Unofficial Comment Form

Project 2008-12 Coordinate Interchange Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=20ed789da717402e80b42a9176b134cb) to submit comments on the draft INT-004-3 and INT-010-2 standards. The electronic comment form must be completed by 8:00 p.m. Eastern on **January 22, 2013**.

If you have questions please contact [Steve Crutchfield](mailto:stephen.crutchfield@nerc.net) via email or by telephone at 609-651-9455.

The project page may be accessed by [clicking here](http://www.nerc.com/pa/Stand/Pages/Project-2008-12-Coordinate-Interchange-Standards.aspx).

## Background Information

The Coordinate Interchange Standard Drafting Team (CISDT) posted drafts of INT-004-3—Dyanmic Transfers, INT-006-4—Evaluation of Interchange Transactions, INT-009-2—Implementation of Interchange, INT-010-2—Interchange Initiation and Modification for Reliability, and INT-011-1—Intra-Balancing Authority Transaction Identification, along with nine revised definitions and four new definitions, for a 45-day comment and ballot period from September 30-November 15, 2013. Support for the standards and definitions was generally high. The CISDT considered each of the comments submitted and has incorporated those that the team found to improve the quality of the standards.

INT-006-4, INT-009-2, INT-011-2, and most of the definitions (Pseudo-Tie, Adjacent Balancing Authority, Confirmed Interchange, Intermediate Balancing Authority, Sink Balancing Authority, Source Balancing Authority, Dynamic Schedule, Reliability Adjustment Arranged Interchange, Composite Confirmed Interchange, Attaining Balancing Authority, Native Balancing Area) earned stakeholder approval of 68% or more in the ballot, and the CISDT did not make any substantive changes to these standards or definitions based on stakeholder comments. Those standards and definitions will proceed to final ballot.

INT-004-3 received 67.35% approval in the ballot, but the CISDT was persuaded by stakeholder comments to make the following improvements to the standard:

* Changed the definitions of Request for Interchange (RFI) and Arranged Interchange to enhance clarity. (While the revised definitions of Arranged Interchange and Request for Interchange received 77.82% approval as part of the package of all definitions, the CISDT was persuaded by stakeholder comments to make improvements to the definitions to add clarity.
* Changed Load-Serving Entity to Purchasing-Selling Entity in the Applicability and Compliance sections and in R1 and R2 in response to industry comments.
* Made changes to the Background section to reflect changes to the standards.
* Added language in the R1 Rationale section to clarify that if no forecast is available, the energy profile cannot exceed the maximum expected transaction MW amount.
* Added language in the R2 Rationale section to clarify that R2 does not preclude tags from being updated at any time, and that the requirement specifies conditions under which the tag must be updated.
* Made changes to R3 to clarify Balancing Authority obligations with respect to Pseudo-Ties included in the NAESB Electric Industry Registry publication.
* Modified the VSLs for R1, R2, and R3 to ensure that the language is consistent with the language in the requirements.
* Made minor changes to the definition of Sink Balancing Authority, Attaining Balancing Authority, Native Balancing Authority, and to the Background section and the R3 Rationale box for consistency or to correct typographical errors.
* Made various errata changes to ensure that capitalization of glossary terms and acronym usage is consistent across the standard.

INT-010-2 received 58.03% approval in the ballot, and the CISDT made the following improvements to address stakeholder comments:

* Added language and a Rationale box to R1 to provide clarity around “energy sharing agreement.”
* Deleted R4 in response to industry comments that R4 is primarily commercial equity-driven and provides only a marginal, if any, reliability benefit.
* Made minor changes to the Applicability Section, R1, R2, M2, and M3 for consistency or to correct typos.
* Modified the VSLs in R1 and R2 to ensure that the language is consistent with the language in the requirement.
* Made various errata changes to ensure that capitalization of glossary terms and acronym usage is consistent across the standard.

The revised two standards and two definitions are posted for a 45-day comment and ballot period from December 9, 2013-January 22, 2014, with a 10-day ballot period from January 10-22, 2014. **Note that all definitions have been stripped from the individual standards in favor of posting separate definition documents.**

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Question

1. The drafting team has revised INT-004-3 in response to stakeholder comments. Do you support the proposed changes?

Yes

No

Comments:

1. The drafting team has the definition of Request for Interchange (RFI) in response to stakeholder comments. Do you support the proposed changes?

Yes

No

Comments:

1. The drafting team has revised the definition of Arranged Interchange in response to stakeholder comments. Do you support the proposed changes?

Yes

No

Comments:

1. The drafting team has revised INT-010-2 in response to stakeholder comments. Do you support the proposed changes?

Yes

No

Comments: