



**NERC Standard: INT-001-3, Requirement 1**  
**NERC Standard: INT-004-2**

**Acceptable Corroborating Evidence:**  
**“Standards Pertaining to Dynamic**  
**Scheduling Do Not Apply in New England**  
**at This Time”**

ISO New England Inc.

Reliability & Operations Compliance

Corroborating Evidence Interpretation No. 2, Revision 1

Effective Date – January 8, 2010

**Background:**

ISO New England Inc. (“ISO-NE”) is the not-for-profit corporation responsible for the reliable operation of New England’s bulk power generation and transmission system. It also administers the region’s wholesale electricity markets and manages the comprehensive planning of the regional bulk power system. ISO-NE is an organization that has registered with the North American Electric Reliability Corporation (“NERC”) as a Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Operator, Transmission Service Provider, Planning Authority, Resource Planner, and Transmission Planner.

The Northeast Power Coordinating Council (“NPCC”) is NERC’s delegated authority for the administration of the NERC Compliance Monitoring and Enforcement Program (CMEP) within NPCC’s boundaries of Eastern North America.

NPCC, in its role of administering the CMEP, performs periodic audits of registered entities that are users, owners, or operators of the New England Bulk Power System. In the conduct of such audits the NPCC auditors have frequently sought corroborating evidence or other information from ISO-NE, based on ISO-NE’s substantial authorities and responsibilities as both a Regional Transmission Organization (“RTO”) and as defined by its aforementioned registrations with NERC. The corroborating evidence sought by NPCC is used to determine that the entity undergoing the audit has complied with certain requirements of the NERC Reliability Standards that specify a required action on the part of the New England based entity relative to the rules and procedures emanating from ISO-NE’s FERC approved Transmission Tariff (“ISO Tariff”).

Given the repetitive nature of many of these requests, NPCC and ISO-NE have joined to provide an agreed to set of “Corroborating Evidence Interpretations” in order to satisfy the requirements of applicable NERC Reliability Standards. These interpretations do not preclude other evidence that may be introduced by the registered entity and accepted by the NPCC auditing body. In addition, these interpretations may not be construed as modifying or contradicting any part of any ISO Procedure or any part of the ISO’s Tariff. In the event that a Participant believes that any part of these Interpretations does conflict with the ISO’s Procedures or Tariff, the ISO urges the Participant to bring that matter to its attention immediately.”

**Document Control:**

As a minimum, all Corroborating Evidence Interpretations will be reviewed on an annual basis. Any required updates, annual or otherwise, will be processed in accordance with the following:

The Corroborating Evidence Interpretations shall be given a Revision Number and an Effective Date. The current Revision will remain in effect until such time as ISO-NE and NPCC agree to updates of these documents. At the time of the update a new Revision Number and Effective Date will be assigned.

## **Relevant NERC Standards:**

### **NERC Standard: INT-001-3 — Interchange Information**

**R1.** The Load-Serving, Purchasing-Selling Entities shall ensure that Arranged Interchange is submitted to the Interchange Authority for:

**R1.1.** All Dynamic Schedules at the expected average MW profile for each hour.

### **NERC Standard: INT-004-2 – Dynamic Interchange Transaction Modifications**

**Purpose:** To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.

**Applicability:** Balancing Authorities, Reliability Coordinators, Transmission Operators and Purchasing-Selling Entities

## **Explanation of Why These Standards Do Not Apply in New England at This Time**

These NERC Interchange Scheduling & Coordination (INT) Requirements pertain to the submittal and modification of Interchange information for Dynamic Schedules.<sup>1</sup> ISO-NE currently only dispatches generation within its New England operational jurisdiction footprint and, therefore, per the NERC definitions, there is no Dynamic Scheduling in New England.

We would note that in the ISO-NE Tariff, Market Rule 1 (III.1.10.5 & III.1.12) dynamic scheduling and dispatch capability for External Resources is contemplated and procedures for implementation are provided. According to Market Rule 1, dynamic scheduling "can be requested." If such a request is made, technical requirements must be specified, hardware and software must be installed, and allocation of costs associated with dynamic scheduling must be determined and filed with the Commission.<sup>2</sup> However, up to the present time, there has been no request for dynamic scheduling in New England and ISO-NE has made no filings with the Commission regarding the implementation or the allocation of costs for dynamic scheduling. As a result, as stated above, at this time there is no Dynamic Scheduling in New England. However, should Dynamic Scheduling be instituted within the New England Balancing Area in the future ISO-NE will provide advance notice to NPCC's Manager, Compliance Audit Program.

With respect to INT-004-2 specifically, neither ISO-NE nor its neighboring Balancing Authorities implement Dynamic Interchange at this time. As a general matter, ISO-NE modifies E-tags, as appropriate, when schedules are modified via external transaction scheduling software (Transmart EES-MOI). ISO-NE also communicates the release of the limit to both the Sink and Source Balancing Authority. Any initiating or reloading (*i.e.*, restoring) of a curtailment of an interchange transaction in New England would be done by ISO-NE and implemented through its

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<sup>1</sup> In the NERC *Glossary of Terms* a **Dynamic Interchange Schedule** or **Dynamic Schedule** is defined as 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." A **Dynamic Transfer** is defined by NERC as "the provision of the real-time monitoring, telemetering, computer software, hardware, communications, engineering, energy accounting (including inadvertent interchange), and administration required to electronically move all or a portion of the real energy services associated with a generator or load out of one Balancing Authority Area into another."

<sup>2</sup> Market Rule 1, Section III.1.12(c) states: "Allocation of costs associated with dynamic scheduling shall be determined and filed with the Commission following the first request."

Transmart EES-MOI software in an automated fashion and there would be no need for a Purchasing-Selling Entity (or other Market Participant) to respond.