

## **NAESB Coordinate Interchange Business Practice Standard (Request For Interchange, RFI)**

### **Background:**

In light of the continuing restructuring of the Electric industry, and FERC's rulemakings to ensure open and non-discriminatory access to the nation's transmission systems, NERC is developing Reliability Standards to replace current Operating Policies and Procedures. ~~Furthermore, NERC Operating Policies do not reflect the new organizations or merchant functions that are forming. A request for the development of a NAESB Business Practice Standard representing the Business Practices in Policy 3 and complementing NERC's Coordinate Interchange Standard was submitted in June, 2003. This Standard was approved by the Joint Interface Committee (JIC) representatives from NERC, NAESB, and RTO/ISO and assigned to NAESB for development.~~

~~With regards to Policy 3, NERC currently is developing the Coordinate Interchange Standard to address the reliability issues associated with a bilateral interchange Transaction. The Standard is being developed using the Functional Model as a basis for defining the "Functions" necessary for Bulk Electric System reliability rather than but also facilitates the existing NERC Operating Policies for "Control Areas".~~

### **Introduction:**

~~A request for the development of a NAESB complementary Business Practice Standard to NERC's Coordinate Interchange Standard was submitted in June, 2003. This Standard was approved by the Joint Interface Committee (JIC) representatives from NERC, NAESB, and RTO/ISO and assigned to NAESB for development.~~

This Standard is being developed to identify market-supported processes to facilitate fair & "equitable" competitive interchange practices. This standard will provide the necessary data and arrangements to the Interchange Authority and all involved parties of the Request for Interchange (RFI) for an Interchange Transaction to take place between Sink and Source Balancing Authorities (BA). This standard is designed to implement the flow of data and approval mechanisms to facilitate Interchange. It is not intended to ~~be the "Tagging Standard". NAESB's ESS is aware of the Industry desire to maintain a "Tagging" mechanism for the dissemination of data. The ESS will be the entity that will go forward with Tagging rules and procedures. The RFI shall contain at a minimum the required market and reliability information from the NAESB RFI Datasheet (attached). supercede existing tagging protocols, but rather will facilitate both existing ETAG or any replacement protocols needed to implement the functional model.~~ It should be understood this Standard covers the front-end business arrangements and requirements for an Interchange Transaction to take place. Upon receiving all approvals from the Approval Entities, the IA will utilize ~~appropriate NERC policies or standards~~ appropriate NERC policies or standards ~~NERC's Coordinate Interchange Standard~~ to transition the Arranged Interchange to a Confirmed Interchange and finally the implementation of the Confirmed Interchange.

~~The Standard is being developed using Functional Model definitions to provide consistency with NERC's Reliability Standards.~~

## **Definitions:**

**RFI Standard 1.0** For the purposes of this Standard, the following definitions shall be applied:

### **RFI Standard 1.1**

Balancing Authority (BA) – The entity which performs the Balancing Function as defined by NERC. ~~Some of the duties of the Balancing Function include integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time. In today's operating environment with respect to Interchange, this entity closely resembles a Control Area.~~ Until such time as the Balancing Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Control Area.

**RFI Standard 1.2** Interchange Authority (IA) – The entity which performs the Interchange Function as defined by NERC. ~~Some of the duties of the Interchange Function include authorizing implementation of valid and balanced Interchange schedules between Balancing Authority Areas, and ensuring Interchange Transactions are properly identified for reliability assessment purposes.~~ Until such time as the Interchange Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Tagging Authority for the sink Control Area for the requested Interchange.  
~~s. This entity most resembles today's Tagging Authority.~~

**RFI Standard 1.3** Interchange Transaction – A transaction representing the delivery of energy from a generator located within a Point of Resource Receipt (POR) BA to a load located within a Point of Delivery (POD) BA.

**RFI Standard 1.4** Point of Resource Receipt BA – The Balancing Authority responsible for monitoring and/or controlling the generation identified as the source of an Interchange Transaction.

**RFI Standard 1.5** Point of Delivery BA – The Balancing Authority responsible for monitoring and/or controlling the load identified as the sink of an Interchange Transaction.

**RFI Standard 1.6** Requesting PSE – The PSE submitting the Request For Interchange (RFI). Under current policy this entity would be called the “Tag Author”.

**RFI Standard 1.7** Market Period – The period of time when a Requesting PSE is making purchase, sale, and Transmission service arrangements needed to support a RFI.

**RFI Standard 1.8** Arranged Interchange – The state where completed and required information from the business arrangements are provided to and received by the Interchange Authority.

**RFI Standard 1.9** ~~C~~Confirmed Interchange – The state where the Interchange Authority has verified the Arranged Interchange and is ready to submit it to the Balancing Authorities.

**RFI Standard 1.10** Implemented Interchange- The state where the Balancing Authority enters the Confirmed Interchange into its area control error (ACE) equation.

**RFI Standard 1.11** Approval Entities – Those entities responsible for providing active approvals to an Arranged Interchange.

**RFI Standard 1.12** Implemented Interchange Block Accounting – Energy accounting that assumes a beginning and ending ramp time of zero minutes. For accounting purposes, this moves the energy associated with the starting and ending ramps into the adjacent starting and ending clock time of the Interchange.

**RFI Standard 1.13** Market Adjustment – A desired modification to the energy and/or transmission profile during the Confirmed Interchange period.

**RFI Standard 1.14** Transaction Correction – Modifications to non-reliability data of a Request For Interchange (RFI) while in the Arranged Interchange period. This non-reliability data is located in the NAESB RFI Datasheet and is labeled as “correctable”.

**RFI Standard 1.15** Reliability Period – The segment of time from when the IA has received the RFI from the requesting PSE to physical implementation (beginning of ramp time).

**RFI Standard 1.16** Request For Interchange, RFI- Process of providing required data as defined in the NAESB\_RFI Datasheet to the IA for the purpose of implementing a bilateral Interchange Transaction.

**RFI Standard 1.17** Transmission Service Provider- Approves or denies transmission service requests from PSEs, Generator Owners, and LSEs. This entity also administers the transmission tariff and provides transmission service agreements.

**RFI Standard 1.18** Reliability Authority- The entity which performs the Reliability Authority functions as defined by NERC. Ensures the real-time operating reliability of the interconnected bulk electric transmission systems within a Reliability Authority area. Provides Interchange Transaction approvals to Interchange Authorities based on reliability analysis. Until such time as the Reliability Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective appropriate reliability entity. Reliability Coordinator.

## **Business Practices**

**RAIRFI Standard 21.0** All requests to implement an Interchange Transaction shall be accomplished by the submission of a completed “Request For Interchange”, RFI, ~~(currently NERC Appendix 3A4)~~ to the Interchange Authority (IA). Upon receipt of the RFI, the IA shall immediately forward the RFI to all involved parties of the RFI. ~~Today this is accomplished by the submission of a “Tag”.~~

**RAIRFI Standard 21.1** All energy purchase, energy sale, and Transmission service arrangements necessary to implement the completed RFI shall be performed during the Market Period.

**RAIRFI Standard 21.2** Until such time as other protocols are established by NERC and/or NAESB, submission of the completed RAIRFI shall be in accordance with NERC Policy 3 Appendix 3A4.

**RAIRFI Standard 32.0** While any Purchasing Selling Entity (PSE) may act as the “Requesting PSE”, it shall be the responsibility of the load\_-serving Purchasing\_-Selling- Entity (PSE), or their designee, to ensure that the completed RFI has been submitted to the IA.

**RAIRFI Standard 43.0** A completed RFI shall contain, at a minimum, the required information specified in the most current version of the **NAESB RFI Datasheet** (attached).

**RAIRFI Standard 54.0** On behalf of the Requesting PSE, the IA shall verify approvals from all involved Approval Entities (e.g. TSP-for transmission reservations, BA-for ramping start/end times and rate, RA-reliability analysis, Generator/Load PSE) prior to being confirmed and implemented in accordance with the NERC Coordinate Interchange Standard.

**RAIRFI Standard 54.1** The Requesting PSE shall submit required RFI information and data in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable** (attached).

**RFI Standard 5.2** Until such time as other protocols are established by NERC and/or NAESB, timing requirements for the submission and approval of the completed RFI shall be in accordance with NERC Policy 3 Appendix 3A1.

**RAIRFI Standard 65.0** All requests for approval/validation of the completed RFI by the IA during the Arranged Interchange Period shall be assessed in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable**. The results of that assessment shall be promptly communicated by the IA back to all involved parties.

**RAIRFI Standard 65.1** Any denial of a RFI request by any Approval Entity shall be communicated to the IA and Requesting PSE and accompanied by the reason for such denial.

**RAIRFI Standard 76.0** The IA shall be responsible for communicating changes on the status of the RFI to all involved parties of the RFI, including BAs, IAs, RAs, counterparty PSE (Generator or Load Serving), and the TSPs, and the PSEs holding the associated transmission rights necessary to support the transaction.

**RAIRFI Standard 87.0** The primary method for submitting a RFI to the IA shall be by electronic means using protocols to be determined by NAESB. ~~Until a newer version of E-tag is available or another tool is developed by NAESB, the current version of E-tag will be the preferred method of submitting the data to the IA.~~

**RAIRFI Standard 87.1** A backup or redundant electronic system shall be available for immediate use should the primary electronic means become disabled.

**RAIRFI Standard 87.2** Submitting a RFI to the IA via facsimile is acceptable only as a last resort when the electronic means and its required backup or redundant system are not available.

**RAIRFI Standard 87.3** Until such time as NERC and/or NAESB establish replacement protocols, the preferred method of submitting data to the IA shall be the most current version of the NERC E-Tag Specifications.

**RAIRFI Standard 98.0** The PSE who created the RFI shall be allowed to submit a Transaction correction to the RFI during the Arranged Interchange Period in accordance with the **NAESB RFI Submission and Response Timetable**.

**RAIRFI Standard 98.1** Market adjustments made during the Confirmed Interchange Period by the PSE must be submitted to the IA who immediately communicates the revised request to all involved parties of the RFI. Timing of the approval assessment on the market adjustment by the Approval Entities shall be in accordance with the **NAESB RFI Submission and Response Timetable**. If denied by any Approval Entity, the original request remains valid.

~~**RAI Standard 8.2** Components of a RFI which can be changed during the Reliability Period include but is not limited to MW, ramp start and stop, and duration of transaction.~~

**RAIRFI Standard 109.0** Each PSE submitting a RFI for an Interchange Transaction shall have, or arrange to have, personnel on site and immediately available 24 x 7 for notification of Interchange Transaction changes.

**RAIRFI Standard 910.1** These personnel shall be available from the beginning of the Market Period until the end of the Implementation Period.

**RAIRFI Standard 110.0** Energy accounting for all RFIs shall be accomplished via Implemented Interchange Block Accounting.

~~**RAIRFI Standard 121.0** Settlement of losses shall be either handled as financial or as payment in-kind. For losses handled as payment in kind, the PSE shall communicate to the IA the mw losses and the entity the losses are with for each TSP along the transaction path.~~

**RAIRFI Standard 112.1** For losses handled as payment in-kind, the PSE shall communicate to the IA the mw losses and the entity the losses are with for each TSP along the transaction path.

**RAIRFI Standard 121.1-2** All bilateral transactions are equal and opposite in direction for a source and sink BA.

**RAIRFI Standard 132.0** Ramp rates shall be standard across the North American Interconnections.

**RAIRFI Standard 132.1** Ramp rate for the Eastern Interconnection shall be 10 minutes equally across the start and end times of the Transaction unless otherwise agreed to by all parties involved in the Transaction.

**RAIRFI Standard 123.2 Ramp rate** ~~For for~~ the Western Interconnection, ~~the ramp rate~~ shall be 20 minutes equally across the start and end times of the Transaction unless otherwise agreed to by all parties involved in the Transaction.

**RFI Standard 143.0** For Dynamic Transfer Transactions, the requirements shall be established by NERC.

**RAIRFI Standard 143.1** ~~Until such time as NERC establishes formal standards for Dynamic Schedule, requirements shall be governed by set forth in the most recent version of NERC's "Dynamic Transfer White Paper" shall be followed.~~