

July 29, 2019

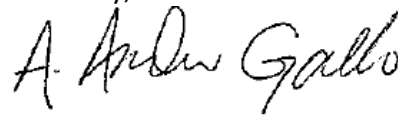
Powerex  
Attn: Raj Hundal  
173 Pavilion Lane  
Youngwood, PA 15697  
[Raj.Hundal@powerex.com](mailto:Raj.Hundal@powerex.com)

Dear Raj Hundal:

Thank you for submitting a Request for Interpretation (RFI) of INT-006-4 Requirements R1, R2, and R3.

Pursuant to Section 7.0 of the NERC Standard Processes Manual (SPM), Appendix 3A to the NERC Rules of Procedure, I am writing to inform you that on July 24, 2019, the Standards Committee (SC) reviewed and rejected the RFI submitted by Powerex. The RFI was rejected on the grounds that the meaning of the Reliability Standard is clear and evident by inspection or the plain words that are written. To provide additional information and context, please see the attached background document and RFI, which were considered during the July 24, 2019 SC meeting.

Sincerely,



Andrew Gallo  
Chair, NERC Standards Committee

Enclosures:  
Standards Committee Background Document  
INT-006-4 RFI

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## Request for Interpretation for INT-006-4

### Action

Reject the Request for Interpretation (RFI) of INT-006-4 – Evaluation of Interchange Transactions as submitted by Powerex and provide a written explanation for the rejection to the submitter within 10 business days.

### Background

Powerex submitted a RFI regarding INT-006-4 on May 17, 2019.

Powerex requests clarification as to whether the time allotted in Attachment 1, Column B for both the *“Timing Requirements for all Interconnections except WECC”* *“Timing Requirements for WECC”* tables are mutually independent of other columns. Additionally, Powerex seeks clarification on whether a Balancing Authority (BA), that is not the Sink BA, can be allocated additional time from other table columns and exceed the specified assessment time prescribed under Column B. Lastly, Powerex seeks clarification on whether a Transmission Service Provider can be allocated additional time from other table columns and exceed the assessment time prescribed under Column B in either table.

Section 7.0 of the Standard Processes Manual states, in part:

The entity requesting the Interpretation shall submit a Request for Interpretation form to NERC Staff explaining the clarification required, the specific circumstances surrounding the request, and the impact of not having the Interpretation provided. NERC Staff shall review the request for Interpretation to determine whether it meets the requirements for a valid Interpretation. Based on this review, NERC Staff shall make a recommendation to the Standards Committee whether to accept the request for Interpretation and move forward in responding to the Interpretation request.

Section 7.2.1 of the Standard Processes Manual provides that the Standards Committee may reject a Request for Interpretation in the following circumstances:

- The request seeks approval of a particular compliance approach.
- The issue can be addressed by incorporating the issue into an existing standard development project or a project contemplated in a published development plan.
- The request seeks clarification or explanation of any element of a Reliability Standard other than a Requirement or referenced attachment.
- The issue has already been addressed in the record.
- The request identifies an issue and proposes the development of a new or modified Reliability Standard (such issues should be addressed via submission of a SAR).
- The request seeks to alter the scope of a Reliability Standard.

Commented [LJ1]: Should “request” be capitalized?

- The meaning of a Reliability Standard is clear and evident by inspection or the plain words that are written.

### Summary

NERC staff recommends rejecting the RFI on the basis that the meaning of the Reliability Standard is clear and evident by inspection or the plain words that are written. In Reliability Standard INT-006-4, the amount of the time specified in each column of the timing tables pertains to only the specific column. Each of the Requirements referencing Column B of the tables (Requirements R1, R2, R3)<sup>1</sup> provide that the required action shall take place “prior to the expiration of the time period *defined in Attachment 1, Column B*” and makes no reference to additional time that may be allocated from other table columns.

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<sup>1</sup> INT-006-4 Requirement R4 also makes reference to Attachment 1, Column B. This requirement has been retired in proposed Reliability Standard INT-006-5.

## Request for Interpretation (RFI)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the RFI to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

**Note: an Interpretation cannot be used to change a standard.**

Interpretation 2010-xx: Request for an Interpretation of [Insert Standard Number], Requirement Rx, for [Insert Name of Company]

Date submitted: May 17, 2019

**Contact information for person requesting the interpretation:**

Name: Raj Hundal

Organization: Powerex

Telephone: 604-891-6063

Email: raj.hundal@powerex.com

**Identify the standard that needs clarification:**

Standard Number (include version number): INT-006-4  
(example: PRC-001-1)

Standard Title: Evaluation of Interchange Transactions

**Identify specifically what requirement needs clarification:**

Requirement Number and Text of Requirement:

R1. Each Balancing Authority shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B

R2. Each Transmission Service Provider shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B

R3. The Source Balancing Authority and the Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange shall approve or deny it prior to the expiration of the time period defined in Attachment 1, Column B.

Clarification needed:

In R1, R2, and R3, the standards state that the applicable entity shall approve or deny the Arranged Interchange prior to the expiration of the time period defined in Attachment 1, Column B.

It is understood from our perspective that NERC Standard INT-006-4 requires Balancing Authorities under R1 to perform an assessment of Arranged Interchange within the prescribed times under Attachment 1, Column B, and the assessment time cannot be extended beyond what is prescribed under Column B.

It is also understood from our perspective that NERC Standard INT-006-4 requires Transmission Service Providers under R2 to perform the assessment of Arranged Interchange within prescribed times under Attachment 1, Column B, and the assessment time cannot be extended beyond what is prescribed under Column B..

The NERC standard also states that Attachment 1, Column A is applicable to only Sink BA for distribution of Arranged Interchange.

The clarity requested from NERC is as follows:

- 1) Is the time allotted in Attachment 1, Column B for both Timing Tables (1. Timing Requirements for all Interconnections except WECC, and 2. Timing Requirements for WECC) mutually independent of other columns?
- 2) Can a BA, that is not the Sink BA, be allocated additional time from other columns and exceed the assessment time prescribed under Column B ?
- 3) Can a TSP be allocated additional time from other columns and exceed the assessment time prescribed under Column B ?

It is our interpretation that each column is mutually exclusive as defined under the NERC Standards, and TSPs and BAs must act within the prescribed timelines provided in Column B.

**Identify the material impact associated with this interpretation:**

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.

Powerex seeks clarification on behalf of entities in the WECC Market Interface Committee (MIC). There are varying opinions on the interpretation of this standard in the industry, and an interpretation of the standard is required. A clarification as to whether or not additional time can be allocated to entities(BA, TSP) in order to complete reliability assessments under R1, R2, R3, beyond the time requirements prescribed under Attachment 1, Column B.

## Version History

Version	Date	Owner	Change Tracking
1	April 22, 2011		
1	May 27, 2014	Standards Information Staff	Updated template and email address for submittal.
1	June 28, 2017	Standards Information Staff	Updated template.
2	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk