

August 27, 2014

VIA ELECTRONIC FILING

David Erickson
President and Chief Executive Officer
Alberta Electric System Operator
2500, 330 - 5 Avenue SW
Calgary, Alberta
T2P 0L4

RE: *North American Electric Reliability Corporation*

Dear Mr. Erickson:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Errata to Interchange Scheduling and Coordination Reliability Standards. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

NERC understands the AESO may adopt the proposed reliability standards subject to Alberta legislation, principally as established in the *Transmission Regulation* (“the T Reg.”). Briefly, it is NERC’s understanding that the T Reg. requires the following with regard to the adoption in Alberta of a NERC Reliability Standard:

1. The AESO must consult with those market participants that it considers are likely to be directly affected.
2. The AESO must forward the proposed reliability standards to the Alberta Utilities Commission for review, along with the AESO’s recommendation that the Commission approve or reject them.
3. The Commission must follow the recommendation of the AESO that the Commission approve or reject the proposed reliability standards unless an interested person satisfies the Commission that the AESO’s recommendation is “technically deficient” or “not in the public interest.”

Further, NERC has been advised by the AESO that the AESO practice with respect to the adoption of a NERC Reliability Standard includes a review of the NERC Reliability Standard for applicability to Alberta legislation and electric industry practice. NERC has been advised that, while the objective is to adhere as closely as possible to the requirements of the NERC Reliability Standard, each NERC Reliability Standard

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approved in Alberta (called an “Alberta reliability standard”) generally varies from the similar and related NERC Reliability Standard.

NERC requests the AESO consider the proposed changes to Interchange Scheduling and Coordination Reliability Standards for adoption in Alberta as an “Alberta reliability standard(s),” subject to the required procedures and legislation of Alberta.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Stacey Tyrewala

Stacey Tyrewala
*Senior Counsel for the North American Electric
Reliability Corporation*

Enclosure

**BEFORE THE
ALBERTA ELECTRIC SYSTEM OPERATOR**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
OF ERRATA TO
INTERCHANGE SCHEDULING AND COORDINATION RELIABILITY STANDARDS**

The North American Electric Reliability Corporation (“NERC”)¹ hereby submits errata to the following four Reliability Standards:

- INT-004-3 (Dynamic Transfers),
- INT-009-2 (Implementation of Interchange),
- INT-010-2 (Interchange Initiation and Modification for Reliability), and
- INT-011-1 (Intra Balancing Authority Transaction Identification).

Exhibit A consists of clean versions of the proposed Reliability Standards and **Exhibit B** shows the proposed redlined changes. These errata changes have an effective date as provided in the implementation plan, in order to provide clarity and regulatory certainty to affected entities, as explained below.²

I. Background

On March 11, 2014, NERC submitted a filing of revised Reliability Standards INT-004-3 (Dynamic Transfers), INT-006-4 (Evaluation of Interchange Transactions), INT-009-2 (Implementation of Interchange), INT-010-2 (Interchange Initiation and Modification for Reliability), and one new proposed Reliability Standard INT-011-1 (Intra Balancing Authority

¹ The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the FPA on July 20, 2006. *N. Amer. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

² Consistent with NERC’s Reliability Standards numbering conventions, the number of these standards will be incremented as follows: INT-004-3.1; INT-009-2.1; INT-010-2.1; and INT-011-1.1.

Transaction Identification), the associated implementation plan, violation risk factors and violation severity levels, and the retirement of certain currently-effective Reliability Standards. NERC also proposed revisions to ten definitions and four new definitions to be added to the Glossary of Terms Used in NERC Reliability Standards.

On July 30, 2014, NERC submitted an informational filing noting that due to a clerical error there is an inconsistency between the implementation plan and the effective date language in the following Reliability Standards: INT-004-3 (Dynamic Transfers), INT-009-2 (Implementation of Interchange), INT-010-2 (Interchange Initiation and Modification for Reliability), and INT-011-1 (Intra Balancing Authority Transaction Identification). NERC determined that this inconsistency is the result of an administrative error and that the implementation plan contains the correct effective date language. In order to provide clarity and transparency, NERC pursued errata changes to these Reliability Standards through the standard development process, pursuant to the Standard Processes Manual. The NERC Standards Committee approved these changes on August 20, 2014.

II. Errata

The proposed errata replaces the language in the effective date section of each affected Reliability Standard with “See implementation plan” in order to clarify that the implementation plan contains the correct effective date language. These proposed changes are also consistent with other NERC Reliability Standards.³

NERC proposes as an effective date the date that these Reliability Standards become effective pursuant to the implementation plan. These proposed corrections will provide clarity and regulatory certainty to industry stakeholders.

³ See BAL-003-1, MOD-025-2, MOD-032-1, PRC-019-1, *etc.*

III. Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

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Respectfully submitted,

/s/ Stacey Tyrewala

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*Counsel for the North American Electric
Reliability Corporation*

August 27, 2014

Exhibit A: Clean INT Standards

A. Introduction

1. **Title:** **Dynamic Transfers**
2. **Number:** INT-004-3.1
3. **Purpose:** To ensure Dynamic Schedules and Pseudo-Ties are communicated and accounted for appropriately in congestion management procedures.
4. **Applicability:**
 - 4.1. Balancing Authority
 - 4.2. Purchasing-Selling Entity
5. **Effective Date:**

See implementation plan.

6. **Background:**

This standard was revised as part of the Project 2008-12 Coordinate Interchange Standards effort to ensure the transparency of Dynamic Transfers.

- R1 is modified from Requirement R1 of INT-001-3 and transferred into INT-004-3. The revised requirement now includes Pseudo-Ties.
- R2 is modified from INT-004-2 to separate the triggers for the review of the Dynamic Transfer and when a modification is required for the Dynamic Transfer.
- R1 and R2 now also apply to Pseudo-Ties. The requirements to create an RFI for Pseudo-Ties ensure that all entities involved are aware of the Dynamic Transfer and agree that the various responsibilities associated with the dynamic transfer have been agreed upon.
- R3 is created to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie.
- The Guidelines and Technical Basis section was added to provide a summary of the considerations that must be given when establishing any Dynamic Transfer.

B. Requirements and Measures

- R1.** Each Purchasing-Selling Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time¹ Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning, Same-day Operations*]
- M1.** The Purchasing-Selling Entity shall have evidence (such as dated and time-stamped electronic logs or other evidence) that a Request for Interchange was submitted for Dynamic Schedules and Pseudo-Ties as an on-time Arranged Interchange to the Sink Balancing Authority for the Dynamic Schedule or Pseudo-Tie. For Pseudo-Ties included in congestion management procedure(s) via an alternate method, the Purchasing-Selling Entity shall have evidence such as Interchange Distribution Calculator model data or written / electronic agreement with a Balancing Authority to include the Pseudo-Tie in the congestion management procedure(s). (R1)
- R2.** The Purchasing-Selling Entity that submits a Request for Interchange in accordance with Requirement R1 shall ensure the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie is updated for future hours in order to support congestion management procedures if any one of the following occurs: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning, Same Day Operations, Real Time Operations*]
- 2.1.** For Confirmed Interchange greater than 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than 10% for that hour and that deviation is expected to persist.
- 2.2.** For Confirmed Interchange less than or equal to 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than 25 MW for that hour and that deviation is expected to persist.
- 2.3.** The Purchasing-Selling Entity receives notification from a Reliability Coordinator or Transmission Operator to update the Confirmed Interchange.
- M2.** The Purchasing-Selling Entity shall have evidence (such as dated and time-stamped electronic logs, reliability studies or other evidence) that it updated its Confirmed Interchange Requests for Interchange when the deviation met the criteria in Requirement R2, Parts 2.1- 2.3. (R2)
- R3.** Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support

¹ Please refer to the timing tables of INT-006-4.

congestion management procedures. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

- M3.** The Balancing Authority shall have evidence (such as dated and time-stamped electronic logs or other evidence) that it only implemented or operated a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication. (R3)

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Evidence Retention

The Purchasing-Selling Entity 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 Purchasing-Selling Entity shall maintain evidence to show compliance with R1 and R2 for the most recent 3 calendar months plus the current month.
- The Balancing Authority shall maintain evidence to show compliance with R3 for the most recent 3 calendar months plus the current month.

If a Purchasing-Selling Entity or 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 Check

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	Operations Planning, Same Day Operations	Lower	N/A	N/A	N/A	The Purchasing-Selling Entity secured energy to serve Load via a Dynamic Schedule or Pseudo-Tie, but did not ensure that a Request for Interchange was submitted as on-time Arranged Interchange to the Sink Balancing Authority, and did not include information about the Pseudo-Tie in congestion management procedure(s) via an alternate method.
R2	Operations Planning, Same Day Operations	Lower	N/A	N/A	N/A	A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3 and was expected to persist, but the Purchasing-Selling Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours.

Standard INT-004-3.1 — Dynamic Transfers

R3	Operations Planning	Lower	N/A	N/A	N/A	The Balancing Authority implemented or operated a Pseudo-Tie that was not included in the NAESB Electric Industry Registry publication.
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D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

The complete Dynamic Transfer Reference Guidelines document is included in the NERC Operating Manual at:
http://www.nerc.com/files/opman_3_2012.pdf.

Application Guidelines

Guidelines and Technical Basis

This standard requires the submittal of an Arranged Interchange for both Dynamic Schedules and Pseudo-Ties. In general, Pseudo-Ties are accounted for by all parties as actual Interchange and Dynamic Schedules are accounted for as Scheduled Interchange. The obligations of the entities involved in each type of Dynamic Transfer are dependent on the type of Dynamic Transfer selected. These guidelines provide items that should be considered when determining which type of Dynamic Transfer should be utilized for a given situation.

General Considerations When Establishing and Implementing Dynamic Transfers:

- During the setup of a Dynamic Transfer, a common source of data is established. During that setup, plans should also be established for what will occur when that normal source of data is not available.
- Following any reliability adjustments to a Dynamic Schedule, each Balancing Authority shall use agreed upon values that ensure any limit established by the reliability adjustment is not exceeded.
 - Since the Net Scheduled Interchange term used in its control ACE (or alternate control process) is not the value from the Confirmed Interchange, but from some common source, each Balancing Authority must be prepared to take action to control the data feeding that common source.
- Each Attaining Balancing Authority shall incorporate resources attained via Dynamic Schedules or Pseudo-Ties into its processes for establishing Contingency Reserve requirements, as well as for the purposes of measuring Contingency Reserve response.

The table below describes and outlines the obligations associated with the typical historical application of Pseudo-Ties and Dynamic Schedules related to many of the topics addressed above. In practical application, however, both the Native Balancing Authority and Attaining Balancing Authority can agree to exchange the obligations from that shown in the table below.

BA's Obligation/modeling	Pseudo-Tie	Dynamic Schedule
Generation planning and reporting and outage coordination	Attaining BA	Typically, Native BA but may be re-assigned (wholly or a portion) to the Attaining BA
CPS and DCS recovery /reporting and RMS	Attaining BA	Attaining and/or Native BA (depending on agreements)
Operational responsibility	Attaining BA	Native BA
BA services FERC OATT Schedules 3–6 and other ancillary services	Attaining BA	Native BA

Application Guidelines

as required		
Ancillary services associated with transmission FERC OATT Schedules 1–2 and other ancillary services as required	Attaining/Native BA (as agreed)	Attaining/Native BA (as agreed)
ACE Frequency Bias calc/setting	The Native and Attaining BA(s) shall adjust the control logic that determines their Frequency Bias Setting to account for the Frequency Bias characteristics of the loads and/or resources being assigned between BA(s) by the Pseudo-Tie	The Attaining BA should include the Load from its Dynamic Schedule as a part of its forecast load to set Frequency Bias requirement. The Native BA should change its Load used to set Frequency Bias setting by the same amount in the opposite direction.
Load forecasting and reporting	Attaining BA	Native BA
Manual load shedding during an Energy Emergency Alert (EEA)	Attaining BA	Native BA

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.

Application Guidelines

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 R1:

This Requirement is intended to ensure that an RFI is submitted for a Dynamic Schedule or Pseudo-Tie. If a forecast is available, it is expected that the forecast will be used to indicate the energy profile on the RFI. If no forecast is available, the energy profile cannot exceed the maximum expected transaction MW amount.

Rationale R2:

This requirement does not preclude tags from being updated at any time. The requirement specifies conditions under which the tag must be updated.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by the NERC Board of Trustees	Revised
2	October 9, 2007	Adopted by the NERC Board of Trustees (Removal of WECC Waiver)	Revised
2	July 21, 2008	Approved by FERC	Revised
3	February 6, 2014	Adopted by the NERC Board of Trustees	Revised
3	June 30, 2014	FERC letter order issued approving INT-004-3	

A. Introduction

1. **Title:** **Implementation of Interchange**
2. **Number:** **INT-009-2.1**
3. **Purpose:** To ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process.
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 effort to combine requirements from the various INT standards into a fewer number of standards and in a logical sequence. The focus of INT-009-2 continues to be the Balancing Authority to Balancing Authority Interchange confirmation process for Interchange Transactions prior to their implementation.

The Requirements in INT-009-2 have been expanded to include previous Measures from INT-009-1 and acknowledge Dynamic Schedules and Pseudo-Ties. A new term “Composite Confirmed Interchange” has been introduced.

The content of INT-009-2 has been revised and expanded in the following manner:

- R1 was combined with INT-003-3 R1 and modified to ensure that a Balancing Authority agrees to a Composite Confirmed Interchange with each of its Adjacent Balancing Authorities.
- R2 was created to ensure that Adjacent Balancing Authorities incorporating a Pseudo-Tie agree to a common source for their Actual Net Interchange term for their ACE controls.
- R3 was created by revising R1.2 from INT-003-3. This requirement ensures that the Balancing Authority that controls a high-voltage direct current tie coordinates the Confirmed Interchange.

B. Requirements and Measures

- 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: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

- 1.1.** Identical in magnitude to that of the Adjacent Balancing Authority, and
 - 1.2.** 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)
- 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 (NI_A) term of their respective control ACE (or alternate control process). [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- 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 (NI_A) term of their respective control ACE (or alternate control process). (R2)
- 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. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations, Operations Planning*]
- 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)

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 3 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

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real-time Operations	Medium	N/A	N/A	N/A	The Balancing Authority did not reach agreement with an Adjacent Balancing Authority on the magnitude or sign of its Composite Confirmed Interchange, 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.
R2	Real-time Operations	Medium	N/A	N/A	N/A	The Balancing Authority failed to use a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Actual Net Interchange (NI _A) term of their respective control ACE (or alternate control process).
R3	Real-time Operations, Operations Planning	Medium	N/A	N/A	N/A	The Balancing Authority failed to coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie.

Application Guidelines

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Guidelines and Technical Basis

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 R2: R12.3 of BAL-005-2b addresses common metering for Dynamic Schedules and Pseudo-Ties but not their implementation into ACE. Requirement R2 is parallel to R10 of BAL-005-2b which only addresses Dynamic Schedules. Presently, there is a gap in the BAL standards that this requirement fills for Pseudo-Ties.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by the NERC Board of Trustees	Revised
2	February 6, 2014	Adopted by the NERC Board of Trustees	Revised
2	June 30, 2014	FERC letter order issued approving INT-009-2	

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

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	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.
R2	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.
R3	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

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

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	

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.	

Exhibit B: Redline INT Standards

A. Introduction

1. **Title:** Dynamic Transfers
2. **Number:** INT-004-3.1
3. **Purpose:** To ensure Dynamic Schedules and Pseudo-Ties are communicated and accounted for appropriately in congestion management procedures.
4. **Applicability:**
 - 4.1. Balancing Authority
 - 4.2. Purchasing-Selling Entity
5. **Effective Date:**

~~First day of the second calendar quarter after the date that this standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is six months after the date this standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction. See [implementation plan](#).~~

6. **Background:**

This standard was revised as part of the Project 2008-12 Coordinate Interchange Standards effort to ensure the transparency of Dynamic Transfers.

- R1 is modified from Requirement R1 of INT-001-3 and transferred into INT-004-3. The revised requirement now includes Pseudo-Ties.
- R2 is modified from INT-004-2 to separate the triggers for the review of the Dynamic Transfer and when a modification is required for the Dynamic Transfer.
- R1 and R2 now also apply to Pseudo-Ties. The requirements to create an RFI for Pseudo-Ties ensure that all entities involved are aware of the Dynamic Transfer and agree that the various responsibilities associated with the dynamic transfer have been agreed upon.
- R3 is created to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie.
- The Guidelines and Technical Basis section was added to provide a summary of the considerations that must be given when establishing any Dynamic Transfer.

B. Requirements and Measures

- R1.** Each Purchasing-Selling Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time¹ Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning, Same-day Operations*]
- M1.** The Purchasing-Selling Entity shall have evidence (such as dated and time-stamped electronic logs or other evidence) that a Request for Interchange was submitted for Dynamic Schedules and Pseudo-Ties as an on-time Arranged Interchange to the Sink Balancing Authority for the Dynamic Schedule or Pseudo-Tie. For Pseudo-Ties included in congestion management procedure(s) via an alternate method, the Purchasing-Selling Entity shall have evidence such as Interchange Distribution Calculator model data or written / electronic agreement with a Balancing Authority to include the Pseudo-Tie in the congestion management procedure(s). (R1)
- R2.** The Purchasing-Selling Entity that submits a Request for Interchange in accordance with Requirement R1 shall ensure the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie is updated for future hours in order to support congestion management procedures if any one of the following occurs: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning, Same Day Operations, Real Time Operations*]
- 2.1.** For Confirmed Interchange greater than 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than 10% for that hour and that deviation is expected to persist.
- 2.2.** For Confirmed Interchange less than or equal to 250 MW for the last hour, the actual hourly integrated energy deviates from the Confirmed Interchange by more than 25 MW for that hour and that deviation is expected to persist.
- 2.3.** The Purchasing-Selling Entity receives notification from a Reliability Coordinator or Transmission Operator to update the Confirmed Interchange.
- M2.** The Purchasing-Selling Entity shall have evidence (such as dated and time-stamped electronic logs, reliability studies or other evidence) that it updated its Confirmed Interchange Requests for Interchange when the deviation met the criteria in Requirement R2, Parts 2.1- 2.3. (R2)
- R3.** Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support

¹ Please refer to the timing tables of INT-006-4.

congestion management procedures. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

- M3.** The Balancing Authority shall have evidence (such as dated and time-stamped electronic logs or other evidence) that it only implemented or operated a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication. (R3)

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Evidence Retention

The Purchasing-Selling Entity 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 Purchasing-Selling Entity shall maintain evidence to show compliance with R1 and R2 for the most recent 3 calendar months plus the current month.
- The Balancing Authority shall maintain evidence to show compliance with R3 for the most recent 3 calendar months plus the current month.

If a Purchasing-Selling Entity or 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 Check

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	Operations Planning, Same Day Operations	Lower	N/A	N/A	N/A	The Purchasing-Selling Entity secured energy to serve Load via a Dynamic Schedule or Pseudo-Tie, but did not ensure that a Request for Interchange was submitted as on-time Arranged Interchange to the Sink Balancing Authority, and did not include information about the Pseudo-Tie in congestion management procedure(s) via an alternate method.
R2	Operations Planning, Same Day Operations	Lower	N/A	N/A	N/A	A deviation met or exceeded the criteria in Requirement R2 Parts 2.1- 2.3 and was expected to persist, but the Purchasing-Selling Entity did not ensure that the Confirmed Interchange associated with that Dynamic Schedule or Pseudo-Tie was updated for future hours.

Standard INT-004-3.1 — Dynamic Transfers

R3	Operations Planning	Lower	N/A	N/A	N/A	The Balancing Authority implemented or operated a Pseudo-Tie that was not included in the NAESB Electric Industry Registry publication.
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D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

The complete Dynamic Transfer Reference Guidelines document is included in the NERC Operating Manual at:

http://www.nerc.com/files/opman_3_2012.pdf.

Application Guidelines

Guidelines and Technical Basis

This standard requires the submittal of an Arranged Interchange for both Dynamic Schedules and Pseudo-Ties. In general, Pseudo-Ties are accounted for by all parties as actual Interchange and Dynamic Schedules are accounted for as Scheduled Interchange. The obligations of the entities involved in each type of Dynamic Transfer are dependent on the type of Dynamic Transfer selected. These guidelines provide items that should be considered when determining which type of Dynamic Transfer should be utilized for a given situation.

General Considerations When Establishing and Implementing Dynamic Transfers:

- During the setup of a Dynamic Transfer, a common source of data is established. During that setup, plans should also be established for what will occur when that normal source of data is not available.
- Following any reliability adjustments to a Dynamic Schedule, each Balancing Authority shall use agreed upon values that ensure any limit established by the reliability adjustment is not exceeded.
 - Since the Net Scheduled Interchange term used in its control ACE (or alternate control process) is not the value from the Confirmed Interchange, but from some common source, each Balancing Authority must be prepared to take action to control the data feeding that common source.
- Each Attaining Balancing Authority shall incorporate resources attained via Dynamic Schedules or Pseudo-Ties into its processes for establishing Contingency Reserve requirements, as well as for the purposes of measuring Contingency Reserve response.

The table below describes and outlines the obligations associated with the typical historical application of Pseudo-Ties and Dynamic Schedules related to many of the topics addressed above. In practical application, however, both the Native Balancing Authority and Attaining Balancing Authority can agree to exchange the obligations from that shown in the table below.

BA's Obligation/modeling	Pseudo-Tie	Dynamic Schedule
Generation planning and reporting and outage coordination	Attaining BA	Typically, Native BA but may be re-assigned (wholly or a portion) to the Attaining BA
CPS and DCS recovery /reporting and RMS	Attaining BA	Attaining and/or Native BA (depending on agreements)
Operational responsibility	Attaining BA	Native BA
BA services FERC OATT Schedules 3–6 and other ancillary services	Attaining BA	Native BA

Application Guidelines

as required		
Ancillary services associated with transmission FERC OATT Schedules 1–2 and other ancillary services as required	Attaining/Native BA (as agreed)	Attaining/Native BA (as agreed)
ACE Frequency Bias calc/setting	The Native and Attaining BA(s) shall adjust the control logic that determines their Frequency Bias Setting to account for the Frequency Bias characteristics of the loads and/or resources being assigned between BA(s) by the Pseudo-Tie	The Attaining BA should include the Load from its Dynamic Schedule as a part of its forecast load to set Frequency Bias requirement. The Native BA should change its Load used to set Frequency Bias setting by the same amount in the opposite direction.
Load forecasting and reporting	Attaining BA	Native BA
Manual load shedding during an Energy Emergency Alert (EEA)	Attaining BA	Native BA

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.

Application Guidelines

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 R1:

This Requirement is intended to ensure that an RFI is submitted for a Dynamic Schedule or Pseudo-Tie. If a forecast is available, it is expected that the forecast will be used to indicate the energy profile on the RFI. If no forecast is available, the energy profile cannot exceed the maximum expected transaction MW amount.

Rationale R2:

This requirement does not preclude tags from being updated at any time. The requirement specifies conditions under which the tag must be updated.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by the NERC Board of Trustees	Revised
2	October 9, 2007	Adopted by the NERC Board of Trustees (Removal of WECC Waiver)	Revised
2	July 21, 2008	Approved by FERC	Revised
3	February 6, 2014	Adopted by the NERC Board of Trustees	Revised
3	June 30, 2014	FERC letter order issued approving INT-004-3	

A. Introduction

1. **Title:** Implementation of Interchange
2. **Number:** INT-009-2.1
3. **Purpose:** To ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process.
4. **Applicability:**
 - 4.1. Balancing Authority.
5. **Effective Date:**

~~The first day of the first calendar quarter that is six months after the date that this standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is six months after the date this standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction. See implementation plan.~~

6. **Background:**

This standard was revised as part of the Project 2008-12 Coordinate Interchange Standards effort to combine requirements from the various INT standards into a fewer number of standards and in a logical sequence. The focus of INT-009-2 continues to be the Balancing Authority to Balancing Authority Interchange confirmation process for Interchange Transactions prior to their implementation.

The Requirements in INT-009-2 have been expanded to include previous Measures from INT-009-1 and acknowledge Dynamic Schedules and Pseudo-Ties. A new term “Composite Confirmed Interchange” has been introduced.

The content of INT-009-2 has been revised and expanded in the following manner:

- R1 was combined with INT-003-3 R1 and modified to ensure that a Balancing Authority agrees to a Composite Confirmed Interchange with each of its Adjacent Balancing Authorities.
- R2 was created to ensure that Adjacent Balancing Authorities incorporating a Pseudo-Tie agree to a common source for their Actual Net Interchange term for their ACE controls.
- R3 was created by revising R1.2 from INT-003-3. This requirement ensures that the Balancing Authority that controls a high-voltage direct current tie coordinates the Confirmed Interchange.

B. Requirements and Measures

- 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: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- 1.1.** Identical in magnitude to that of the Adjacent Balancing Authority, and
 - 1.2.** 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)
- 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 (NI_A) term of their respective control ACE (or alternate control process). [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- 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 (NI_A) term of their respective control ACE (or alternate control process). (R2)
- 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. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations, Operations Planning*]
- 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)

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 3 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

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real-time Operations	Medium	N/A	N/A	N/A	The Balancing Authority did not reach agreement with an Adjacent Balancing Authority on the magnitude or sign of its Composite Confirmed Interchange, 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.
R2	Real-time Operations	Medium	N/A	N/A	N/A	The Balancing Authority failed to use a dynamic value emanating from an agreed upon common source to account for the Pseudo-Tie in the Actual Net Interchange (NI _A) term of their respective control ACE (or alternate control process).
R3	Real-time Operations, Operations Planning	Medium	N/A	N/A	N/A	The Balancing Authority failed to coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie.

Application Guidelines

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Guidelines and Technical Basis

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 R2: R12.3 of BAL-005-2b addresses common metering for Dynamic Schedules and Pseudo-Ties but not their implementation into ACE. Requirement R2 is parallel to R10 of BAL-005-2b which only addresses Dynamic Schedules. Presently, there is a gap in the BAL standards that this requirement fills for Pseudo-Ties.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	May 2, 2006	Adopted by the NERC Board of Trustees	Revised
2	February 6, 2014	Adopted by the NERC Board of Trustees	Revised
2	June 30, 2014	FERC letter order issued approving INT-009-2	

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:**

~~The first day of the first calendar quarter that is six months after the date that this standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is six months after the date this standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.— 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

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	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.
R2	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a Reliability Adjustment

Standard INT-010-2.1 — Interchange Initiation and Modification for Reliability

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.
R3	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

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

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	

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:**

~~The first day of the first calendar quarter that is six months after the date that this standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is six months after the date this standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction. 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.	