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. * Removed and placed in the Intro* ~~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 the existing NERC Operating Policies for "Control Areas".

Introduction:

The Standards Review Subcommittee requested the development of a NAESB Business Practice Standard complementary to NERC's Coordinate Interchange Standard 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 (IA) and all involved parties of the Request for Interchange (RFI) for Interchange 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 supercede existing tagging protocols, but rather will facilitate both existing ETAG or any replacement protocols needed to implement the functional model.~~ to supercede the existing ETAG specifications.
This Standard covers the front-end business arrangements and requirements for Interchange to take place. The IA will utilize NERC's standards to transition the Arranged Interchange to a Confirmed Interchange and finally the Confirmed Interchange as Implemented Interchange.

The Standard is being developed with the understanding that FERC approved tariffs may supersede this Standard.
This Standard applies Functional Model definitions to provide consistency with NERC's Reliability Standards. Terms used in this Standard which are defined by the Functional

Model are not included herein. Until such time the following shall be the appropriate entities – Tagging Authority for IA, Reliability Coordinator for Reliability Authority …Terms defined in the NERC Coordinate Interchange Standard are included for reference only. Although those terms have not been approved as a standard, the ESS believes these definitions will provide clarity to the various transition states of Interchange. For the purposes of this standard only these terms are defined as follows:

> Arranged Interchange – The state where required information is provided to the Interchange Authority
>
> Confirmed Interchange - The state where the Interchange Authority has verified the Arranged Interchange and it is provided to the Balancing Authorities.
>
> Interchange – Energy transfers that cross Balancing Authority boundaries.
>
> Implemented Interchange- The state where the Balancing Authority enters the Confirmed Interchange into its area control error (ACE) equation's net scheduled interchange component

Definitions * were alphabetized*

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

RFI Standard 1.1 Approval Entities – Those entities responsible for providing active approvals to an Arranged Interchange.

RFI Standard 1.2 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 1.3 Market Adjustment – A desired modification to the energy and/or transmission profile during the Confirmed Interchange period.

RFI Standard 1.4 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 1.5 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 1.6 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 1.7 Requesting PSE – The PSE submitting the Request For Interchange (RFI). Under current policy this entity would be called the "Tag Author".

RFI Standard 1.8 ~~**Point of Delivery**~~ Sink BA – The Balancing Authority responsible for monitoring and/or controlling the load identified as the sink of an Interchange Transaction.

. **RFI Standard 1.9** ~~Point of Receipt~~ Source BA – The Balancing Authority responsible for monitoring and/or controlling the generation identified as the source of an Interchange Transaction.

. **RFI Standard 1.10** 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".

The following definitions were removed since they are covered in Functional Model

~~**RFI Standard 1.1** Balancing Authority (BA) – The entity which performs the Balancing Function. 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.~~

~~**RFI Standard 1.1.1** 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. 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.~~

~~**RFI Standard 1.2.1** 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.~~

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~~**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- 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.~~

~~**RFI Standard 1.18.1** Until such time as the Reliability Authority becomes a certified Function under the NERC Functional Model, these duties shall be performed by the respective Reliability Coordinator.~~

Business Practices

RFI Standard 2.0 All requests to implement an Interchange Transaction shall be accomplished by the submission of a completed "Request For Interchange", RFI, to the Interchange Authority (IA).

RFI Standard 2.1 All energy purchase, energy sale, and Transmission service arrangements necessary to implement the completed RFI shall be performed during the Market Period.

* Transferred original 2.2 down to 4.1*

2.2 A completed RFI shall be forwarded to all involved parties. In the current ETAG environment this shall be done by the tagging authority.

RFI Standard 3.0 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.

RFI Standard 4.0 A completed RFI shall contain, at a minimum, the NERC required information specified in the most current version of the **NAESB RFI Datasheet** (attached).

~~**RFI Standard 5.0** On behalf of the Requesting PSE, the IA shall obtain approvals from all involved Approval parties (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 requirements established by NERC.~~

* NERC requirement in the NERC CI Standard*

RFI Standard 5.0 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 Timetables** (attached).

RFI Standard 6.0 All requests for approval/validation of the completed RFI by the IA as Arranged Interchange shall be assessed in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetables.** The results of that assessment shall be promptly communicated by the IA back to all involved parties.

RFI Standard 6.1 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.

RFI Standard 7.0 Any changes to the status of the RFI shall be communicated to all involved parties of the RFI, including BAs, IAs, RAs, all PSEs , and the TSPs. In the current ETAG environment this shall be done by the tagging authority.

RFI Standard 8.0 The primary method for submitting a RFI to the IA shall be by electronic means using protocols to be determined by NAESB.

RFI Standard 8.1 A backup or redundant electronic system shall be available for immediate use should the primary electronic means become disabled.

RFI Standard 8.2 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.

RFI Standard 8.3 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.

RFI Standard 9.0 The PSE, or their designee, who created the RFI shall be allowed to submit a Transaction correction to the RFI prior to submittal to the IA in accordance with the **NAESB RFI Submission and Response Timetables**.

RFI Standard 9.1 Market adjustments made as Confirmed Interchange by the PSE, or their designee, 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 Timetables**. If the adjustment is denied by any Approval Entity, the original request remains valid for the original RFI duration period.

RFI Standard 10.0 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 changes to the Request for Interchange. *vs. Interchange Transaction changes *

RFI Standard 10.1 These personnel shall be available from the beginning of the Market Period through the implementation of the RFI.

RFI Standard 11.0 Unless provided for under a FERC approved market mechanism, energy accounting for all RFIs shall be accomplished via Interchange Block Accounting.

RFI Standard 12.0 Settlement of losses shall be either handled as financial or as payment in-kind.

RFI Standard 12.1 For losses handled as payment in-kind, the PSE, or its designee, shall communicate to the IA, via an RFI (either the original or a separate), the MW losses and the entity the losses are with for each TSP/BA along the transaction path.

RFI Standard 13.0 Default ramp rates for the North American Interconnection shall be as follows:

RFI Standard 13.1 Default 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.

RFI Standard 13.2 Default ramp rate for the Western Interconnection 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 14.0** For Dynamic Transfer Transactions, the requirements shall be established by NERC.~~

~~**RFI Standard 14.1** Until such time as NERC establishes formal standards for Dynamic Schedule, requirements shall be governed by the most recent version of NERC's "Dynamic Transfer White Paper" shall be followed.~~

NAESB RFI Datasheet

(Request For Interchange)

Required and Correctable Data

Version 1

A. New Requests For Interchange
B. Market Related Profile Modifications (Market Adjustment)

A. New Requests For Interchange

A **new RFI** is an RFI that has not yet been implemented or confirmed for implementation. Such RFI must be presented to those entities that are responsible for the implementation of the RFI in order that they may **evaluate** the Request and determine whether or not it can be implemented. The following information is to be used to describe such a RFI.

1. Market Information

1.1. Financial Path (Required) – the description of financially responsible parties for the transaction in order. This will typically start with a GPE and finish with a LSE, with optionally Intermediate PSE'S between the two.

1.1.1. Energy Title Holder(s) (Required) – the identity of the entities financially responsible to take and/or deliver the energy as described in the physical path. This will typically start with a GPE and finish with a LSE, with optionally Intermediate PSE'S between the two.

1.1.1.1. Energy Product Type (Correctable) – the type of energy delivered by the Energy Title Holder.

1.1.1.2. Contract Number(s) (Correctable) – reference to a TRANSACTION entered into by the Energy Title Holder with one or more other participants in the RFI.

1.1.1.3. Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

2. Physical Information

2.1. Physical Path (Required) – the description of physically scheduling parties for the transaction in order and related to the financially responsible parties described above. This will always contain a Generation segment, at least one Transmission segment, and a LOAD segment.

2.1.1. Generation (Required) – set of data describing the physical and contractual characteristics of the energy source.

2.1.1.1. Resource Service Point (Required) – the physical point at which the energy is being generated. This may vary in granularity, dependent on local business practices.

2.1.1.2. Contract Number(s) (Correctable) – reference to a schedule or agreement entered into by the Generation Providing Entity and the Generator Operator.

2.1.1.3. Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

2.1.1.4. Energy Profile (Required) – energy to be produced by the generator for this RFI.

2.1.2. Transmission (Required) – set of data describing the physical and contractual characteristics of a wheel (import, export, or through).

2.1.2.1 Transmission Provider (Required) – the identity of the transmission provider that is wheeling the energy.

2.1.2.2 Point of Receipt -POR (Correctable) – valid Point of Receipt for scheduled Transmission Reservation.

2.1.2.3 Point of Delivery - POD (Correctable) – valid Point of Delivery for scheduled Transmission Reservation.

2.1.2.4 Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

2.1.2.5 Scheduling Entity(ies) (Correctable) – entities that are physically scheduling interchange on behalf of the TRANSMISSION PROVIDER in order to provide wheeling services.

2.1.2.6 Loss Provision Information (Required) (Correctable)– Information describing the manner in which losses are accounted for. Losses will either be paid back In-Kind or Financially.

2.1.2.7 Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

2.1.2.8 POR and POD Profiles (Required) – schedule of Energy Flow imported at the Point of Receipt and Exported at the Point of Delivery.

2.1.2.9 Transmission Reservation Number(s) (Required) (Correctable) – reference to a particular transmission reservation being used to provide transmission capacity to support the transaction being described.

2.1.2.9.1 Transmission Product (Required) (Correctable) – Specifies the NERC Priority.

2.1.2.9.2 Transmission Customer (Required) (Correctable) – identifies the entity that purchased and holds the transmission reservation being presented for use.

2.1.2.9.3 Transmission Reservation Profile (Required) - information describing the transmission reservation commitment associated with the TRANSMISSION PROVIDER.

2.1.3. Load (Required) – set of data describing the physical and contractual characteristics of the energy sink.

2.1.3.1. Resource Service Point (Required) – the physical point at which the energy is being consumed. This may vary in granularity, dependent on local business practices.

2.1.3.2. Contract Number(s) (Correctable) – reference to a schedule or agreement entered into by the Load Serving Entity and the Load and/or Distributor.

2.1.3.3. Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

2.1.3.4. Energy Profile (Required) – energy to be consumed by the load for this RFI.

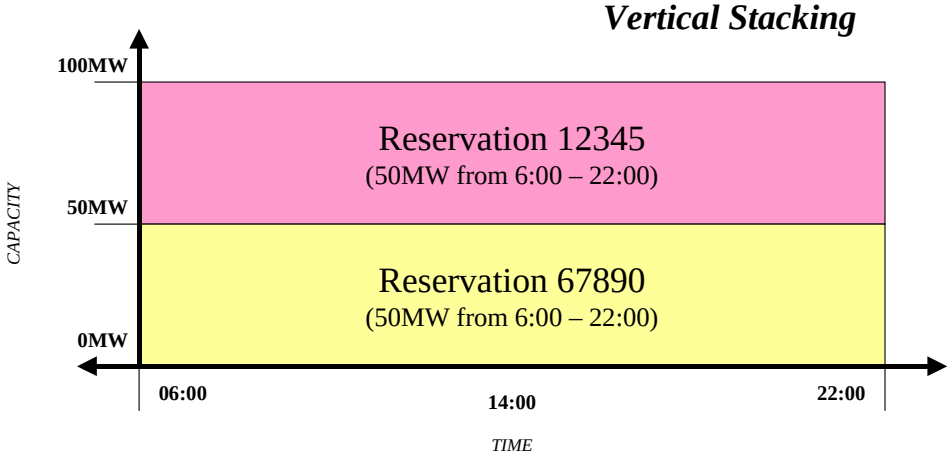
Using Multiple Transmission Reservations to Support a Single Leg of an Interchange Transaction

The use of multiple transmission reservations to support a single leg of an RFI is known as transmission **stacking**. There are two types of transmission stacking:

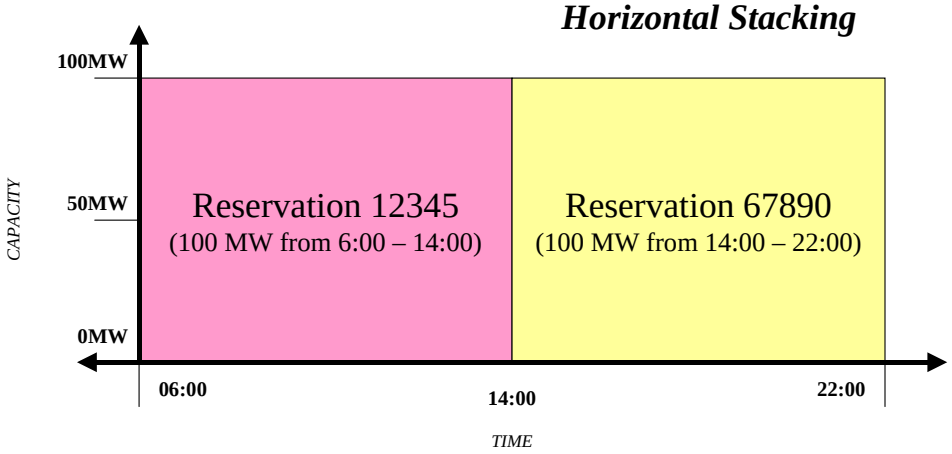
- Vertical stacking, in which a Transmission Customer combines multiple reservations to achieve a certain net level of transmission capacity, and
- Horizontal stacking, in which a Transmission Customer combines multiple reservations to achieve a certain transmission capacity coverage over time.

The following diagrams illustrate these concepts more fully. In both cases, the assumed need is 100 MW of transmission capacity for hours 06:00 through 22:00.

Vertical Stacking



Horizontal Stacking



Should a customer elect to utilize stacking, including any combination of the two stacking types, to support their RFI, they must understand the following requirements:

- Stacks MUST be described through fully qualified profiles for each reservation being used
- At no point may the coverage described by the stack be less than the transmission capacity needed for the RFI's energy flow

B. Market-Related Profile Modifications (Market Adjustment)

Profile Modifications are changes to a RFI's energy profile based on market desires. Such modifications must be presented to those entities that are responsible for the implementation of the modification in order that they may **evaluate** the RFI and determine whether or not the modification can be implemented. The following information must be used to describe such a modification.

- The RFI being modified
- All necessary profile changes to set the transmission capacity or energy flow to the desired levels during the appropriate hours (including the specification of new reservations to support the request, if necessary), and
- Contact information for the person that initiated the modification.

NAESB RFI Submission and Response Timetables

Document Subsections

C. Eastern Interconnection – New Transactions
D. Western Interconnection – New Transactions
E. Interchange Transaction Corrections
F. Interchange Transaction Modifications

A. Eastern Interconnection – New Transactions

The table below represents the recommended business practices for RFI submission to the IA deadlines within the Eastern Interconnection. These are default requirements; some regulatory or provincially approved provider practices may have requirements that are more stringent. Under these instances, the more restrictive criteria shall be adhered to.

Table 1: Eastern Interconnection – Timing Requirements

Transaction Duration	PSE Submit Deadline*	Actual RFI Submission Time	Approval Entity Assessment Time	Time to Start of Transaction
Less than 24 Hours	20 Minutes prior to start	≤1 Hour prior to start	≤ 10 Minutes from tag receipt	≥ 10 Min
		>1 to <4 hours prior to start	≤20 Minutes from tag receipt	≥ 40 Min
		≥ 4 Hours prior to start	≤ 2 Hours from tag receipt	≥ 2 Hours
24 Hours or longer	4 Hours prior to start	Any	≤ 2 Hours from tag receipt	≥ 2 Hours
*Start time references are for start of the TRANSACTION not the start of the ramp.				

*Added the following paragraphs between Table A and B *

RFI submission timing requirements are based on the duration of the TRANSACTION. RFIs representing TRANSACTIONS that run for less that one day (24 hours) must be submitted at least 20 minutes prior to the start of the TRANSACTION (excluding ramp time). RFIs representing TRANSACTIONS running for one day or more (24 hours or more) must be submitted at least four hours prior to the start. RFIs submitted that meet these requirements shall be considered "on-time" by the E-Tag system and may be granted conditional approval. RFIs submitted that do not meet these requirements shall be

considered “late” by the E-Tag system, and consequently will be denied if not explicitly approved by all parties.
The E-Tag system accepts tags with a start time up to one hour prior to the current time. Tags with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit tags to document emergency actions taken to mitigate an OPERATING SECURITY LIMIT violation (Policy 3, Section A 2.4.1). This provision shall not be used to schedule TRANSACTIONS without the proper tag (Policy 3, Section A 6.1).
RFI assessment timing requirements are based on the submission time of the RFI, as well as the duration. Hourly RFIs submitted one hour or less prior to start must be evaluated in ten minutes. Hourly RFIs submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. RFIs with a duration of less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. RFIs with a duration of 24 hours or more must be evaluated in two hours.

Timing Requirements for Reallocation when in a TLR Event

During a NERC TLR event, TRANSACTIONS may be submitted to replace existing TRANSACTIONS with a lower transmission priority. The new TRANSACTION RFI must be received by the Interchange Distribution Calculator no later than 35 minutes prior to the top of the hour to allow time for RELIABILITY COORDINATOR to assess the impact of reallocation.

B. Western Interconnection – New Transactions

The tables below represent the recommended business practices for RFI submission deadlines to the IA within the Western Interconnection. These are default requirements. The tables describe the various minimum submission and assessment timing requirements.

Table 2: Western Interconnection – Timing Requirements

Transaction Start/Submittal Time	PSE Submit Deadline	Actual RFI Submission Time*	Approval Entity Assessment Time	Approval/Denial Notes	Time to Start of Transaction*
Start 00:00 next day or beyond when submitted prior to 18:00 of the current day	**15:00 day prior to start**	**Any**	**3 hours**	**Passive Approval if submitted before deadline, else Passive Denial. Deferred denial**	**≥ 6 Hours**

Start 00:00 next day and submitted between 18:00 and 23:59:59 on day prior to start – OR – start within current day		**≥ 4 Hours prior to start**	**2 Hours from RFI receipt**	**Passive Approval Deferred denial**	**≥ 2 Hours**
		<4 Hours to ≥1 Hour prior to start	**20 minutes from RFI receipt**	**Passive Approval Deferred denial**	**≥ 40 Min**
		<1 hour to ≥30 minutes prior to start	**10 minutes from RFI receipt**	**Passive Approval Deferred denial**	**≥ 20 Min**
		<30 minutes to ≥20 minutes prior to start	**10 minutes from RFI receipt**	**Passive Approval Deferred denial**	**≥ 10 Min**
	20 minutes prior to start	**<20 minutes prior to start**	**5 minutes from RFI receipt**	**Passive Denial. Deferred denial**	**Submission time minus maximum time of 5 minutes**

Notes/Clarification:

1. **All clock times are in PPT.**
2. **RFI falling under the criteria in yellow are deemed pre-schedule requests.**
3. **RFI falling under the criteria in green are deemed real-time requests.**
4. **Pre-schedule requests submitted between 15:00 and 18:00 will be assigned LATE composite status.**
5. **Real-time requests submitted after 20 minutes prior to the start of the Transaction will be assigned LATE composite status.**

***Start-time references are for start of the Transaction, not the start of the ramp.**

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* Added the following paragraphs after Table B*

RFI submission timing requirements are based on the type and duration of the TRANSACTION. RFIs representing TRANSACTIONS that run for less that one day (24 hours) within the current day must be submitted at least 30 minutes prior to the start of the TRANSACTION (excluding ramp time). RFIs representing TRANSACTIONS that are pre-scheduled to start the next day must be submitted by 1500 PST the day prior to the day the TRANSACTION is to start. RFIs submitted that meet these requirements shall be considered "on-time" by the E-Tag system and may be granted conditional approval. RFIs submitted that do not meet these requirements shall be considered "late" by the E-Tag system, and consequently will be denied if not explicitly approved by all parties. The E-Tag system accepts tags with a start time up to one hour prior to the current time. RFIs with a start time older than one hour will be rejected as invalid. This one-hour window shall be used to submit RFIs to document emergency actions taken to mitigate an OPERATING SECURITY LIMIT violation (Policy 3, Section A 2.4.1). This provision shall not be used to schedule TRANSACTIONS without the proper RFI (Policy 3, Section A 6.1).

RFI assessment timing requirements are based on the submission time of the RFI, as well as the duration. Hourly RFIs submitted one hour or less prior to start must be evaluated in ten minutes. Hourly RFIs submitted more than one hour but less than four hours prior to start must be evaluated in 20 minutes. RFIs with a duration of less than 24 hours that are submitted four hours or more prior to start must be evaluated in two hours. RFIs submitted for pre-scheduled service starting the next day or a future day must be evaluated in three hours.

C. Interchange Transaction Corrections

TRANSACTION Corrections may be provided by the PSE to the IA to replace non-reliability data listed in a RFI. As each correction is received, the Evaluation Time of the TRANSACTION will extend, based on the following rules:

- Each correction shall extend the evaluation time by ten minutes
- At no time can the evaluation time be extended past the start time of the TRANSACTION.
- Each correction shall reset the approval status of those entities affected by the correction
- The segment or segments corrected will be eligible for passive approval if the correction is received within the timelines specified below, except in the case where the TRANSACTION has already been set for passive denial. The segment or segments corrected will be subject to passive denial if the correction is not received within the timelines specified below. At no point may a TRANSACTION segment already under Passive Denial constraints be returned to Passive Approval eligibility.

Table 3: Correction Submission Requirements*

Eastern Interconnection	Western Interconnection
20 minutes prior to start	30 minutes prior to start
*Start time references are for start of the Transaction not the start of the ramp.	

D. Interchange Transaction Modifications

Market-initiated modifications, and other TRANSACTION modifications that affect energy profiles must be received by and evaluated within certain times. The following tables describe the submission and evaluation requirements for such changes.

Modification requests received by the deadlines specified below shall be considered "on time," and are eligible for active Approval. Modification requests received past the deadlines shall be considered "late," and are considered denied unless explicitly approved by all parties.

Table 4: Eastern Interconnection – Modifications

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market – Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A
Market – Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

Table 5: Western Interconnection – Modifications

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market – Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A
Market – Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

*See Special Exception for Cancellations below

**If received after deadline, requires active approval or will be passively denied

Special Exception for Cancellations

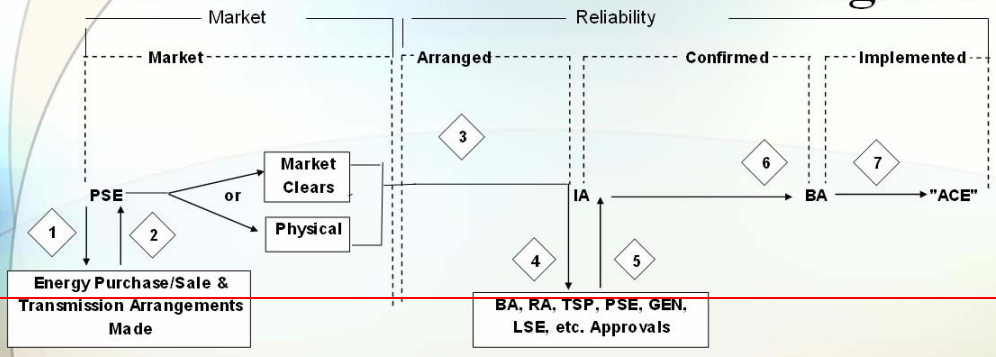
A cancellation is defined as setting both committed transmission reservation(s) and energy flow to zero for the duration of the TRANSACTION **prior** to the start of a TRANSACTION but **following** that TRANSACTIONS approval. In the event that a PSE elects to cancel a TRANSACTION, the following timelines should be utilized:

Table 6: Special Exception for Cancellations Submission and Evaluation Timing

Region	Submission Deadline*	Evaluation Time
Eastern Interconnection	**15 minutes prior to transaction start**	**If received by deadline, no evaluation required. Request is automatically approved.**
		If not received by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
Western Interconnection	**20 minutes prior to transaction start**	**If received by deadline, no evaluation required. Request is automatically approved.**
		If not by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
***Start time references are for start of the Transaction not the start of the ramp.**		

* Added Flow Diagram on next page*

CIBP Standard RFI Flow Diagram



- **1 & 2** - All energy purchase/sale & transmission service arrangements are performed.
- **3** - Submission of RFI to IA. RFI includes reliability data (required) and business information. IA receives from PSE or it's designee.
- **4 & 5** - Sends RFI request data to all involved parties for approval (including "requesting" PSE).
- **6** - IA sends approved and confirmed RFI to BA for implementation.
- **7** - BA enters data into ACE equation.