**Unofficial Comment Form**
Project 2008-12 Coordinate Interchange Standards

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the standards and associated documents. The electronic comment form must be completed by **8:00 p.m. ET, November 13, 2013**. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

If you have questions please contact [Steve Crutchfield](#) (via email) or by telephone at 609-651-9455.

**Project 2008-12: Coordinate Interchange Standards Project Page**

**Background Information**
The Coordinate Interchange Standard Drafting Team posted drafts of INT-004-3, INT-006-4, INT-009-2, INT-010-2, and INT-011-1 for a 30-day public comment period from July 25 – August 23, 2013. The posting was designed to gather stakeholder feedback regarding the proposed requirements, especially with respect to the aspects of Paragraph 81 criteria. The drafting team did not get clear consensus with respect to the requirements. The drafting team considered each of the comments and have incorporated those that team found to improve the quality of the standards. Below is a list of the changes made to the standards since the last posting.

**INT-004**

- **R1**: An exception for Pseudo-ties that are already accounted for in congestion management tools was added and the detail on the MW amount to be included on the transaction was eliminated.

- **R2**: The requirement was revised to apply to only those LSEs that submitted and RFI per R1. The drafting team also simplified the language or R2.1 and R2.2 and R2.3.

- **R3**: This was removed as an interim registration process was determined to be unnecessary.

- **R4**: The requirement was modified to require entities to register Pseudo-Ties when the registration process is available in the NAESB Electric Industry Registry (EIR).

- The drafting team added general considerations for curtailment of dynamic transactions to the Guidelines and Technical Basis section of the standard.

**INT-006**

- **R1**: This requirement was removed. The entities to receive the transaction are included today in the eTag specification, Section 3.6.1.1.1. The timing requirement for the distribution of tags is
removed from this standard, as they are currently included and expected to remain in the NAESB documentation.

- R2, R3: The drafting team revised the language for clarity.
- R4: The drafting team added the specific entities to perform the review.
- R5: No changes. These requirements direct that ‘active’ approval is required to transition to Confirmed Interchange; that if entities do not approve the transaction that it will not be transitions to Confirmed. If the software were not automatically performing this function, this requirement identifies the logic to be applied.
- R6: No changes. This distribution requirement may currently drive how software performs this function. However, if that software were not present this requirement clearly directs who needs to receive the results of the evaluations that were performed in order for the interchange to occur.
- Tables: The drafting team removed columns A and C details as these are no addressed in any requirement. These details remain in the NAESB timing tables.

**INT-009**

- R1: The drafting team added phrase “by a Reliability Coordinator” to clarify what aspect of INT-010 is applicable to this requirement.
- R2: No change was made to language but language was added to the Rationale.
- R3: This requirement was unchanged and was not removed as suggested by some commenters. Since the Transmission Operator is not a part of the approval process for the Interchange, this requirement is the only means by which they are aware of the need to adjust the HVDC flow.

**INT-010**

- R1: This language was modified to be consistent with the currently effective requirement. This results in minimal revision to the existing, enforceable requirement.
- R2, R3: The drafting team revised the term “created” to “submitted”.
- R4: The drafting team agreed with comments that these are rules for when reliability adjusts should be used and if reliability adjusts were issued for reasons other than this it would not impact reliability. We agree these would be included in the NAESB business and the requirement is removed from the standard.
- R5: The entities to receive the transaction for evaluation are included today in the eTag specification, Section 3.6.1.1.1 so the drafting team has removed this requirement.
- R6: Pseudo-ties were added to the requirement and the language was clarified.
The drafting team added general considerations for curtailment of dynamic transactions to the Guidelines and Technical Basis section of the standard.

Several entities from the ERCOT area requested exemption from some or all of the standards. When the drafting team reviewed the requirements we did not see that an exemption is required. For example, on INT-011, if ERCOT does not have point-to-point service, the requirement would not apply and an exemption is not needed. However, when we look at INT-006, if ERCOT is involved in a transaction outside its area, all of these requirements would apply.

Proposed Revisions or Additions to NERC Glossary of Terms

1. Proposed revisions to approved NERC Glossary terms (note that for stakeholder convenience, each term has been redlined in the list of definitions contained in each posted standard):

   a. **Adjacent Balancing Authority** - A Balancing Authority whose Balancing Authority Area is interconnected with another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.
      
      **Existing definition:** A Balancing Authority Area that is interconnected another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.

   b. **Intermediate Balancing Authority** - A Balancing Authority on the scheduling path of an Interchange Transaction other than the Source Balancing Authority and Sink Balancing Authority.
      
      **Existing Definition:** A Balancing Authority Area that has connecting facilities in the Scheduling Path between the Sending Balancing Authority Area and Receiving Balancing Authority Area and operating agreements that establish the conditions for the use of such facilities.

   c. **Dynamic Interchange Schedule or Dynamic Schedule:** A time-varying energy transfer that is updated in real time and included in the Net Interchange Scheduled term in the same manner as an Interchange Schedule in the affected Balancing Authorities’ control ACE equations (or alternate control processes).
      
      **Existing definition:** A telemetered reading or value that is updated in real time and used as a schedule in the AGC/ACE equation and the integrated value of which is treated as a schedule for interchange accounting purposes. Commonly used for scheduling jointly owned generation to or from another Balancing Authority Area.

   d. **Pseudo-tie:** A time-varying energy transfer that is updated in real time and included in the Net Interchange Actual term in the same manner as a Tie Line in the affected Balancing Authorities’ control ACE equations (or alternate control processes).
      
      **Existing definition:** A telemetered reading or value that is updated in real time and used as a “virtual” tie line flow in the AGC/ACE equation but for which no physical tie or energy metering
actually exists. The integrated value is used as a metered MWh value for interchange accounting purposes.

e. Request for Interchange (RFI) - A collection of data as defined in the NAESB Business Practice Standards, to be submitted to the Sink Balancing Authority for the purpose of implementing bilateral Interchange between a Source and Sink Balancing Authority or within a single Balancing Authority.

**Existing definition:** A collection of data as defined in the NAESB RFI Datasheet, to be submitted to the Interchange Authority for the purpose of implementing bilateral Interchange between a Source and Sink Balancing Authority.

f. Arranged Interchange - The state where the Sink Balancing Authority has received the Interchange information or intra-Balancing Authority transfer information (initial or revised).

**Existing definition:** The state where the Interchange Authority has received the Interchange information (initial or revised).

g. Confirmed Interchange - The state where no party has denied and all required parties have approved the Arranged Interchange.

**Existing definition:** The state where the Interchange Authority has verified the Arranged Interchange.

h. Sink Balancing Authority - The Balancing Authority in which the load (sink) is located for an Interchange Transaction and the resulting Interchange Schedule.

**Existing Definition:** The Balancing Authority in which the load (sink) is located for an Interchange Transaction. (This will also be a Receiving Balancing Authority for the resulting Interchange Schedule.)

i. Source Balancing Authority - The Balancing Authority in which the generation (source) is located for an Interchange Transaction and for the resulting Interchange Schedule.

**Existing Definition:** The Balancing Authority in which the generation (source) is located for an Interchange Transaction. (This will also be a Sending Balancing Authority for the resulting Interchange Schedule.)

2. Proposed new NERC Glossary terms:

**Composite Confirmed Interchange** – The energy profile (including non-default ramp) throughout a given time period, based on the aggregate of all Confirmed Interchange occurring in that time period.

**Attaining Balancing Authority** - A Balancing Authority bringing generation or load into its effective control boundaries through a dynamic transfer from the Native Balancing Authority.
Native Balancing Authority - A Balancing Authority from which a portion of its physically interconnected generation and/or load is transferred from its effective control boundaries to the Attaining Balancing Authority through a dynamic transfer.

Reliability Adjustment Arranged Interchange - Request to modify a Confirmed Interchange or Implemented Interchange for reliability purposes.

3. Proposed NERC Glossary terms for retirement:

Sending Balancing Authority – The Balancing Authority exporting the Interchange.

Receiving Balancing Authority - The Balancing Authority importing the Interchange.

Reliability Adjustment RFI - Request to modify an Implemented Interchange Schedule for reliability purposes.

The defined term Sending Balancing authority is only used in existing Standard INT-003-3 in Requirement R1. The CISDT has replaced this term with Source Balancing Authority. It is also contained in the defined terms Intermediate Balancing Authority and Source Balancing Authority. The CISDT has removed Sending Balancing Authority from those two defined terms.

The defined term Receiving Balancing authority is only used in Standard INT-003-3 in Requirement R1. The CISDT has replaced this term with Sink Balancing Authority. It is also contained in the defined terms Intermediate Balancing Authority and Sink Balancing Authority. The CISDT has removed Receiving Balancing Authority from those two defined terms.

The defined term Reliability Adjustment RFI is used in INT-006-3, Requirement R1. The CISDT has proposed a new defined term, Reliability Adjustment Arranged Interchange, as a replacement as it more appropriately defines the reliability activity.

4. Additional terms revised to address FERC directives:

The CISDT had previously posted proposed requirements to address FERC Order 693, Paragraph 866. These proposed Transmission Operator and Reliability Coordinator requirements related to review of Confirmed Interchange prior to implementation. The CISDT received feedback from stakeholders as well the NERC Operating Committee that the proposed requirements were not necessary as this review was already addressed in other standards. The CISDT reviewed those standards and Interchange is not explicitly noted. The team feels that additional revisions are necessary to meet the directive. Rather than revise requirements, the CISDT is proposing revisions to defined terms as they apply to existing standards. These terms are Operational Planning Analysis and Real-time Assessment:

Operational Planning Analysis: An analysis of the expected system conditions for the next day’s operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.)
Expected system conditions include things such as load forecast(s), generation output levels, Interchange, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.).

This defined term is used in existing IRO-008-1 (Reliability Coordinator Operational Analyses and Real-time Assessments) and proposed TOP-002-3 (Operations Planning). In IRO-008-1, Requirement R1 specifies that the Reliability Coordinator must perform an Operational Planning Analysis. By explicitly including “Interchange” in the definition of Operational Planning Analysis, the Reliability Coordinator must consider interchange when performing the study. Further, Requirement R2 specifies that the Reliability Coordinator must perform a Real-time Assessment. Again, by explicitly including “Interchange” in the definition of Real-time Assessment, the Reliability Coordinator must consider interchange when performing the study. When the results of either of these studies indicate the need for action, the Reliability Coordinator is required to share the results per Requirement R3. TOP-002-3 contains requirement for the Transmission Operator to perform an Operational Planning Analysis (R1), develop plans for reliable operations based on the results of the Operational Planning Analysis and to notify other entities as to their role in those plans (R3).
Questions

1. **INT-004-3**: Do you have any comments relating to INT-004-3? Please provide specific suggestions for improvement, including alternate language.
   
   ☒ Yes
   ☐ No
   Comments:

2. **INT-006-4**: Do you have any comments relating to INT-006-4? Please provide specific suggestions for improvement, including alternate language.
   
   ☐ Yes
   ☒ No
   Comments: It isn’t clear in what manner the entities listed in 5.1 through 5.5 shall be notified by the BA of the Confirmed Interchange.

3. **INT-009-2**: Do you have any comments relating to INT-009-2? Please provide specific suggestions for improvement, including alternate language.
   
   ☐ Yes
   ☒ No
   Comments:

4. **INT-010-2**: Do you have any comments relating to INT-010-2? Please provide specific suggestions for improvement, including alternate language.
   
   ☒ Yes
   ☐ No
   Comments: The notation “4.2” in Section A4 Applicability should be removed.

Suggest revising Requirement R2 as follows:
R2. Each Sink Balancing Authority shall submit a Reliability Adjustment Arranged Interchange reflecting that modification 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.

With the wording change, corresponding changes must be made to the Measures and the VSLs as appropriate.

The above wording change to R2 is also proposed for other requirements in this standard where applicable.

5. **INT-011-1**: A requirement was developed to require that 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. Do you agree with this proposed requirement? If not, please provide specific suggestions for improvements to the requirement.

☐ Yes
☒ No
Comments:

6. **INT-011-1**: Do you have any other comments relating to INT-011-1 that you have not previously submitted? Please provide specific suggestions for improvement, including alternate language.

☐ Yes
☒ No
Comments:

7. **Definitions**: The CISDT proposed revisions to the defined term Dynamic Schedule. Do you agree with the proposed revisions? If not, please provide specific suggestions for improvements.

☒ Yes
☐ No
Comments:
8. **Definitions:** The CISDT proposed revisions to the defined term Pseudo-Tie. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

- Yes
- No

Comments:

9. **Definitions:** The CISDT proposed revisions to the defined term Adjacent Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

- Yes
- No

Comments:

10. **Definitions:** The CISDT proposed revisions to the defined term Arranged Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

- Yes
- No

Comments:

11. **Definitions:** The CISDT proposed revisions to the defined term Confirmed Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

- Yes
- No

Comments:

12. **Definitions:** The CISDT proposed revisions to the defined term Intermediate Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

- Yes
- No

Comments:
13. **Definitions**: The CISDT proposed revisions to the defined term Request for Interchange (RFI). Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☐ Yes
☐ No

Comments:

14. **Definitions**: The CISDT proposed revisions to the defined term Sink Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☐ Yes
☐ No

Comments:

15. **Definitions**: The CISDT proposed revisions to the defined term Source Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☐ Yes
☐ No

Comments:

16. **Definitions**: The CISDT proposed a new defined term, Reliability Adjustment Arranged Interchange which is a replacement for the current term Reliability Adjustment RFI. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☐ Yes
☐ No

Comments:

17. **Definitions**: The CISDT proposed a new defined term Composite Confirmed Interchange. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☐ Yes
☐ No

Comments:
18. **Definitions**: The CISDT proposed a new defined term Attaining Balancing Authority. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☑ Yes
☐ No

Comments:

19. **Definitions**: The CISDT proposed a new defined term Native Balancing Area. Do you agree with the proposed definition? If not, please provide specific suggestions for improvements.

☑ Yes
☐ No

Comments:

20. **FERC Directives from Order 693, Paragraph 866**: The CISDT has proposed revisions to the definition of Operational Planning Analysis. Do you agree with this proposed defined term? If not, please provide specific substantive suggestions for improvements to the definitions.

☑ Yes
☐ No

Comments:

**VRFs and VSLs**

21. **VRFs and VSLs for INT-004-3**: The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

☑ Yes
☐ No

Comments:
22. **VRFs and VSLs for INT-006-4:** The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

☐ Yes  ☒ No

Comments: In Section B1.2 – Evidence Retention, R2 in the first bullet should read R3, the R3 in the next bullet should read R2 since R3 applies to BA while R2 applies to the TSP.

23. **VRFs and VSLs for INT-009-2:** The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

☒ Yes  ☐ No

Comments:

24. **VRFs and VSLs for INT-010-2:** The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

☒ Yes  ☐ No

Comments:

25. **VRFs and VSLs for INT-011-1:** The CISDT has proposed Violation Risk Factors and Violation Severity Levels for this standard. Do you agree with these compliance elements? If not, please provide specific substantive suggestions for improvements to the VRFs or VSLs.

☒ Yes  ☐ No

Comments: