

## A. Introduction

1. **Title:** Interchange Initiation and Modification for Reliability
2. **Number:** INT-010-2.1
3. **Purpose:** To provide guidance for required actions on Confirmed Interchange or Implemented Interchange to address reliability.
4. **Applicability:**
  - 4.1. Balancing Authority
5. **Effective Date:**

See implementation plan.
6. **Background:**

This standard was revised as part of the Project 2008-12 Coordinate Interchange Standards.

- R1 is modified to replace “request for Arranged Interchange” with the correct term “Request for Interchange.” A rationale was developed to clarify use of the term “energy sharing agreement” for this requirement.
- R2 and R3 are modified to shift compliance from the Reliability Coordinator to the Sink Balancing Authority.

## B. Requirements and Measures

- R1.** The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no RFI is required. *[Violation Risk Factor: Lower] [Time Horizon: Real Time Operations]*
- M1.** The Balancing Authority that uses its energy sharing agreement where the duration exceeds 60 minutes shall have evidence such as dated and time-stamped RFI, electronic logs or other similar evidence that it submitted an RFI per Requirement R1. (R1)
- R2.** Each Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchange reflecting a modification is submitted within 60 minutes of the start of the modification if a Reliability Coordinator directs the modification of a Confirmed Interchange or Implemented Interchange for actual or anticipated reliability-related reasons. *[Violation Risk Factor: Lower] [Time Horizon: Real Time Operations]*
- M2.** The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that a Reliability Adjustment Arranged Interchange was submitted within 60 minutes of the start of a modification to either a Confirmed Interchange or an Implemented Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R2)

- R3.** Each Sink Balancing Authority shall ensure that a Request for Interchange is submitted reflecting that Interchange Schedule within 60 minutes of the start of the scheduled Interchange if a Reliability Coordinator directs the scheduling of Interchange for actual or anticipated reliability-related reasons. [*Violation Risk Factor: Lower*] [*Time Horizon: Real Time Operations*]
- M3.** The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other evidence that a Request for Interchange was submitted reflecting that Interchange Schedule within 60 minutes of the start of any scheduled Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R3)

**C. Compliance**

**1. Compliance Monitoring Process**

**1.1. Compliance Enforcement Authority**

Regional Entity

**1.2. Evidence Retention**

The Balancing Authority shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority (CEA) to retain specific evidence for a longer period of time as part of an investigation. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- The Balancing Authority shall maintain evidence to show compliance with R1, R2, and R3, for the most recent three calendar months plus the current month.
- If a Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

**1.3. Compliance Monitoring and Assessment Processes:**

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

**1.4. Additional Compliance Information**

None

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**Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1</b>	Real Time Operations	Lower	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 60 minutes, but not more than 75 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 75 minutes, but not more than 90 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 90 minutes, but not more than 120 minutes, following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.	The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement ensured that a Request for Interchange was submitted, and it was submitted with a start time more than 120 minutes following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.  OR The Balancing Authority that experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement did not ensure that a Request for Interchange was submitted following the resource loss when the use of the energy sharing agreement exceeded 60 minutes.
<b>R2</b>	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a Reliability Adjustment

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						Arranged Interchange reflecting a modification was submitted within 60 minutes following the start of that modification.
<b>R3</b>	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a Request for Interchange reflecting the Interchange Schedule was submitted within 60 minutes following the start of that scheduled Interchange.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## Application Guidelines

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### Guidelines and Technical Basis

#### General Considerations for Curtailments of Dynamic Transfers

The unique handling of Curtailments of Dynamic Transfers is described in NERC's Dynamic Transfer Reference Guidelines, Version 2.

For Dynamic Schedules:

**If transmission service between the Source and Sink BA(s) is curtailed then the allowable range of the magnitude of the schedules between them, including Dynamic Schedules, may have to be curtailed accordingly. All BAs involved in a Dynamic Schedule Curtailment must also adjust the Dynamic Schedule Signal input to their respective ACE equations to a common value. The value used must be equal to or less than the curtailed Dynamic Schedule tag. Since Dynamic Schedule tags are generally not used as Dynamic Transfer Signals for ACE, this adjustment may require manual entry or other revision to a telemetered or calculated value used by the ACE.**

For Pseudo-Ties:

**If transmission service between the Native and Attaining BA(s) is curtailed, then the allowable range of the magnitude of the Pseudo-Ties between them must be limited accordingly to these constraints.**

Both sections above describe when Curtailments (typically communicated through e-Tags) of Dynamic Transfers require additional action by Balancing Authorities to ensure compliance with the Curtailment.

Curtailments of most tagged transactions are implemented through a change in the Source and Sink Balancing Authorities' ACE equations. However, changes, including Curtailments, in Dynamic Schedule and Pseudo-Tie tagged transactions do not change the Source and Sink Balancing Authorities' ACE equations directly. These types of transactions impact the ACE equation via the Dynamic Transfer Signal, not by the e-Tag. As such, Balancing Authorities need to develop additional automation or perform additional manual actions to reduce the Dynamic Transfer Signal in order to comply with the Curtailment.

#### **Rationale:**

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### **Rationale for R1:**

This requirement was originally revised to replace the term "Request for an Arranged Interchange" with the defined term "Request for Interchange (RFI)" within the requirement. Additional clarification was requested regarding "energy sharing agreement." There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled.

## Application Guidelines

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### Version History

Version	Date	Action	Change Tracking
1	May 2, 2006	Board of Trustees Adoption	New
1	March 16, 2007	FERC Approval	New
2	February 6, 2014	Board of Trustees Adoption	Revised
2	June 30, 2014	FERC letter order issued approving INT-010-2	
2.1	August 22, 2014	Errata submitted for INT-004-3, INT-009-2, INT-010-2 and INT-011-2 to correct inconsistency between the Implementation Plan and the effective date language. The NERC Standards Committee approved errata changes on August 20, 2014.	Errata
2.1	November 26, 2014	FERC letter order approving errata changes.	