

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

INT-009-2.1 – Implementation of Interchange

***This section to be completed by the Compliance Enforcement Authority.***

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| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:**  | Registered name of entity being audited |
| **NCR Number:**  | NCRnnnnn |
|  **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:**  | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:**  | Supplied by CEA |

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **PA** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** | X |  |  |  |  |  |  |  |  |  |  |  |
| **R2** | X |  |  |  |  |  |  |  |  |  |  |  |
| **R3** | X |  |  |  |  |  |  |  |  |  |  |  |

**Legend:**

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| --- | --- |
| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

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| --- | --- | --- | --- |
| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |

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| **Req.** | **Areas of Concern** |
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| **Req.** | **Recommendations** |
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| **Req.** | **Positive Observations** |
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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

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| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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R1 Supporting Evidence and Documentation

**R1**. Each Balancing Authority shall agree with each of its Adjacent Balancing Authorities that its Composite Confirmed Interchange with that Adjacent Balancing Authority, at mutually agreed upon time intervals, excluding Dynamic Schedules and Pseudo-Ties and including any Interchange per INT-010-2 not yet captured in the Composite Confirmed Interchange, is:

* 1. Identical in magnitude to that of the Adjacent Balancing Authority, and
	2. Opposite in sign or direction to that of the Adjacent Balancing Authority.

**M1.** The Balancing Authority shall have evidence (such as dated logs, voice recordings, electronic records, or other evidence) that its Composite Confirmed Interchange, excluding Dynamic Schedules and Pseudo-Ties and including any Interchange as directed per INT-010-2 not yet captured in the Composite Confirmed Interchange, was agreed to by each Adjacent Balancing Authority, identical in magnitude to those of each Adjacent Balancing Authority, and opposite in sign to that of each Adjacent Balancing Authority. (R1)

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:[[3]](#endnote-1)

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated logs, voice recordings, electronic records, or other evidence that entity’s Composite Confirmed Interchange, as adjusted as described in R1, was agreed to by each Adjacent Balancing Authority, identical in magnitude and opposite in sign. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-009-2.1, R1

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R1) Select a sample of Composite Confirmed Interchanges with Adjacent Balancing Authorities, and examine evidence to verify entity and Adjacent Balancing Authority agree the interchange is as follows: |
|  | (Part 1.1) Identical in magnitude to that of the Adjacent Balancing Authority. |
|  | (Part 1.2) Opposite in sign or direction to that of the Adjacent Balancing Authority. |
| **Note to Auditor:**  |

Auditor Notes:

R2 Supporting Evidence and Documentation

**R2.** The Attaining Balancing Authority and the Native Balancing Authority shall use a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Actual Net Interchange (NIA) term of their respective control ACE (or alternate control process).

**M2.** The Balancing Authority shall have evidence (such as dated logs, voice recordings, electronic records, written agreement or other evidence) that it used a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Actual Net Interchange (NIA) term of their respective control ACE (or alternate control process). (R2)

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated logs, voice recordings, electronic records, written agreements or other evidence that entity used a dynamic value to account for the Pseudo-Tie in the Actual Net Interchange term of their respective control ACE in accordance with R2. |
| Energy Management System displays or other evidence to demonstrate the list of values used in calculating the Net Actual Interchange for use in the entity’s ACE equation for those Pseudo-Ties implemented and operated during the compliance monitoring period. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-009-2.1, R2

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R2) For all or a sample of Attaining or Native Balancing Authorities, review evidence to verify entity used a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Net Actual Interchange (NIA) term of their respective control ACE (or alternate control process). |
| **Note to Auditor:** Auditors should review the values included in the calculation of Net Actual Interchange used in the entity’s ACE equation to verify the data for any Pseudo-Ties that were implemented or operated during the compliance monitoring period. |

Auditor Notes:

R3 Supporting Evidence and Documentation

**R3.** Each Balancing Authority in whose area the high-voltage direct current tie is controlled shall coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie.

**M3.** The Balancing Authority shall have evidence (such as dated logs, electronic records, or other evidence) that it coordinated the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie. (R3)

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated logs, electronic records, or other evidence that entity coordinated the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-009-2.1 R3

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R3) For all, or a sample of, Confirmed Interchange implemented across a high-voltage direct current tie during the compliance monitoring period, verify entity coordinated the Confirmed Interchange with the Transmission Operator of the high-voltage direct current tie. |
| **Note to Auditor:** If entity did not implement any Confirmed Interchange for high-voltage direct current ties during the compliance monitoring period, then Requirement R3 is not applicable. |

Auditor Notes:

Additional Information:

Reliability Standard



Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

Regulatory Background

INT-009-1 was approved by FERC in [Order No. 693](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf) on March 16, 2007. In its approval, the Commission directed the NERC to clarify which reliability entities have the responsibility for ensuring proper implementation of interchange transactions that have received reliability assessments and to clarify the applicability of the Standard.[[4]](#footnote-3) INT-009-2 has been expanded to clarify the role of the Balancing Authority in Interchanges.

**FERC Orders**

**Letter Order**

**North American Electric Reliability Corp.., Docket No. RD14-4-000 (June 30, 2014) (letter order).** Order approving proposed Reliability Standards for Interchange Scheduling and Coordination.

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/INT%20Letter%20Order.pdf>

Page 2. FERC approved “Reliability Standard INT-009-[2 which requires] balancing authorities to implement the interchange as agreed during the interchange confirmation process.”

Order No. 693.

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf>

P 875 FERC approved Reliability Standard INT-009-1 as mandatory and enforceable. “Our understanding is that a source and sink balancing authority will serve as the interchange authority until the ERO has clarified the role and responsibility of an interchange authority in the modification of the Functional Model and in the registration process.”

Revision History for RSAW

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 2/23/2018 | NERC Compliance Assurance, RSAW Task Force | New Document contains a minor revision to update to INT-009-2.1 |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The RSAW may provide a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserve the right to request additional evidence from the registered entity that is not included in this RSAW. This RSAW may include excerpts from FERC Orders and other regulatory references which are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)
4. *Mandatory Reliability Standards for the Bulk‐Power System*, 118 FERC ¶ 61,218 at P874-875 (March 16, 2007) (“Order 693”). [↑](#footnote-ref-3)