



NERC Standard: INT-001-3, R1 & 1.1
NERC Standard: INT-004-2, R2, 2.1, 2.2, 2.3
NERC Standard: IRO-001-1.1, R8
NERC Standard: IRO-005-3a, R10
NERC Standard: TOP-005-2a, R3
NERC Standard: VAR-001-2, R5

Acceptable Corroborating Evidence:
**“Standards Pertaining to Purchasing-
Selling Entity functions in New England”**



ISO New England Inc.
Reliability & Operations Compliance
Corroborating Evidence Interpretation No. 9, Revision 3
Effective Date – January 20, 2012



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 Entity 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

R2. The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:

R2.1. The average energy profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +10%.

R2.2. The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +25 megawatt-hours.

R2.3. A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing- Selling Entity of that determination and the reasons.

NERC Standard: IRO-001-1.1– Reliability Coordination — Responsibilities and Authorities

R8. Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions.

NERC Standard: IRO-005-3a – Reliability Coordination — Current Day Operations

R10. In instances where there is a difference in derived limits, the Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.

NERC Standard: TOP-005-2a– Operational Reliability Information

R3. Each Purchasing-Selling Entity shall provide information as requested by its Host Balancing Authorities and Transmission Operators to enable them to conduct operational reliability assessments and coordinate reliable operations.

NERC Standard: VAR-001-2– Voltage and Reactive Control

R5. Each Purchasing-Selling Entity and Load Serving Entity shall arrange for (self-provide or purchase) reactive resources – which may include, but is not limited to, reactive generation scheduling; transmission line and reactive resource switching; and controllable load - to satisfy its reactive requirements identified by its Transmission Service Provider.

Applicability: Regardless of the applicability in the individual standards, this corroborating evidence is only applicable to Purchasing-Selling Entities (PSEs) under the ISO New England operational structure.

Explanation of Applicability and Compliance Determination

Per the ISO New England documents (such documents include, but may not be limited to, the Participants Service Agreement, Transmission Operating Agreement, Tariff, Market Rule 1 and accompanying Manuals, and ISO New England Operating Procedures), dictating the operational and market model, PSEs do not “own or operate” any equipment; this is strictly a marketing function. Therefore, no NERC Standard Requirements are applicable to such entities.