

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

INT-006-4 – Evaluation of Interchange Transactions

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

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

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **IA** | **LSE** | **PA** | **PSE** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R2** |  |  |  |  |  |  |  |  |  |  |  |  |  |  | X |
| **R3** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R4** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R5** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

**Legend:**

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

Findings

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

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| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |
| **R4** |  |  |  |
| **R5** |  |  |  |

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

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

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

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

**R1**. Each Balancing Authority shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B.

* 1. Each Source and Sink Balancing Authority shall deny the Arranged Interchange or curtail Confirmed Interchange if it does not expect to be capable of supporting the magnitude of the Interchange, including ramping, throughout the duration of the Arranged Interchange.
	2. Each Balancing Authority shall deny the Arranged Interchange or curtail Confirmed Interchange if the Scheduling Path (proper connectivity of Adjacent Balancing Authorities) between it and its Adjacent Balancing Authorities is invalid.

**M1.** Each Balancing Authority shall have evidence (such as dated and time-stamped electronic logs, or other evidence) that it responded to each request for its approval to transition an Arranged Interchange to a Confirmed Interchange within the time defined in Attachment 1, Column B. (R1)

**Registered Entity Response (Required):**

**Compliance Narrative:**

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

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

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Evidence such as dated and time-stamped electronic logs, or other evidence, that it responded to each request for its approval to transition an Arranged Interchange to a Confirmed Interchange within the time defined in Attachment 1, Column B. |

Registered Entity Evidence (Required):

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

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Compliance Assessment Approach Specific to INT-006-4 R1

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

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|  | (R1) Select a sample of on-time Arranged Interchanges or emergency Arranged Interchanges received by entity and verify it either approved or denied the Interchanges within the time defined in Attachment 1, Column B of the Reliability Standard. |
|  | (Part 1.1) For the sample of on-time Arranged Interchanges, verify whether the entity denied the Arranged Interchange or curtailed the Confirmed Interchange when it did not expect to be capable of supporting the magnitude of the Interchange, including ramping, throughout the duration of the Arranged Interchange. |
|  | (Part 1.2) For the sample of on-time Arranged Interchanges, verify whether the entity denied the Arranged Interchange or curtailed the Confirmed Interchange when the Scheduling Path between it and its Adjacent Balancing Authorities was invalid. |
| **Note to Auditor:** (Part 1.1) The auditor should first determine the entity’s policy or procedure for determining its expectation of capability of supporting the magnitude of the Interchange, and then, for instances where it did not have that expectation, verify that the Arranged Interchange was denied or the Confirmed Interchange was curtailed by the entity. |

Auditor Notes:

R2 Supporting Evidence and Documentation

**R2.** Each Transmission Service Provider shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B.

* 1. Each Transmission Service Provider shall deny the Arranged Interchange or curtail Confirmed Interchange if the transmission path (proper connectivity of adjacent Transmission Service Providers) between it and its adjacent Transmission Service Providers is invalid.

**M2.** Each Transmission Service Provider shall have evidence (such as dated and time stamped electronic logs, studies, or other evidence) that it responded to each Arranged Interchange or emergency Arranged Interchange within the time defined in Attachment 1, Column B. If the transmission path between the Transmission Service Provider and its adjacent Transmission Service Providers is invalid, each Transmission Service Provider shall have evidence (such as dated and time stamped electronic logs, studies, or other evidence) that it denied the Arranged Interchange or curtailed confirmed Interchange. (R2)

**Registered Entity Response (Required):**

**Compliance Narrative:**

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

Evidence Requested i:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Evidence such as dated and time-stamped electronic logs, studies, or other evidence that it responded to each Arranged Interchange or emergency Arranged Interchange within the time defined in Attachment 1, Column B of the Reliability Standard. If the transmission path between the entity and its adjacent Transmission Service Providers is invalid entity shall have evidence such as dated and time-stamped electronic logs, studies, or other that it denied or curtailed the Interchange. |

Registered Entity Evidence (Required):

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

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Compliance Assessment Approach Specific to INT-006-4, R2

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

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|  | (R2) Select a sample of on-time Arranged Interchanges or emergency Arranged Interchanges received by entity and verify it either approved or denied the Interchanges within the time defined in Attachment 1, Column B of the Reliability Standard. |
|  | (Part 2.1) For the sample of on-time Arranged Interchanges, verify whether the entity denied the Arranged Interchange or curtailed the Confirmed Interchange when the transmission path between it and its adjacent Transmission Service Providers was invalid.  |
| **Note to Auditor:**  |

Auditor Notes:

R3 Supporting Evidence and Documentation

**R3.** The Source Balancing Authority and the Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange shall approve or deny it prior to the expiration of the time period defined in Attachment 1, Column B.

* 1. If a Balancing Authority denies a Reliability Adjustment Arranged Interchange, the Balancing Authority must communicate that fact to its Reliability Coordinator no more than 10 minutes after the denial.

**M3.**  Each Balancing Authority shall have evidence (such as dated and time-stamped electronic logs, studies, or other evidence) that when responding to a Reliability Adjustment Arranged Interchange, it either approved the request or denied the request and, if applicable, communicated denial to the Reliability Coordinator no more than 10 minutes after the denial. (R3)

**Registered Entity Response (Required):**

**Compliance Narrative:**

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

Evidence Requested i:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Instances of receiving a Reliability Adjustment Arranged Interchange. |
| Dated and time-stamped electronic logs, studies, or other evidence entity either approved or denied request for Reliability Adjustment Arranged Interchange within the time period defined in Attachment 1, Column B and, if applicable, communicated denial to the Reliability Coordinator no more than 10 minutes after the denial. |

Registered Entity Evidence (Required):

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

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Compliance Assessment Approach Specific to INT-006-4, R3

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

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|  | (R3) Select a sample of instances where entity received a Reliability Adjustment Arranged Interchange, and verify entity approved or denied the request within the time period defined in Attachment 1, Column B. |
|  | (Part 3.1) For each instance in the sample of Reliability Adjustment Arranged Interchange selected by the auditor where the request was denied, verify entity communicated the denial to the Reliability Coordinator within 10 minutes. |
| **Note to Auditor:**  |

Auditor Notes:

R4 Supporting Evidence and Documentation

**R4.** Each Sink Balancing Authority shall confirm that none of the following conditions exist prior to transitioning an Arranged Interchange to Confirmed Interchange:

* It is a Reliability Adjustment Arranged Interchange, the time period specified in Attachment 1, Column B has elapsed, and the Source Balancing Authority or the Sink Balancing Authority associated with the Arranged Interchange has not communicated its approval of the transition.
* It is not a Reliability Adjustment Arranged Interchange, the time period specified in Attachment 1, Column B, has elapsed, and not all Balancing Authorities and Transmission Service Providers associated with the Arranged Interchange have communicated their approval of the transition.
* It is not a Reliability Adjustment Arranged Interchange, the time period specified in Attachment 1, Column B, has elapsed, and any entity associated with the Arranged Interchange has communicated its denial of the transition.

**M4.** Each Sink Balancing Authority shall have evidence (such as dated and time-stamped electronic logs, studies, or other evidence) that, under the conditions in R4, it did not transition an Arranged Interchange to Confirmed Interchange. (R4)

**Registered Entity Response (Required):**

**Compliance Narrative:**

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

Evidence Requested i:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated and time stamped electronic logs, studies, or other evidence that, under the conditions in R4, it did not transition an Arranged Interchange to a Confirmed Interchange. |

Registered Entity Evidence (Required):

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

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Compliance Assessment Approach Specific to INT-006-4, R4

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

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|  | For a sample of Arranged Interchanges transitioned to Confirmed Interchanges, review evidence to verify that none of the conditions in R4 existed. |
| **Note to Auditor:**  |

Auditor Notes:

R5 Supporting Evidence and Documentation

**R5.** For each Arranged Interchange that is transitioned to Confirmed Interchange, the Sink Balancing Authority shall notify the following entities of the on-time Confirmed Interchange such that the notification is delivered in time to be incorporated into scheduling systems prior to ramp start as specified in Attachment 1, Column D:

* 1. The Source Balancing Authority,
	2. Each Intermediate Balancing Authority,
	3. Each Reliability Coordinator associated with each Balancing Authority included in the Arranged Interchange,
	4. Each Transmission Service Provider included in the Arranged Interchange, and
	5. Each Purchasing Selling Entity included in the Arranged Interchange.

**M5.** Each Sink Balancing Authority shall have evidence (such as dated and time stamped electronic logs, or other evidence) that it notified the entities of the on-time Confirmed Interchange such that the notification was delivered in time to be incorporated into scheduling systems prior to ramp start as specified in Attachment 1, Column D. (R5)

**Registered Entity Response (Required):**

**Compliance Narrative:**

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

Evidence Requested i:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated and time stamped electronic logs, or other evidence, that entity notified the required entities of the on-time Confirmed Interchange such that the notification was delivered in accordance with Attachment 1, Column D of the Reliability Standard. |

Registered Entity Evidence (Required):

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

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Compliance Assessment Approach Specific to INT-006-4, R5

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

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|  | (R5) For a sample of Confirmed Interchanges, verify notification was delivered in accordance with Attachment 1, Column D of the Reliability Standard to: |
|  | (Part 5.1) The Source Balancing Authority. |
|  | (Part 5.2) Each Intermediate Balancing Authority. |
|  | (Part 5.3) Each Reliability Coordinator associated with each Balancing Authority included in the Arranged Interchange.  |
|  | (Part 5.4) Each Transmission Service Provider included in the Arranged Interchange. |
|  | (Part 5.5) Each Purchasing Selling Entity included in the Arranged Interchange. |
| **Note to Auditor:**  |

Auditor Notes:

Additional Information:

Reliability Standard



Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

**Regulatory Background**

INT-0064 was approved by FERC in [Order No. 693](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf)[[4]](#footnote-3) on March 16, 2007. In its approval, FERC directed NERC to develop a modification to INT-006-1 to add Reliability Coordinators and Transmission Operators as applicable entities with specific review responsibilities.

In its July 21, 2008 [Order No.713](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order_713_Modified-INT_and_TLR-Stds-07212008.pdfhttp%3A/www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order_713_Modified-INT_and_TLR-Stds-07212008.pdf), FERC adjusted the existing five-minute review period to ten minutes for WECC.[[5]](#footnote-4)

In [Order 730](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order_730_Approval_3_INT-Standards.pdf), dated December 17, 2009, FERC clarified response deadlines for Emergency and Reliability Adjustment requests for interchange service and also clarified response times for “on-time” requests for interchange service.[[6]](#footnote-5) INT-006-4 Attachment 1 contains the timing requirement for each of the interconnections.

**FERC Orders**

**Letter Order**

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

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

Page 2. FERC approved “Reliability Standard INT-006-4 [which] requires that reliability assessments are conducted for each arranged interchange prior to implementation. Attachment 1 of Reliability Standard INT-006-4 contains the timing requirements for each of the interconnections.”

**Order No. 730.**

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order_730_Approval_3_INT-Standards.pdf>

P 18 In the order approving INT-006-3, FERC stated “NERC’s proposal incorporates one important change from the version 2 requirements. The prior revision, reflected in version 2, requires responsible entities to “respond to a request from an Interchange Authority to transition to an Arranged Interchange to a Confirmed Interchange.” This language suggests that a response is required for requests within the designated time periods. In version 3, Requirement R1 is clarified, directing the applicable entity to respond to “on-time” requests for interchange service within a given time period, and also to all Emergency and Reliability Adjustment requests for interchange service.[[7]](#footnote-6)

P 19 FERC found the proposed clarification to INT-006-3 Requirement R1 acceptable. Responsible entities are still required to respond to all on-time requests for interchange service, as well as all requests for Emergency interchange service and Reliability Adjustment interchange service.

**Order No. 713.**

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order_713_Modified-INT_and_TLR-Stds-07212008.pdf>

P 62 In the order approving INT-006-2, FERC stated “Reliability Standards for INT-005-2, INT-006-2, and INT-008-2 increase the timeframe for applicable WECC entities to perform the reliability assessment from five to ten minutes for next hour interchange tags submitted in the first thirty minutes of the hour before. According to NERC, this modification is needed because the majority of next-hour tags in WECC are submitted between xx:00 and xx:30. The existing five minute assessment window makes it nearly impossible for balancing authorities and transmission service providers to review each tag before the five minute assessment time expires.”

**Order No. 693.**

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

P 849 In the order approving INT-006-1, FERC stated “INT-006-1 applies to balancing authorities and transmission service providers, and requires these entities to evaluate the energy profile and ramp rate of generation that supports interchange transactions in response to a request from an interchange authority to change the status of an interchange from an arranged interchange transaction to a confirmed interchange.”

P 866 The Order contained a FERC directive, which stated “In addition, the FERC directs the Electric Reliability Organization to develop a modification to INT-006-1 through the Reliability Standards process that: (1) makes it applicable to reliability coordinators and transmission operators and (2) requires reliability coordinators and transmission operators to review energy interchange transactions from the wide-area and local area reliability viewpoints respectively and, where their review indicates a potential detrimental reliability impact, communicate to the sink balancing authorities necessary transaction modifications before implementation. ”

Revision History for RSAW

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 08/29/2014 | NERC Compliance, RSAWTF, CMFG, ECEMG | New Document |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)
4. *Mandatory Reliability Standards for the Bulk‐Power System*, 118 FERC ¶ 61,218 at P866 (March 16, 2007) (“Order 693”). [↑](#footnote-ref-3)
5. Revised Mandatory Reliability Standards for Interchange Scheduling and Coordination, 129 FERC, ¶ 61,223 at P18 (December 17, 2009) (“Order 730”). [↑](#footnote-ref-4)
6. *Modification of Interchange and Transmission Loading Relief Reliability Standards; and Electric Reliability Organization Interpretations of Specific Requirements of Four Reliability Standards*, 124 FERC, ¶ 61,071 at P62 (July 21, 2008) (“Order 713”). [↑](#footnote-ref-5)
7. See INT-006-3, Measure M1. [↑](#footnote-ref-6)