| VRF and VSL Justifications – INT-006-4, R1 | |
|---|---|
| **Proposed VRF** | Lower |
| NERC VRF Discussion | Balancing Authorities must take action on a received Arranged Interchange within a certain time frame.  A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>This guideline is not applicable, as the requirement does not have any sub-requirements. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>This Requirement is a revision  of comparable INT-006-3, R1, which deals with responding to on-time RFI, is assigned a Lower VRFs. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |
| Proposed High VSL | N/A |
| Proposed Severe VSL | The Balancing Authority receiving an on-time Arranged Interchange or an emergency Arranged Interchange did not approve or deny its transition to Confirmed Interchange prior to the expiration of the time period defined in Attachment 1, Column B.<br><br>OR |

| VRF and VSL Justifications – INT-006-4, R1 | |
|---|---|
| | The Source or Sink Balancing Authority did not expect to be capable of supporting the magnitude of the Interchange, including ramping, throughout duration of the Arranged Interchange and did not deny the Arranged Interchange.<br><br>OR<br><br>The scheduling path between the Balancing Authority and its Adjacent Balancing Authorities was invalid, and the Balancing Authority did not deny the Arranged Interchange. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs assigned to this requirement do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |

| VRF and VSL Justifications – INT-006-4, R1 | |
|---|---|
| **FERC VSL G4**<br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to take action on an on-time Arranged Interchange or an emergency Arranged Interchange, or for failing to deny an Arranged Interchange under certain circumstances. |

| VRF and VSL Justifications – INT-006-4, R2 | |
|---|---|
| **Proposed VRF** | Lower |
| NERC VRF Discussion | Transmission Service Providers must take action on a received Arranged Interchange within a certain time frame.  A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>This guideline is not applicable, as the requirement does not have any sub-requirements. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>This Requirement is a revision  of comparable INT-006-3, R1, which deals with responding to on-time RFI, is assigned a Lower VRFs. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |
| Proposed High VSL | N/A |

| VRF and VSL Justifications – INT-006-4, R2 | |
|---|---|
| Proposed Severe VSL | The Transmission Service Provider receiving an on-time Arranged Interchange or an emergency Arranged Interchange did not approve or deny its transition to Confirmed Interchange prior to the expiration of the time period defined in Attachment 1, Column B.<br><br>OR<br><br>The transmission path between the Transmission Service Provider and its adjacent Transmission Service Providers was invalid, and the Transmission Service Provider did not deny the Arranged Interchange or curtail Confirmed Interchange. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs assigned to this requirement do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |

| VRF and VSL Justifications – INT-006-4, R2 | |
|---|---|
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to take action on an on-time Arranged Interchange or an emergency Arranged Interchange, or for failing to deny an Arranged Interchange or curtail Confirmed Interchange under certain circumstances. |

| VRF and VSL Justifications – INT-006-4, R3 | |
|---|---|
| **Proposed VRF** | Lower |
| NERC VRF Discussion | Source or Sink Balancing Authorities receiving a Reliability Adjustment Arranged Interchange need to approve or deny it prior to the expiration of the reliability assessment period defined in the timing requirements.  A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>This guideline is not applicable, as the requirement does not have any sub-requirements. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable INT-006-3, R1, which deals with approving or denying Arranged Interchange is submitted, is assigned a Lower VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |

| VRF and VSL Justifications – INT-006-4, R3 | |
|---|---|
| Proposed High VSL | The Source Balancing Authority or Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange denied it prior to the expiration of the time period defined in Attachment 1, Column B, but did not communicate that fact to its Reliability Coordinator within 10 minutes of the denial. |
| Proposed Severe VSL | The Source Balancing Authority or Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange did not approve or deny it prior to the expiration of the time period defined in Attachment 1, Column B. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs assigned to this requirement do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |

| VRF and VSL Justifications – INT-006-4, R3 | |
|---|---|
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to act on a Reliability Adjustment Arranged Interchange within a certain time frame, or for failing to communicate a denial to the Reliability Coordinator within 10 minutes of the denial. |

| VRF and VSL Justifications – INT-006-4, R4 | |
|---|---|
| **Proposed VRF** | Lower |
| NERC VRF Discussion | Balancing Authorities should not transition Arranged Interchange to Confirmed Interchange under certain conditions. A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>This guideline is not applicable, as the requirement does not have any sub-requirements. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable INT-007-13, R1, which deals with ensuring Arranged Interchanges is valid before transitioning to Confirmed Interchange, is assigned a Lower VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |

| VRF and VSL Justifications – INT-006-4, R4 ||
|---|---|
| Proposed High VSL | N/A |
| Proposed Severe VSL | The Sink Balancing Authority failed to confirm that none of the conditions in Requirement 4 existed before transitioning an Arranged Interchange to Confirmed Interchange. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs assigned to this requirement do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of transitioning an Arranged Interchange to Confirmed Interchange under certain circumstances under which an Interchange should not be transitioned. |

| VRF and VSL Justifications — INT-006-4, R5 | |
|---|---|
| **Proposed VRF** | Lower |
| NERC VRF Discussion | Distributing information regarding whether an Arranged Interchange was transitioned to Confirmed Interchange is necessary to ensure that everyone has the same information regarding the transactions. A single violation of this Requirement would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>This guideline is not applicable, as the requirement does not have any sub-requirements. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable INT-008-3, R1, which deals with distributing information regarding whether an Arranged Interchange was transitioned to Confirmed Interchange, is assigned a Lower VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |
| Proposed High VSL | The Sink Balancing Authority did not distribute notification of whether an Arranged Interchange was transitioned to Confirmed Interchange to all of the entities listed in Requirement R5 Parts 5.1-5.5. |
| Proposed Severe VSL | The Sink Balancing Authority did not notify the entities listed in Requirement R5 Parts 5.1-5.5 of the on-time Confirmed Interchange. |

| VRF and VSL Justifications – INT-006-4, R5 | |
|---|---|
| | OR<br><br>The Sink Balancing Authority notified the entities listed in Requirement R5 Parts 5.1-5.5 of the on-time Confirmed Interchange, but did not notify the entities in time for the notification to be incorporated into scheduling systems prior to ramp start as specified in Attachment 1, Column D. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs assigned to this requirement do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is binary, and the single VSL is appropriately assigned "Severe."<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly violated if a Request for Interchange is not submitted. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to distribute notification of whether an Arranged Interchange was transitioned to Confirmed Interchange to specific entities. |