

### Standard Development Timeline

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

#### Development Steps Completed

1. SAR posted for comment (July 2, 2008 through July 31, 2008).
2. Revised SAR and response to comments posted (December 1, 2008).
3. SC authorized moving the SAR forward to standard development (December 16–17, 2008).
4. SDT appointed (February 12, 2009).
5. First draft of proposed standard posted (November 10, 2009).
6. Project became inactive until February, 2013.
7. Second draft of standard posted for 30 day informal comment period (July 25-August 23, 2013).
- 7-8. [Third draft of standard posted for 45 day formal comment period with parallel initial ballot \(September 30 – November 15, 2013\).](#)

#### Description of Current Draft

This is the ~~third-fourth~~ draft of the proposed standard and is being posted for stakeholder comments and an ~~initial-additional~~ ballot. This draft includes the modifications based on comments submitted by stakeholders, ~~as well as items identified in the SAR and applicable FERC directives from FERC Order 693.~~

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Parallel <del>Initial</del> <a href="#">Additional Initial</a> Ballot	<del>December</del> <del>September–</del> <del>October 2013 –</del> <a href="#">January 2014</a>
Recirculation ballot	<del>January</del> <del>2014</del> <a href="#">December 2013</a>
BOT adoption	February 2014
File standard with regulatory authorities.	February 2014

## Standard INT-010-2 — Interchange Initiation and Modification for Reliability

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### Effective Dates

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.

### Version History

Version	Date	Action	Change Tracking
1	TBD		New

## Standard INT-010-2 — Interchange Initiation and Modification for Reliability

When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.

### A. Introduction

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

~~4.2.~~

5. **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.
- ~~R4 was created to address the fact that when a Reliability Adjustment Arranged Interchange is approved for a Pseudo Tie or Dynamic Schedule, the Native and Attaining Balancing Authorities must take action to meet MW relief obligations resulting from an implemented Reliability Adjustment Arranged. action is required by the Balancing Authority to ensure that the data source feeding the Net Interchange value of ACE value does not exceed the MW value of the Reliability Adjustment Arranged Interchange.~~

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### 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

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.

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*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 ~~that 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 ~~created-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 RFI was ~~created-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)

~~**R4.** Each Balancing Authority involved in a Pseudo-Tie or Dynamic Schedule shall ensure the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange is not exceeded in their ACE equation. [*Violation Risk Factor: Medium*] [*Time Horizon: Real Time Operations*]~~

~~**M4.** The Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that,~~

~~Rationale for R1: The Balancing Authority is responsible for implementing the Confirmed Interchange that results from a Reliability Adjustment Arranged Interchange. Future actions may be taken by the Balancing Authority or other entities that may reduce or eliminate the curtailment.~~

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~~following any Reliability Adjustment Arranged Interchange on a Pseudo Tie or Dynamic Schedule, it ensured the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange was not exceeded in their ACE equation. (R4)~~

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

Regional Entity

#### 1.2. Evidence Retention

The Balancing Authority and Transmission Service provider shall each keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority 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, and R4~~ for the most recent three calendar months plus the current month.
- If a Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant.

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

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

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

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**Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real Time Operations	Lower	The Balancing Authority that experienced a loss of resources <u>covered by an energy sharing agreement or other reliability needs</u> 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.	The Balancing Authority that experienced a loss of resources <u>covered by an energy sharing agreement or other reliability needs</u> 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.	The Balancing Authority that experienced a loss of resources <u>covered by an energy sharing agreement or other reliability needs</u> 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.	The Balancing Authority that experienced a loss of resources <u>covered by an energy sharing agreement or other reliability needs</u> 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.  OR The Balancing Authority that experienced a loss of resources <u>covered by an energy sharing agreement or other reliability needs</u> covered by an energy sharing agreement did not ensure that a RFI was submitted following the resource loss.
R2	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a Reliability Adjustment Arranged Interchange reflecting <del>the a</del> modification was submitted within 60 minutes following the start of <del>the that</del> modification.

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R3	Real Time Operations	Lower	N/A	N/A	N/A	The Sink Balancing Authority did not ensure that a RFI was submitted within 60 minutes following the start of the scheduled Interchange.
R4	Real Time Operations	Lower	N/A	N/A	N/A	The Balancing Authority involved in a Pseudo Tie or Dynamic Schedule failed to ensure that the MW value from the Confirmed Interchange resulting from a Reliability Adjustment Arranged Interchange was not exceeded in its ACE equation.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## Application Guidelines

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### Guidelines and Technical Basis

#### General Considerations for Curtailments of Dynamic Transfers

In NERC's Dynamic Transfer Reference Guidelines, Version 2, it describes unique handling of eCurtailments of dynamic transfers.

For Dynamic Schedules:

**If transmission service between the Ssource and sSink 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 eCurtailment 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-tTies:

**If transmission service between the nNative and nAttaining 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 that when eCurtailments (typically communicated through e-Tags) of dynamic transfers occur, they require additional action by Balancing Authorities to ensure compliance with the Ccurtailment.

Curtailments of most tagged transactions are implemented through a change in the Source and Sink Balancing Authorities' ACE equations. However, changes, including eCurtailments, in Dynamic Schedule and Pseudo-tTie 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 eCurtailment.

**Requirement R1:**

**Requirement R2:**

**Requirement R3:**