

A. Introduction

1. **Title:** Intra-Balancing Authority Transaction Identification
2. **Number:** INT-011-1.1
3. **Purpose:** To ensure that transfers within a Balancing Authority Area using Point to Point Transmission Service are communicated and accounted for in congestion management procedures.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Load-Serving Entities
5. **Effective Date:**

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

This standard was created in response to a FERC directive in Order 693, paragraph 817: *In addition, e-Tagging of such transfers was previously included in INT-001-0 and the Commission is aware that such transfers are included in the e-Tagging logs. In short, the practice already exists, but if this Requirement is removed from INT-001-2, no Reliability Standard would require that such information be provided. We therefore will adopt the directive we proposed in the NOPR and direct the ERO to include a modification to INT-001-2 that includes a Requirement that interchange information must be submitted for all point-to-point transfers entirely within a balancing authority area, including all grandfathered and “non-Order No. 888” transfers.*

The transfers within a Balancing Authority Area using Point to Point Transmission Service can impact transmission congestion, and this standard ensures that these transfers are communicated and accounted for in congestion management procedures.

B. Requirements and Measures

- R1.** Each Load-Serving Entity that uses Point to Point Transmission Service for intra-Balancing Authority Area transfers shall submit a Request for Interchange unless the information about intra-Balancing Authority transfers is included in congestion management procedure(s) via an alternate method. *[Violation Risk Factor: Lower]*
[Time Horizon: Operations Planning, Same-day Operations]
- M1.** Each Load-Serving Entity subject to R1 shall have evidence, such as dated and time-stamped electronic records, documentation of congestion management procedures, or other similar evidence, that a Request for Interchange was submitted for each Point to Point Transmission Service intra-Balancing Authority transfer subject to R1 or that each intra-Balancing Authority transfer subject to R1 was accounted for in congestion management procedure(s) via an alternate method. (R1)

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Evidence Retention

The Load-Serving Entity shall keep data or evidence to show compliance with R1 for the most recent three months plus the current month unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an entity 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

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	<i>Operations Planning, Same-day Operations</i>	<i>Lower</i>	N/A	N/A	N/A	The Load-Serving Entity used Point to Point Transmission Service for an intra-Balancing Authority Area transfer, and did not submit a Request for Interchange for an intra-Balancing Authority transfer that is not included in congestion management procedure(s) via an alternate method.

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Application Guidelines

Version History

Version	Date	Action	Change Tracking
1	February 6, 2014	Adopted by the NERC Board of Trustees	New standard developed
1	June 30, 2014	FERC letter order issued approving INT-011-1.	
1.1	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
1.1	November 26, 2014	FERC letter order approving errata changes.	