



NERC Standard: EOP-002-2.1, Requirement 9/9.1

Acceptable Corroborating Evidence: “Deficient Load-Serving Entities Are Not Required to Request the Reliability Coordinator to Initiate an Energy Emergency Alert in New England.”

ISO New England Inc.

Reliability & Operations Compliance

Corroborating Evidence Interpretation No. 4, 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 Standard:

NERC Standard: EOP-002-2.1 — Capacity and Energy Emergencies

R9. When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff (See Attachment 1-IRO-006-0 “Transmission Loading Relief Procedure” for explanation of Transmission Service Priorities):

R9.1. The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.

Explanation of Why This Requirement Does Not Apply to Load-Serving Entities in New England

Under the terms of the ISO New England Open Access Transmission Tariff for Regional Network Service, there are no priority services inside New England. Curtailment provisions of the Tariff are outlined in Section II.44. The Tariff does not provide for any entity to submit an “Energy Emergency Alert” as outlined in this standard.

Elevation of transmission service “Priority”, as used in this context, is a Transmission Loading Relief concept. ISO-NE does not initiate TLR requests, because the internal constraints on its transmission system do not arise from third-party unscheduled power flows (parallel flows or loop flows) onto its transmission system and are thus manageable through redispatch. The ISO Open Access Transmission Tariff (“OATT”) has differed from the Commission’s pro forma OATT in its Commission-approved major features since its inception¹; and in connection with its Commission-approved, Order 890 compliance filing, ISO-NE removed those provisions of the *pro forma* OATT which reference TLR.

¹ Transmission service over the New England Bulk Power System (generally referred to as “Regional Network Service” (“RNS”)) does not distinguish between “firm” and “non-firm” service, does not utilize “point-to-point” service, does not utilize advance reservations and does not have any unauthorized use penalties associated with it.