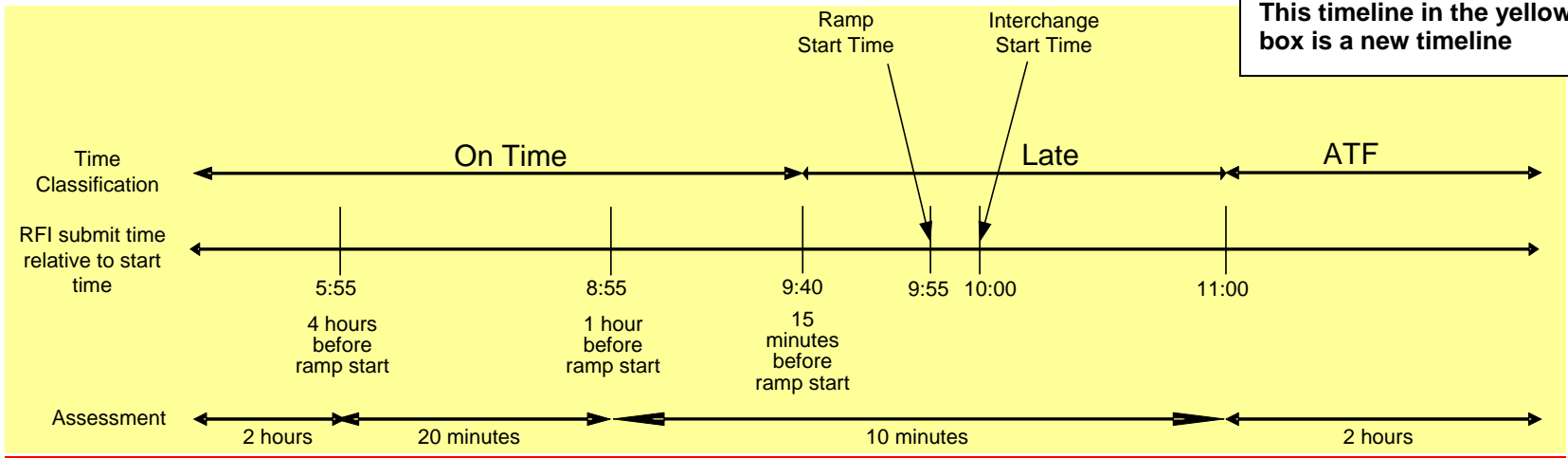
**Timeline Requirements for all Interconnections except WECC, continued**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>3</sup> is Submitted	<u>IA Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	
<del>&gt;20 minutes to ≤1 hour prior to ramp start</del> < 1 hour <del>and &gt;15 minutes prior to ramp start</del>	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA <del>for WECC</del>	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	<del>15 minutes</del>
≥ 1 hour to < 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<del>1 hour plus 1 minute</del>
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 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	<del>4 hours</del>

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged interchange.

# Timing Requirements for all Interconnections except WECC

This timeline in the yellow box is a new timeline



## Timing Requirements for WECC

		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
<u>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</u>	<u>IA Assigned Time Classification</u>	<u>IA Makes Initial Distribution of Arranged Interchange</u>	<u>BA and TSP Conduct Reliability Assessments</u>	<u>IA Compiles and Distributes Status</u>	<u>BA Prepares Confirmed Interchange for Implementation</u>
<u>&gt;1 hour after the start time</u>	<u>ATF</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 2 hours to respond if they choose. .</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>NA</u>
<u>&lt;10 minutes prior to ramp start and &lt;1 hour after the start time</u>	<u>Late</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 10 minutes to respond if they choose.</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&lt; 3 minutes after receipt of confirmed RFI</u>
<u>10 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 5 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>11 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 6 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>12 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 7 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>13 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 8 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

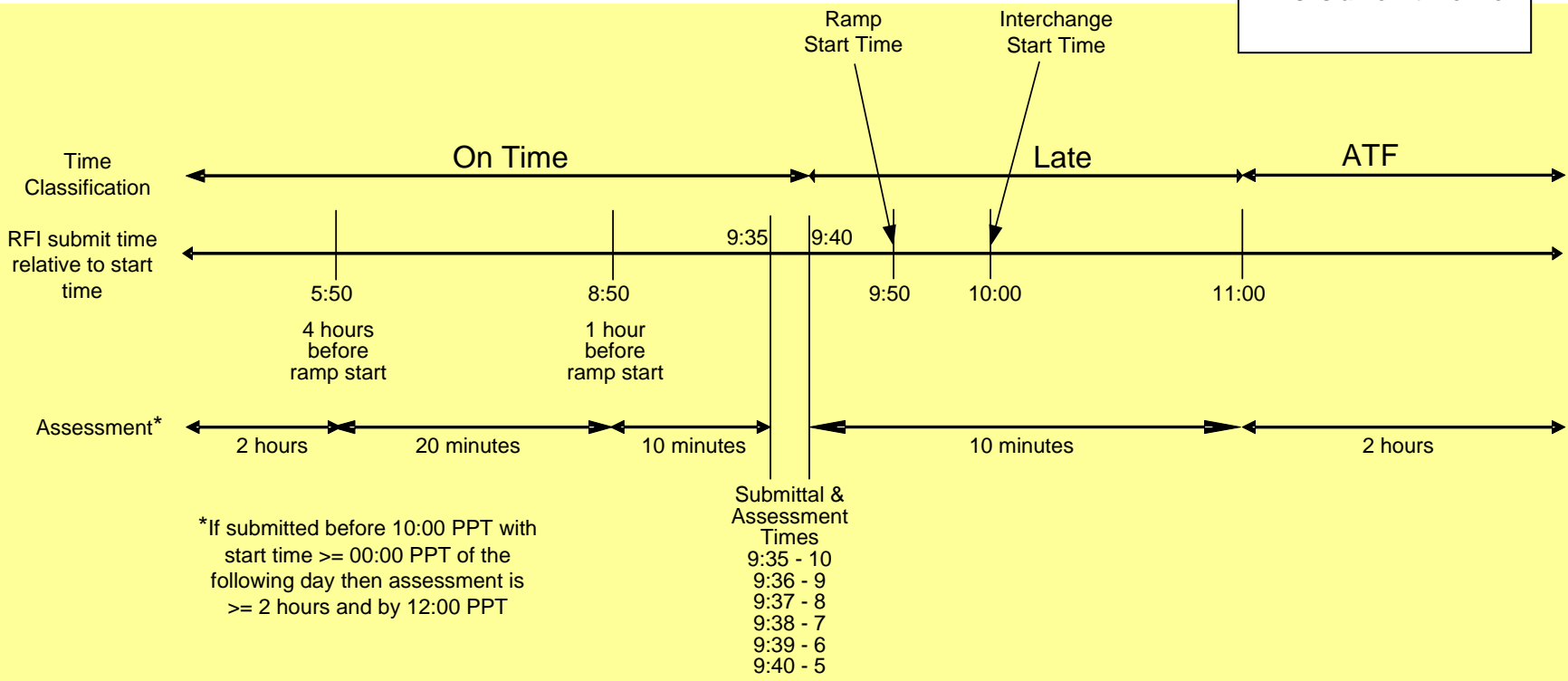
## Timing Requirements for WECC, Continued

		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
<u>If Arranged Interchange (RFI)<sup>5</sup> is Submitted</u>	<u>IA Assigned Time Classification</u>	<u>IA Makes Initial Distribution of Arranged Interchange</u>	<u>BA and TSP Conduct Reliability Assessments</u>	<u>IA Compiles and Distributes Status</u>	<u>BA Prepares Confirmed Interchange for Implementation</u>
<u>&gt;1 hour and &lt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 20 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 39 minutes prior to ramp start</u>
<u>&gt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 2 hours from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>≥ 1 hour 58 minutes prior to ramp start</u>
<u>Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 1 hour 58 minutes prior to ramp start</u>

<sup>5</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

## Timing Requirements for WECC

This is a new timeline



**A. Introduction**

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-3
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:** First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustee adoption.

**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.

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

**E. Regional Differences**

None

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>

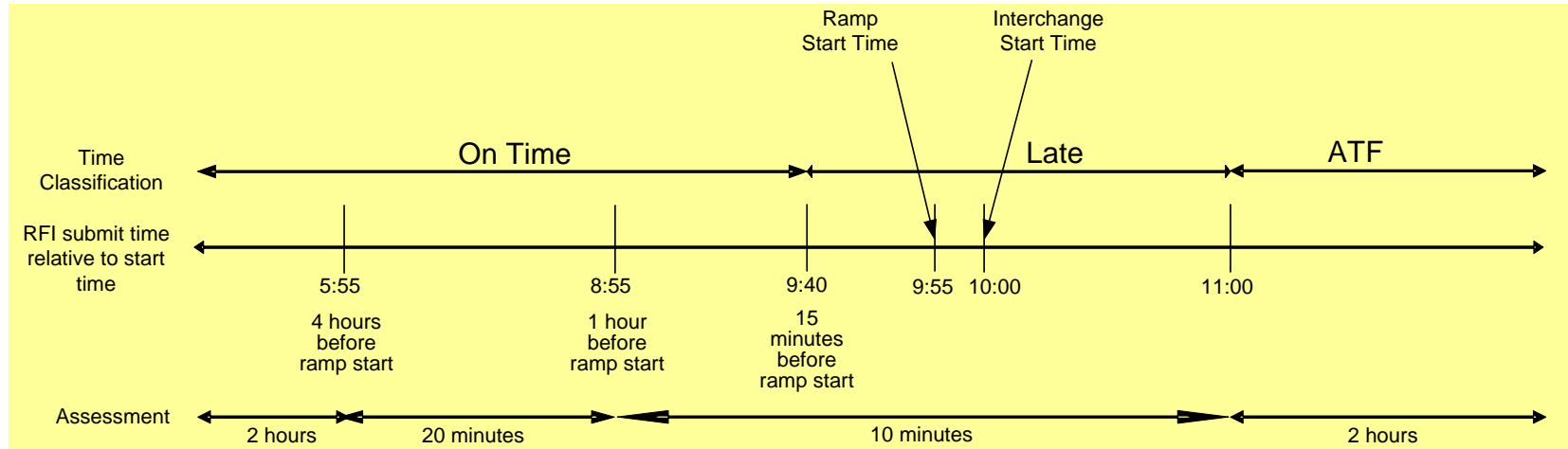


**Timing Requirements for all Interconnections except WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Actual Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>If Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
> 1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Response not required Entities have up to 2 hours to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	N/A
< 15 minutes prior to ramp start and ≤ 1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Response not required Entities have up to 10 minutes to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
< 1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Timing Requirements for all Interconnections except WECC



Timing Requirements for WECC

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	<u>ATF</u>	≤ 1minute from RFI submission	<u>Response not required.</u> <u>Entities have up to 2 hours to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	<u>Late</u>	≤ 1minute from RFI submission	<u>Response not required.</u> <u>Entities have up to 10 minutes to respond if they choose.</u>	≤ 1minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start

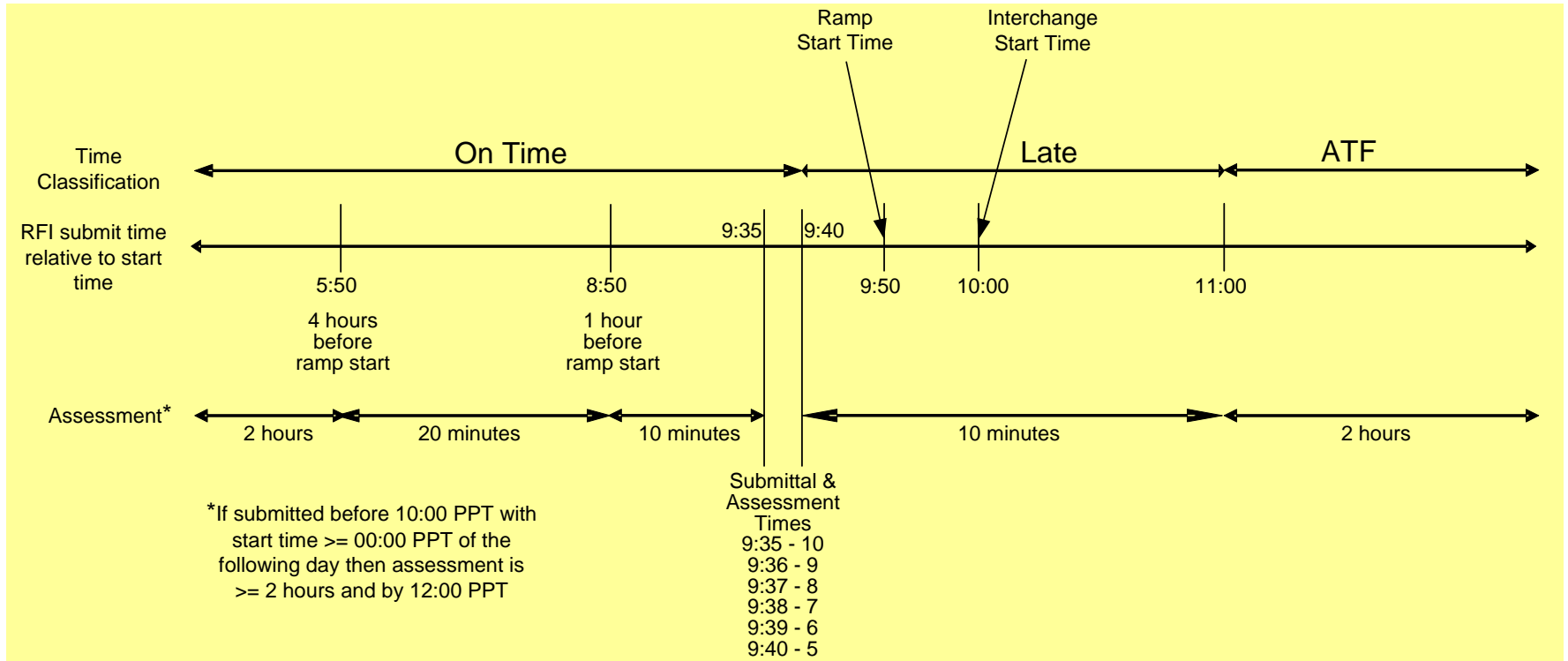
<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Timing Requirements for WECC, Continued

		A	B	C	D
If Arranged Interchange (RFI) <sup>4</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
≥1 hour and < 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 20 minutes from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 39 minutes prior to ramp start
≥ 4 hours prior to ramp start	<u>On-time</u>	≤ 1minute from RFI submission	≤ 2 hours from Arranged Interchange receipt from IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	<u>On-time</u>	≤ 1minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Timing Requirements for WECC



## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-~~23~~
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. First day of first quarter after applicable regulatory approval, or in those jurisdictions where no regulatory approval is required, first day of first quarter after Board of Trustee adoption.~~

## 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**

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

**Standard INT-008-23— Interchange Authority Distributes Status**

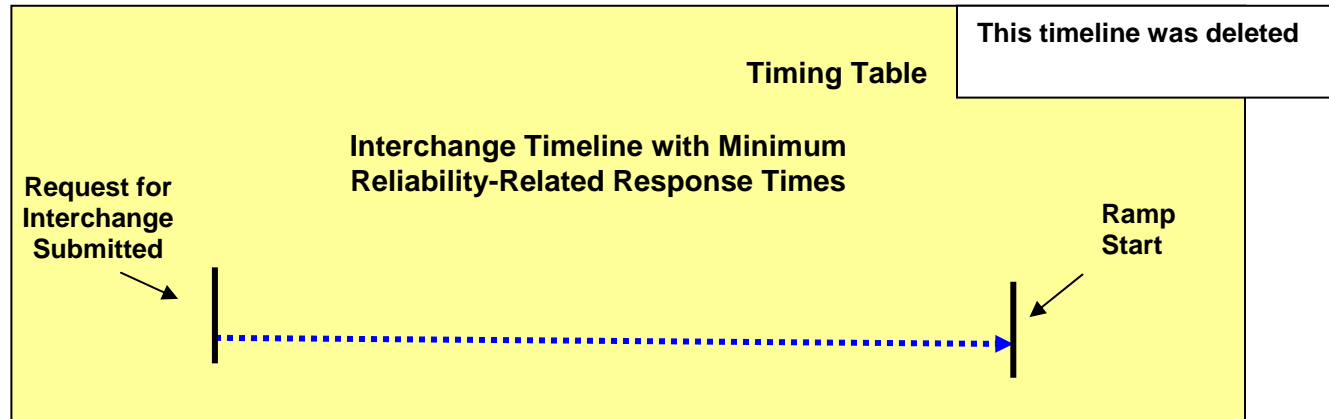
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None

**Version History**

Version	Date	Action	Change Tracking





**Timing Requirements for all Interconnections Except WECC**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>2</sup> is Submitted	<u>If Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments  <b>IA Verifies Reliability Data Complete</b>	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	<b>Minimum Total Reliability Period</b>  <b>(Columns A through D)</b>
<u>≤ 1 hour prior to ramp start &gt; 1 hour after the RFI start time</u>	<u>ATF</u>	≤ 1 minute from RFI submission	<u>≤ 10 minutes from Arranged Interchange receipt from IA for all interconnections except WECC</u> <u>Response not required</u>  <u>Entities have up to 2 hours to respond if they choose</u>	≤ 1 minute from receipt of all Reliability Assessments	<u>≥ 3 minutes prior to ramp start</u> <u>N/A</u>	<u>15 minutes</u>

<sup>2</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

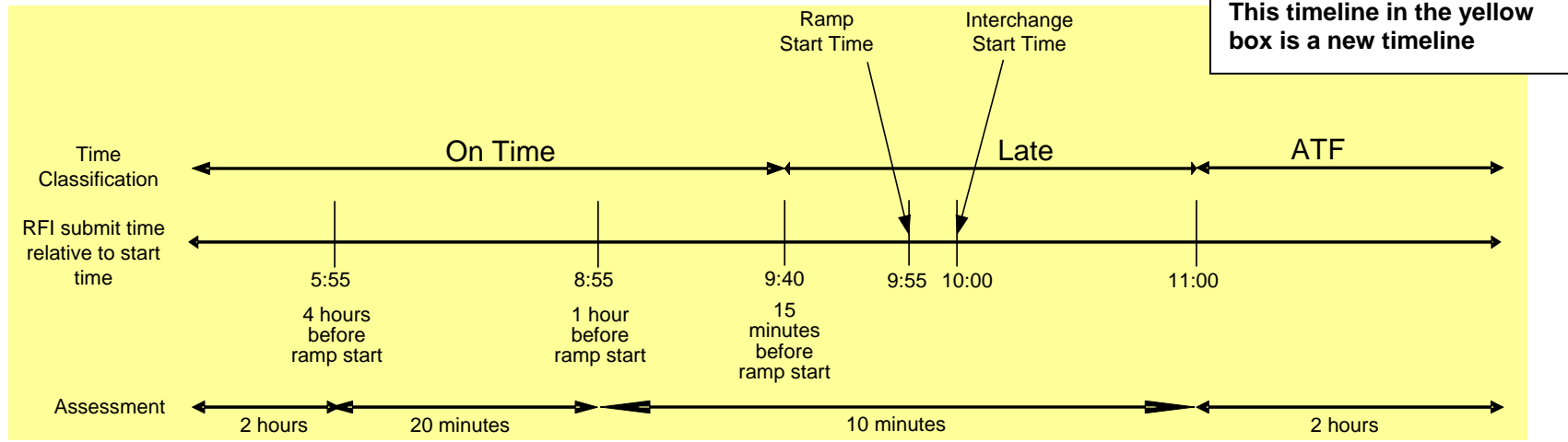
Standard INT-008-2-3 — Interchange Authority Distributes Status

**Timing Requirements for all Interconnections Except WECC, continued**

		A	B	C	D	
If Actual Arranged Interchange (RFI) <sup>3</sup> is Submitted	<u>If Assigned Time Classification</u>	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments  <b>IA Verifies Reliability Data Complete</b>	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation	<b>Minimum Total Reliability Period</b>  <b>(Columns A through D)</b>
<del>≤ 20 minutes prior to ramp start &lt; 15 minutes prior to ramp start and &lt; 1 hour after the RFI start time</del>	<u>Late</u>	≤ 1 minute from RFI submission	<del>&lt; 5 minutes from Arranged Interchange receipt from IA for WECC</del> Response not required  Entities have up to 10 minutes to respond if they choose	≤ 1 minute from receipt of all Reliability Assessments	<del>&gt; 3 minutes prior to ramp start &lt; 3 minutes after receipt of confirmed RFI</del>	<del>10 minutes</del>
<del>&gt; 20 minutes to ≤ 1 hour prior to ramp start &lt; 1 hour and &gt; 15 minutes prior to ramp start</del>	<u>On-time</u>	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA <del>for WECC</del>	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	<del>15 minutes</del>
<del>≥ 1 hour to &lt; 4 hours prior to ramp start</del>	<u>On-time</u>	≤ 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	<del>1 hour plus 1 minute</del>
<del>≥ 4 hours prior to ramp start</del>	<u>On-time</u>	≤ 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	<del>4 hours</del>

<sup>3</sup> Time classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

**Timing Requirements for all Interconnections Except WECC**



**Standard INT-008-2.3— Interchange Authority Distributes Status**

**Timing Requirements for WECC**

		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
<u>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</u>	<u>IA Assigned Time Classification</u>	<u>IA Makes Initial Distribution of Arranged Interchange</u>	<u>BA and TSP Conduct Reliability Assessments</u>	<u>IA Compiles and Distributes Status</u>	<u>BA Prepares Confirmed Interchange for Implementation</u>
<u>&gt;1 hour after the start time</u>	<u>ATF</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 2 hours to respond if they choose. .</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>NA</u>
<u>&lt;10 minutes prior to ramp start and &lt;1 hour after the start time</u>	<u>Late</u>	<u>&lt; 1minute from RFI submission</u>	<u>Response not required. Entities have up to 10 minutes to respond if they choose.</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&lt; 3 minutes after receipt of confirmed RFI</u>
<u>10 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 5 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>11 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 6 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>12 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 7 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>
<u>13 minutes prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 8 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 3 minutes prior to ramp start</u>

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

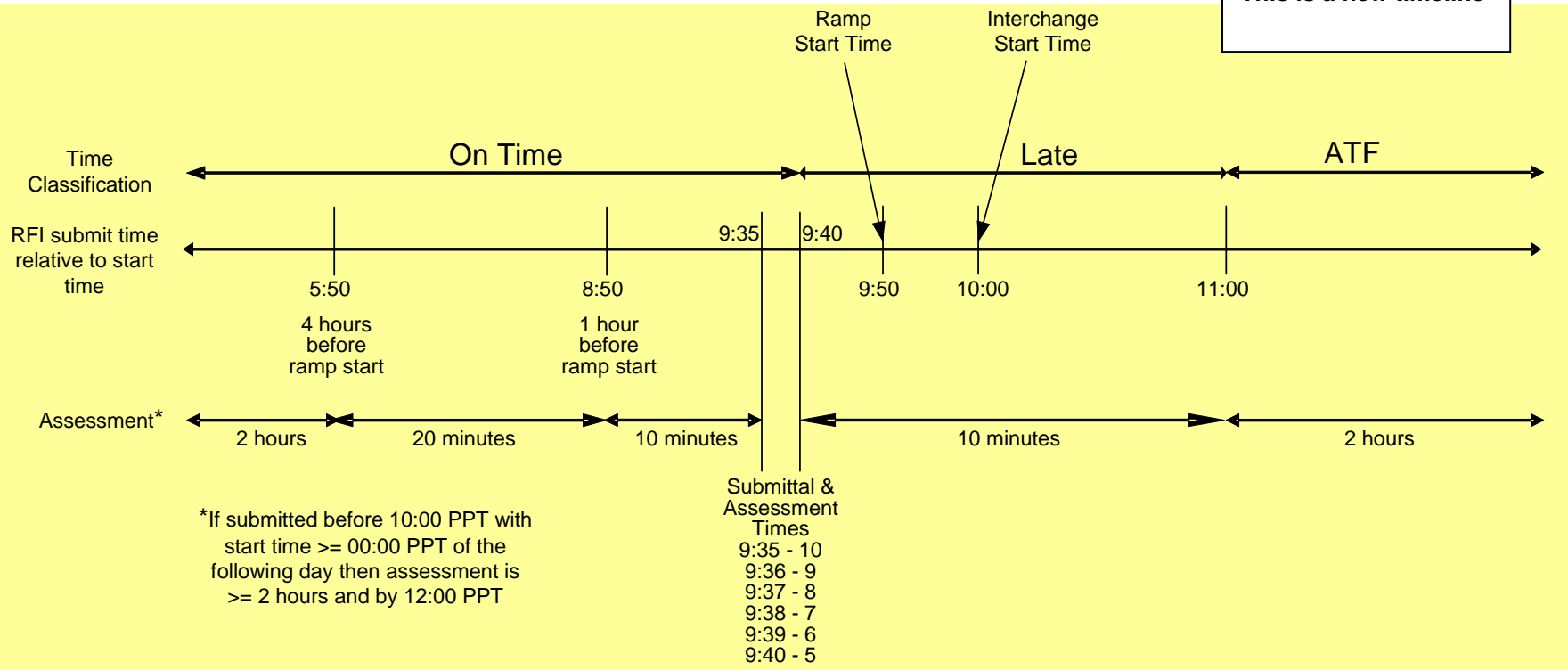
**Timing Requirements for WECC, Continued**

		<b><u>A</u></b>	<b><u>B</u></b>	<b><u>C</u></b>	<b><u>D</u></b>
<b><u>If Arranged Interchange (RFI)<sup>5</sup> is Submitted</u></b>	<b><u>IA Assigned Time Classification</u></b>	<b><u>IA Makes Initial Distribution of Arranged Interchange</u></b>	<b><u>BA and TSP Conduct Reliability Assessments</u></b>	<b><u>IA Compiles and Distributes Status</u></b>	<b><u>BA Prepares Confirmed Interchange for Implementation</u></b>
<u>&gt;1 hour and &lt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 20 minutes from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 39 minutes prior to ramp start</u>
<u>&gt; 4 hours prior to ramp start</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>&lt; 2 hours from Arranged Interchange receipt from IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 1 hour 58 minutes prior to ramp start</u>
<u>Submitted before 10:00 PPT with start time &gt; 00:00 PPT of following day</u>	<u>On-time</u>	<u>&lt; 1minute from RFI submission</u>	<u>By 12:00 PPT of day the Arranged Interchange was received by the IA</u>	<u>&lt; 1minute from receipt of all Reliability Assessments</u>	<u>&gt; 1 hour 58 minutes prior to ramp start</u>

<sup>5</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

**Timing Requirements for WECC**

This is a new timeline



## **Implementation Plan for INT-005-3, INT-006-3, and INT-008-3**

### **Prerequisite Approvals**

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before these modified standards can be implemented.

### **Modified Standards**

INT-005-2, INT-006-2, and INT-008-2 should all be retired when the proposed standards become effective.

### **Compliance with Standards**

Once these standards become effective, the responsible entities identified in the applicability section of the standard must comply with the requirements.

### **Proposed Effective Date**

All requirements in the standards should become effective on the first day of the first calendar quarter beyond the date the standard is approved by applicable regulatory authorities. For jurisdictions where regulatory approval is not required, the proposed standards become effective on the first day of the first calendar quarter following the date the standards are adopted by the NERC Board of Trustees.

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities





**Background Information:**

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Thad K. Ness
Organization:	AEP
Telephone:	614-716-2053
E-mail:	tkness@aep.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input checked="" type="checkbox"/> 3 — Load-serving Entities
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<input checked="" type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
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**Background Information:**

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- INT-006 — Response to Interchange Authority
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Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

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- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: It is inappropriate to say an ATF classification for the RFI has a reliability assessment period for applicable BAs and TSPs in the timing table. There is no point because the ATF submittal is merely there for accounting and settlement purposes in the inadvertent interchange process. If the RFI was for extended hours, then it would there for identification in reliability assessment/monitoring and the congestion management process. It must be understood that a ATF classification for RFI would only be valid if the affected reliability assessment entities had prior confirmation of interchange to be implemented prior to the time of implementation into the ACE equation, as stated in NERC Standard INT-003-2. The impact of reliability on the Bulk Electric System is pertinent to real-time and not ATF.

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Troy Simpson
Organization:	Bonneville Power Administration, Business Process & Implementation Office - TSPB
Telephone:	360-418-8659
E-mail:	tdsimpson@bpa.gov
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities





**Background Information:**

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Bonneville Power Administration believes that all requests for interchange should be confirmed with at least 5 minutes available for the BA to Prepare Confirmed Interchange for Implementation with a minimum of 3 minutes for the BA and TSP to conduct Reliability Assessments. For that reason, we recommend requests with <10 minutes prior to the ramp start and < 1 hour after the start time allow the BA and TSP reliability assessments 3 minutes. For requests 10 minutes prior to ramp start time, should also provide 3 minutes for the BA and TSP to conduct reliability assessments. For request 11 minutes prior to ramp start time, should provide 4 minutes for the BA and TSP to conduct reliability assessments; etc.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time requests. Late requests may have a reliability impact and should require assessment as well. The Timing Requirements for WECC tables in all three standards should be modified to remove the "Response not required" and "if they choose" language. Requirement R1 (and the associated Measure M1) should be modified to include Late requests.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The Timing Requirements for WECC Timeline chart ignores the IA response times. We recommend that the timeline be revised to incorporate the IA response times in the Submittal & Assessment Times.



**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Raj Hundal
Organization:	BC Transmission Corp
Telephone:	604-699-7475
E-mail:	raj.hundal@bctc.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
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<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/> 5 — Electric Generators
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**Background Information:**

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Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
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Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
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- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

- Yes  
 No

Comments: The following statement in BA and TSP Conduct Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

- Yes  
 No

Comments: The following statement in BA and TSP Conduct Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

- Yes  
 No

Comments: All requests should be processed in the same manner and should be actively approved or denied. There is not reason to have Late and ATF tags not be processed within required timelines.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

- Yes  
 No

Comments:



**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Greg Rowland
Organization:	Duke Energy
Telephone:	704-382-5348
E-mail:	gdrowland@dukeenergy.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
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**Background Information:**

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- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
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Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ed Davis
Organization:	Entergy Services, Inc
Telephone:	504-576-3029
E-mail:	edavis@entergy.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
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**Background Information:**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

The following comment applies only to the details of the Late row in the "Timeline Requirements for all Interconnections Except WECC" table in each of the three standards. Column B of the new Late requirement contains the entry that "Response not required" and "Entities have up to 10 minutes to respond if they choose".

The new standard should also explicitly state that the RFI defaults to EXPIRED, as defined and used in Electronic Tagging Functional Specification Version 1.8.0, if a response has not been received within the 10 minutes.

Please add to Column B of Late: "The RFI will default to EXPIRED, as defined and used in Electronic Tagging Functional Specification, if a response has not been received within the 10 minutes".

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Not applicable.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:





**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Linda Campbell
Organization:	FRCC
Telephone:	8130207-7961
E-mail:	lcampbell@frcc.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
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1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	IESO
Telephone:	905-855-6187
E-mail:	ron.falsetti@ieso.ca
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities



**Background Information:**

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
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- 4 A change was made to INT-006-2, R1, clarifying applicability to "On-time" RFIs.
- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

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The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.



**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

- Yes  
 No

Comments: We notice that while the revisions are intended to address the RFI timing for WECC, changes have been made to the timing table for other Interconnections as well. We agree with these latter changes as we believe this to be corrections to the timing relationship to ramp start times since it is always 20 minutes to the top of the hour before the tags were considered late.

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

- Yes  
 No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

- Yes  
 No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

- Yes  
 No

Comments: The IESO continues to be concerned with the proposed "variable" implementation dates that will result in various jurisdictions having different effective dates for the standards. This is particularly important for arranged transaction (RFI) between neighbouring jurisdictions with different effective dates, resulting in different timing schedules for interchange transactions.

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Craig McLean
Organization:	Manitoba Hydro
Telephone:	204 487 5517
E-mail:	cmclean@hydro.mb.ca
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> <b>MRO</b>	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
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<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
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The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities



**Background Information:**

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- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Stan Southers / Ellis Rankin
Organization:	Oncor Electric Delivery Company LLC
Telephone:	214-486-2084 / 214-743-6825
E-mail:	stan.southers@oncor.com / erankin@oncor.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments: Oncor endorses the changes as made by the standards drafting team.

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

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<b>Individual Commenter Information</b>	
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<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments:

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3, and INT-008-3 standards. Comments must be submitted by **March 8, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "CI Timing Table" in the subject line. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Jim Hansen
Organization:	Seattle City Light
Telephone:	206-706-0165
E-mail:	james.hansen@seattle.gov
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input checked="" type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities



**Background Information:**

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposes permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The members of the Coordinate Interchange Timing Tables Standards Drafting Team (CITT SDT) believe the changes made to the table provide clarity for timing requirements. The CITT SDT revised the timing tables based on industry comments. These revisions include:

- 1 To provide better understanding of the timing requirements, the timing tables were split into a WECC specific table and an Eastern / ERCOT / Hydro Quebec specific table. Timeline images were also added to the standard. These formatting changes do not change the timing rules.
- 2 Based on industry comments, the new timing tables re-introduce the time classifications of "Late" and "On-time" and include a designation for the new "After-the-Fact (ATF)" time classification applicable to all Interconnections. These classifications are consistent with the existing e-Tag implementation. The addition of these time classifications does not add to or modify the requirements of the standard.
- 3 The timing table for WECC includes the modification to allow reliability entities up to 10 minutes for reliability assessment in most cases while still allowing for On-Time submittal of e-Tags up to 20 minutes prior to the operating hour (per the Urgent Action change to the standard). This change brings WECC reliability assessment timing in better alignment with Eastern / ERCOT / Hydro Quebec assessment periods.
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- 5 The "Minimum Total Reliability Period" column has been deleted from the tables. The CITT SDT felt that the information in this column did not add any benefit to the standards and removing the column makes the table clearer.

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The CITT SDT requests comments on the acceptability of the changes made to the timing table. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "CI Timing Table" by **March 8, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: The table states that entities are not required to respond to Requests for Interchange which represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.

This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.

In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: This new exemption represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

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based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.

This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.

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4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: Despite their differences, there are a few common items in the two tables that should be aligned, such as the title to the first column and the status of the column to rights of Column D.

Additionally, the proposed standard revision is beyond the scope of the original SAR. The SAR sought to 1) Reintroduce the timing classifications to the INT standards which were dropped in the transition from Policy 3 to NAESB/NERC split Coordinate Interchange (INT) standards, 2) to introduce the ATF timing classification and relaxed assessment requirements associated with it, and to 3) increase the reliability assessment period for the WECC timing tables up to the maximum possible while still meeting market needs. The SAR did not seek to remove requirements for active response to all but on-time requests.

An argument has been made that "it is up to interpretation" on whether row 1 of the timing tables applies to anything other than on-time requests however it is a mathematical statement that has mathematic proof to back it up. Row 1 applies to any RFI that is submitted < 1 hour prior to ramp start. Just as -15 is < 60, an RFI submitted at 1010 with a ramp start of 955 is -15 minutes prior to ramp start -15 minutes is < 60 minutes, therefore row 1 applies. On a continuous time graph, if the RFI has a ramp start of 955, row 1 applies to the RFI for all submittal times from 855 and later (including all times past 955). This consistent application of row 1 was also adopted by all e-Tag vendors without ever raising the question with NERC or NERC members, committees, subcommittees, or working groups and is how the e-Tag calculation of reliability assessment periods works today.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Rich Salgo
Organization:	Sierra Pacific Resources
Telephone:	775-834-5874
E-mail:	rsalgo@sppc.com
<b>NERC Region</b> (Please check all Regions in which your company operates.)	<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments: N/A

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments: Tags not considered "On-Time" encompass two different transaction type tags, ATF tags and LATE tags, and those transaction types need to be broken down further than simply not "On-Time". We agree ATF tags generally are not a reliability issue and do not warrant penalties yet because Dynamic Schedule Adjustments are treated as ATF tag adjustments there is a need for this type of tag to be acted on every hour for reliability reasons. LATE tag requests should always require action within up to 10 minutes as shown on the proposed timing table particularly if marked Emergency Tags.

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: Again tags not considered "On-Time" need to be treated differently depending on whether they are ATF Dynamic Schedule Adjustment tags or LATE tags. The INT-006-3 R1 and the associated Measure M1 could apply to ATF tags that are not Dynamic Schedule Adjustments and not to Late tags but this could be confusing. In the WECC Late Emergency Tags are required to be acted on and we believe this requirement should continue.

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: The impact of introducing "On-Time" to the Standards will be more detrimental than beneficial. There are too many variables in the ATF Tag Types for implementation and Late tags need to be assessed and acted on. The driving purpose to re-open the Timing Tables was to make permanent the changes requested for the West prior to expiration of the Urgent Action SAR and this needs to be completed as soon as possible.



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E-mail:		
<b>NERC Region</b> (Please check all Regions in which your company operates.)		<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree with the proposed timing table "Timing Requirements for all Interconnections except WECC"? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed timing table "Timing Requirements for WECC"? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.

Yes

No

Comments: INT-006 – Requirement 1 – The Drafting Team is to be commended for ensuring the Requirement 1 that references the revised timing table has been modified to correct possible reliability assessment issues with the inclusion of the ATF, Late and On-time Time Classifications to the table. The application of the requirement to respond to a request from the IA to transition an Arranged Interchange was correctly limited only to "On-time" interchange, an appropriate change to keep the timing table implications in line with reliability assessment capabilities and needs.

It is recommended, however, that the application to respond also be expanded slightly to include Late reliability curtailments. The importance of the timely processing of reliability-based curtailments/adjustments was reflected in the fact that in INT-005, R1.1 was expressly broken out to limit the distribution to necessary assessment entities so that processing could take place with limited delay and unnecessary or inappropriate Denials. This same importance to actively process a reliability curtailment should be extended to the requirement to respond on INT-006.

Suggested wording would be "...shall respond to all On-time and any Late reliability-based Curtailment request from an Interchange Authority to transition...". Omission of "Late" curtailments from the requirement to respond could adversely impact reliability due to the intentional or unintentional failure to respond (with no resulting compliance implications) and the resulting IA action to not confirm the Arranged Interchange requesting the curtailment.

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**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008**

---

Yes

No

Comments: There is no explanation of the acronym "ATF" in the timing tables. Suggest that the first occurrence at a minimum be spelled out "After-the-Fact (ATF)". Also, RFI (Request for Interchange) is not defined

Heading in 2<sup>nd</sup> column of timing table in INT-005 and INT-008 should be "IA Assigned" and not "IF Assigned...".

The new timelines should be labeled as examples since specific times were used rather than a generic syntax such as xx:40, xx:00, etc. Recommend using something like "Example Timing Requirements" in the timeline heading. This would help make sure there is no confusion about implied requirements such as a top-of-the hour start time or 10 minute ramp time.



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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Operating Reliability Working Group	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
<b>NERC Region</b> (Please check all Regions in which your company operates.)		<b>Registered Ballot Body Segment</b> (Please check all Industry Segments in which your company and its affiliates are registered.)
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 — Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

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Yes

No

Comments:

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Comments:

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Yes

No

Comments:

4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.

Yes

No

Comments: We concur with the proposed changes which primarily affect WECC and appreciate the separation of the two tables for clarification.

## Consideration of Comments on Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)

The Coordinate Interchange Timing Table Standard Drafting Team (CITT SDT) thanks all commenters who submitted comments on the additional modifications to the timing tables. These standards were posted for a 45-day public comment period from January 24 through March 8, 2008. The standard drafting team asked stakeholders to provide feedback on the proposed timing table modifications through a special Comment Form. There were 15 sets of comments, including comments from 27 different people from more than 21 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team made the following significant modifications:

- Some stakeholders indicated that these standards should all be implemented at the same time throughout the continent. In response, the drafting team changed the proposed effective date so that the revised standards will become effective in all regulatory jurisdictions at the same time.
- Some stakeholders indicated that in some regions, a response is required for all Arranged Interchanges. In response, the drafting team modified both timing tables in all three standards to remove the language (for Arranged Interchange classified as either “After-the-fact” or “Late”) that indicated that Transmission Service Provider and Balancing Authority did not have to respond. This modification allows regions to require a response, if needed, but does not mandate a response throughout the continent.
- Some stakeholders expressed a concern that, without clarifying language, the timing classifications in the timing table have introduced ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. In response, the drafting team modified INT-006 R1 and M1 to add some clarifying language that specifically identifies the types of reliability-related requests for Arranged Interchange that require active approval. This is not an expansion of the requirement, but should remove the ambiguity that would otherwise exist.

The drafting team is reposting the documents for an additional comment period.

In this “Consideration of Comments” document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received can be viewed in their original format at:

[http://www.nerc.com/~filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/~filez/standards/INT_Urgent_Action.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

**Consideration of Comments on Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
1.	Thad K. Ness	American Electric Power	x		x		x	x				
2.	Troy Simpson	Bonneville Power Administration	x		x		x	x				
3.	Raj Hundal	British Columbia Transmission Corp.		x								
4.	Paul Lampe (G3)	City Power & Light (Independence, MO)	x		x		x					
5.	Jeanne Kurzynowski (G1)	Consumers Energy Company			x	x	x					
6.	Greg Rowland	Duke Energy Corporation	x		x							
7.	Brian Berkstresser (G3)	Empire District Electric	x		x		x					
8.	Edward J. Davis	Entergy Services, Inc.	x									
9.	Linda Campbell	Florida Reliability Coordinating Council										x
10.	Ron Falsetti	Independent Electricity System Operator		x								
11.	Scott Frink (G3)	Kansas City Power & Light	x		x		x					
12.	Mike Lucas (G3)	Kansas City Power & Light	x		x		x					
13.	Craig McLean	Manitoba Hydro	x		x		x	x				
14.	Jason Marshall (G1)	Midwest ISO		x								
15.	Stan Southers/Ellis Rankin	Oncor Electric Delivery	x									
16.	Phil Riley	PS Commission of South Carolina									x	
17.	Jim Hansen	Seattle City Light			x	x	x	x				
18.	Rich Salgo	Sierra Pacific Resources	x									
19.	Roman Carter (G2)	Southern Transmission	x									
20.	Mike Oatts (G2)	Southern Transmission	x									

**Consideration of Comments on Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

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Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
21.	Dan Baisdan (G2)	Southern Transmission	x										
22.	JT Wood (G2)	Southern Transmission	x										
23.	Jim Busbin (G2)	Southern Transmission	x										
24.	Marc Butts (G2)	Southern Transmission											
25.	Robert Rhodes (G3)	Southwest Power Pool		x									
26.	Kyle McMenamin (G3)	Southwestern Public Service	x		x		x						
27.	Allen Klassen (G3)	Westar Energy	x		x		x						

- G1 – Midwest ISO Stakeholders
- G2 – Southern Transmission
- G3 – SPP Operating Reliability Working Group

## Index to Questions, Comments, and Responses

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**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

**1. Do you agree with the proposed timing table “Timing Requirements for all Interconnections except WECC”? If not, please explain in the comment area.**

**Summary Consideration:** While most commenters agreed with the proposed timing table, there were some comments indicating that the proposed language, “response not required” and “if they choose” for the BA and TSP when an Arranged Interchange is submitted either Late or After the Fact should be removed from the timing table. This language was removed from the timing tables. There was also concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. We have modified INT-006-3, R1 and M1 as shown below to identify the specific types of reliability-related requests for Arranged Interchange that require active approval.

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 **an each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

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 On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#1 – Commenter	Yes	No	Comment
British Columbia Transmission Corp.		x	The following statement in BA and TSP Conduct: Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The drafting team disagrees with your assessment regarding passive approval / denial. The approval entity is not precluded from actively responding to all requests.</p> <p>We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p>			

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#1 – Commenter	Yes	No	Comment
			<p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>each On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p> <p>Regarding the WECC Interchange tool: The drafting team concurs with your statement, however we recommend that you pursue regional standards to address WECC specific concerns.</p>
Entergy Services, Inc.		x	<p>The following comment applies only to the details of the Late row in the "Timeline Requirements for all Interconnections Except WECC" table in each of the three standards. Column B of the new Late requirement contains the entry that "Response not required" and "Entities have up to 10 minutes to respond if they choose".</p> <p>The new standard should also explicitly state that the RFI defaults to EXPIRED, as defined and used in Electronic Tagging Functional Specification Version 1.8.0, if a response has not been received within the 10 minutes.</p> <p>Please add to Column B of Late: "The RFI will default to EXPIRED, as defined and used in Electronic Tagging Functional Specification, if a response has not been received within the 10 minutes".</p>
			<p><b>Response:</b> The CITT SDT thanks you for your comment. The drafting team discussed your concern and believes that the concern is that the Compliance Enforcement Authority may request evidence to support an Arranged Interchange that is Late, and the responsible entity may not have this evidence because the E-Tag system has automatically rejected the request. The drafting team made revisions to the measure of INT-006-3, M1 to address this concern by clarifying that evidence is only needed for responses to those Arranged Interchanges that are On-time or related to either Emergencies or Reliability Adjustments.</p> <p>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 <del>an</del> <b>each On-time, Emergency or Reliability Adjustment</b> request from an</p>

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#1 – Commenter	Yes	No	Comment
Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b>			
Independent Electricity System Operator	x		We notice that while the revisions are intended to address the RFI timing for WECC, changes have been made to the timing table for other Interconnections as well. We agree with these latter changes as we believe this to be corrections to the timing relationship to ramp start times since it is always 20 minutes to the top of the hour before the tags were considered late.
<b>Response:</b> The CITT SDT thanks you for your comment.			
Oncor Electric Delivery	x		Oncor endorses the changes as made by the standards drafting team.
<b>Response:</b> The CITT SDT thanks you for your comment.			
American Electric Power	x		
Bonneville Power Administration	x		
Duke Energy Corporation	x		
Manitoba Hydro	x		
Midwest ISO	x		
PS Commission of South Carolina	x		
Southern Transmission	x		
SPP ORWG	x		

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

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**2. Do you agree with the proposed timing table “Timing Requirements for WECC”? If not, please explain in the comment area.**

**Summary Consideration:** While most commenters agreed with the proposed timing table requirements for WECC, none of the commenters from entities within the WECC Interconnection agreed with these timing requirements. The comments received indicated that the proposed language, “response not required” and “if they choose” for the BA and TSP when an Arranged Interchange is submitted either Late or After the Fact should be removed from the timing table. This language was removed from the timing tables. There was also concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response. The requirement and measure of INT-006-3, R1 and M1 were revised to address these concerns.

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 **an each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

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 **On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#2 – Commenter	Yes	No	Comment
Bonneville Power Administration		X	Bonneville Power Administration believes that all requests for interchange should be confirmed with at least 5 minutes available for the BA to Prepare Confirmed Interchange for Implementation with a minimum of 3 minutes for the BA and TSP to conduct Reliability Assessments. For that reason, we recommend requests with <10 minutes prior to the ramp start and < 1 hour after the start time allow the BA and TSP reliability assessments 3 minutes. For requests 10 minutes prior to ramp start time, should also provide 3 minutes for the BA and TSP to conduct reliability assessments. For request 11 minutes prior to ramp start time, should provide 4 minutes for the BA and TSP to conduct reliability assessments; etc.
<p><b>Response:</b> The CITT SDT thanks you for your comment. Your request to increase the time in Column D from three minutes to five minutes is outside the scope of this standard drafting team. The type of changes that you are requesting are more appropriately addressed in a new SAR through the Standards Development process. The SAR for this project limited the scope</p>			

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#2 – Commenter	Yes	No	Comment
<p>of the project to modifications of the timing tables. There is a project in the work plan to address the bigger set of modifications to the entire set of INT standards (Project 2009-03). We recommend that you actively participate in that project.</p>			
<p>British Columbia Transmission Corp.</p>		<p>x</p>	<p>The following statement in BA and TSP Conduct: Reliability Assessments should be removed "Response not required.". The Late and ATF tags should be actively approved or denied. Significant time and efforts were invested in removing passive approvals and denials, but they have been brought back with this language. It is also a requirement for WECC Interchange Tool to ensure that ATF tags are approved in a timely so that correct NSI values can be calculated.</p>
<p><b>Response:</b> The CIT TSDT thanks you for your comment. The phrases "Response not required" and "if they choose" were removed from the timing table. The drafting team disagrees with your assessment regarding passive approval / denial. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> each <b>On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p> <p>Regarding the WECC Interchange tool: The drafting team concurs with your statement, however we recommend that you pursue regional standards to address WECC specific concerns.</p>			
<p>Seattle City Light</p>		<p>x</p>	<p>The table states that entities are not required to respond to Requests for Interchange which represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes</p>

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#2 – Commenter	Yes	No	Comment
			<p>to start of ramp. This modification would conflict with INT-10. It is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.</p> <p>This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.</p> <p>In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.</p>
<p><b>Response:</b> The CITT SDT thanks you for your comment. The standard drafting team has made revisions to INT-006-3 and the timing tables to address your concerns. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Sierra Pacific Resources		x	<p>Tags not considered "On-Time" encompass two different transaction type tags, ATF tags and LATE tags, and those transaction types need to be broken down further than simply not "On-Time". We agree ATF tags generally are not a reliability issue and do not warrant penalties yet because Dynamic Schedule Adjustments are treated as ATF tag</p>

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#2 – Commenter	Yes	No	Comment
			adjustments there is a need for this type of tag to be acted on every hour for reliability reasons. LATE tag requests should always require action within up to 10 minutes as shown on the proposed timing table particularly if marked Emergency Tags.
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. that require active approval. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>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 <del>an</del> each <b>On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Duke Energy Corporation	x		
American Electric Power	x		
Independent Electricity System Operator	x		
Manitoba Hydro	x		
Midwest ISO	x		
Oncor Electric Delivery	x		
PS Commission of South Carolina	x		
Southern Transmission	x		
SPP ORWG	x		

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

**3. Do you agree with limiting the applicability of R1 (and the associated Measure M1) of INT-006-3 to On-time RFIs? If not, please explain in the comment area.**

**Summary Consideration:** There was concern that, without clarifying language, there is ambiguity as to the scope of Arranged Interchanges to which the responsible entity is obligated to provide an active response.. The requirement and measure of INT-006-3, R1 and M1 were revised to clarify that active approval is only required for reliability-related requests for Arranged Interchange.

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 ~~an~~ **each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

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 **On-time, Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

#3 – Commenter	Yes	No	Comment
Bonneville Power Administration		x	Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time requests. Late requests may have a reliability impact and should require assessment as well. The Timing Requirements for WECC tables in all three standards should be modified to remove the "Response not required" and "if they choose" language. Requirement R1 (and the associated Measure M1) should be modified to include Late requests.
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p>			



**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#3 – Commenter	Yes	No	Comment
<p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p> <p>The phrases “Response not required” and “if they choose” were removed from the timing table.</p>			
British Columbia Transmission Corp.		x	All requests should be processed in the same manner and should be actively approved or denied. There is not reason to have Late and ATF tags not be processed within required timelines.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Seattle City Light		x	This new exemption represents a major change and is out of scope of the SAR. When a reliability entity fails to respond to an RFI, the RFI is not approved. The current standards require entities to respond to RFIs regardless of submittal time. The assessment periods and requirements to assess RFIs apply even if the RFI is submitted after 10 minutes prior to ramp start. This is based on a straightforward application of the boolean logic in row 1 of the timing table and all entities who have developed timing based on these tables have applied the assessment period the same way. In addition, INT-10 requires that RFIs be submitted past 10 minutes to start of ramp. This modification would conflict with INT-10. It

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#3 – Commenter	Yes	No	Comment
			<p>is clear from INT-10 that the authors of the INT standards meant for row 1 to apply to any RFI submitted and that there was no intent to allow these RFIs to be automatically denied. It would be a major barrier to compliance with INT-10 to exempt reliability entities from responding to these RFIs.</p> <p>This table is shared between reliability and market (NAESB coordinate Interchange) standards and so both Reliability and non-Reliability issues must be considered. Commercial and business entities also would expect that RFIs they submit to be acted on. It could cause an interruption of commercial interaction if entities failed to respond to RFIs with no accountability for this action.</p> <p>In the WECC, Requests submitted after 10 minutes prior to start of ramp are used to automate and record compliance with BAL standards. Not requiring active response could result in non-compliance with BAL standards.</p>
<p><b>Response:</b> The CITT SDT thanks you for your comment. The phrases “Response not required” and “if they choose” were removed from the timing table. The approval entity is not precluded from actively responding to all requests. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Sierra Pacific Resources		x	<p>Again tags not considered "On-Time" need to be treated differently depending on whether they are ATF Dynamic Schedule Adjustment tags or LATE tags. The INT-006-3 R1 and the associated Measure M1 could apply to ATF tags that are not Dynamic Schedule Adjustments and not to</p>

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#3 – Commenter	Yes	No	Comment
			Late tags but this could be confusing. In the WECC Late Emergency Tags are required to be acted on and we believe this requirement should continue.
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Southern Transmission		x	<p>INT-006 – Requirement 1 – The Drafting Team is to be commended for ensuring the Requirement 1 that references the revised timing table has been modified to correct possible reliability assessment issues with the inclusion of the ATF, Late and On-time Time Classifications to the table. The application of the requirement to respond to a request from the IA to transition an Arranged Interchange was correctly limited only to “On-time” interchange, an appropriate change to keep the timing table implications in line with reliability assessment capabilities and needs.</p> <p>It is recommended, however, that the application to respond also be expanded slightly to include Late reliability curtailments. The importance of the timely processing of reliability-based curtailments/adjustments was reflected in the fact that in INT-005, R1.1 was expressly broken out to limit the distribution to necessary assessment entities so that processing could take place with limited delay and unnecessary or inappropriate Denials. This same importance to actively process a reliability curtailment should be extended to the requirement to respond on INT-006.</p>

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#3 – Commenter	Yes	No	Comment
			Suggested wording would be "...shall respond to all On-time and any Late reliability-based Curtailment request from an Interchange Authority to transition...". Omission of "Late" curtailments from the requirement to respond could adversely impact reliability due to the intentional or unintentional failure to respond (with no resulting compliance implications) and the resulting IA action to not confirm the Arranged Interchange requesting the curtailment.
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
American Electric Power	x		
Duke Energy Corporation	x		
Entergy Services, Inc.	x		
Independent Electricity System Operator	x		
Manitoba Hydro	x		
Midwest ISO	x		
Oncor Electric Delivery	x		
PS Commission of South Carolina	x		
SPP ORWG	x		

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

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**4. If you have any other comments on the modifications made to the standards that you haven't made in response to the first four questions, please provide them here.**

**Summary Consideration:** Many of the comments received were a duplication of comments received in questions 1 through 3. Additionally, there were a few suggestions regarding formatting and definitions that the team accommodated. The following definitions have been added to the standards:

**Emergency Request** – Request for Arranged Interchange to be initiated or modified by reliability entities under abnormal operating conditions.

**Reliability Adjustment Request** – Request to modify an Implemented Interchange or Interchange Schedule for reliability purposes.

**After-the-fact (ATF)** – A time classification assigned to an Arranged Interchange (also called a Request for Interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

#4 – Commenter	Yes	No	Comment
American Electric Power			It is inappropriate to say an ATF classification for the RFI has a reliability assessment period for applicable BAs and TSPs in the timing table. There is no point because the ATF submittal is merely there for accounting and settlement purposes in the inadvertent interchange process. If the RFI was for extended hours, then it would there for identification in reliability assessment/monitoring and the congestion management process. It must be understood that a ATF classification for RFI would only be valid if the affected reliability assessment entities had prior confirmation of interchange to be implemented prior to the time of implementation into the ACE equation, as stated in NERC Standard INT-003-2. The impact of reliability on the Bulk Electric System is pertinent to real-time and not ATF.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The drafting team recognizes that there are instances where ATF tags are reliability related (such as instances in INT-010) and as such, we have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. This requires reliability assessment periods in rows 1 and 2 of the timing tables.</p> <p>R1. Prior to the expiration of the reliability assessment period defined in the Timing Table, Column B, the Balancing</p>			

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#4 – Commenter	Yes	No	Comment
<p>Authority and Transmission Service Provider shall respond to <del>an</del> each On-time, Emergency and Reliability Adjustment request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Bonneville Power Administration	x		The Timing Requirements for WECC Timeline chart ignores the IA response times. We recommend that the timeline be revised to incorporate the IA response times in the Submittal & Assessment Times.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The timeline was designed to show the relationship between the time classification, the RFI submittal time and the reliability assessment period. The IA response time was intentionally left off the timeline.</p>			
Florida Reliability Coordinating Council			The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The SAR limited the scope of the project to modifications of the timing tables. There is a project in the work plan to address the bigger set of modifications to the entire set of INT standards, and the changes in terminology for the compliance elements of the standard will be addressed as part of that larger project. (Project 2009-03)</p>			
Independent Electricity System Operator	x		The IESO continues to be concerned with the proposed “variable” implementation dates that will result in various jurisdictions having different effective dates for the standards. This is particularly important for arranged transaction (RFI) between neighbouring jurisdictions with different effective dates, resulting in different timing schedules for interchange transactions.
<p><b>Response:</b> The CITT SDT thanks you for your comment. This is a global issue that NERC is working to address. The team agrees and modified the proposed effective date for implementation to be the same for all entities. We have changed the proposed effective date language to:</p> <p>The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.</p>			

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#4 – Commenter	Yes	No	Comment
Seattle City Light			<p>Despite their differences, there are a few common items in the two tables that should be aligned, such as the title to the first column and the status of the column to rights of Column D.</p> <p>Additionally, the proposed standard revision is beyond the scope of the original SAR. The SAR sought to 1) Reintroduce the timing classifications to the INT standards which were dropped in the transition from Policy 3 to NAESB/NERC split Coordinate Interchange (INT) standards, 2) to introduce the ATF timing classification and relaxed assessment requirements associated with it, and to 3) increase the reliability assessment period for the WECC timing tables up to the maximum possible while still meeting market needs. The SAR did not seek to remove requirements for active response to all but on-time requests.</p> <p>An argument has been made that “it is up to interpretation” on whether row 1 of the timing tables applies to anything other than on-time requests however it is a mathematical statement that has mathematic proof to back it up. Row 1 applies to any RFI that is submitted &lt; 1 hour prior to ramp start. Just as -15 is &lt; 60, an RFI submitted at 1010 with a ramp start of 955 is -15 minutes prior to ramp start -15 minutes is &lt; 60 minutes, therefore row 1 applies. On a continuous time graph, if the RFI has a ramp start of 955, row 1 applies to the RFI for all submittal times from 855 and later (including all times past 955). This consistent application of row 1 was also adopted by all e-Tag vendors without ever raising the question with NERC or NERC members, committees, subcommittees, or working groups and is how the e-Tag calculation of reliability assessment periods works today.</p>
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. With these modifications, the scope of the SAR is unchanged. This also applies to the comment regarding the applicability of row 1.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p>			

**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#4 – Commenter	Yes	No	Comment
<p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Sierra Pacific Resources	x		<p>The impact of introducing "On-Time" to the Standards will be more detrimental than beneficial. There are too many variables in the ATF Tag Types for implementation and Late tags need to be assessed and acted on. The driving purpose to re-open the Timing Tables was to make permanent the changes requested for the West prior to expiration of the Urgent Action SAR and this needs to be completed as soon as possible.</p>
<p><b>Response:</b> The CITT SDT thanks you for your comment. We have added some language to INT-006-3 R1 and M1 to clarify that active approval is only required for reliability-related requests for Arranged Interchange. Regarding the ATF tag, we suggest that this is best served through a regional business practice or through NAESB.</p> <p>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 <del>an</del> <b>each On-time, Emergency and Reliability Adjustment</b> request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.</p> <p>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 <b>On-time, Emergency or Reliability Adjustment</b> request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. <b>The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.</b></p>			
Southern Transmission	x		<p>There is no explanation of the acronym "ATF" in the timing tables. Suggest that the first occurrence at a minimum be spelled out "After-the-Fact (ATF)". Also, RFI (Request for Interchange) is not defined</p> <p>Heading in 2<sup>nd</sup> column of timing table in INT-005 and INT-008 should be "IA Assigned" and not "IF Assigned...".</p> <p>The new timelines should be labeled as examples since specific times were used rather than a generic syntax such as xx:40, xx:00, etc. Recommend</p>



**Consideration of Comments on 1<sup>st</sup> Draft of Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

#4 – Commenter	Yes	No	Comment
			using something like "Example Timing Requirements" in the timeline heading. This would help make sure there is no confusion about implied requirements such as a top-of-the hour start time or 10 minute ramp time.
<p><b>Response:</b> The CITT SDT thanks you for your comment. The team is proposing to add the term ATF to the NERC Glossary. RFI is defined in the NERC Glossary. The column heading was revised based on your comment. The timelines titles were revised to indicate that they are examples.</p>			
SPP ORWG	x		We concur with the proposed changes which primarily affect WECC and appreciate the separation of the two tables for clarification.
<p><b>Response:</b> The CITT SDT thanks you for your comment.</p>			
Midwest ISO	x		
British Columbia Transmission Corp.		x	
Entergy Services, Inc.		x	
Manitoba Hydro		x	
PS Commission of South Carolina		x	



## Standards Announcement

Comment Period Opens

May 12–June 10, 2008

Now available at: [http://www.nerc.com/~filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/~filez/standards/INT_Urgent_Action.html)

### Proposed modifications to Timing Tables in INT-005, INT-006, and INT-008 (Project 2007-14) Posted for 30-day Comment Period

The second drafts of the following Interchange Scheduling and Coordination standards have been posted for a 30-day comment period from May 12 through June 10, 2008.

- INT-005-3 — Interchange Authority Distributes Arranged Interchange
- INT-006-3 — Response to Interchange Authority
- INT-008-3 — Interchange Authority Distributes Status

The proposed standards make permanent the changes approved through the Urgent Action process last year. This set of proposed standards includes changes resulting from comments received from the initial posting of the standards. These include adding clarifying language to INT-006-3, Requirement R1 and Measure M1, adding three new definitions (Emergency Request, Reliability Adjustment Request, and After-the-fact), and various minor working and format changes.

Please use this [electronic comment form](#) to submit comments on these INT standards by June 10, 2008.

### Standards Development Process

The [Reliability Standards Development Procedure Manual](#) 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.

*For more information or assistance, please contact Maureen Long,  
Standards Process Manager, at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or at (813) 468-5998.*

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**Standard Development Roadmap**

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

**Development Steps Completed:**

1. SAR posted for 30-day comment period from April 20 through May 21, 2007
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
3. Revised Standards posted for 45 day comment period from January 24 to March 8, 2008
4. Team met April 1–2, 2008 to respond to comments and revised standards.

**Proposed Action Plan and Description of Current Draft:**

This is a second posting of the proposed changes to the timing table and the associated Implementation Plan.

**Future Development Plan:**

<b>Anticipated Actions</b>	<b>Anticipated Date</b>
1. Respond to comments on 30 day posting.	To be determined.
2. Post for 30-day pre-ballot review.	To be determined.
3. Conduct initial ballot.	To be determined.
4. Respond to comments on initial ballot.	To be determined.
5. Conduct recirculation ballot.	To be determined.
6. BOT adoption.	To be determined.
7. Submit for regulatory approvals.	To be determined.

**A. Introduction**

1. **Title:** **Interchange Authority Distributes Arranged Interchange**
2. **Number:** INT-005-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

**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 History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 2, 2006	Approved by BOT	New

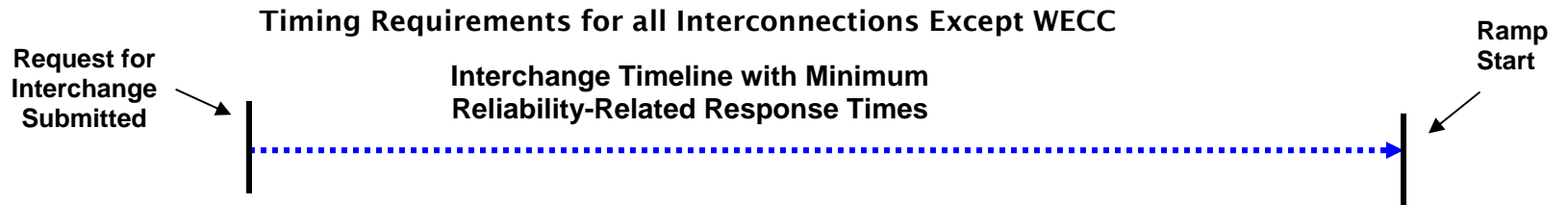
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<sup>1</sup> This does not include instances of not distributing information due to extenuating circumstances approved by the Compliance Monitor.

**Standard INT-005-3 — Interchange Authority Distributes Arranged Interchange**

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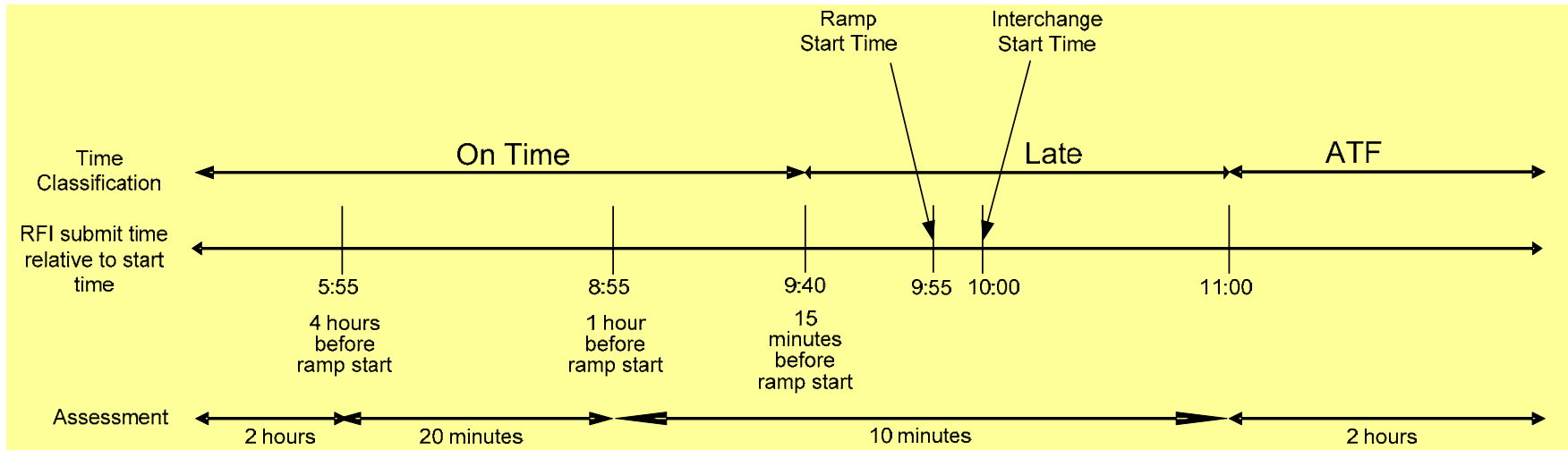
2	May 2, 2007	Approved by BOT	Revised
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		A	B	C	D
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections Except WECC





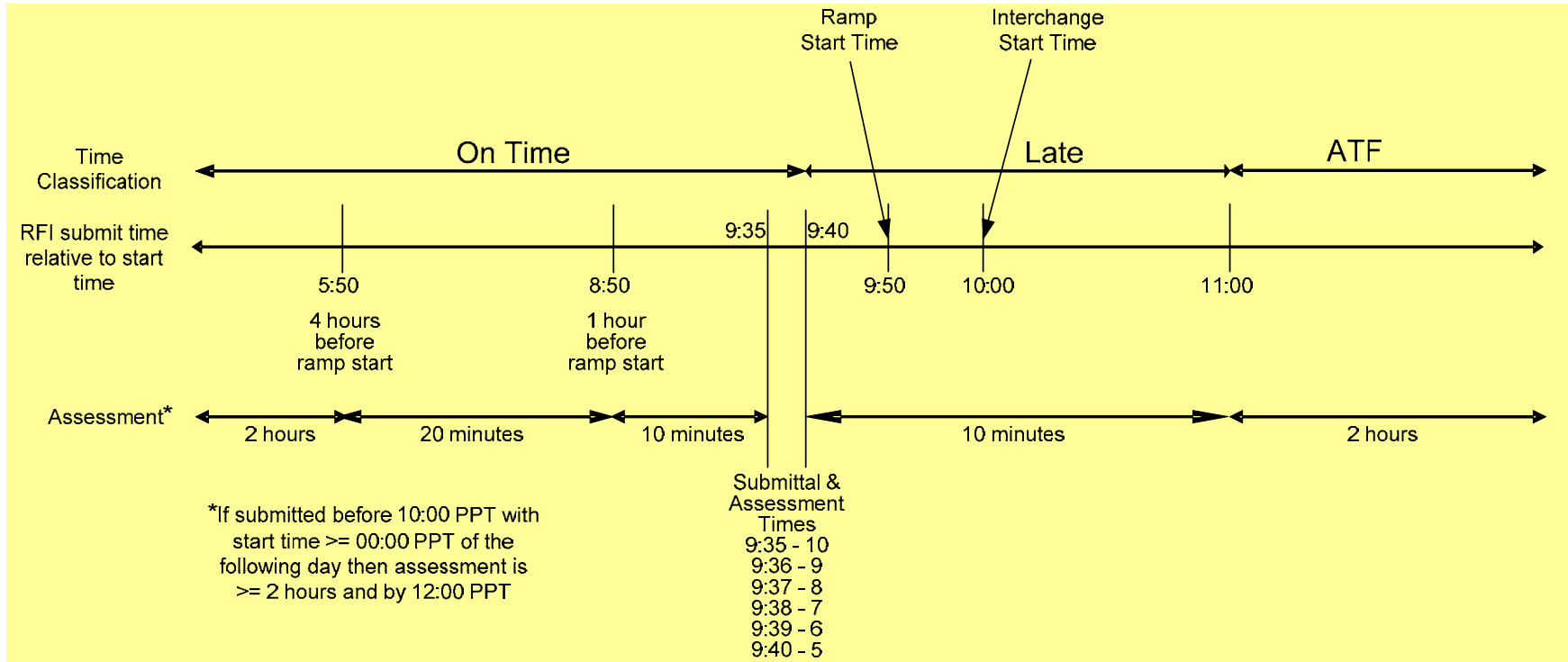
**Standard INT-005-3 — Interchange Authority Distributes Arranged Interchange**

**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for WECC



## A. Introduction

1. **Title:** **Interchange Authority Distributes Arranged Interchange**
2. **Number:** INT-005-~~32~~
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.
- ~~5. 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

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

**Version History**

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

Standard INT-005-32 — Interchange Authority Distributes Arranged Interchange

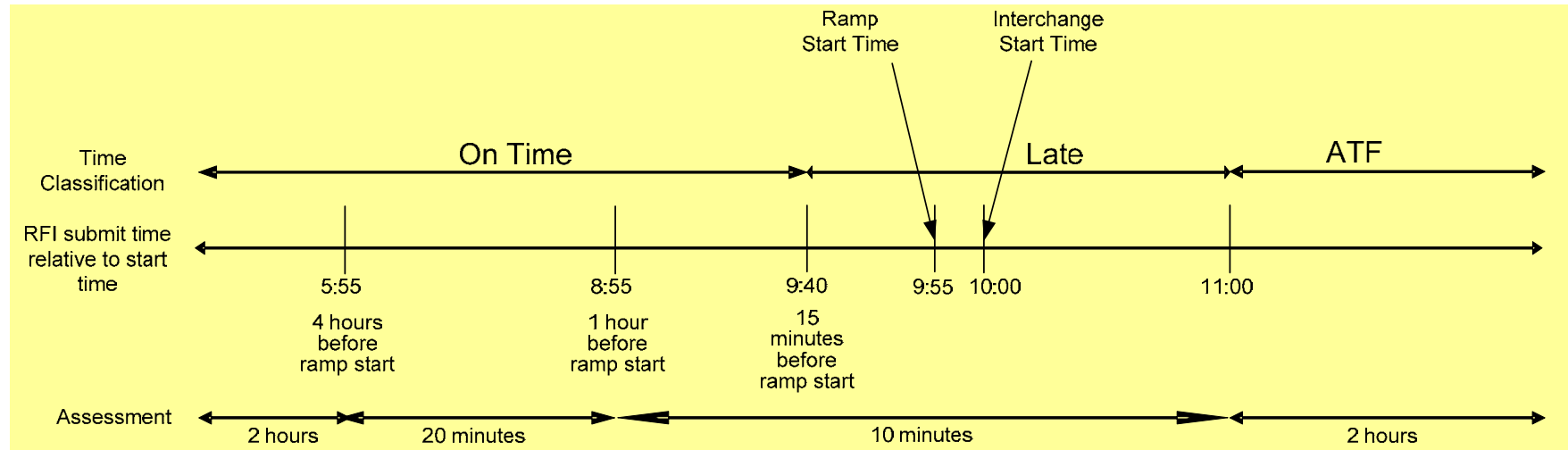
**Timing Requirements for all Interconnections Except WECC**

**Interchange Timeline with Minimum Reliability-Related Response Times**

		A	B	C	D	Minimum Total Reliability Period (Columns A through D)
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>	<b>Minimum Total Reliability Period (Columns A through D)</b>
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	<del>Response not required.</del> Entities have up to 2 hours to respond <b>if they choose.</b>	≤ 1 minute from receipt of all Reliability Assessments	NA	<i>15 minutes</i>
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	<del>Response not required.</del> Entities have up to 10 minutes to respond <b>if they choose.</b>	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	<i>10 minutes</i>
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	<i>15 minutes</i>
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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	<i>1 hour plus 1 minute</i>
≥ 4 hours prior to ramp start	On-time	≤ 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	<i>4 hours</i>

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections except WECC



**Standard INT-005-32 — Interchange Authority Distributes Arranged Interchange**

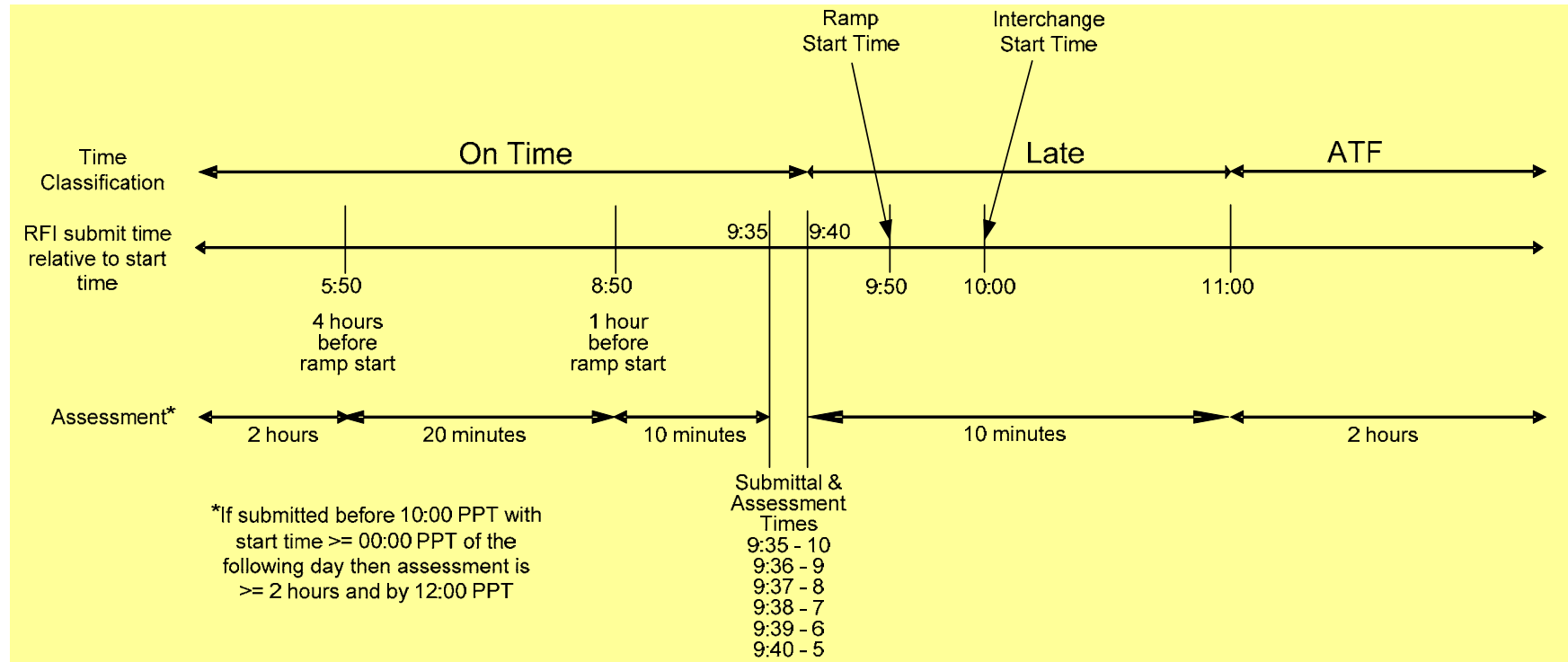
**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	<del>Response not required:</del> Entities have up to 2 hours to respond <del>if they choose:</del>	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	<del>Response not required:</del> Entities have up to 10 minutes to respond <del>if they choose:</del>	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<del>&lt;1 hour and &gt; 15 minutes prior to ramp start</del>	<del>On-time</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 10 minutes from Arranged Interchange receipt from IA</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



**Example of Timing Requirements for WECC**



**Standard Development Roadmap**

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

**Development Steps Completed:**

1. SAR posted for 30-day comment period from April 20 through May 21, 2007
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
3. Revised Standards posted for 45 day comment period from January 24 to March 8, 2008
4. Team met April 1–2, 2008 to respond to comments and revised standards.

**Proposed Action Plan and Description of Current Draft:**

This is a second posting of the proposed changes to the timing table and the associated Implementation Plan.

**Future Development Plan:**

<b>Anticipated Actions</b>	<b>Anticipated Date</b>
1. Respond to comments on 30 day posting.	To be determined.
2. Post for 30-day pre-ballot review.	To be determined.
3. Conduct initial ballot.	To be determined.
4. Respond to comments on initial ballot.	To be determined.
5. Conduct recirculation ballot.	To be determined.
6. BOT adoption.	To be determined.
7. Submit for regulatory approvals.	To be determined.

**Definitions of Terms Used in Standard**

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**Emergency Request** – Request for Arranged Interchange to be initiated or modified by reliability entities under abnormal operating conditions.

**Reliability Adjustment Request** – Request to modify an Implemented Interchange or Interchange Schedule for reliability purposes.

**After-the-fact (ATF)** – A time classification assigned to an Arranged Interchange (also called a request for interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

## A. Introduction

1. **Title:** **Response to Interchange Authority**
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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 each On-time, Emergency and Reliability Adjustment 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 On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## 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.

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

## Standard INT-006-3 — Response to Interchange Authority

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- 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 History

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

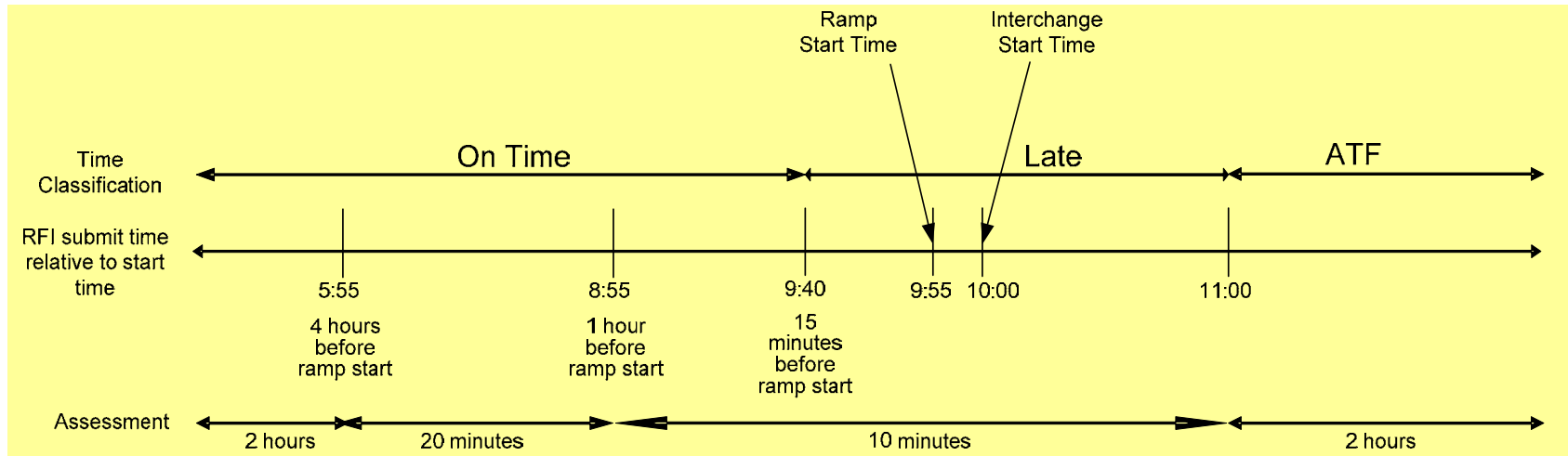
Timing Requirements for all Interconnections Except WECC



		A	B	C	D
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections Except WECC



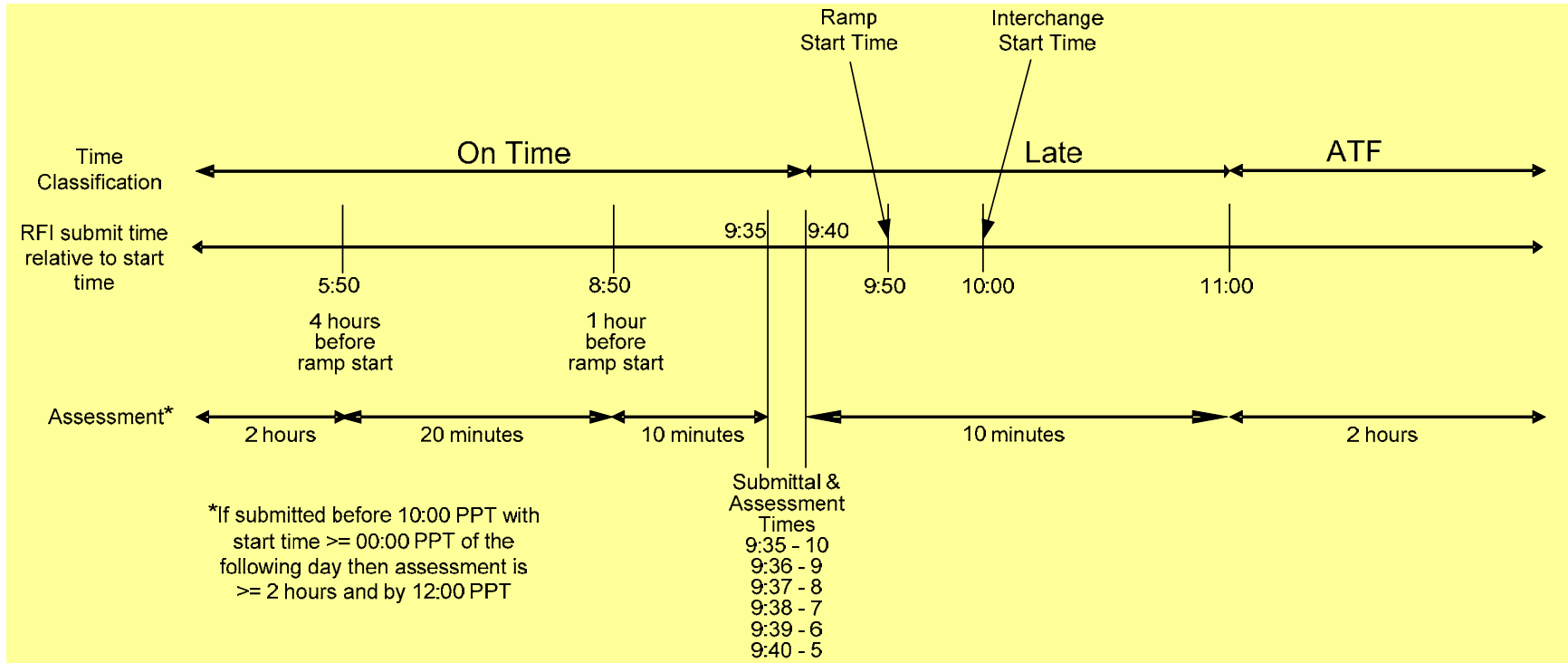


**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
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### Example of Timing Requirements for WECC



### Definitions of Terms Used in Standard

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**After-the-fact (ATF)** – A time classification assigned to an Arranged Interchange (also called a request for interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

## A. Introduction

1. **Title:** **Response to Interchange Authority**
2. **Number:** INT-006-~~32~~
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~~ The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.-

## 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 ~~an each~~ On-time, Emergency and Reliability Adjustment-request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.
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    - 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 On-time, Emergency or Reliability Adjustment request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## 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.

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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**

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## **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 History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 2, 2006	Approved by BOT	New
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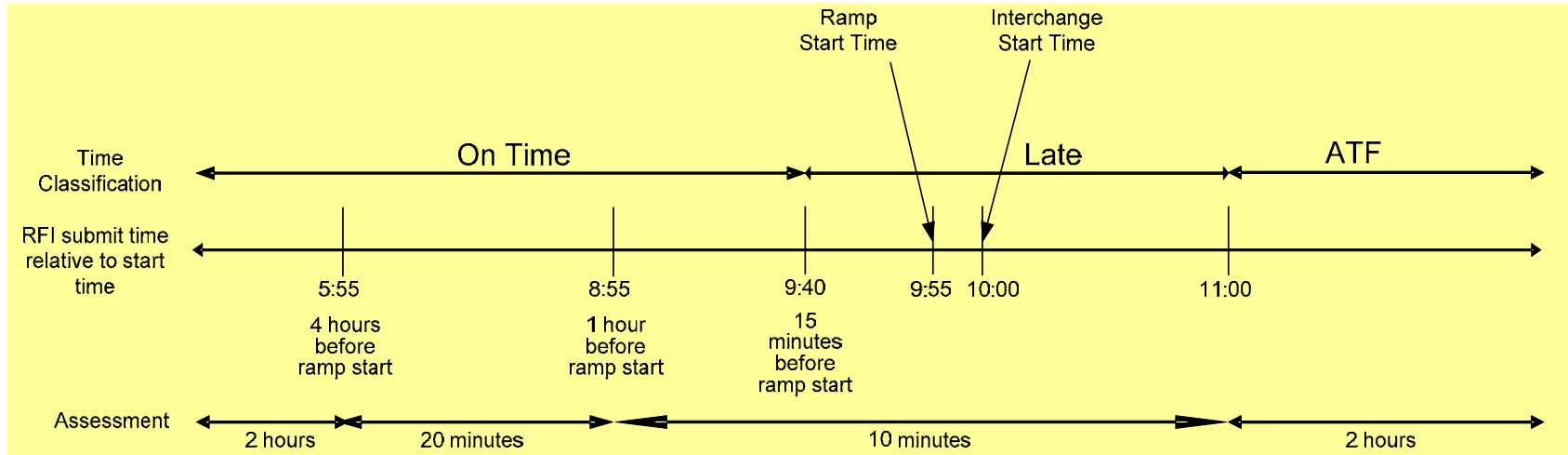
Timing Requirements for all Interconnections ~~except~~ Except WECC



		A	B	C	D	<del>Minimum Total Reliability Period</del> (Columns A through D)
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<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	<del>15 minutes</del>
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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	<del>1 hour plus 1 minute</del>
≥ 4 hours prior to ramp start	On-time	≤ 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	<del>4 hours</del>

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**Example of Timing Requirements for all Interconnections ~~except~~ Except WECC**





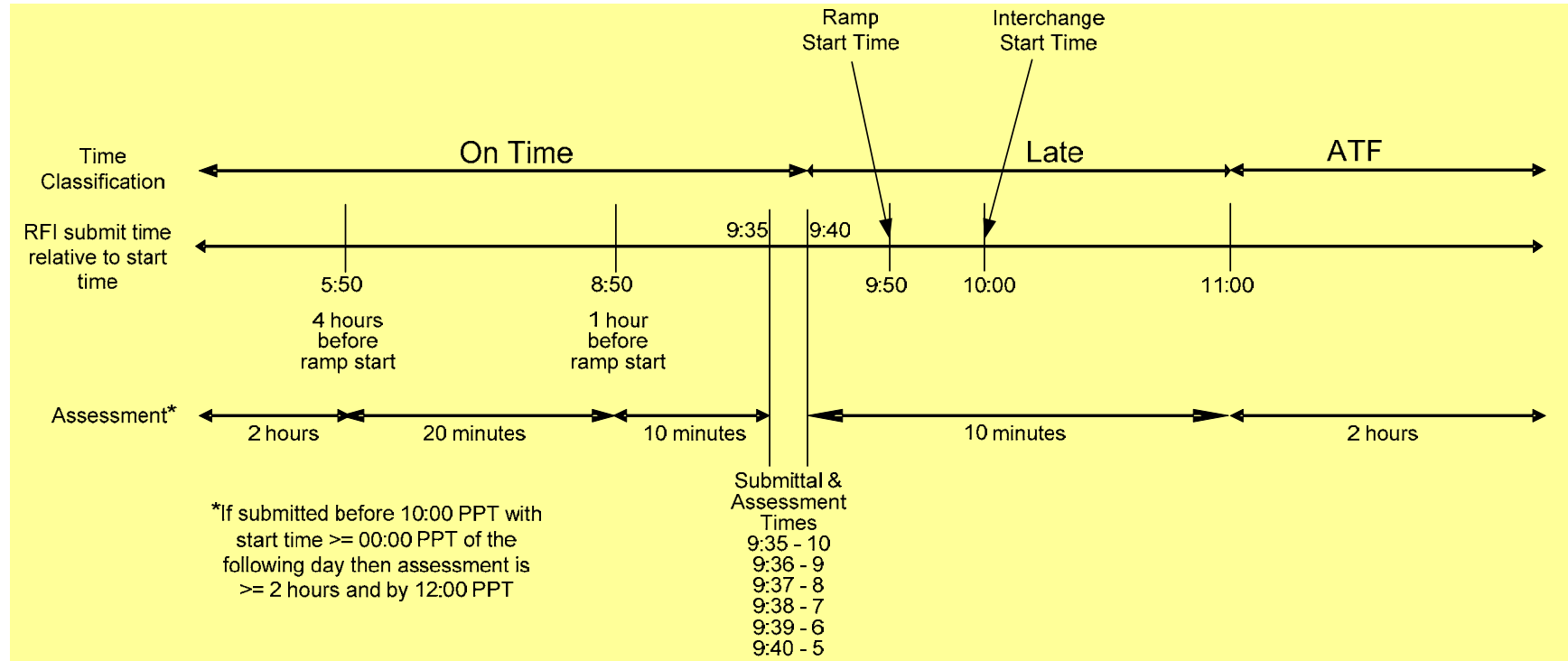
Standard INT-006-32 — Response to Interchange Authority

Timing Requirements for WECC

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**Example of Timing Requirements for WECC**



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*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

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**Future Development Plan:**

<b>Anticipated Actions</b>	<b>Anticipated Date</b>
1. Respond to comments on 30 day posting.	To be determined.
2. Post for 30-day pre-ballot review.	To be determined.
3. Conduct initial ballot.	To be determined.
4. Respond to comments on initial ballot.	To be determined.
5. Conduct recirculation ballot.	To be determined.
6. BOT adoption.	To be determined.
7. Submit for regulatory approvals.	To be determined.

## A. Introduction

1. **Title:** **Interchange Authority Distributes Status**
2. **Number:** INT-008-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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.

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

- 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.

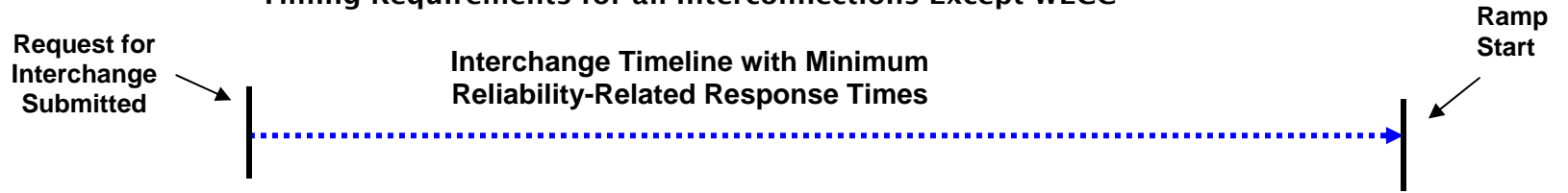
**E. Regional Differences**

None.

**Version History**

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

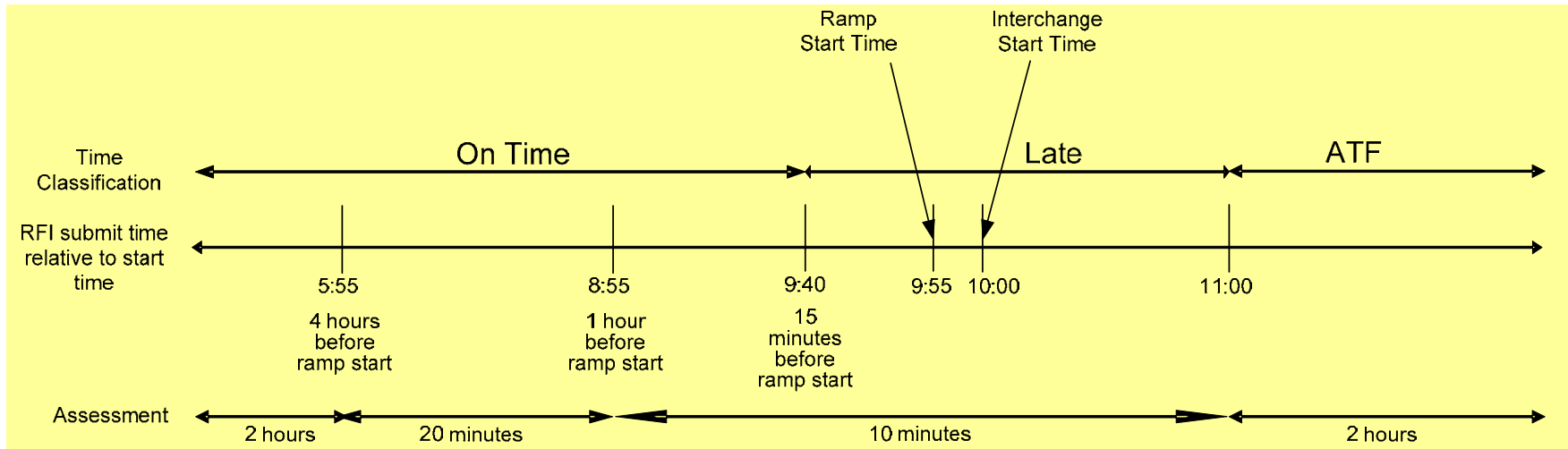
Timing Requirements for all Interconnections Except WECC



		A	B	C	D
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections except WECC



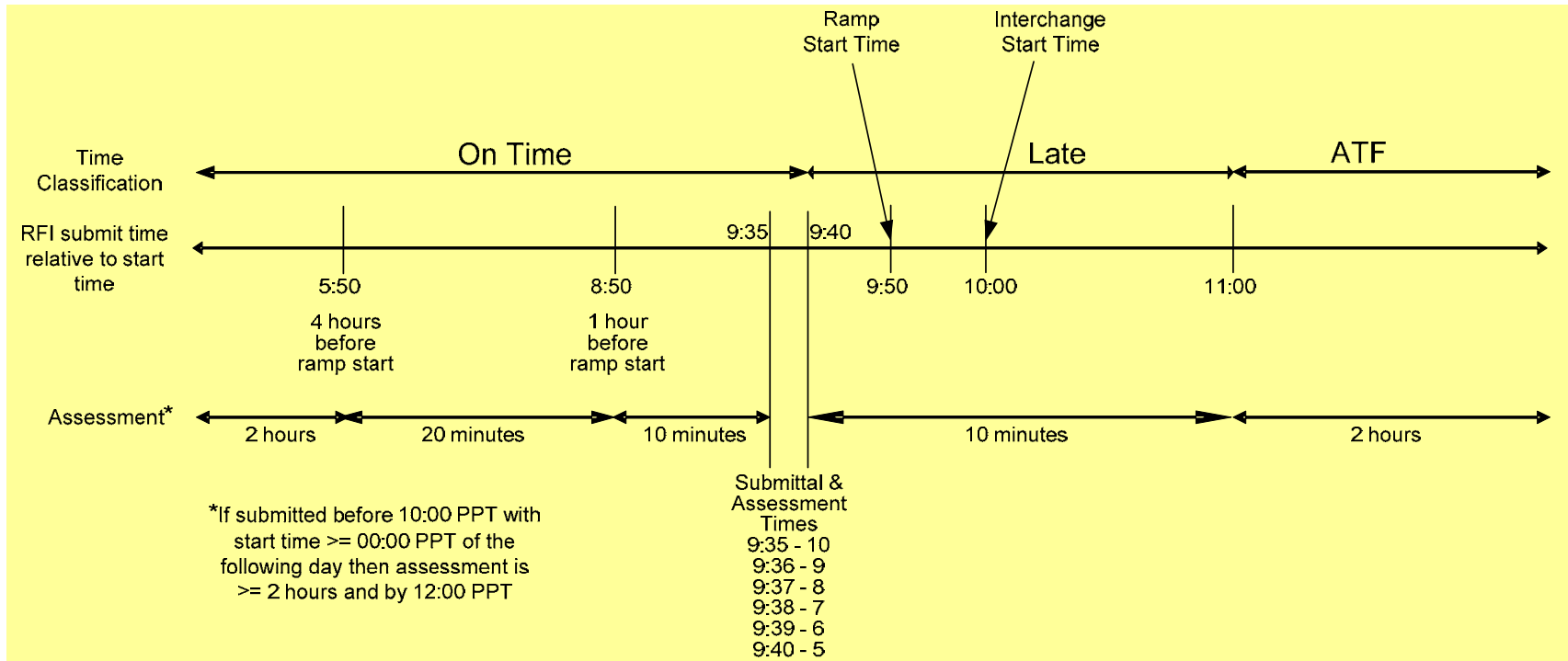


Timing Requirements for WECC

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for WECC



## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-~~3~~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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.~~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.

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

- 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.

**Version History**

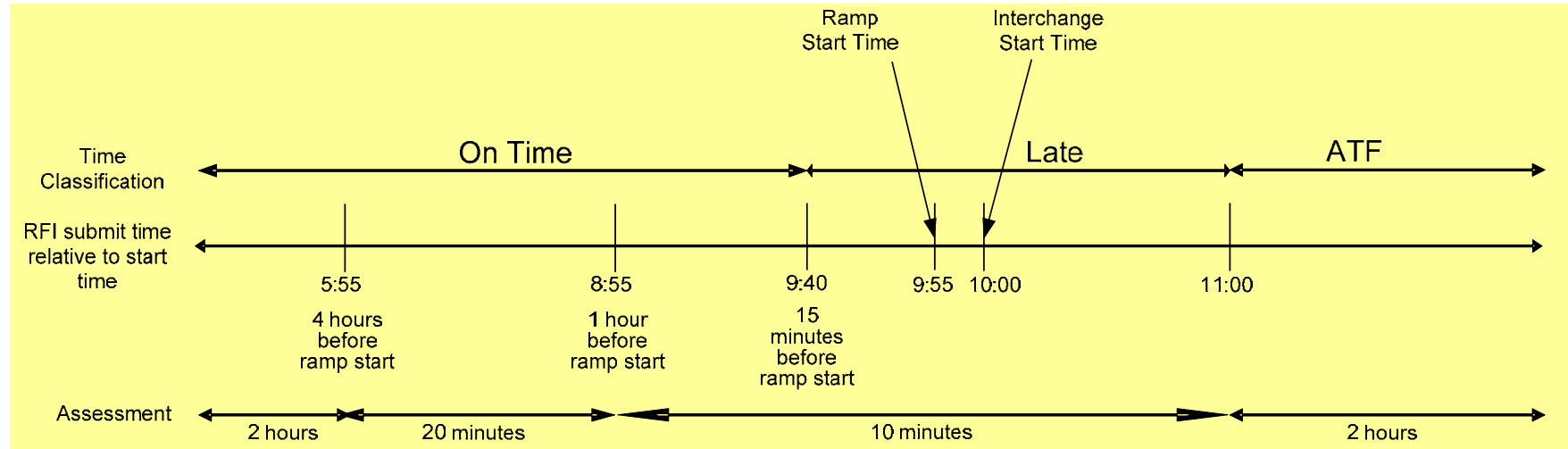
Version	Date	Action	Change Tracking
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Timing Requirements for all Interconnections Except WECC

		A	B	C	D	
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>	<b>Minimum Total Reliability Period (Columns A through D)</b>
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	<del>Response not required.</del> Entities have up to 2 hours to respond <b>if they choose.</b>	≤ 1 minute from receipt of all Reliability Assessments	NA	<i>15 minutes</i>
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	<del>Response not required.</del> Entities have up to 10 minutes to respond <b>if they choose.</b>	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI	<i>10 minutes</i>
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start	<i>15 minutes</i>
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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	<i>1 hour plus 1 minute</i>
≥ 4 hours prior to ramp start	On-time	≤ 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	<i>4 hours</i>

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

**Example of Timing Requirements for all Interconnections except WECC**



**Standard INT-008-2.3 — Interchange Authority Distributes Status**

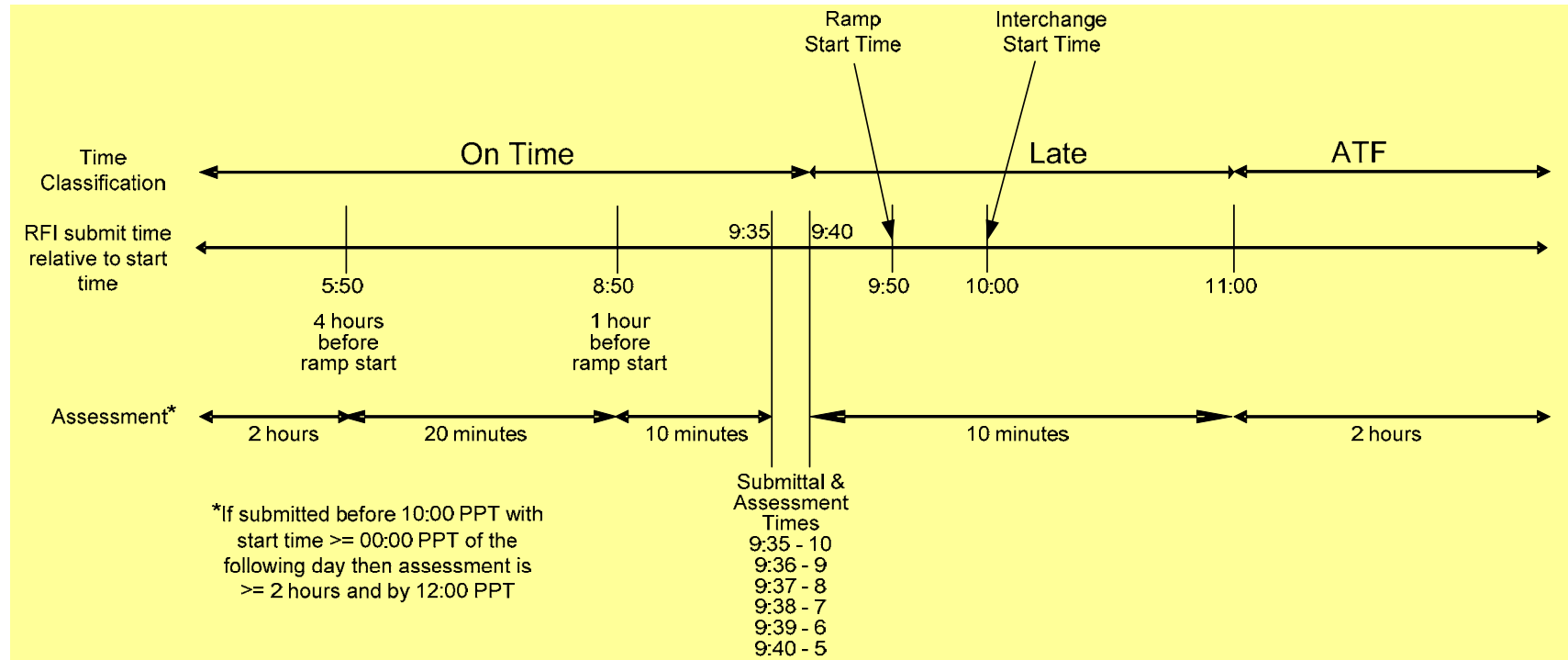
**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	<del>Response not required:</del> Entities have up to 2 hours to respond <del>if they choose:</del>	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	<del>Response not required:</del> Entities have up to 10 minutes to respond <del>if they choose:</del>	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<del>&lt;1 hour and &gt; 15 minutes prior to ramp start</del>	<del>On-time</del>	<del>&lt; 1 minute from RFI submission</del>	<del>&lt; 10 minutes from Arranged Interchange receipt from IA</del>	<del>&lt; 1 minute from receipt of all Reliability Assessments</del>	<del>&gt; 3 minutes prior to ramp start</del>
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.



Example of Timing Requirements for WECC





## **Implementation Plan for INT-005-3, INT-006-3 and INT-008-3**

### **Prerequisite Approvals**

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before these modified standards can be implemented.

### **Modified Standards**

INT-005-2, INT-006-2 and INT-008-2 should all be retired when the proposed standards become effective.

### **Compliance with Standards**

Once these standards become effective, the responsible entities identified in the applicability section of the standard must comply with the requirements.

### **Proposed Effective Date**

All requirements in the standards shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.



## Implementation Plan for INT-005-3, INT-006-3 and INT-008-3

### Prerequisite Approvals

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before these modified standards can be implemented.

### Modified Standards

INT-005-2, INT-006-2 and INT-008-2 should all be retired when the proposed standards become effective.

### Compliance with Standards

Once these standards become effective, the responsible entities identified in the applicability section of the standard must comply with the requirements.

### Proposed Effective Date

All requirements in the standards ~~should~~ shall become effective on the first day of the first calendar quarter, three months after all beyond the date the standard is approved by applicable regulatory authorities approvals. ~~For jurisdictions where regulatory approval is not required, the proposed standards become effective on the first day of the first calendar quarter following the date the standards are adopted by the NERC Board of Trustees.~~

**Comment Form — Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 (Project 2007-14)**

Please use this form to submit comments on the proposed INT-005-3, INT-006-3 and INT-008-3 standards. Comments must be submitted by **June 10, 2008**. If you have questions please contact Stephen Crutchfield at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

**Background Information:**

An Urgent Action SAR was developed in 2007 to make a change to the Coordinate Interchange Timing Table for WECC to increase the reliability assessment time from five minutes to ten minutes for Requests for Interchange (RFIs) submitted from one hour up to twenty minutes prior to ramp start time. With only 5 minutes to assess, WECC reliability entities were unable to assess many RFIs and therefore the Arranged Interchange was not implemented.

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table will expire unless they are replaced with permanent changes that go through the full standards development procedure. The SAR for this project proposed permanent changes to the timing table referenced in the following standards:

- INT-005 — Interchange Authority Distributes Arranged Interchange
- INT-006 — Response to Interchange Authority
- INT-008 — Interchange Authority Distributes Status

Note that the proposed revisions to the timing table have also been submitted to NAESB under Request R07007 for use in the associated business practices.

The draft INT standards were posted for a 45 day comment period from January 24 – March 8, 2008. Stakeholder comments were considered and revisions were made to the Timing Table. Some stakeholders indicated that, for INT-006, a conforming change was needed to Requirement R1 to ensure that R1 doesn't conflict with the language in the Timing Table. The drafting team agreed and is proposing to add clarifying language to Requirement R1 and Measure M1. The additional language does not change the intent of the original Requirement or Measure.

INT-006-3 R1 was revised to as follows: 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 **an each On-time, Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

INT-006-3 M1 was revised to state: 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 On-time, Emergency or Reliability Adjustment request from an Interchange Authority within** the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

The drafting team is proposing three new terms based on the revisions to INT-006-3 R1 and comments received:

**Emergency Request** – Request for Arranged Interchange to be initiated or modified by reliability entities under abnormal operating conditions.

**Reliability Adjustment Request** – Request to modify an Implemented Interchange or Interchange Schedule for reliability purposes.

**After-the-fact (ATF)** – A time classification assigned to an Arranged Interchange (also called a request for interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

The drafting team is also removing the phrases “Response not required” and “if they choose” from the timing tables and made some cosmetic changes to the timing tables based on comments:

- Removed blank column
- Corrected headings for consistency

Under the Reliability Standards Development Procedure, the Urgent Action modifications made to the timing table in 2007 will expire. They will be replaced with these proposed permanent changes that go through the full standards development procedure. There is a project identified in the *Reliability Standards Work Plan: 2007-2009* that will open the entire set of Coordinate Interchange standards to a robust set of modifications during 2009.

The CITT SDT requests comments on the acceptability of the changes made to the timing table.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. The drafting team made the following change to INT-006-3, Requirement R1:

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 each On-time, **Emergency and Reliability Adjustment** request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.

Do you agree with the proposed revisions to INT-006-3, Requirement R1? If not, please explain in the comment area.

Yes

No

Comments:

2. The drafting team made the following change to INT-006-3, Measure M1:

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 On-time, **Emergency or Reliability Adjustment** request from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. **The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.**

Do you agree with the proposed revisions to INT-006-3, Measure M1? If not, please explain in the comment area.

Yes

No

Comments:

3. The drafting team developed the following definition of "Emergency Request" to support the clarifications to INT-006-3 R1:

**Emergency Request** – Request for Arranged Interchange to be initiated or modified by reliability entities under abnormal operating conditions.

Do you agree with the proposed definition of "Emergency Request"? If not, please provide specific language for its improvement.

Yes

No

Comments:

4. The drafting team developed the following definition of "Reliability Adjustment Request" to support the clarifications to INT-006-3 R1:

**Reliability Adjustment Request** – Request to modify an Implemented Interchange or Interchange Schedule for reliability purposes.

Do you agree with the proposed definition of “Reliability Adjustment Request”? If not, please provide specific language for its improvement.

Yes

No

Comments:

5. The drafting team developed the following definition of “After-the-fact (ATF):”

**After-the-fact (ATF)** – A time classification assigned to a (n Arranged Interchange (also called a request for interchange or RFI) when the submittal time is greater than one hour after the start time of the RFI.

Do you agree with the proposed definition of “ATF”? If not, please provide specific language for its improvement.

Yes

No

Comments:

6. If you have any other comments on the modifications made to the standards that you haven’t made in response to the first five questions, please provide them here.

Yes

No

Comments:



Individual or group.	Name	Organization	Group Name	Lead Contact	Contact Organization	Question 1	Question 1: Comment	Question 2	Question 2 Comments	Question 1	Question 1: Comment	Question 1	Question 1: Comment	Question 5	Question 1: Comment	Question 5	Question 5: Comment	Question 6: Comment
<input checked="" type="checkbox"/> Individual	Joy Barton	Tucson Electric Power - Marketing				Yes		Yes		Yes		Yes		Yes		Yes		
<input checked="" type="checkbox"/> Group			PJM Interconnection	Patrick Brown, Manager	NERC & Regional Coordination Department	Yes		Yes		Yes		Yes		Yes		Yes		
<input checked="" type="checkbox"/> Group			NPCC	Guy Zito	NPCC	No	R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests. However, there are no response times associated with these requests. We interpret that the word "on-time" in R1 does not qualify these two types of requests and hence the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late.	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted on-time, then the timing for on-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target,	No	The title of this block should be Question 5 Comments. We agree with the definition. However, we have two comments: (1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)? (2) Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-	Same as preceding question, but this response title block is correct.		





<input checked="" type="checkbox"/>	Individual	Rick White	Northeast Utilities			No	in R1 does not qualify these two types of requests and hence, the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the intended clarification instead creates confusion.	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.	Yes	We agree with the definition. However, INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?	Yes	We agree with the definition. However, INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?	Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. While ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table, with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-compliant.
<input checked="" type="checkbox"/>	Individual	MARILYN FRANZ	SPPC			Yes		Yes		Yes	Could be modified to state "Request for Arranged Interchange to be initiated or modified at the request of or by reliability entities under abnormal operating conditions."	Yes	Yes	Yes	Yes	Approval of late or intra-hour curtailment/reload, emergency, and (WECC) Spinning/Non-Spinning requests should require only a 5 minute assessment time due the nature and urgency for action of late and intra-hour transactions. This item was discussed on the WECC Interchange Scheduling and Accounting conference call to discuss comments on the CITT.		
<input checked="" type="checkbox"/>	Group		Midwest ISO Standards Collaboration	Marie Knox	Midwest ISO	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a BA/TP should result in a passive denial of the request by the entity.	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to provide evidence that responses for all requests were communicated.	No	For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".	Yes	Yes			
																	Bonneville Power Administration believes that all requests for interchange should	







								every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a Balancing Authority/Transmission Service Provider should result in a passive denial of the request by the entity.	communicated.	"Emergency Request" to "Emergency Interchange Request".	Interchange Adjustment Request".				Applicability and General Upgrade" dated May 27, 2008 will address this issue and fully support it. 3. We have a question concerning the distribution of the information concerning the arranged interchange. In the standard INT-008-3 R1 & M1.1, all entities involved in the confirmed arranged interchange are communicated to. In the standard INT-005-03 R.1.1, only the sink and source balancing authorities for the arranged interchange are given the reliability assessment. Shouldn't all entities like the intermediate balancing authorities between the source and sink balancing authorities be given the reliability assessment associated with the proposed arranged interchange? These intermediate balancing authorities may have reliability related issues caused by this proposed arranged interchange such as thermal or stability ratings being exceeded or additional voltage support being required.	
<input checked="" type="checkbox"/>	Individual	Kathleen Goodman	ISO New England			No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.	No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.	
							If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests that the BA and TSP must								Included in the	

<p><input checked="" type="checkbox"/> Group</p>	<p>IRC Standards Review Committee</p>	<p>Charles Yeung</p>	<p>Southwest Power Pool</p>	<p>No</p>	<p>respond to, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for the usual On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the clarification intent turns into creating confusion.</p>	<p>No</p>	<p>Because we disagree with the proposed revision in Requirement R1, we are unable to agree with the Measure M1 as drafted</p>	<p>No</p>	<p>For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".</p>	<p>No</p>	<p>definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".</p>	<p>Yes</p>	<p>Yes we agree with the proposed definition.</p>	<p>Yes</p>	<p>Yes we agree with the proposed definition. Balancing Authorities and Transmission Service Providers to respond in some expedited manner beyond the timing requirements posed in the existing timing tables.</p>
<p><input checked="" type="checkbox"/> Individual</p>	<p>Ron Falsetti</p>	<p>Ontario IESO</p>	<p>No</p>	<p>R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests. However, there is not response times associated with these requests. We interpret that the word "on-time" in R1 does not also qualify these two types of requests and hence the BAs and TSPs will have not time frame as a target to respond to these requests, particularly if these requests are submitted late.</p>	<p>No</p>	<p>We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.</p>	<p>No</p>	<p>We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.</p>	<p>No</p>	<p>We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.</p>	<p>No</p>	<p>We agree with the definition. However, we have two comments: (1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)? (2) Table 1 is a part of the standard and the timing stipulated therein are also regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frame stipulated in Column B of the Timing Table, the wording in the Timing Table, now that with the words "Response not required" and "if they choose" deleted, hold the BA and TSP responsible for responding to ATF and Late requests that time frame. This will make them both non-compliant.</p>	<p>No</p>	<p>We agree with the definition. However, we have two comments: (1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)? (2) Table 1 is a part of the standard and the timing stipulated therein are also regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frame stipulated in Column B of the Timing Table, the wording in the Timing Table, now that with the words "Response not required" and "if they choose" deleted, hold the BA and TSP responsible for responding to ATF and Late requests that time frame. This will make</p>	

													timing target, and the clarification intent turns into creating confusions.					them both non-compliant.	
<input checked="" type="checkbox"/>	Individual	Kathryn Downey	PacifiCorp				Yes		Yes		No	In order to maintain the flexibility of requesting our merchant to create Emergent tags, PacifiCorp suggests the following language: Request for Arranged Interchange to be initiated or modified at the request of, or by, reliability entities under abnormal operating conditions.	Yes		Yes		Yes		PacifiCorp believes that a 10-minute assessment period for reliability adjustments is too long. The assessment period should be no more than 5 minutes. We suggest the 5-minutes assessment period for the all LATE requests, but more specifically reliability adjustments. If the argument is that there isn't enough time to process LATE tags, then we suggest those parties need to adjust their auto processes to improve their ability to act in a timely manner.



## **Consideration of Comments Permanent Modifications to Timing Tables in INT-005, INT-006, INT-008 — Project 2007-14**

The Coordinate Interchange Standards Drafting Team thanks all commenters who submitted comments on the 2nd draft of the INT-005, INT-006, and INT-008 standards, permanent changes to Coordinate Interchange Timing Tables. These standards were posted for a 45-day public comment period from May 12, 2008 through June 10, 2009. The stakeholders were asked to provide feedback on the standards through an electronic Standard Comment Form. There were 21 sets of comments, including comments from more than 90 different people from more than 50 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on stakeholder comments, the drafting team made some clarifying modifications to one requirement and its measure in INT-006, moved one definition from INT-006 to INT-005, and made some clarifications to the other two definitions.

Modification to INT-006 R1 and M1:

In the first posting of this set of standards, the drafting team had included language to the timing table to clarify that for some types of requests, no response is required. Several stakeholders indicated that in some Regions, a response is required for all requests, and the drafting team removed the qualifying language from the timing tables. In the second posting of this set of standards, stakeholders indicated that some clarification is needed to ensure that the Balancing Authority and Transmission Service Provider know that, under INT-006, they are not required to respond to requests other than those that are on-time or needed for either an emergency or for a reliability adjustment. To provide this clarity the drafting team elected to modify R1 by adding some more words to R1 and a footnote to clarify which RFIs require a timely response and which RFIs do not require a response. The team clarified R1 as follows:

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 each On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>

<sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

This modification is not an expansion of the requirement, but should remove the ambiguity that would otherwise exist.

The drafting team changed the term, "Emergency Request" to "Emergency Request for Interchange (RFI)" and clarified that this is for either Emergency or Energy Emergency conditions.

The drafting team changed the term, "Reliability Adjustment Request" to "Reliability Adjustment Request for Interchange"

## **Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

The drafting team did not make any other changes to the standards or to the implementation plan and recommends that the Standards Committee authorize moving the set of standards forward to the balloting stage of the standards process.

[http://www.nerc.com/~filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/~filez/standards/INT_Urgent_Action.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

**Index to Questions, Comments, and Responses**

1. The drafting team made the following change to INT-006-3, Requirement R1. Do you agree with the proposed revisions to INT-006-3, Requirement R1? If not, please explain in the comment area..... 7

2. The drafting team made the following change to INT-006-3, Measure M1. Do you agree with the proposed revisions to INT-006-3, Measure M1? If not, please explain in the comment area. .... 12

3. The drafting team developed the following definition of “Emergency Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Emergency Request”? If not, please provide specific language for its improvement. .... 16

4. The drafting team developed the following definition of “Reliability Adjustment Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Reliability Adjustment Request”? If not, please provide specific language for its improvement..... 19

5. The drafting team developed the following definition of “After-the-fact (ATF). Do you agree with the proposed definition of “ATF”? If not, please provide specific language for its improvement..... 22

6. If you have any other comments on the modifications made to the standards that you haven’t made in response to the first five questions, please provide them here. .... 25

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Commenter		Organization		Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Joy Barton	Tucson Electric Power - Marketing		x		x		x						x	
2.	Patrick Brown, Manager	PJM Interconnection			x										
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>		<b>Segment Selection</b>									
1.	Leanne Harrison	PJM	RFC			2									
3.	Guy Zito	NPCC — NPCC Standards Review Committee													x
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>		<b>Segment Selection</b>									
1.	Ralph Rufrano	New York Power Authority		NPCC		5									
2.	Michael Gildea	Constellation Energy		NPCC		6									
3.	William DeVries	New York Independent System Operator		NPCC		2									
4.	Randy MacDonald	New Brunswick System Operator		NPCC		2									
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC		1									
6.	Ron Hart	Dominion Resources, Inc.		NPCC		5									
7.	Ed Thompson	Consolidated Edison Co. of New York, Inc.		NPCC		1									
8.	Don Nelson	Massachusetts Dept. of Public Utilities		NPCC		9									
9.	David Kiguel	Hydro One Networks, Inc.		NPCC		1									
10.	Michael Schiavone	National Grid US		NPCC		1									
11.	Ron Falsetti	Independent Electricity System Operator		NPCC		2									
12.	Kathleen Goodman	ISO - New England		NPCC		2									
13.	Brian Gooder	Ontario Power Generation, Inc.		NPCC		5									
14.	Ben Li	Independent Electricity System Operator		NPCC		2									
15.	Lee Pedowicz	Northeast Power Coordinating Council		NPCC		10									
4.	Gary Nolan	Puget Sound Energy Transmission		x		x		x							
5.	Kris Manchur	Manitoba Hydro		x		x		x	x						
6.	Robert Rhodes	SPP — Operating Reliability Working Group (ORWG)		x	x	x		x							
<b>Additional Member</b>		<b>Additional Organization</b>		<b>Region</b>		<b>Segment Selection</b>									
1.	Mike Gammon	Kansas City Power & Light		SPP		1, 3, 5									
2.	Don Hargrove	Oklahoma Gas & Electric		SPP		1, 3, 5									
3.	Allen Klassen	Westar Energy		SPP		1, 3, 5									
4.	Kyle McMenamin	Southwestern Public Service		SPP		1, 3, 5									

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

Commenter		Organization		Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
5.	Robert Rhodes	Southwest Power Pool	SPP				2								
7.	Sam Ciccone	FirstEnergy		x		x		x	x						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Doug Hohlbaugh	FE	RFC	1, 3, 5, 6											
8.	Alessia Dawes	Hydro One Networks		x		x									
9.	Raj Hundal	BC Transmission Corp		x										x	
10.	Rick White	Northeast Utilities		x											
11.	MARILYN FRANZ	SPPC		x											
12.	Marie Knox	MISO — Midwest ISO Standards Collaboration			x										
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Nicholas Browning	Midwest ISO		2											
13.	Denise Koehn	Bonneville Power Administration		x		x		x	x						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Troy Simpson	Tx Business Process & Implementation				WECC		1							
2.	Wes Hutchison	Tx Operational Analysis & Support				WECC		1							
3.	Kristey Humphrey	Power Scheduling Coordination				WECC		3, 5, 6							
14.	Jim Griffith	Southern Co. — SERC OC Standards Review Group		x		x		x							
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Phil Creech	Progress Energy - carolinas	SERC	1, 3, 5											
2.	Louis Slade	Dominion Virginia Power	SERC	1, 3, 5											
3.	Randal Haynes	Tennessee Valley Authority	SERC	1, 3, 5, 9											
4.	Sam Holeman	Duke energy - Carolinas	SERC	1, 3, 5											
5.	Jim Case	Entergy	SERC	1, 3, 5											
6.	Rene Free	Santee Cooper	SERC	1, 3, 5, 9											
7.	Kristi Boland	Santee Cooper	SERC	1, 3, 5, 9											
8.	Scott Homburg	Tennessee Valley Authority	SERC	1, 3, 5, 9											
9.	Jim Barnes	Tennessee Valley Authority	SERC	1, 3, 5, 9											
10.	Mike Oatts	Southern	SERC	1, 3, 5											
15.	Steve Dietrich	PUD NO. of Grant County				x		x							
16.	Terry L. Blackwell	Santee Cooper		x											
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	S. T. Abrams	Santee Cooper	SERC	1											
2.	Glenn Stephens	Santee Cooper	SERC	1											
3.	Rene' Free	Santee Cooper	SERC	1											
4.	Kristi Boland	Santee Cooper	SERC	1											
17.	Carol Gerou	Minnesota Power — MRO Standards Review Subcommittee		x		x		x	x						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Neal Balu	WPS	MRO	3, 4, 5											

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Commenter		Organization		Industry Segment																
				1	2	3	4	5	6	7	8	9	10							
2.	Terry Bilke	MISO	MRO	2																
3.	Jim Haigh	WAPA	MRO	1, 6																
4.	Ken Goldsmith	ALTW	MRO	4																
5.	Tom Mielnik	MEC	MRO	1, 3, 5, 6																
6.	Pam Oreschnick	XCEL	MRO	1, 3, 5, 6																
7.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6																
8.	Eric Ruskamp	LES	MRO	1, 3, 5, 6																
9.	Joseph Knight	GRE	MRO	1, 3, 5, 6																
10.	Joe DePoorter	MGE	MRO	3, 4, 5, 6																
11.	Larry Brusseau	MRO	MRO	10																
12.	Michael Brytowski	MRP	MRO	10																
18.	Kathleen Goodman	ISO New England				x														
19.	Charles Yeung	Southwest Power Pool — ISO RTO Council				x														
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>																
1.	Anita Lee	AESO	WECC	2																
2.	Patrick Brown	PJM	RFC	2																
3.	Brent Kingsford	CAISO	WECC	2																
4.	Steve Myers	ERCOT	ERCOT	2																
5.	Jim Castle	NYISO	NPCC	2																
6.	Matt Goldberg	ISO NE	NPCC	2																
7.	Bill Phillips	MISO	RFC	2																
8.	Ron Falsetti	IESO	NPCC	2																
20.	Ron Falsetti	Ontario IESO				x														
21.	Kathryn Downey	PacifiCorp			x															

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

1. The drafting team made the following change to INT-006-3, Requirement R1. Do you agree with the proposed revisions to INT-006-3, Requirement R1? If not, please explain in the comment area.

**Summary Consideration:** The CITT SDT reviewed comments received from stakeholders regarding R1. Many stakeholders suggested edits that improved clarity. The SDT could either add more rows to the timing table, or add clarifying language to Requirement R1. Based on stakeholder feedback, the CITT SDT revised R1 for further clarity as follows:

**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 each On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange<sup>1</sup>.

<sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

Organization	Question 1:	Question 1 Comments:
NPCC	No	R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests. However, there are no response times associated with these requests. We interpret that the word "on-time" in R1 does not qualify these two types of requests and hence the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and After The Fact (ATF) requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Hydro One Networks	No	We do not see the need for the additional words "Emergency and Reliability Adjustment", as any On-time requests must be assessed within the timeframe specified in Table 1 Column B. If there is an attempt to create a special response time for "Late" or ATF requests which are labeled "Emergency and Reliability Adjustment" requests, then add another row in the table to describe this scenario.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. The drafting team decided to clarify the Requirement rather than insert new rows into the already busy tables. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Northeast Utilities	No	R1 now clarifies that the BA and TSP shall respond to Emergency and Reliability Adjustment requests. However,

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

Organization	Question 1:	Question 1 Comments:
		<p>there are no response times associated with these requests. We interpret that the word "on-time" in R1 does not qualify these two types of requests and hence, the BAs and TSPs will not have a timing target for responding to these requests, particularly if these requests are submitted late. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the intended clarification instead creates confusion.</p>
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
Midwest ISO Standards Collaboration	No	<p>Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a BA/TP should result in a passive denial of the request by the entity.</p>
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		
Bonneville Power Administration	No	<p>Bonneville Power Administration disagrees with limiting Requirement R1 (and the associated Measure M1) to only On-Time, Emergency and Reliability Adjustment requests. Late requests may have a reliability impact and should require assessment as well. Additionally, After-the-Fact (ATF) requests may have an impact on a Balancing Authority's (BA) ability to confirm net interchange balances with adjacent BA's for WECC/NERC reporting requirements. Requirement R1 (and the associated Measure M1) should be modified to include Late and ATF requests.</p>
<p><b>Response:</b> The CITT SDT Thanks you for your comment. Discussions within the drafting team have shown that not all entities agree that all requests should be actively responded to by BAs and TSPs. As a matter of cooperation, the proposed timing tables relieve BAs and TSPs from active responses within a specified time period for Late and ATF requests – except when the request is an Emergency RFI or Reliability Adjustment RFI. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		



**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

<b>Organization</b>	<b>Question 1:</b>	<b>Question 1 Comments:</b>
MRO NERC Standards Review Subcommittee	No	There should be an "or" between the text "Emergency" and "Reliability" to be consistent with possible requests and the measure M1. We are assuming Reliability Adjustment requests don't happen that often but we believe it's reasonable to assume that a reliability adjustment request could be made and no emergency condition could be present. We would prefer not to single out Emergency and Reliability Adjustments as the only adjustments requiring response. We would suggest keeping the current requirements of all the requests of the interchange authority, because every request affects reliability. Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to include response for all requests, not just "Emergency and Reliability Adjustments". A lack of response from a Balancing Authority/Transmission Service Provider should result in a passive denial of the request by the entity.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment requests. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment requests must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 to clarify our intent. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.</p>		
ISO New England	No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
IRC Standards Review Committee	No	If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests that the BA and TSP must respond to, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for the usual On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the clarification intent turns into creating confusion.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.</p>		
Ontario IESO	No	R1 now clarifies that the BA and TSP shall respond to the Emergency and Reliability Adjustment requests.

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

<b>Organization</b>	<b>Question 1:</b>	<b>Question 1 Comments:</b>
		However, there is not response times associated with these requests. We interpret that the word "on-time" in R1 does not also qualify these two types of requests and hence the BAs and TSPs will have not time frame as a target to respond to these requests, particularly if these requests are submitted late.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.</p>		
SERC OC Standards Review Group	Yes	We assume, from the placement of the comma after "On-time" in R1, that the drafting team intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on time or late.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. Your assumption is correct. We have modified R1 and M1 to clarify these points.</p>		
Santee Cooper	Yes	We assume, from the placement of the comma after "On-time" in R1, that the SDT intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on-time or late.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. Your assumption is correct. We have modified R1 and M1 to clarify these points.</p>		
Puget Sound Energy Transmission	Yes	I would prefer there to be some requirement that Reliability Adjustments must be approved unless there were a legitimate reliability concern - not just scheduling or market issues.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. Your comment is beyond the scope of the team's charge.</p>		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
PUD NO. of Grant County	Yes	

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

<b>Organization</b>	<b>Question 1:</b>	<b>Question 1 Comments:</b>
PacifiCorp	Yes	

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

2. The drafting team made the following change to INT-006-3, Measure M1. Do you agree with the proposed revisions to INT-006-3, Measure M1? If not, please explain in the comment area.

**Summary Consideration:** The CITT SDT reviewed comments received from stakeholders regarding M1. Several stakeholders disagreed with M1 because they did not agree with R1. Edits to R1 (see question 1) have addressed those concerns. Based on stakeholder feedback, the CITT SDT revised M1 for further clarity as follows:

**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 On-time RFI, Emergency RFI or Reliability Adjustment RFI from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

Organization	Question 2:	Question 2 Comments:
NPCC	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
<b>Response:</b> The CITT SDT Thanks you for your comment. The drafting team has clarified the M1 wording (see above).		
Operating Reliability Working Group (ORWG)	No	We suggest deleting the last sentence in M1 because it doesn't add anything.
<b>Response:</b> The CITT SDT Thanks you for your comment. The drafting team believes that this statement is integral to the interpretation of the requirement and subsequent compliance with it.		
FirstEnergy	No	The last sentence is only informational and does not add any anything to the measure. It should be removed.
<b>Response:</b> The CITT SDT Thanks you for your comment. The drafting team believes that this statement is integral to the interpretation of the requirement and subsequent compliance with it.		
Hydro One Networks	No	The measure implies that column B in Table 1 is not enforceable unless the request is labeled as "Emergency and Reliability Adjustment". We recommend, not modifying R1 and M1 at this time and focusing on the initial intent of the Urgent Action SAR, increasing the reliability assessment time from 5 min. to 10 min. for the WECC system.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in		

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<b>Organization</b>	<b>Question 2:</b>	<b>Question 2 Comments:</b>
Column B of the timing tables. We have modified R1 and M1 to clarify these points.		
Northeast Utilities	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as an Emergency RFI or as a Reliability Adjustment RFI. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points.		
Midwest ISO Standards Collaboration	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to provide evidence that responses for all requests were communicated.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.		
Bonneville Power Administration	No	Please see comment provided in #1 above that addresses R1 and M1 statements. Further, Bonneville Power Administration believes the last sentence in M1 above which does not require evidence nor even response to "any other requests" be deleted. Bonneville Power Administration believes responses and evidence of response should be provided for all request types.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.		
MRO NERC Standards Review Subcommittee	No	Virtually each and every request from the Interchange Authority has reliability impact, and is therefore necessary to provide evidence that responses for all requests were communicated.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases,		

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<b>Organization</b>	<b>Question 2:</b>	<b>Question 2 Comments:</b>
		LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. The CITT SDT disagrees that all RFIs have a reliability impact. There are certain examples (an ATF tag) of RFIs that do not require a response from a reliability point of view. A lack of response by a BA/TP is equivalent to a passive denial. Regional business practices may go beyond the NERC response requirements.
ISO New England	No	The proposed revisions create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
		<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.
IRC Standards Review Committee	No	Because we disagree with the proposed revision in Requirement R1, we are unable to agree with the Measure M1 as drafted
		<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables.
Ontario IESO	No	We disagree with the requirement for Emergency and Reliability Adjustment requests (see above), and hence we are unable to agree with the Measures as drafted.
		<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 to clarify these points. (see above)
SERC OC Standards Review Group	Yes	We assume, from the placement of the comma after "On-time" in R1, that the drafting team intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on time or late.
		<b>Response:</b> The CITT SDT Thanks you for your comment. Your assumption is correct and the requirement is to respond to all Emergency RFIs and Reliability Adjustment RFIs.
Santee Cooper	Yes	We assume, from the placement of the comma after "On-time" in R1, that the SDT intends for all Emergency and Reliability Adjustment requests to be acted on regardless of whether they are on-time or late.
		<b>Response:</b> The CITT SDT Thanks you for your comment. Your assumption is correct and the requirement is to respond to all Emergency RFIs

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

<b>Organization</b>	<b>Question 2:</b>	<b>Question 2 Comments:</b>
<a href="#">and Reliability Adjustment RFIs.</a>		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
PUD NO. of Grant County	Yes	
PacifiCorp	Yes	

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- The drafting team developed the following definition of “Emergency Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Emergency Request”? If not, please provide specific language for its improvement.

**Summary Consideration:** The CITT SDT reviewed comments received from stakeholders regarding the definition of “Emergency Request”. Many stakeholder comments began with “We agree with the definition but ...”. These comments were based on issues with R1 and the inclusion of this definition. Revisions to R1 and this definition were made to address the concerns. Some stakeholders suggested utilizing defined terms from the NERC Glossary of Terms. The team agreed with these comments and refined the definition to:

**Emergency Request for Interchange (RFI) – Request for Interchange to be initiated for Emergency or Energy Emergency conditions.**

Organization	Question 3:	Question 3 Comments:
NPCC	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
<b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team’s intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.		
Puget Sound Energy Transmission	No	"Abnormal" is too broad of a term. Would recommend using the NERC defined term "Emergency" in its place.
<b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
FirstEnergy	No	The definition could be further clarified by adding "NERC registered" before "reliability entities".
<b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the definition (see above and it no longer includes any reference to the entities requesting the RFI.		
Midwest ISO Standards Collaboration	No	For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".
<b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the definition (see above).		
MRO NERC Standards	No	What's an abnormal operating condition? Is an abnormal condition other than previously studied? We would like the SDT to define the term abnormal. For clarity, we suggest the name of the definition be changed from



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<b>Organization</b>	<b>Question 3:</b>	<b>Question 3 Comments:</b>
Review Subcommittee		"Emergency Request" to "Emergency Interchange Request".
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. We have revised the definition (see above).</a>		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.</a>		
IRC Standards Review Committee	No	For clarity, we suggest the name of the definition be changed from "Emergency Request" to "Emergency Interchange Request".
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. We have revised the definition (see above).</a>		
Ontario IESO	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.</a>		
PacifiCorp	No	In order to maintain the flexibility of requesting our merchant to create Emergency tags, PacifiCorp suggests the following language: Request for Arranged Interchange to be initiated or modified at the request of, or by, reliability entities under abnormal operating conditions.
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. We have modified the definition to address your comment (see above).</a>		
Northeast Utilities	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.</a>		
SPPC	Yes	Could be modified to state "Request for Arranged Interchange to be initiated or modified at the request of or by reliability entities under abnormal operating conditions."
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. We have modified the definition to address your comment (see above).</a>		
SERC OC Standards Review Group	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification of the term "reliability entities" by including: (RC, BA, TOP). With these suggested changes the definition would read as "Emergency Request - Request for Arranged Interchange to be initiated by reliability entities (RC, BA, TOP) under abnormal operating conditions."
<b>Response:</b> <a href="#">The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above).</a>		
Santee Cooper	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

Organization	Question 3:	Question 3 Comments:
		initiation of new requests. We suggest further clarification of the term "reliability entities" by including "(RC, BA, TOP)" behind the term. With these suggested changes the definition would read as "Emergency Request - Request for Arranged Interchange to be initiated by reliability entities (RC, BA, TOP) under abnormal operating conditions."
<b>Response:</b> The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above).		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
Hydro One Networks	Yes	
BC Transmission Corp	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

4. The drafting team developed the following definition of “Reliability Adjustment Request” to support the clarifications to INT-006-3 R1. Do you agree with the proposed definition of “Reliability Adjustment Request”? If not, please provide specific language for its improvement.

**Summary Consideration:** The CITT SDT reviewed comments received from stakeholders regarding the definition of “Reliability Adjustment Request” Many stakeholder comments began with “We agree with the definition but ...”. These comments were based on issues with R1 and the inclusion of this definition. Revisions to R1 and this definition were made to address the concerns. Some stakeholders suggested improvements to the term for clarification. The team agreed with these comments and refined the definition to:

**Reliability Adjustment Request for Interchange (RFI) – Request to modify an Implemented Interchange Schedule for reliability purposes.**

Organization	Question 4:	Question 4 Comments:
NPCC	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests to which the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted on-time, then the timing for on-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific response time, it leaves the BA and the TSP without a timing target, and the intended clarification instead creates confusion.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team’s intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.</p>		
Midwest ISO Standards Collaboration	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".
<p><b>Response:</b> The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the “who” that can perform these actions. We have revised the defined term to “Reliability Adjustment RFI” per stakeholder comments.</p>		
MRO NERC Standards	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange

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<b>Organization</b>	<b>Question 4:</b>	<b>Question 4 Comments:</b>
Review Subcommittee		Adjustment Request".
<b>Response:</b> The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the "who" that can perform these actions. We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments.		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
<b>Response:</b> The CITT SDT Thanks you for your comment. Please see our responses to your previous comments.		
IRC Standards Review Committee	No	Included in the definition should be that reliability entities may make such a modification. Also, for clarity, we suggest the name of the definition be changed from "Reliability Adjustment Request" to Reliability Interchange Adjustment Request".
<b>Response:</b> The CITT SDT Thanks you for your comment. The CITT SDT does not feel that we need to include the "who" that can perform these actions. We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments.		
Ontario IESO	No	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1. If Emergency and Reliability Adjustment requests are included in R1 to clarify the type of requests that the BA and TSP must respond, then there needs to be timing specified for these responses. For example, if the Emergency and Reliability Adjustment requests are submitted On-time, then the timing for the usual On-time requests shall be followed. If they are not submitted on-time, i.e. Late, then the response time should be different. Absent a specific responses time, it leaves the BA and the TSP without a timing target, and the clarification intent turns into creating confusions.
<b>Response:</b> The CITT SDT Thanks you for your comment. Please see our response to Q1. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFI or as Reliability Adjustment RFI. In those cases, LATE or ATF Emergency or Reliability Adjustment RFIs must be responded to within the period of time specified in column B of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. We have modified R1 and M1 appropriately.		
Northeast Utilities	Yes	We agree with the definition, but we feel that the inclusion of this term in R1 creates confusion rather than providing clarification and eliminating ambiguity as the SDT explains in its Consideration of Comments. Please see our comments in Q1.
<b>Response:</b> The CITT SDT Thanks you for your comment. Please see our response to Q1.		
SERC OC Standards Review Group	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification to the definition of "Reliability Adjustment Request" by adding the following: "by reliability entities (RC, BA, TOP)" to the end of the existing definition.
<b>Response:</b> The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other		

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

<b>Organization</b>	<b>Question 4:</b>	<b>Question 4 Comments:</b>
		stakeholders (see above). We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments. The CITT SDT does not feel that we need to include the "who" that can perform these actions.
Santee Cooper	Yes	The definitions of Emergency and Reliability Adjustment Requests overlap in that both could be existing interchanges that were modified. We suggest that Emergency Requests should be defined to be limited only to initiation of new requests. We suggest further clarification to the definition of "Reliability Adjustment Request" by adding the following: "by reliability entities (RC, BA, TOP)" to the end of the existing definition.
		<b>Response:</b> The CITT SDT Thanks you for your comment. We have modified the definition based on your comments and those of other stakeholders (see above). We have revised the defined term to "Reliability Adjustment RFI" per stakeholder comments. The CITT SDT does not feel that we need to include the "who" that can perform these actions.
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
Hydro One Networks	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	
PacifiCorp	Yes	

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5. The drafting team developed the following definition of “After-the-fact (ATF). Do you agree with the proposed definition of “ATF”? If not, please provide specific language for its improvement.

**Summary Consideration:** The CITT SDT reviewed comments received from stakeholders regarding the definition of “After-the-fact (ATF)”. Several stakeholders suggested that we move the definition to INT-005 since the term is first used there. We concur and made this revision. Two stakeholders had concerns that the timing table imposed additional requirements not specified in the timing tables. The revisions to R1 address these concerns.

Organization	Question 5:	Question 5
NPCC	No	<p>The title of this block should be Question 5 Comments. We agree with the definition. However, we have two comments:</p> <p>(1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?</p> <p>(2) Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-compliant.</p>
<p><b>Response:</b> The CITT SDT Thanks you for your comment. (1) We moved the definition to INT-005.                  (2) The CITT SDT has revised the wording in R1 to:</p> <p>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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup></p> <p><sup>1</sup>The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p> <p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>		
SERC OC Standards Review Group	No	ATF specifically does not include Emergency Requests or Reliability Adjustment Requests.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. The definition does not limit the types of requests that are included as an after-the-fact</p>		

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<b>Organization</b>	<b>Question 5:</b>	<b>Question 5</b>
<b>RFI. Emergency Requests and Reliability Adjustment Requests can be classified as on-time, late or after-the-fact.</b>		
ISO New England	No	We agree with the definition. However, the proposed revisions to R1, M1 and the Timing Table create conflicts among R1, M1 and the Timing Table and open the door to varying interpretations. Further clarifications are needed, as detailed in comments provided by IESO.
<b>Response:</b> The CITT SDT Thanks you for your comment. Please see our response to IESO's comments.		
Ontario IESO	No	We agree with the definition. However, we have two comments:  (1) INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?  (2) Table 1 is a part of the standard and the timing stipulated therein are also regarded as requirements. Whilst ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frame stipulated in Column B of the Timing Table, the wording in the Timing Table, now that with the words "Response not required" and "if they choose" deleted, hold the BA and TSP responsible for responding to ATF and Late requests that time frame. This will make them both non-compliant.
<b>Response:</b> The CITT SDT Thanks you for your comment. (1) We moved the definition to INT-005.  (2) The CITT SDT has revised the wording in R1 to:  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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange. <sup>1</sup>  <sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.  This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.		
Hydro One Networks	Yes	INT-005 uses this term in the timing table. We suggest defined the term in that standard as it appears there first.
<b>Response:</b> The CITT SDT Thanks you for your comment. We moved the definition to INT-005.		
Northeast Utilities	Yes	We agree with the definition. However, INT-005 already uses this term in the timing table. Should it be defined in that standard (as it appears there first)?
<b>Response:</b> The CITT SDT Thanks you for your comment. We moved the definition to INT-005.		
IRC Standards Review	Yes	Yes we agree with the proposed definition.

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<b>Organization</b>	<b>Question 5:</b>	<b>Question 5</b>
Committee		
<a href="#">Response: The CITT SDT Thanks you for your comment.</a>		
Tucson Electric Power - Marketing	Yes	
PJM Interconnection	Yes	
Puget Sound Energy Transmission	Yes	
Manitoba Hydro	Yes	
Operating Reliability Working Group (ORWG)	Yes	
FirstEnergy	Yes	
BC Transmission Corp	Yes	
SPPC	Yes	
Midwest ISO Standards Collaboration	Yes	
Bonneville Power Administration	Yes	
PUD NO. of Grant County	Yes	
Santee Cooper	Yes	
MRO NERC Standards Review Subcommittee	Yes	
PacifiCorp	Yes	



**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

- If you have any other comments on the modifications made to the standards that you haven't made in response to the first five questions, please provide them here.

**Summary Consideration:** Several of the comments received on this question relate to WECC specific issues that have arisen since the SAR was developed for this project. The original SAR, at the request of the WECC, was for a 10 minute assessment period. The CITT SDT has suggested that these proposals are outside the scope of the drafting team and that a new SAR be developed to address these concerns at either the NERC level or in the WECC Region. It was also pointed out to stakeholders that a new SAR (Project 2008-12) has been initiated to provide a thorough review of all INT standards. The CITT SDT encourages stakeholders to participate by providing their comments to that team.

Organization	Question 6 Comments:
Puget Sound Energy Transmission	Thanks to the Drafting Team for their hard work on this very important issue.
<b>Response:</b> The CITT SDT Thanks you for your comment.	
FirstEnergy	R1 & M1- "Timing Table" is not a defined term and should be in lower case; "request" should be capitalized, but "On-Time" should not be capitalized since it is not a defined term.R1.2 - "transmission" and "system" are defined terms and should be capitalized.
<b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the standards based on your comments. We have chosen to leave On-time capitalized because it is shown that way in the table and the far left column of the table defines what is considered On-time. While we agree that "transmission" and "system" can be defined terms, these terms as well as "transmission system limits" are not being used as defined terms in this standard.	
Hydro One Networks	We recommend not changing R1 and M1 at this time. Instead, when deleting the phases "Response not required" and "? if they choose" in Table 1, insert the words "should" and "shall" into the appropriate rows in Column B. Example: Row 2, Column B should read "If responding, entities should respond within 2 hours.", and Row 3, Column B should read "Entities shall respond <= 10 minutes from Arranged Interchange receipt from IA."
<p><b>Response:</b> The CITT SDT Thanks you for your comment. The CITT SDT chose a different approach to clarify the tables and requirements. We have revised the wording in R1 to:</p> <p>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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup></p> <p><sup>1</sup>The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>	

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Organization	Question 6 Comments:
	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>
BC Transmission Corp	<p>Thank you to the drafting team for their hard work in revising the standards and responding to the comments that were received</p>
	<p><b>Response:</b> The CITT SDT Thanks you for your comment.</p>
Northeast Utilities	<p>Table 1 is a part of the standard and the timing stipulations therein are regarded as requirements. While ATF and Late requests supposedly do not bind the BA and TSP to respond within the time frames stipulated in Column B of the Timing Table, with the words "Response not required" and "if they choose" deleted, the BA and TSP are now responsible for responding to ATF and Late requests in the specified time frames. This will make them both non-compliant.</p>
	<p><b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the wording in R1 to:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup></p> <p style="padding-left: 40px;"><sup>1</sup>The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>
	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "Response not required" and "if they choose" from the tables.</p>
SPPC	<p>Approval of late or intra-hour curtailment/reload, emergency, and (WECC) Spinning/Non-Spinning requests should require only a 5 minute assessment time due the nature and urgency for action of late and intra-hour transactions. This item was discussed on the WECC Interchange Scheduling and Accounting conference call to discuss comments on the CITT.</p>
	<p><b>Response:</b> The CITT SDT thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. We suggest that a new SAR be developed to address your concerns at either the NERC level or in the WECC Region.</p>
Bonneville Power Administration	<p>Bonneville Power Administration believes that all requests for interchange should be confirmed with at least 5 minutes available for the BA to Prepare Confirmed Interchange for Implementation with 3 minutes for the BA and TSP to conduct Reliability Assessments. We do not believe 3 minutes is sufficient time for Balancing Authorities with many adjacencies and a complex hydro system to confirm interchange AND set generator base points. For that reason, we recommend requests with &lt;10 minutes prior to the ramp start and &lt; 1 hour after the start time ("Late" tags) allow the BA and TSP reliability assessments 3 minutes. Requests 10 minutes prior to ramp start time, should also be provided 3 minutes for the BA and TSP to conduct reliability assessments. Requests 11 minutes prior to ramp start time, should be provided 4 minutes for the BA and TSP to conduct reliability assessments; etc. The changes proposed by Bonneville Power Administration will result in a new graduated</p>

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Organization	Question 6 Comments:
	assessment period allowing 3 minutes to assess an on-time request submitted 10minutes prior to the ramp start time, 4 minutes to assess an on-time request submitted 11 minutes prior to the ramp start time, etc? The proposed change does not include changing the definition of On Time. The current version provides up to 10 minutes for response to Late requests as well as two additional minutes for each request that is less than 15 minutes prior to ramp through requests received 10 minutes prior to ramp. This additional time leaves potential for further delay in agreeing to Interchange and setting generator base points.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. Stakeholder consensus supports the proposed revisions to the timing tables.</p>	
SERC OC Standards Review Group	On the Timing Table, for Column B of Row "ATF", suggest adding the words "if desired" to the end of the text. On the Timing Table, for Column B of Row "Late", suggest adding the words "per Requirement 1" to the end of the text.
<p><b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the wording in R1 rather than change the wording in the timing table. R1 now says:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup></p> <p style="padding-left: 40px;"><sup>1</sup>The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p> <p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "if desired" from the tables.</p>	
Santee Cooper	On each of the Timing Requirements tables, we suggest adding the words "if they choose" back to the end of the text in Column B for the ATF classifications. As currently stated, it is not explicitly clear that the BA and TSP do not have to respond to ATF interchange. With this suggestion, the text for Column B would read: "Entities have up to 2 hours to respond if they choose."
<p><b>Response:</b> The CITT SDT Thanks you for your comment. We have revised the wording in R1 rather than change the wording in the timing table. R1 now says:</p> <p style="padding-left: 40px;">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 each On-time Request For Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup></p> <p style="padding-left: 40px;"><sup>1</sup>The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.</p>	

**Consideration of Comments on 2nd Draft of INT Standards — Coordinate Interchange Timing Tables — Project 2007-14**

Organization	Question 6 Comments:
	<p>This was intended to clarify that the timing table applies to specific types of RFIs only. Previous stakeholder comments indicated a strong consensus to remove the words "if they choose" from the tables.</p>
<p>MRO NERC Standards Review Subcommittee</p>	<p>No comments to the modifications other than answered above. OTHER COMMENTS RELATED TO THE SET OF STANDARDS BUT NOT TO THE MODIFICATIONS:</p> <ol style="list-style-type: none"> <li>1. These standards (INT-005, 006, &amp; 008) should be consolidated; they reference the same tables and the only thing that changes are the measures and the requirements. We believe that the SAR titled "Modify Coordinate Interchange Standards for Applicability and General Upgrade" dated May 27, 2008 will address this issue and fully support it.</li> <li>2. These standards need the following items assigned before these standards are approved for ballot even though these assigned items may not be within the scope of the SDT. It seems impractical to have these standards go through the Standard Development Process when the resulting standards have serious deficiencies. The following items need to be assigned: Violation Severity Levels (VSL), Violation Risk Factors (VRF), and Time Horizons. Without these items and if these standards are violated, penalties and mitigation plans may be applied inconsistently. We believe that the SAR titled "Modify Coordinate Interchange Standards for Applicability and General Upgrade" dated May 27, 2008 will address this issue and fully support it.</li> <li>3. We have a question concerning the distribution of the information concerning the arranged interchange. In the standard INT-008-3 R1 &amp; M1.1, all entities involved in the confirmed arranged interchange are communicated to. In the standard INT-005-03 R.1.1, only the sink and source balancing authorities for the arranged interchange are given the reliability assessment. Shouldn't all entities like the intermediate balancing authorities between the source and sink balancing authorities be given the reliability assessment associated with the proposed arranged interchange? These intermediate balancing authorities may have reliability related issues caused by this proposed arranged interchange such as thermal or stability ratings being exceeded or additional voltage support being required.</li> </ol>
	<p><b>Response:</b> The CITT SDT Thanks you for your comment. These suggestions / issues are outside the scope of the CITT SDT. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR. Note that VRFs for these standards were developed and approved – as were VSLs. Since there have been no modifications to the scope or intent of the requirements, these VRFs and VSLs should not need immediate modification.</p>
<p>IRC Standards Review Committee</p>	<p>The proposed terms for questions 3, 4, and 5 have value to the INT-006-3 requirements only if the intent is for Balancing Authorities and Transmission Service Providers to respond in some expedited manner beyond the timing requirements posed in the existing timing tables.</p>
	<p><b>Response:</b> The CITT SDT Thanks you for your comment. It was the drafting team's intent to clarify that BAs and TSPs were not required to respond to Late and ATF requests unless the requests were specified as Emergency RFIs or as Reliability Adjustment RFIs. In those cases, responses to LATE or ATF Emergency RFIs or Reliability Adjustment RFIs must be responded to within the period of time specified in column B</p>

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Organization	Question 6 Comments:
	<p>of the timing tables. In addition, for any On-time requests, regardless of type, the BAs and TSPs must respond within the period of time specified in Column B of the timing tables. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR.</p>
PacifiCorp	<p>PacifiCorp believes that a 10-minute assessment period for reliability adjustments is too long. The assessment period should be no more than 5 minutes. We suggest the 5-minutes assessment period for the all LATE requests, but more specifically reliability adjustments. If the argument is that there isn't enough time to process LATE tags, then we suggest those parties need to adjust their auto processes to improve their ability to act in a timely manner.</p>
	<p><b>Response:</b> The CITT SDT Thanks you for your comment. The original SAR, at the request of the WECC, was for a 10-minute assessment period. We suggest that a new SAR be developed to address your concerns at either the NERC level or in the WECC Region. There is a new SAR that has been developed to perform a thorough review of all INT standards (Project 2008-12). We encourage you to participate in providing comments on that SAR.</p>
Tucson Electric Power - Marketing	
PJM Interconnection	
Midwest ISO Standards Collaboration	
Manitoba Hydro	
Operating Reliability Working Group (ORWG)	No
Ontario IESO	
ISO New England	
PUD NO. of Grant County	
NPCC	

## Standards Announcement

Ballot Pool and Pre-ballot Window Open  
August 13–September 11, 2008

Now available at: <https://standards.nerc.net/BallotPool.aspx>

### Pre-ballot Window and Ballot Pool for Permanent Changes to the Coordinate Interchange Standards (Project 2007-14) Open August 13, 2008

The following [Coordinate Interchange](#) standards and associated implementation plan are posted for a 30-day pre-ballot review:

- INT-005-3 — Interchange Authority Distributes Arranged Interchange
- INT-006-3 — Response to Interchange Authority
- INT-008-3 — Interchange Authority Distributes Status

In 2007, stakeholders approved a set of Urgent Action modifications to the Timing Tables in INT-005-1, INT-006-1, and INT-008-1. The modifications lengthened the reliability assessment period for WECC 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](#), these Urgent Action modifications will expire unless they are replaced with permanent changes that go through the full standards development procedure. The modifications in the posted standards will make “permanent” the Urgent Action modifications made to the Timing Tables.

In addition, conforming changes were made by adding definitions and making clarifications to Requirement R1 in both INT-005-3 and INT-006-3.

A new [ballot pool](#) to vote on these standards has been formed and will remain open up until **8 a.m. (EDT), Thursday, September 11, 2008**. During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” The list server for this ballot pool is: [bp-Perm\\_Chg\\_CI\\_tbl\\_in\\_in@nerc.com](mailto:bp-Perm_Chg_CI_tbl_in_in@nerc.com). Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.

### Standards Development Process

The [Reliability Standards Development Procedure](#) 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.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
3. Revised Standards posted for 45 day comment period from January 24 to March 8, 2008
4. Team met April 1–2, 2008 to respond to comments and revised standards.
5. Team posted second draft of revisions for a 30-day comment period from May 12 through June 10, 2008.
6. Team responded to comments received in second posting July 10, 2008.

#### Proposed Action Plan and Description of Current Draft:

This is a pre-ballot draft of the proposed changes to the standard and the associated Implementation Plan.

#### Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
2. Conduct initial ballot.	September 11–22, 2008
3. Respond to comments on initial ballot.	September 23–30, 2008
4. Conduct recirculation ballot.	October 1–10, 2008
5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined

### **Definitions of Terms Used in Standard**

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**ATF (After the Fact)** – A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.



## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the time period defined in the timing requirements tables in this standard, 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 History**

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

---

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

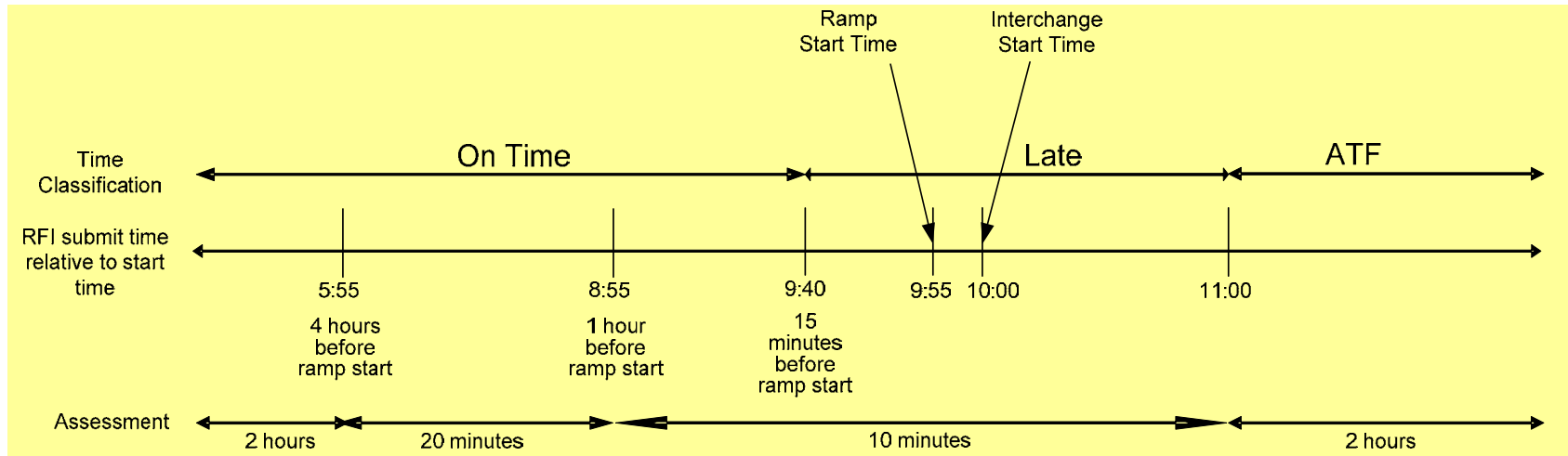
Timing Requirements for all Interconnections except WECC



		A	B	C	D
If Arranged Interchange (RFI) <sup>2</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and <1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections except WECC

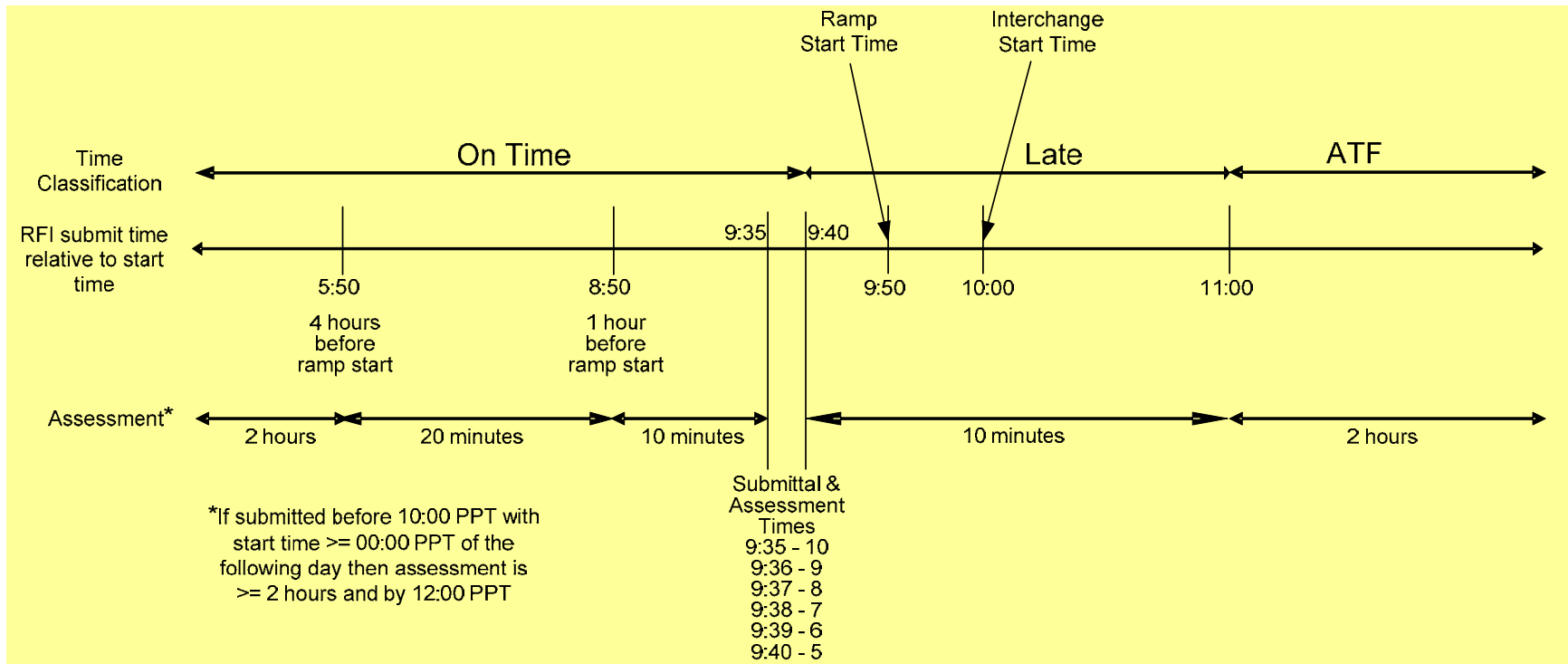


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>3</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
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Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
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#### Proposed Action Plan and Description of Current Draft:

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### Definitions of Terms Used in Standard

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**ATF (After the Fact) – A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.**



## A. Introduction

1. **Title:** Interchange Authority Distributes Arranged Interchange
2. **Number:** INT-005-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the time period defined in the ~~Timing Table~~[timing requirements tables in this standard](#), 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.
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**E. Regional Differences**

None

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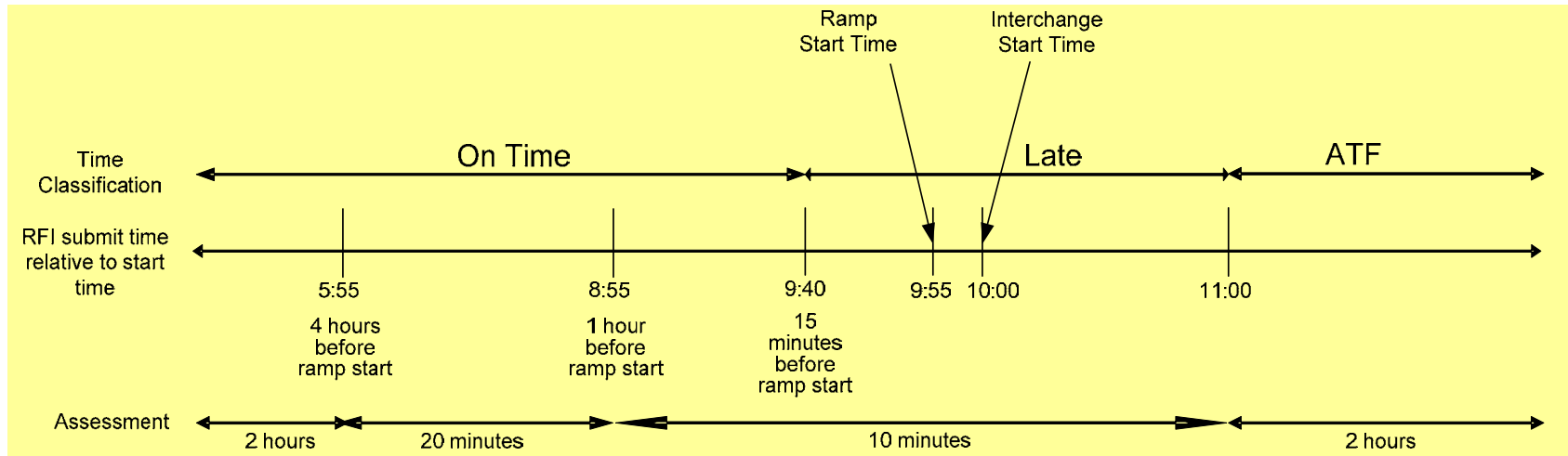
**Timing Requirements for all Interconnections Except WECC**



		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>2</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
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<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections Except WECC

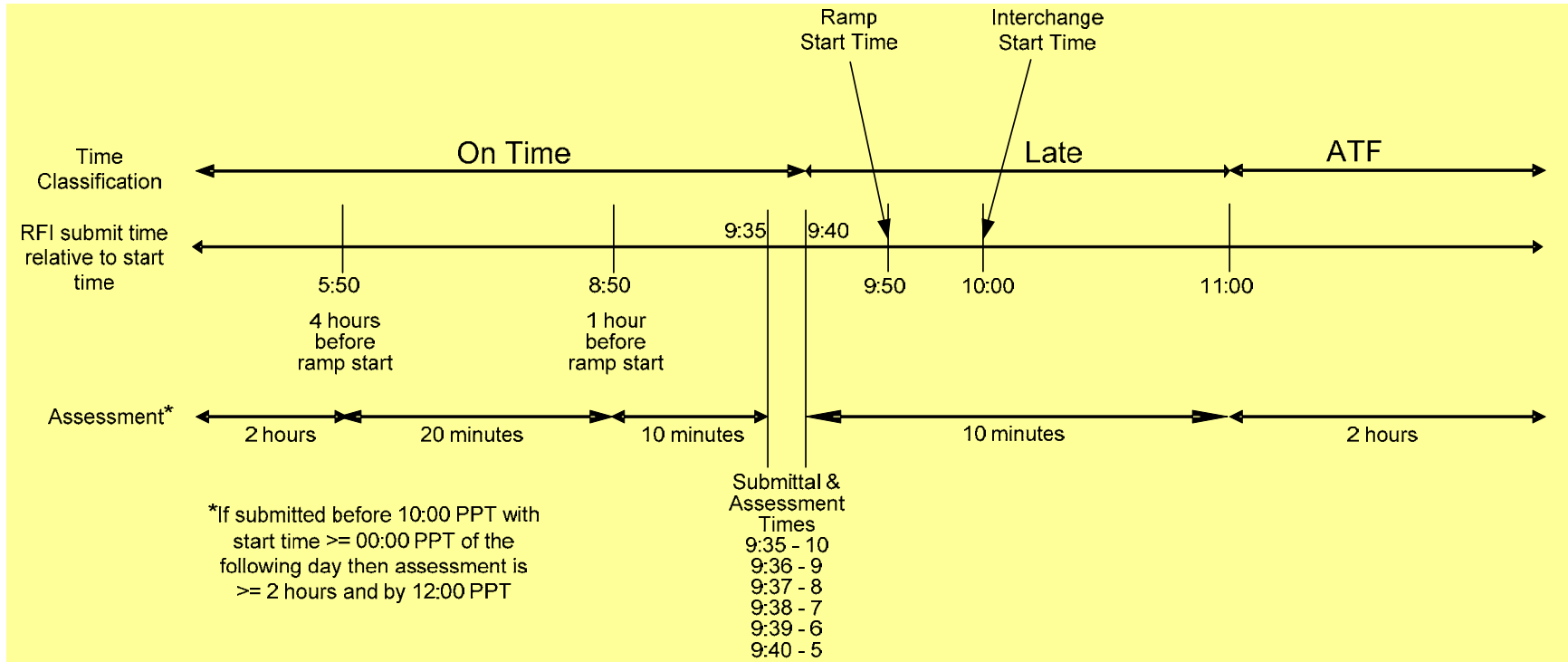


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>3</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
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<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



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### Definitions of Terms Used in Standard

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**Emergency RFI** – Request for Interchange to be initiated for Emergency or Energy Emergency conditions.

**Reliability Adjustment RFI** – Request to modify an Implemented Interchange Schedule for reliability purposes.



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the reliability assessment period defined in the timing requirements tables in this standard, Column B, the Balancing Authority and Transmission Service Provider shall respond to each On-time Request for Interchange (RFI), and to each Emergency RFI and Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>
  - 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 On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## D. Compliance

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

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<sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.

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>2</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.

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<sup>2</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 History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
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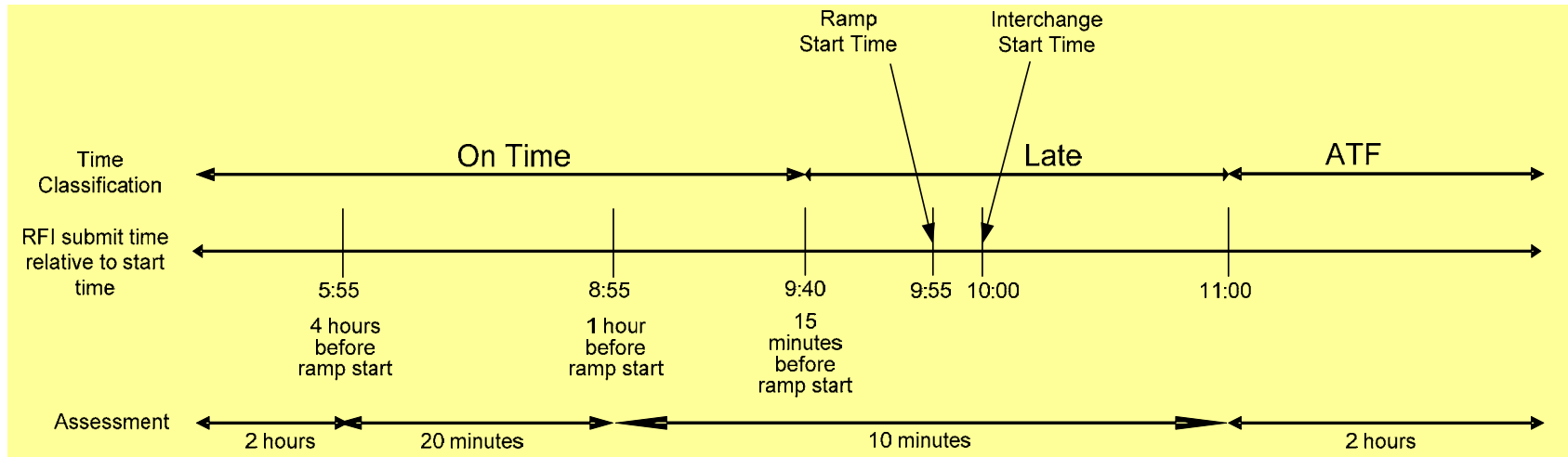
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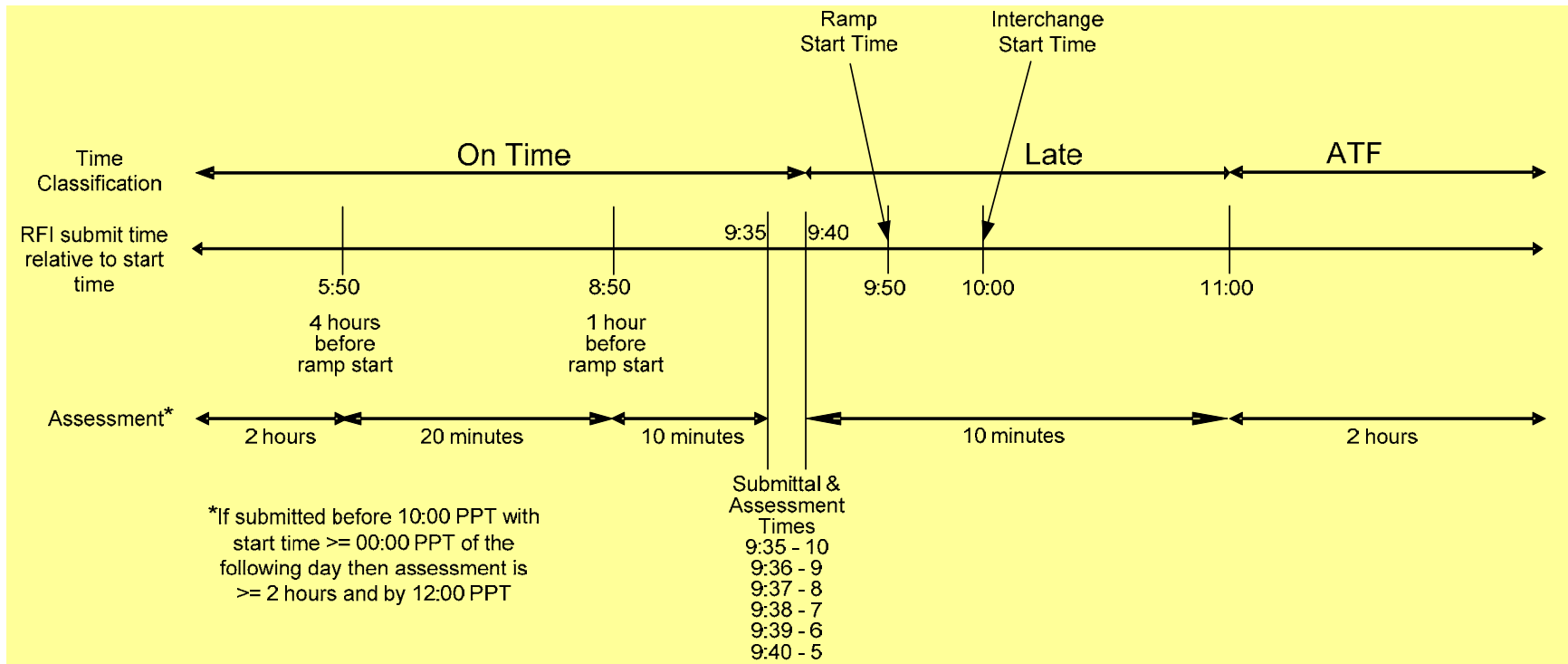


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
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### Example of Timing Requirements for WECC



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1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
2. Conduct initial ballot.	September 11–22, 2008
3. Respond to comments on initial ballot.	September 23–30, 2008
4. Conduct recirculation ballot.	October 1–10, 2008
5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined



### Definitions of Terms Used in Standard

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**Emergency RFI** – Request for Interchange to be initiated ~~or modified by reliability entities under for abnormal~~ Emergency or Energy Emergency ~~operating~~ conditions.

**Reliability Adjustment RFI** – Request to modify an Implemented Interchange Schedule for reliability purposes.

**ATF (After the Fact)** – ~~A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.~~

## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the reliability assessment period defined in the [Timing requirements Tables in this standard](#), Column B, the Balancing Authority and Transmission Service Provider shall respond to ~~an each~~ On-time [Request for Interchange \(RFI\)](#), and to each Emergency [RFI](#) and Reliability Adjustment [RFI request](#) from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>
  - 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 On-time [Request for Interchange \(RFI\)](#), and to each Emergency [RFI](#) or Reliability Adjustment [RFI request](#) from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## D. Compliance

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

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<sup>1</sup> [The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.](#)

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>2</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>2</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.

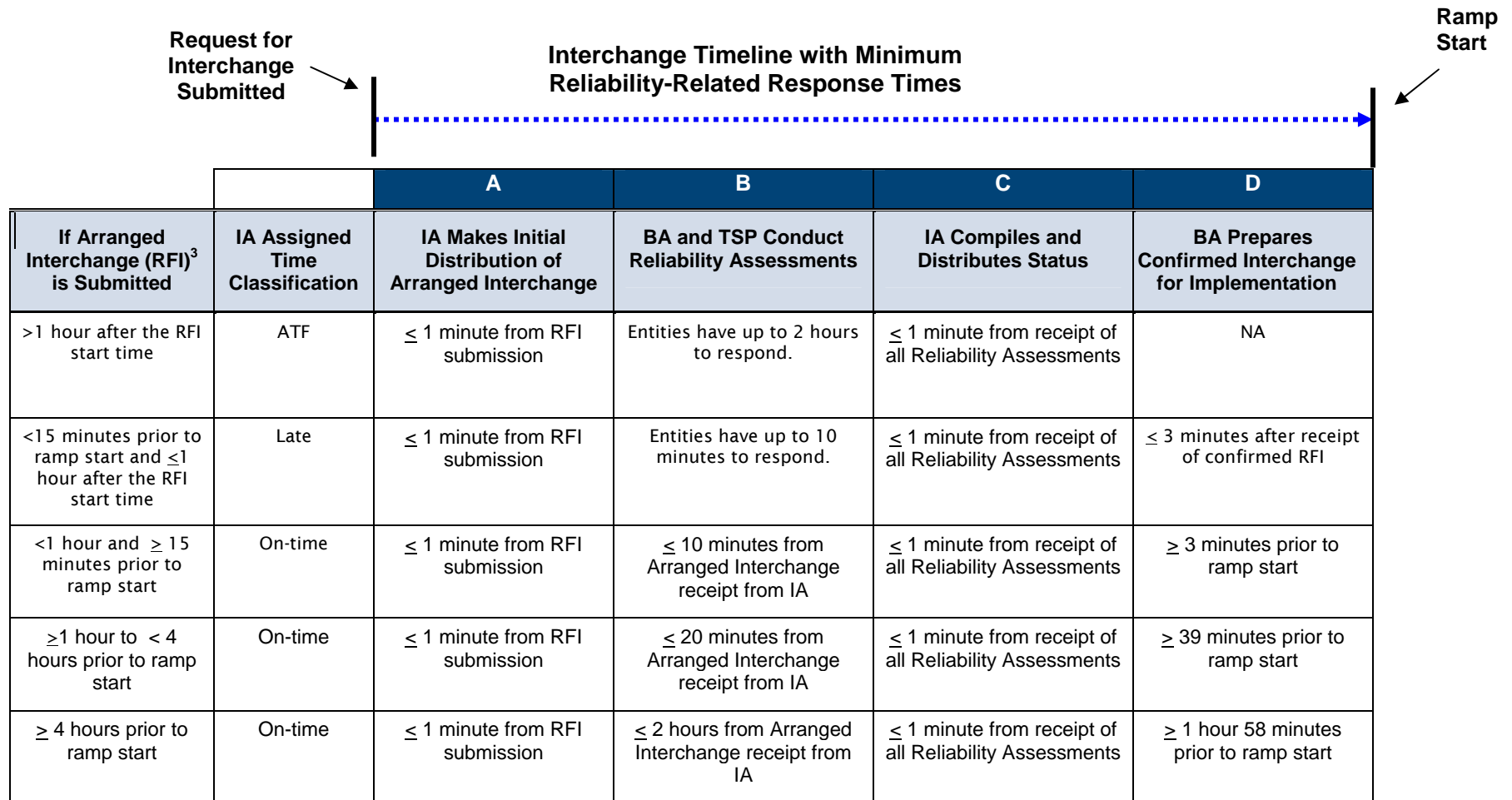
**E. Regional Differences**

None.

**Version History**

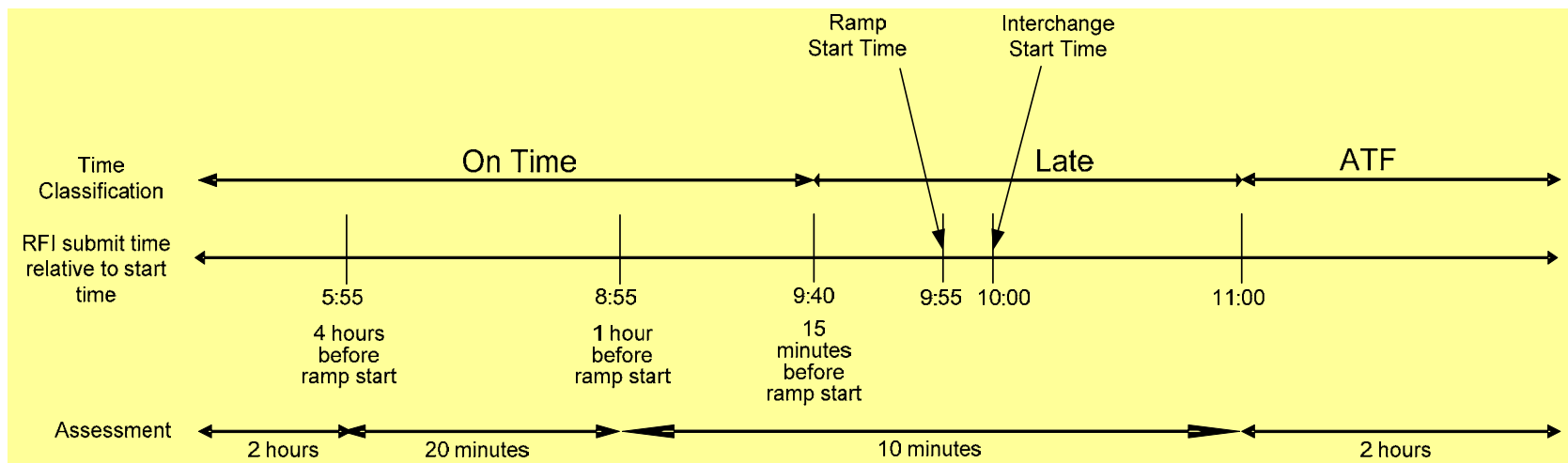
<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 2, 2006	Approved by BOT	New
2	May 2, 2007	Approved by BOT	Revised

Timing Requirements for all Interconnections except WECC



<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections except WECC

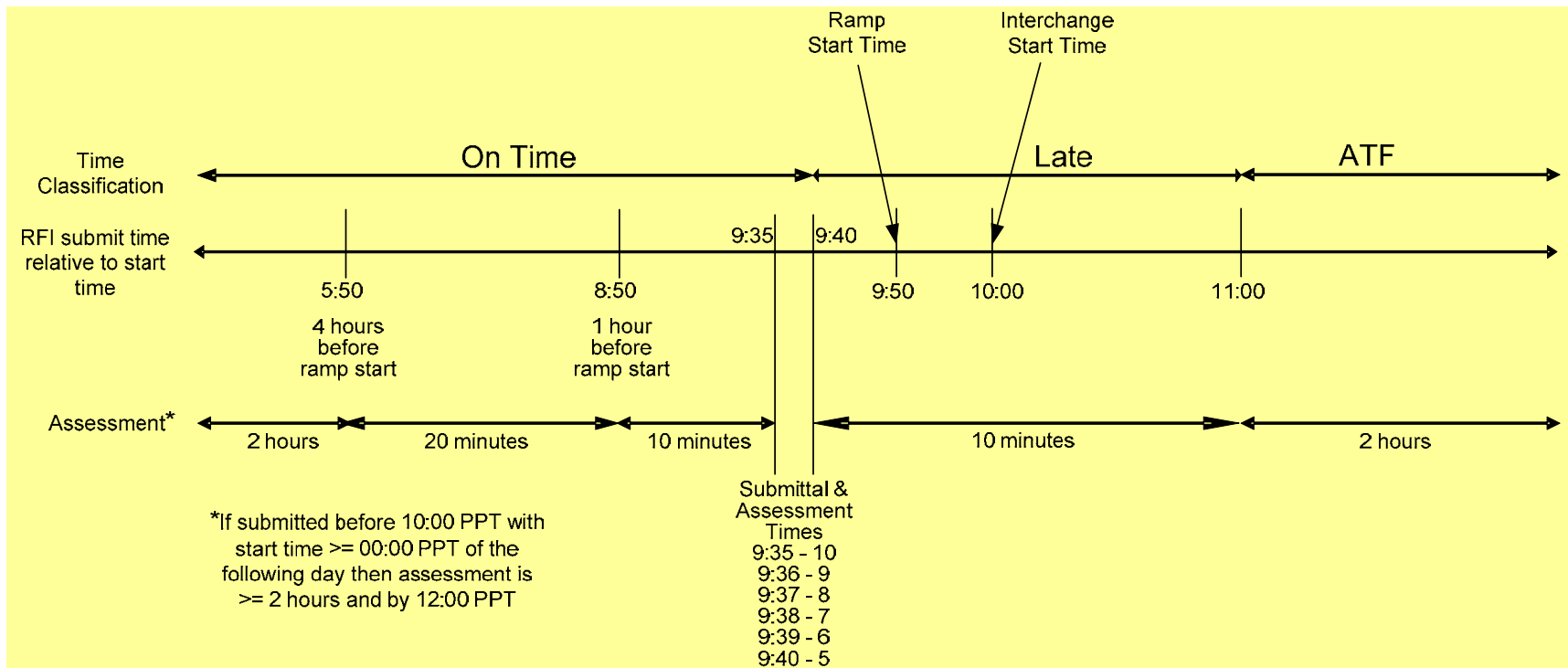


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC





### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
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4. Team met April 1–2, 2008 to respond to comments and revised standards.
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#### Proposed Action Plan and Description of Current Draft:

This is a pre-ballot draft of the proposed changes to the standard and the associated Implementation Plan.

#### Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
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### **Definitions of Terms Used in Standard**

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**None.**

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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.

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<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.

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**E. Regional Differences**

None.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 2, 2006	Approved by BOT	New
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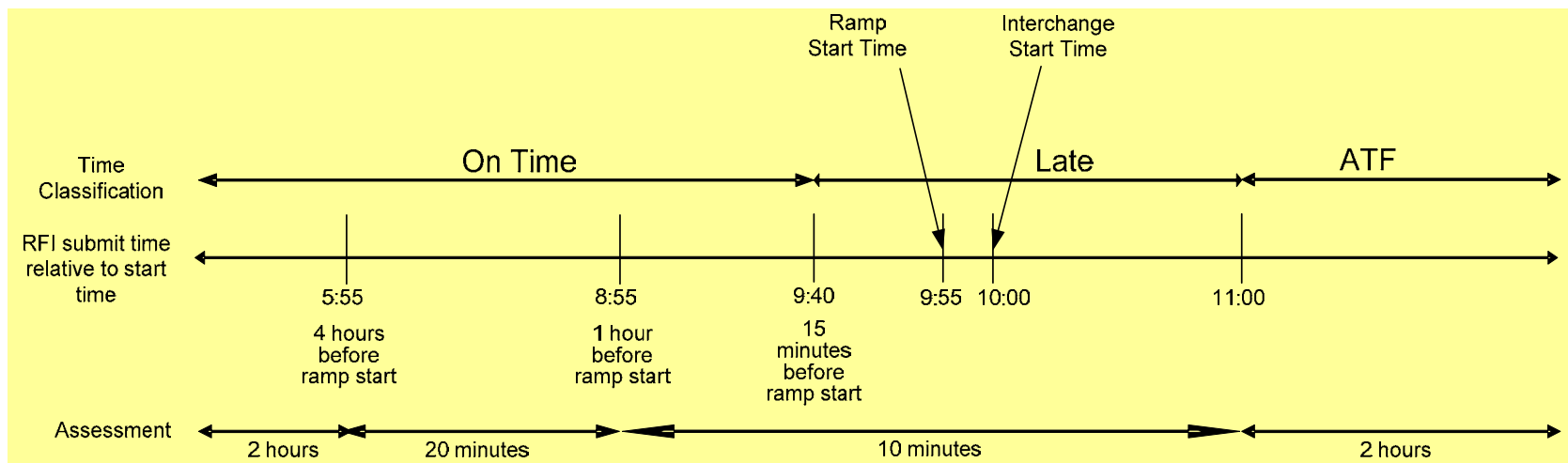
Timing Requirements for all Interconnections except WECC



		A	B	C	D
If Arranged Interchange (RFI) <sup>2</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
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Example of Timing Requirements for all Interconnections except WECC



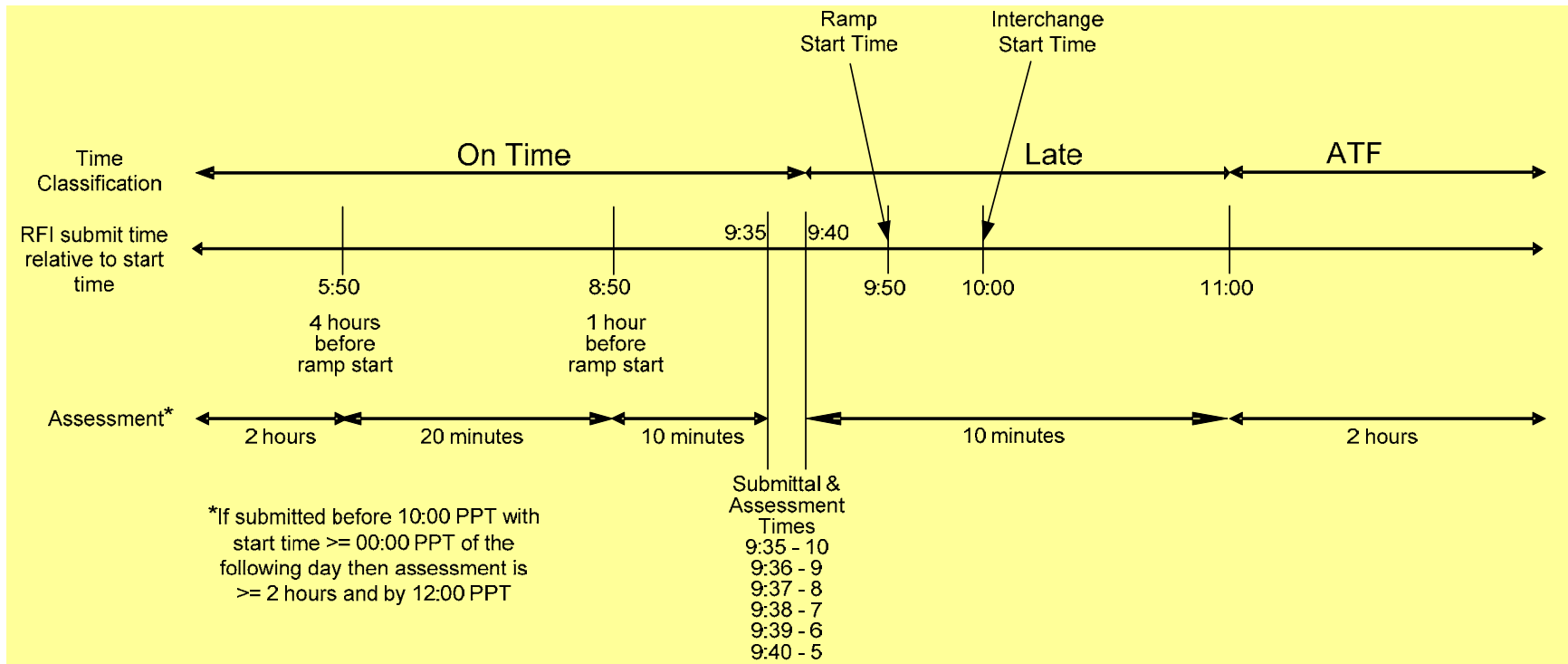
**Timing Requirements for WECC**

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### Example of Timing Requirements for WECC



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**E. Regional Differences**

None.

**Version History**

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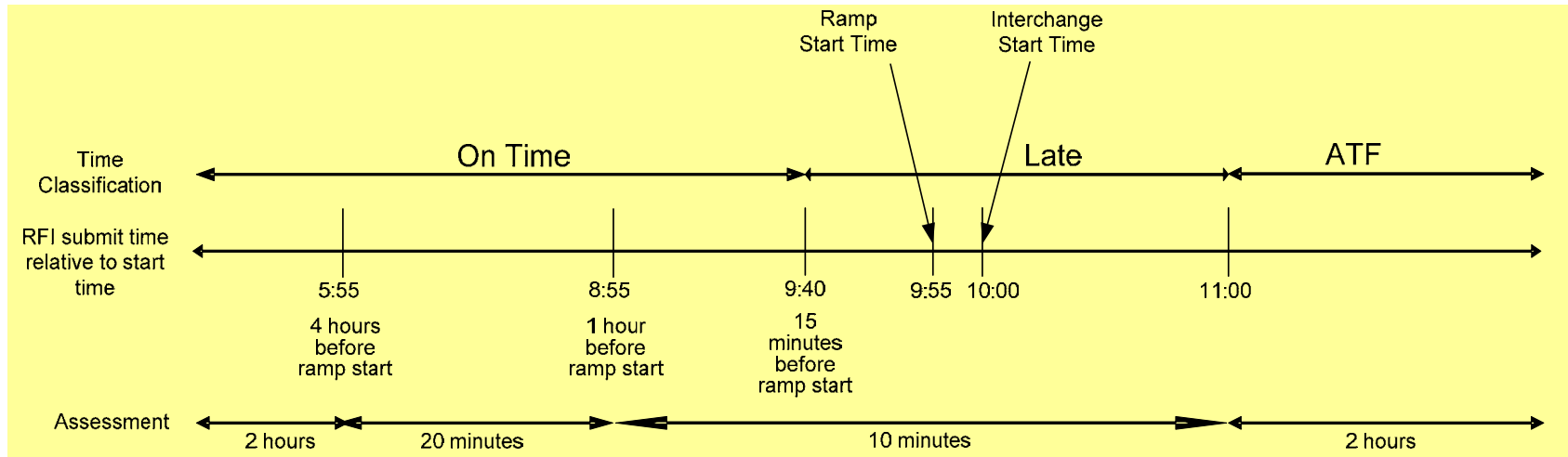
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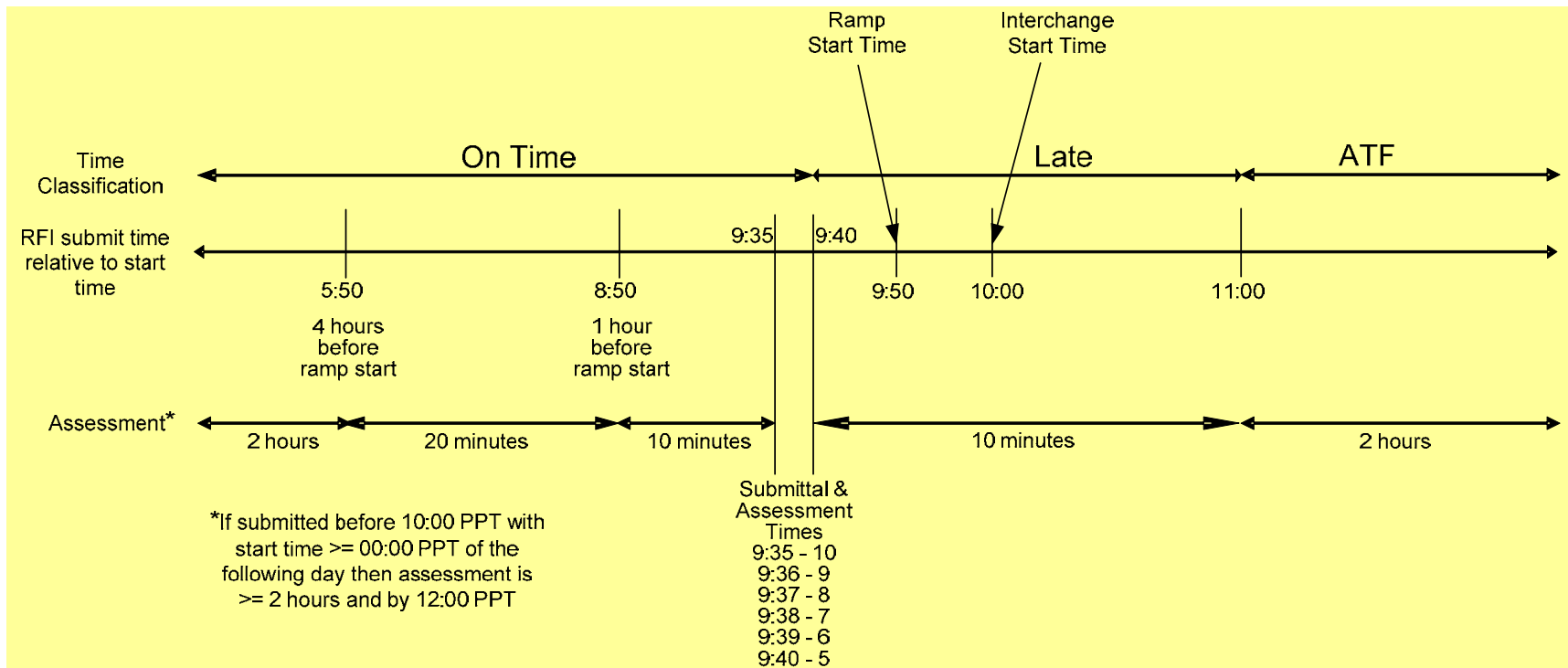


**Timing Requirements for WECC**

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<b>If Arranged Interchange (RFI)<sup>3</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
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### Example of Timing Requirements for WECC





## **Implementation Plan for INT-005-3, INT-006-3 and INT-008-3**

### **Prerequisite Approvals**

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before these modified standards can be implemented.

### **Modified Standards**

INT-005-2, INT-006-2 and INT-008-2 should all be retired when the proposed standards become effective.

### **Compliance with Standards**

Once these standards become effective, the responsible entities identified in the applicability section of the standard must comply with the requirements.

### **Proposed Effective Date**

All requirements in the standards shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## Standards Announcement Three Initial Ballot Windows

One Ballot Now Open

Closing: September 17, 2008 (8 p.m. EDT)

Available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Initial ballot for interpretation of VAR-002-1a — Generator Operation for Maintaining Network Voltage Schedules (Project 2008-11)**

ICF Consulting submitted a formal Request for Interpretation, which asked for the following clarifications:

- Which requirements in VAR-002 apply to Generator Operators that operate generators that do not have automatic voltage regulation (AVR) capability?
- Does the standard require a Generator Owner to acquire AVR devices to comply with the requirements in this standard?

The interpretation provides the following clarifications:

- All the requirements and associated subrequirements in VAR-002-1a apply to Generator Owners and Generator Operators that own or operate generators whether equipped with an automatic voltage regulator or not.
- There are no requirements in the standard that require a generator to have an automatic voltage regulator, nor are there any requirements for a Generator Owner to modify its generator to add an automatic voltage regulator.

Project page: [http://www.nerc.com/filez/standards/Project2008-11\\_VAR-002\\_Interpretation.html](http://www.nerc.com/filez/standards/Project2008-11_VAR-002_Interpretation.html)

Two Other Ballots to Open September 11, 2008 (8 a.m. EDT)

Closing: September 22, 2008 (8 p.m. EDT)

Ballots will be available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Initial ballot for the MOD-004-1 — Capacity Benefit Margin standard and associated implementation plan (Project 2006-07 — ATC/TTC/AFC and CBM/TRM Revisions)**

This standard addresses the reliability aspects of determining and maintaining a Capacity Benefit Margin and the conditions under which that margin may be used. The ballot for this standard includes the retirement of the following associated approved standards:

- MOD-005-0 — Procedure for Verifying CBM Values
- MOD-006-0 — Procedures for the Use of Capacity Benefit Margin Values
- MOD-007-0 — Documentation of the Use of Capacity Benefit Margin

The implementation plan contains the justification for the recommended retirements.

**Project page:** <http://www.nerc.com/filez/standards/MOD-V0-Revision.html>

### **Initial ballot for three Coordinate Interchange standards and associated implementation plan (Project 2007-14 — Permanent Changes to Coordinate Interchange Timing Table)**

- INT-005-3 — Interchange Authority Distributes Arranged Interchange
- INT-006-3 — Response to Interchange Authority
- INT-008-3 — Interchange Authority Distributes Status

In 2007, stakeholders approved a set of Urgent Action modifications to the Timing Tables in INT-005-1, INT-006-1, and INT-008-1. The modifications lengthened the reliability assessment period for WECC 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, these Urgent Action modifications will expire unless they are replaced with permanent changes that go through the full standards development procedure. The modifications in the posted standards will make “permanent” the Urgent Action modifications made to the Timing Tables.

In addition, conforming changes were made by adding definitions and making clarifications to Requirement R1 in both INT-005-3 and INT-006-3.

**Project page:** [http://www.nerc.com/filez/standards/INT\\_Urgent\\_Action.html](http://www.nerc.com/filez/standards/INT_Urgent_Action.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) 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.

*For more information or assistance, please contact Shaun Streeter, Standards Program Administrator, at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)

### Standard Development Roadmap

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### **Definitions of Terms Used in Standard**

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**ATF (After the Fact)** – A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.

## A. Introduction

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2. **Number:** INT-005-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the time period defined in the timing requirements tables in this standard, 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.
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**2. Levels of Non-Compliance**

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**E. Regional Differences**

None

**Version History**

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

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

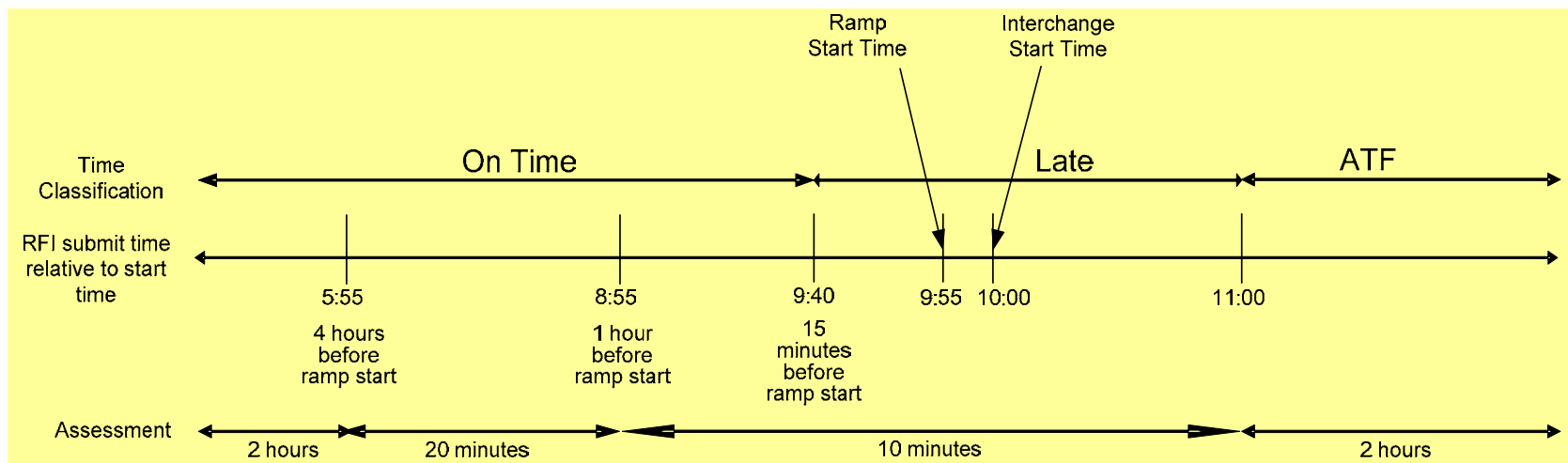
**Timing Requirements for all Interconnections except WECC**



		A	B	C	D
If Arranged Interchange (RFI) <sup>2</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
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Example of Timing Requirements for all Interconnections except WECC

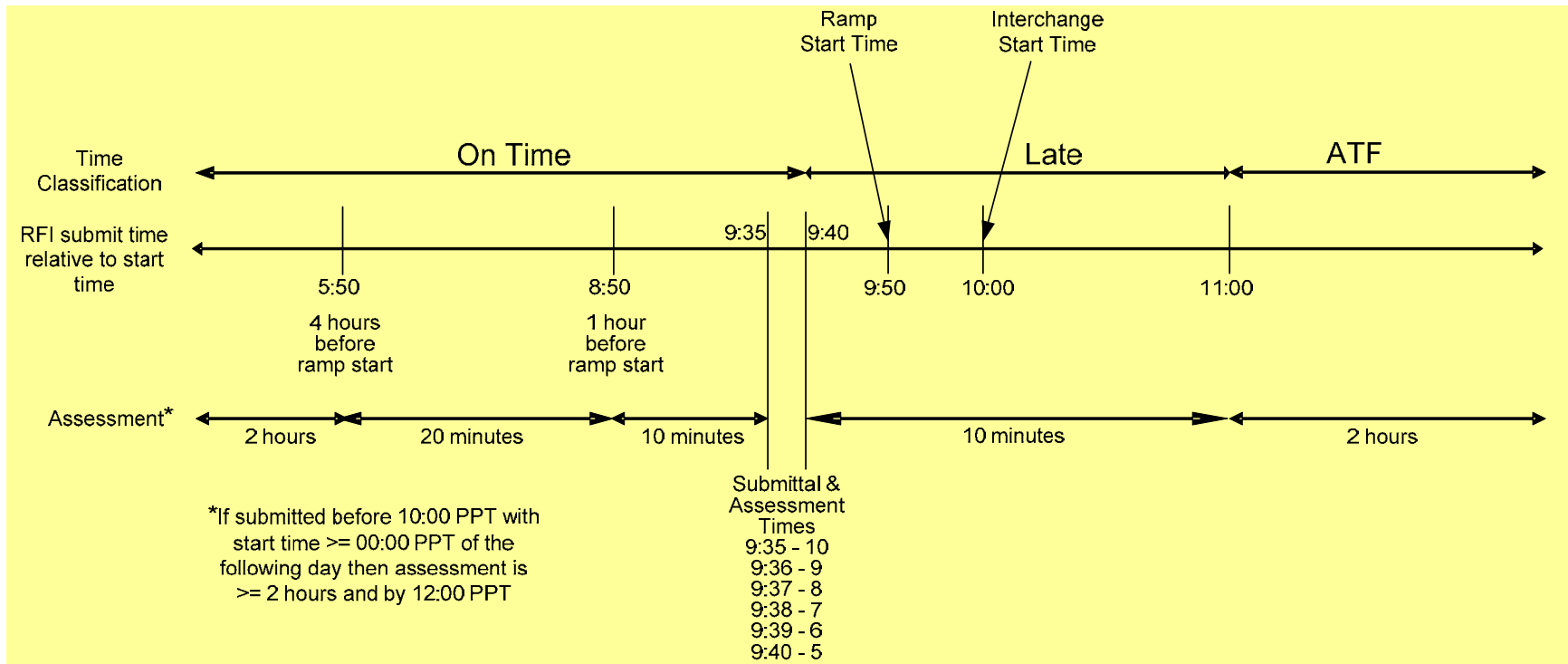


**Timing Requirements for WECC**

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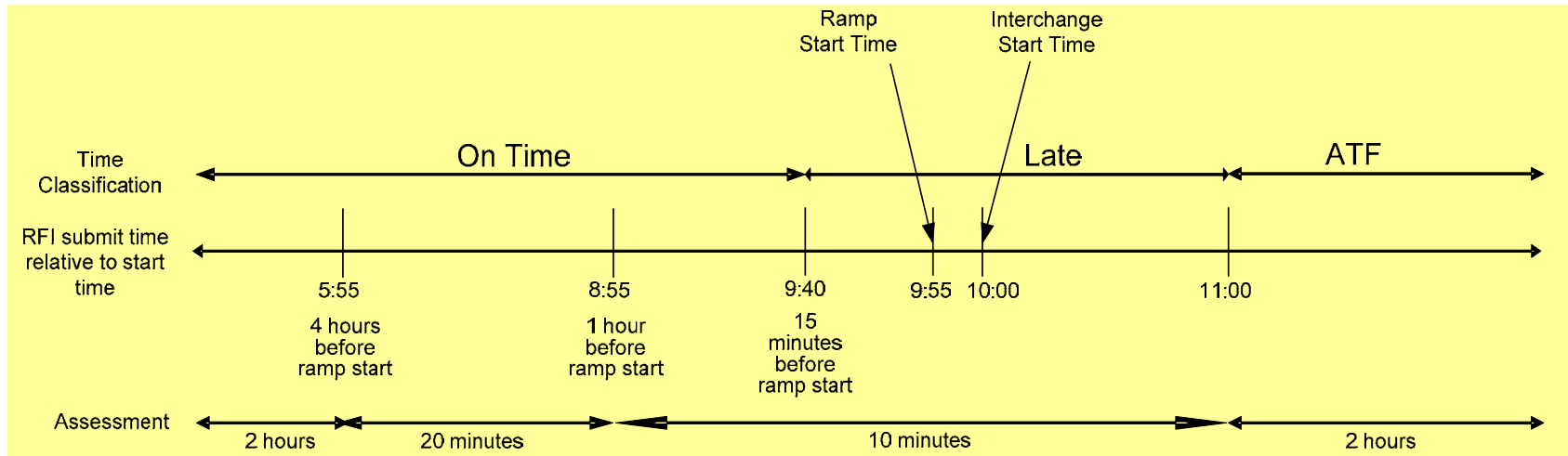
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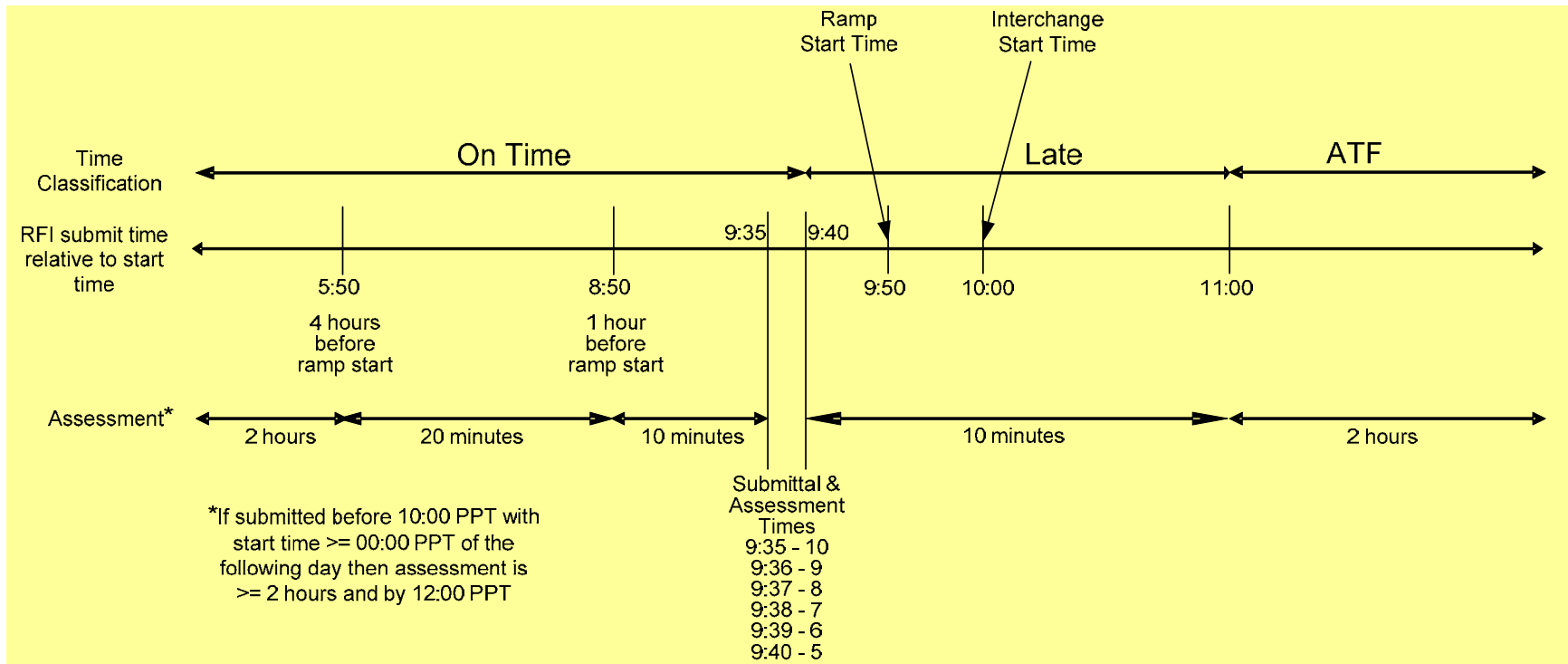


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Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
2. Conduct initial ballot.	September 11–22, 2008
3. Respond to comments on initial ballot.	September 23–30, 2008
4. Conduct recirculation ballot.	October 1–10, 2008
5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined

### Definitions of Terms Used in Standard

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**Emergency RFI** – Request for Interchange to be initiated for Emergency or Energy Emergency conditions.

**Reliability Adjustment RFI** – Request to modify an Implemented Interchange Schedule for reliability purposes.

## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the reliability assessment period defined in the timing requirements tables in this standard, Column B, the Balancing Authority and Transmission Service Provider shall respond to each On-time Request for Interchange (RFI), and to each Emergency RFI and Reliability Adjustment RFI from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>
  - 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 On-time Request for Interchange (RFI), and to each Emergency RFI or Reliability Adjustment RFI from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## D. Compliance

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

---

<sup>1</sup> The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.



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>2</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>2</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 History**

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

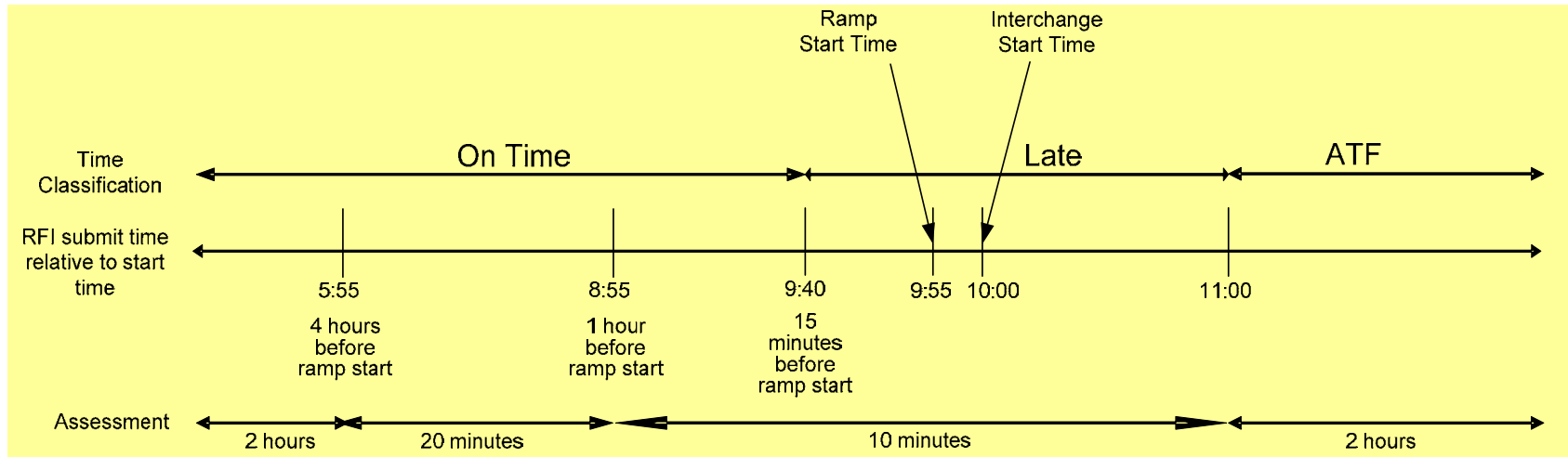
**Timing Requirements for all Interconnections except WECC**



		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and <1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections except WECC

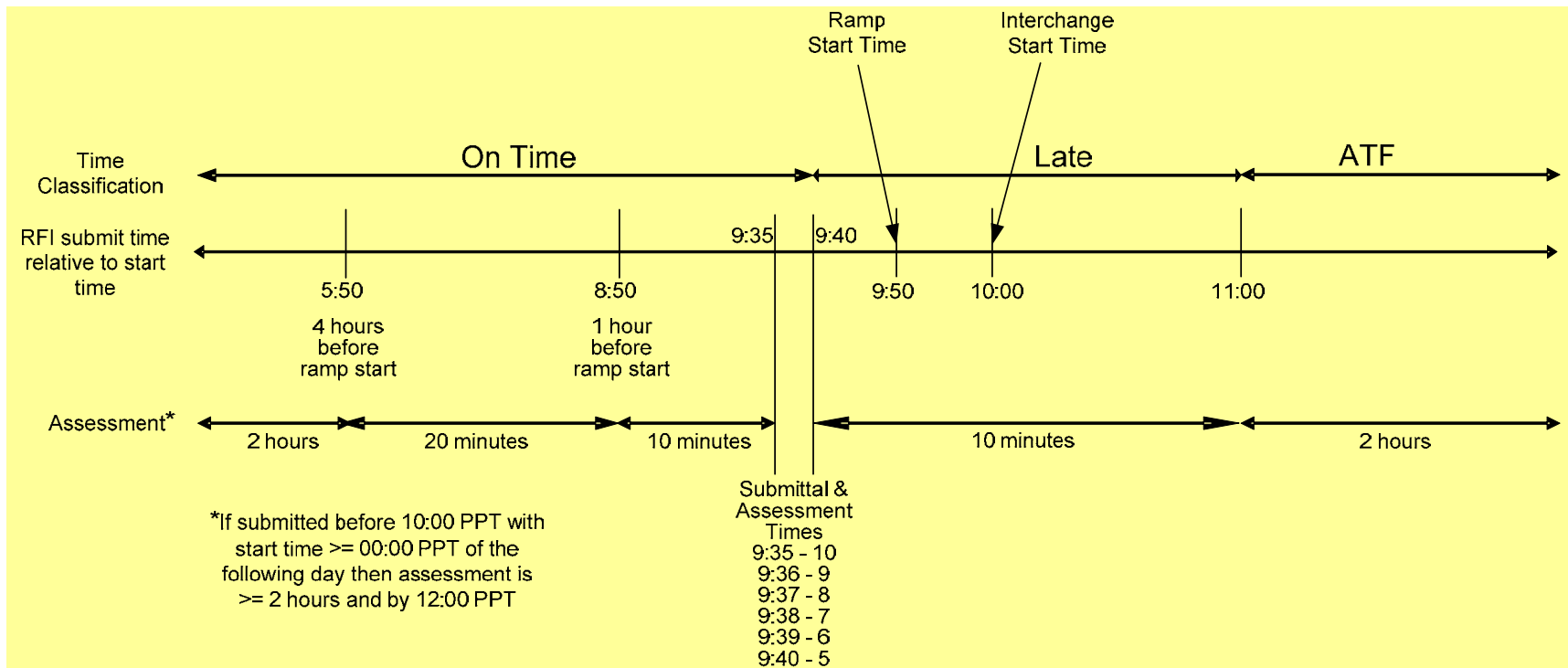


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<10 minutes prior to ramp start and ≤1 hour after the start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
13 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 8 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
3. Revised Standards posted for 45 day comment period from January 24 to March 8, 2008.
4. Team met April 1–2, 2008 to respond to comments and revised standards.
5. Team posted second draft of revisions for a 30-day comment period from May 12 through June 10, 2008.
6. Team responded to comments received in second posting July 10, 2008.

#### Proposed Action Plan and Description of Current Draft:

This is a pre-ballot draft of the proposed changes to the standard and the associated Implementation Plan.

#### Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
2. Conduct initial ballot.	September 11–22, 2008
3. Respond to comments on initial ballot.	September 23–30, 2008
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5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined

### Definitions of Terms Used in Standard

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**Emergency RFI** – Request for Interchange to be initiated ~~or modified by reliability entities under for abnormal~~ Emergency or Energy Emergency operating conditions.

**Reliability Adjustment RFI** – Request to modify an Implemented Interchange Schedule for reliability purposes.

**ATF (After the Fact)** – ~~A time classification assigned to an RFI when the submittal time is greater than one hour after the start time of the RFI.~~



## A. Introduction

1. **Title:** Response to Interchange Authority
2. **Number:** INT-006-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## B. Requirements

- R1. Prior to the expiration of the reliability assessment period defined in the ~~Timing requirements Tables in this standard~~, Column B, the Balancing Authority and Transmission Service Provider shall respond to ~~an each~~ On-time [Request for Interchange \(RFI\)](#), and to each Emergency [RFI](#) and Reliability Adjustment [RFI request](#) from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.<sup>1</sup>
  - 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 On-time [Request for Interchange \(RFI\)](#), and to each Emergency [RFI](#) or Reliability Adjustment [RFI request](#) from an Interchange Authority within the reliability assessment period defined in the Timing Table, Column B. The Balancing Authority and Transmission Service Provider need not provide evidence that it responded to any other requests.

## D. Compliance

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

---

<sup>1</sup> [The Balancing Authority and Transmission Service Provider need not provide responses to any other requests.](#)

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>2</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>2</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 History**

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

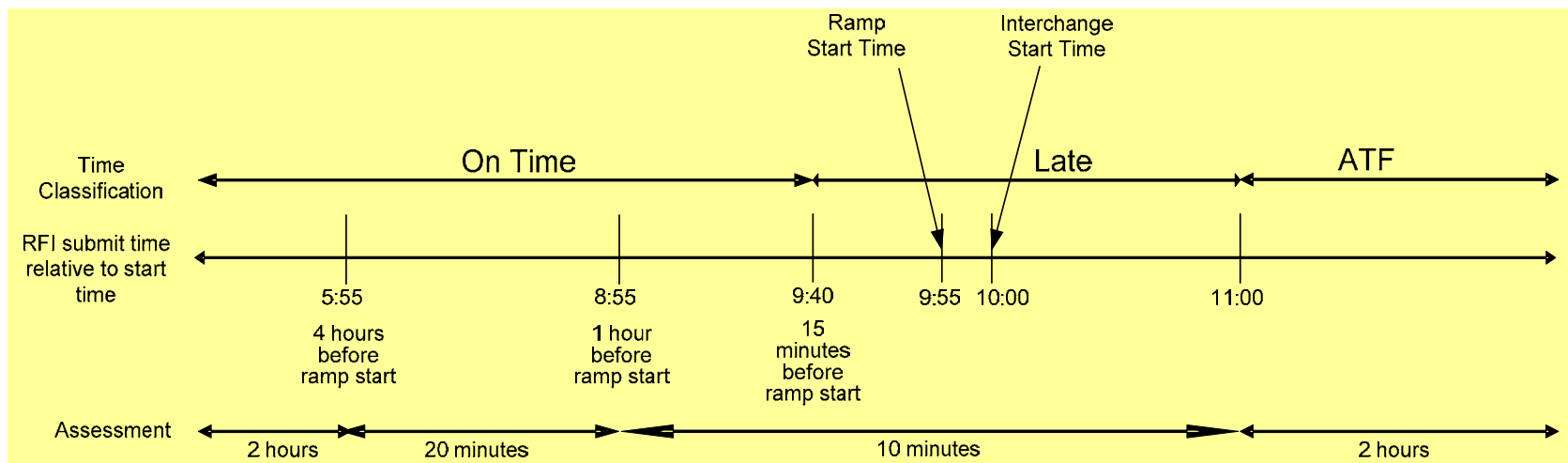
Timing Requirements for all Interconnections except WECC



		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
>1 hour after the RFI start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
<15 minutes prior to ramp start and ≤1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
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<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for all Interconnections except WECC

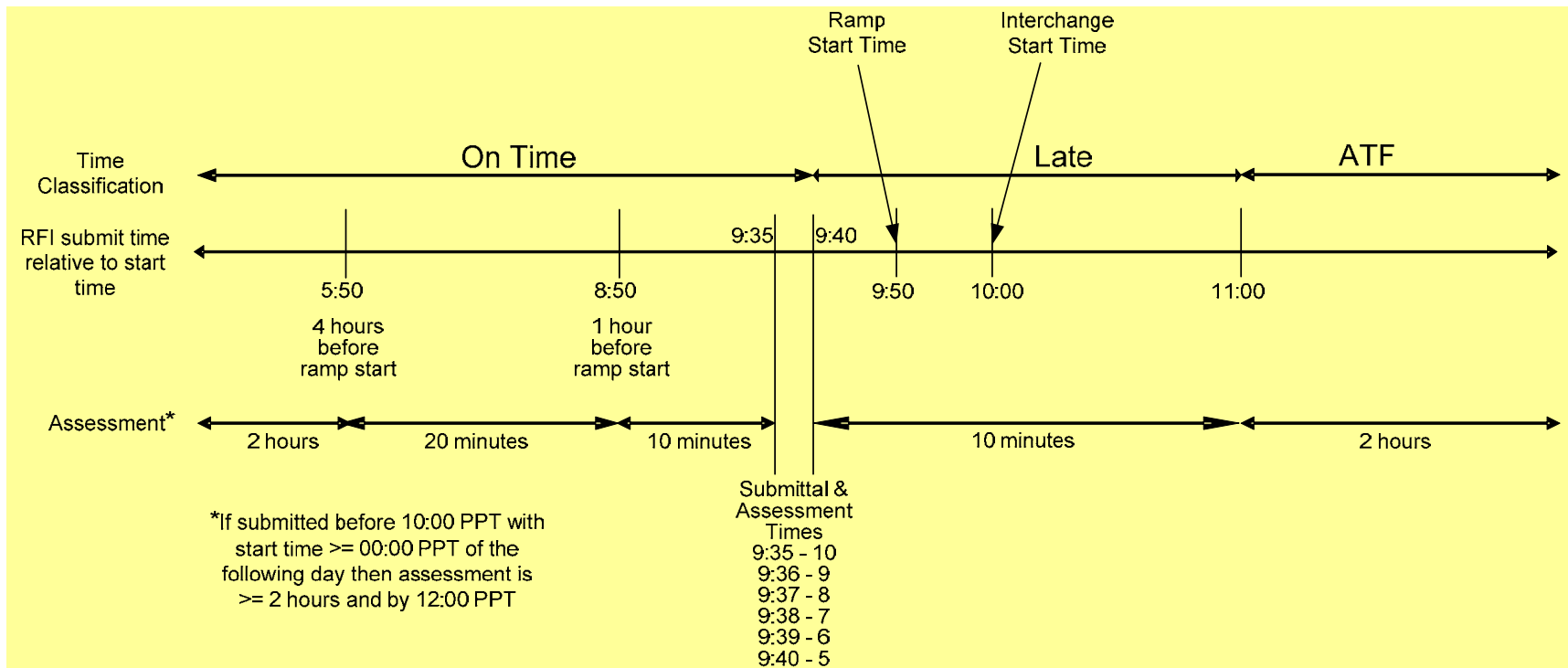


**Timing Requirements for WECC**

		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>If Arranged Interchange (RFI)<sup>4</sup> is Submitted</b>	<b>IA Assigned Time Classification</b>	<b>IA Makes Initial Distribution of Arranged Interchange</b>	<b>BA and TSP Conduct Reliability Assessments</b>	<b>IA Compiles and Distributes Status</b>	<b>BA Prepares Confirmed Interchange for Implementation</b>
>1 hour after the start time	ATF	≤ 1 minute from RFI submission	Entities have up to 2 hours to respond.	≤ 1 minute from receipt of all Reliability Assessments	NA
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≥ 1 hour and < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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
Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>4</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC



### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
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4. Team met April 1–2, 2008 to respond to comments and revised standards.
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#### Proposed Action Plan and Description of Current Draft:

This is a pre-ballot draft of the proposed changes to the standard and the associated Implementation Plan.

#### Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
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5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined



### **Definitions of Terms Used in Standard**

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**None.**

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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.

---

<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 History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 2, 2006	Approved by BOT	New
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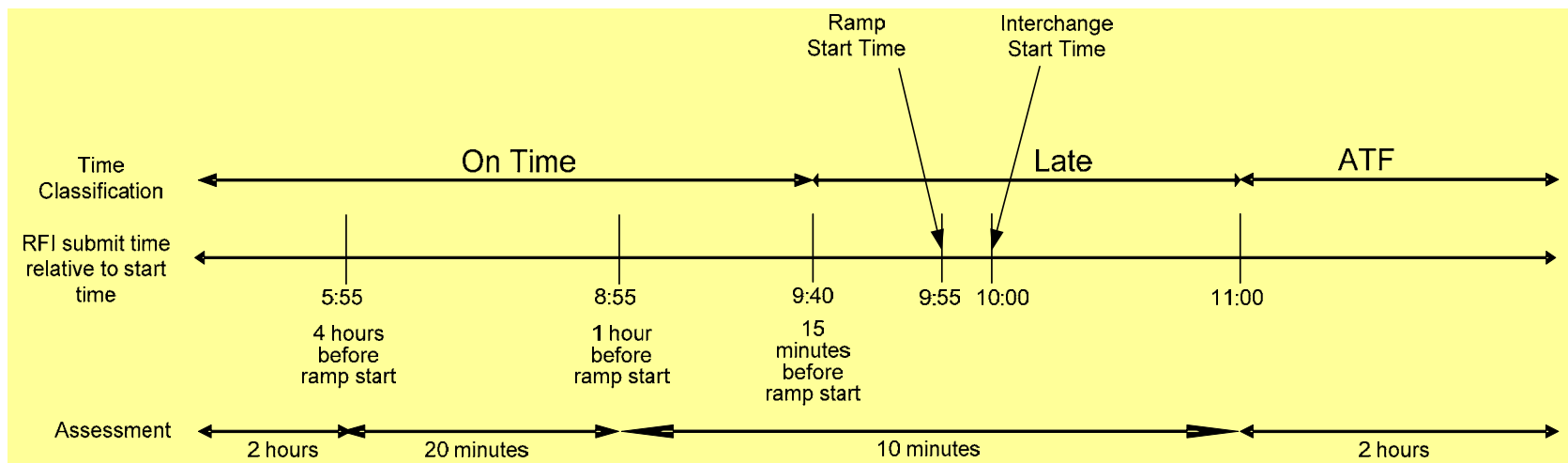
Timing Requirements for all Interconnections except WECC



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If Arranged Interchange (RFI) <sup>2</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
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<15 minutes prior to ramp start and <1 hour after the RFI start time	Late	≤ 1 minute from RFI submission	Entities have up to 10 minutes to respond.	≤ 1 minute from receipt of all Reliability Assessments	≤ 3 minutes after receipt of confirmed RFI
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
≥1 hour to < 4 hours prior to ramp start	On-time	≤ 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
≥ 4 hours prior to ramp start	On-time	≤ 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

<sup>2</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

Example of Timing Requirements for all Interconnections except WECC

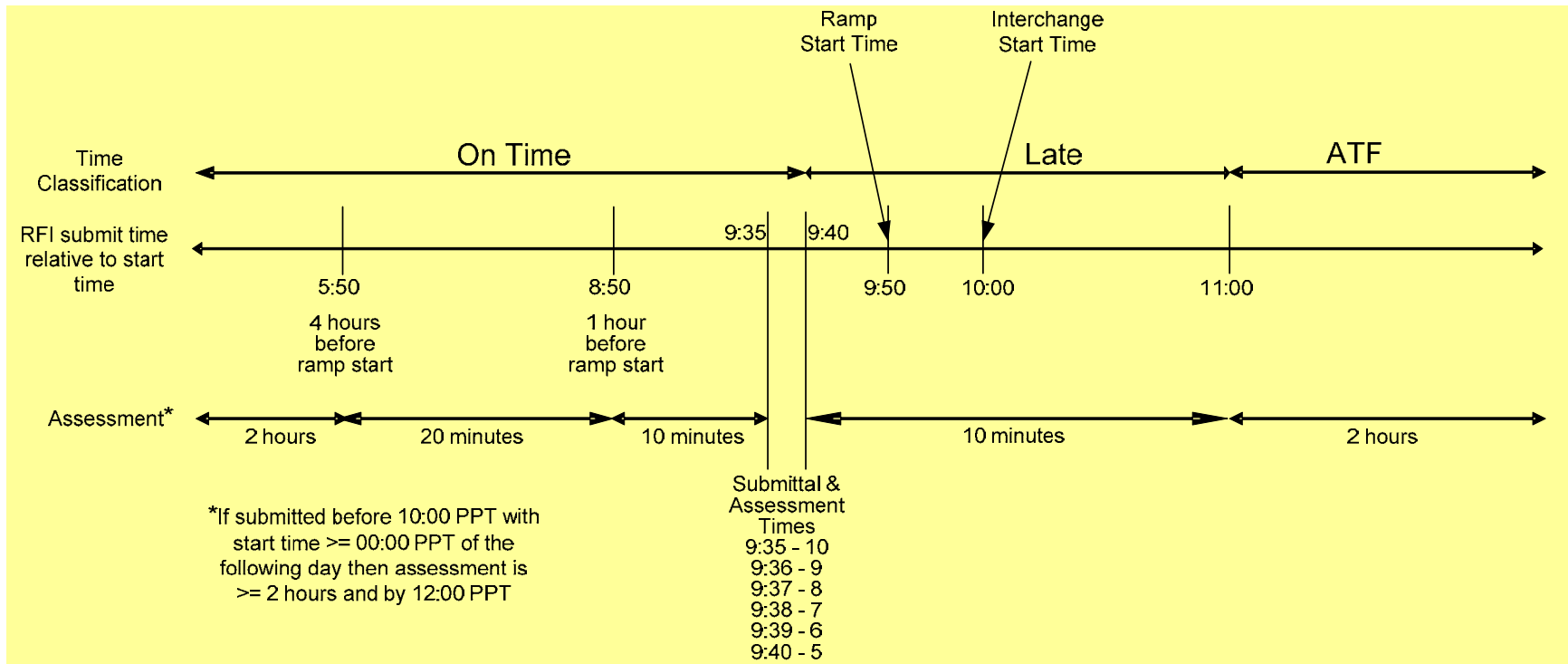


**Timing Requirements for WECC**

		A	B	C	D
If Arranged Interchange (RFI) <sup>3</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
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10 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 5 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
11 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 6 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
12 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 7 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
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14 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 9 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
<1 hour and ≥ 15 minutes prior to ramp start	On-time	≤ 1 minute from RFI submission	≤ 10 minutes from Arranged Interchange receipt from IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 3 minutes prior to ramp start
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Submitted before 10:00 PPT with start time ≥ 00:00 PPT of following day	On-time	≤ 1 minute from RFI submission	By 12:00 PPT of day the Arranged Interchange was received by the IA	≤ 1 minute from receipt of all Reliability Assessments	≥ 1 hour 58 minutes prior to ramp start

<sup>3</sup> Time Classifications and deadlines apply to both initial Arranged Interchange submittal and any subsequent modifications to the Arranged Interchange.

### Example of Timing Requirements for WECC





### Standard Development Roadmap

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed:

1. SAR posted for 30-day comment period from April 20 through May 21, 2007.
2. Standards Committee authorized moving SAR forward to standard drafting August 13 2007.
3. Revised Standards posted for 45 day comment period from January 24 to March 8, 2008.
4. Team met April 1–2, 2008 to respond to comments and revised standards.
5. Team posted second draft of revisions for a 30-day comment period from May 12 through June 10, 2008.
6. Team responded to comments received in second posting July 10, 2008.

#### Proposed Action Plan and Description of Current Draft:

This is a pre-ballot draft of the proposed changes to the standard and the associated Implementation Plan.

#### Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post for 30-day pre-ballot review.	August 11–September 10, 2008
2. Conduct initial ballot.	September 11–22, 2008
3. Respond to comments on initial ballot.	September 23–30, 2008
4. Conduct recirculation ballot.	October 1–10, 2008
5. BOT adoption.	October 29, 2008
6. Submit for regulatory approvals.	To be determined

### Definitions of Terms Used in Standard

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

**None.**

## A. Introduction

1. **Title:** Interchange Authority Distributes Status
2. **Number:** INT-008-3
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:** The standard shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

## 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.

---

<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 History**

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

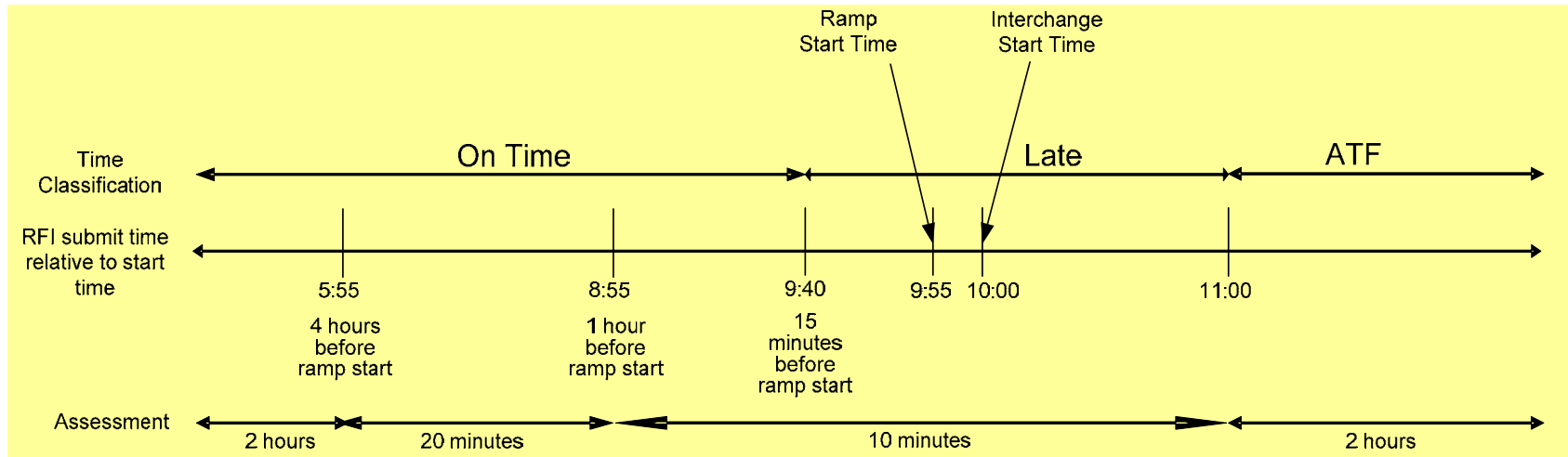
Timing Requirements for all Interconnections except WECC



		A	B	C	D
If Arranged Interchange (RFI) <sup>2</sup> is Submitted	IA Assigned Time Classification	IA Makes Initial Distribution of Arranged Interchange	BA and TSP Conduct Reliability Assessments	IA Compiles and Distributes Status	BA Prepares Confirmed Interchange for Implementation
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### Example of Timing Requirements for all Interconnections except WECC



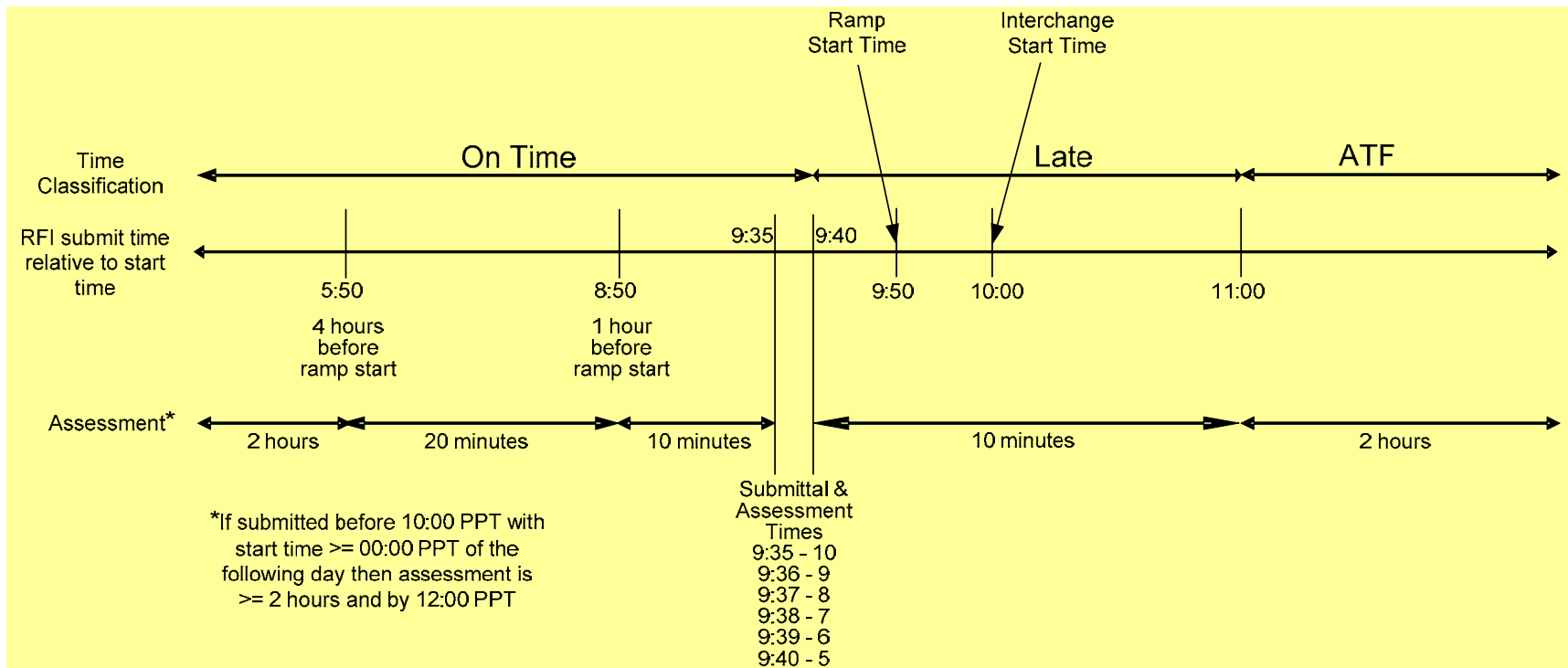
**Timing Requirements for WECC**

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### Example of Timing Requirements for WECC





## **Implementation Plan for INT-005-3, INT-006-3 and INT-008-3**

### **Prerequisite Approvals**

There are no other reliability standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before these modified standards can be implemented.

### **Modified Standards**

INT-005-2, INT-006-2 and INT-008-2 should all be retired when the proposed standards become effective.

### **Compliance with Standards**

Once these standards become effective, the responsible entities identified in the applicability section of the standard must comply with the requirements.

### **Proposed Effective Date**

All requirements in the standards shall become effective on the first day of the first calendar quarter, three months after all regulatory approvals.

User Name

Password

Log in

Register

- Ballot Pools
- Current Ballots
- Ballot Results
- Registered Ballot Body
- Proxy Voters

Home Page

Ballot Results	
<b>Ballot Name:</b>	Permanent Changes to CI Timing Tables_in_in
<b>Ballot Period:</b>	9/12/2008 - 9/22/2008
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	122
<b>Total Ballot Pool:</b>	153
<b>Quorum:</b>	<b>79.74 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	100.00 %
<b>Ballot Results:</b>	<b>The Standard has Passed</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.	38	1	31	1	0	0	1	6	
2 - Segment 2.	8	0.7	7	0.7	0	0	1	0	
3 - Segment 3.	37	1	26	1	0	0	6	5	
4 - Segment 4.	7	0.5	5	0.5	0	0	1	1	
5 - Segment 5.	28	1	18	1	0	0	3	7	
6 - Segment 6.	20	1	11	1	0	0	2	7	
7 - Segment 7.	0	0	0	0	0	0	0	0	
8 - Segment 8.	1	0.1	1	0.1	0	0	0	0	
9 - Segment 9.	5	0.4	4	0.4	0	0	0	1	
10 - Segment 10.	9	0.4	4	0.4	0	0	1	4	
<b>Totals</b>	<b>153</b>	<b>6.1</b>	<b>107</b>	<b>6.1</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>31</b>	

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Ameren Services Company	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	Avista Corp.	Scott Kinney	Affirmative	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Central Maine Power Company	Brian Conroy	Affirmative	
1	Consolidated Edison Co. of New York	Edwin Thompson		
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	E.ON U.S. LLC	Larry Monday	Abstain	

1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative
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	Kansas City Power & Light Co.	Jim Useldinger	Affirmative
1	Lincoln Electric System	Doug Bantam	
1	Manitoba Hydro	Michelle Rheault	Affirmative
1	Municipal Electric Authority of Georgia	Jerry J Tang	Affirmative
1	National Grid	Michael J Ranalli	Affirmative
1	New Brunswick Power Transmission Corporation	Wayne N. Snowdon	Affirmative
1	New York Power Authority	Ralph Rufrano	Affirmative
1	New York State Electric & Gas Corp.	Henry G. Masti	
1	Northeast Utilities	David H. Boguslawski	Affirmative
1	Northern Indiana Public Service Co.	Joseph Dobes	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	Affirmative
1	Progress Energy Carolinas	Sammy Roberts	Affirmative
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative
1	Salt River Project	Robert Kondziolka	Affirmative
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	SaskPower	Wayne Guttormson	
1	Seattle City Light	Pawel Krupa	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 Cooperative, Inc.	James L. Jones	Affirmative
1	Western Area Power Administration	Robert Temple	Affirmative
2	Alberta Electric System Operator	Anita Lee	Affirmative
2	British Columbia Transmission Corporation	Phil Park	Affirmative
2	California ISO	David Hawkins	Affirmative
2	Independent Electricity System Operator	Kim Warren	Affirmative
2	ISO New England, Inc.	Kathleen Goodman	Affirmative
2	Midwest ISO, Inc.	Terry Bilke	Abstain
2	New York Independent System Operator	Gregory Campoli	Affirmative
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative
3	Alabama Power Company	Robin Hurst	Affirmative
3	Ameren Services Company	Mark Peters	
3	American Electric Power	Raj Rana	Affirmative
3	Arizona Public Service Co.	Thomas R. Glock	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative
3	Consumers Energy	David A. Lapinski	Abstain
3	Cowlitz County PUD	Russell A Noble	Affirmative
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative
3	Entergy Services, Inc.	Matt Wolf	Affirmative
3	Farmington Electric Utility System	Alan Glazner	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative
3	Florida Power Corporation	Lee Schuster	Affirmative
3	Georgia Power Company	Leslie Sibert	Affirmative
3	Grays Harbor PUD	Wesley W Gray	Affirmative
3	Great River Energy	Sam Kokkinen	Abstain
3	Gulf Power Company	Gwen S Frazier	Affirmative
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative
3	JEA	Garry Baker	
3	Lakeland Electric	Mace Hunter	Affirmative
3	Lincoln Electric System	Bruce Merrill	Abstain
3	Louisville Gas and Electric Co.	Charles A. Freibert	Abstain
3	Manitoba Hydro	Ronald Dacombe	Affirmative
3	Mississippi Power	Don Horsley	Affirmative
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative
3	Orlando Utilities Commission	Ballard Keith Mutters	Affirmative

3	Platte River Power Authority	Terry L Baker	Affirmative
3	Progress Energy Carolinas	Sam Waters	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	Santee Cooper	Zack Dusenbury	Affirmative
3	Seattle City Light	Dana Wheelock	Affirmative
3	Tennessee Valley Authority	Cynthia Herron	
3	Wisconsin Public Service Corp.	James Maenner	Abstain
3	Xcel Energy, Inc.	Michael Ibold	Affirmative
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	
4	Consumers Energy	David Frank Ronk	Abstain
4	Northern California Power Agency	Fred E. Young	Affirmative
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative
4	Seattle City Light	Hao Li	Affirmative
4	Seminole Electric Cooperative, Inc.	Steven R. Wallace	Affirmative
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative
5	AEP Service Corp.	Brock Ondayko	Affirmative
5	Avista Corp.	Edward F. Groce	Affirmative
5	Bonneville Power Administration	Francis J. Halpin	Affirmative
5	City of Tallahassee	Alan Gale	Affirmative
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative
5	Conectiv Energy Supply, Inc.	Richard K. Douglass	Affirmative
5	Constellation Generation Group	Michael F. Gildea	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative
5	Entergy Corporation	Stanley M Jaskot	Affirmative
5	Exelon Nuclear	Michael Korchynsky	Abstain
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative
5	Great River Energy	Cynthia E Sulzer	Abstain
5	Lincoln Electric System	Dennis Florom	
5	Louisville Gas and Electric Co.	Charlie Martin	Abstain
5	Manitoba Hydro	Mark Aikens	Affirmative
5	New York Power Authority	Gerald Mannarino	Affirmative
5	Northern States Power Co.	Liam Noailles	Affirmative
5	Orlando Utilities Commission	Richard Kinan	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative
5	Progress Energy Carolinas	Wayne Lewis	Affirmative
5	PSEG Power LLC	Thomas Piascik	
5	Reedy Creek Energy Services	Bernie Budnik	
5	Salt River Project	Glen Reeves	Affirmative
5	Seattle City Light	Michael J. Haynes	Affirmative
5	Southern California Edison Co.	David Schiada	
5	Southern Company Services, Inc.	Roger D. Green	Affirmative
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative
5	U.S. Bureau of Reclamation	Martin Bauer	
6	AEP Marketing	Edward P. Cox	Affirmative
6	Ameren Energy Marketing Co.	Jennifer Richardson	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative
6	Dominion Resources, Inc.	Louis S Slade	
6	Entergy Services, Inc.	William Franklin	Affirmative
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative
6	Florida Municipal Power Agency	Robert C. Williams	
6	Great River Energy	Donna Stephenson	
6	Lincoln Electric System	Eric Ruskamp	Abstain
6	Louisville Gas and Electric Co.	Daryn Barker	Abstain
6	Manitoba Hydro	Daniel Prowse	Affirmative
6	PP&L, Inc.	Thomas Hyzinski	Affirmative
6	Progress Energy Carolinas	James Eckelkamp	Affirmative
6	PSEG Energy Resources & Trade LLC	James D. Hebson	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	
6	Santee Cooper	Suzanne Ritter	Affirmative
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative
6	Southern California Edison Co.	Marcus V Lotto	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative



9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	North Carolina Utilities Commission	Kimberly J. Jones		
9	Oregon Public Utility Commission	Jerome Murray	Affirmative	
9	Public Utilities Commission of Ohio	Klaus Lambeck	Affirmative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Affirmative	
10	Florida Reliability Coordinating Council	Linda Campbell	Affirmative	
10	Midwest Reliability Organization	Larry Brusseau	Abstain	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Edward A. Schwerdt		
10	ReliabilityFirst Corporation	Jacque Smith		
10	SERC Reliability Corporation	Carter B Edge		
10	Southwest Power Pool	Charles H. Yeung		
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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 Washington Office: 1120 G Street, N.W. : Suite 990 : Washington, DC 20005-3801

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