



NERC Standard: VAR-002-1.1a, Requirement 4

Acceptable Corroborating Evidence: “ISO-NE provides email notification to NPCC/Auditors if an entity does not provide Generator Step Up and Auxiliary Transformer information to ISO-NE within 30 calendar days of a request for such data.”

ISO New England Inc.

Reliability & Operations Compliance

Corroborating Evidence Interpretation No. 8, Revision 0

Effective Date – April 15, 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: VAR-002-1.1a — Voltage and Reactive Control

R4. The Generator Owner shall provide the following to its associated Transmission Operator and Transmission Planner within 30 calendar days of a request.

R4.1. For generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage:

R4.1.1. Tap settings.

R4.1.2. Available fixed tap ranges.

R4.1.3. Impedance data.

R4.1.4. The +/- voltage range with step-change in % for load-tap changing transformers.

Explanation of How ISO-NE Will Keep NPCC Informed About Generator Owner Failures to Provide Data Referenced in This Requirement by the Required Deadline

NPCC has requested that ISO-NE corroborate evidence provided by the Generator Owner to NPCC that the Generator Owner provided its associated Transmission Operator and Transmission Planner with information on its step-up transformers and auxiliary transformers as required in NERC Standard VAR-002-1.1a, Requirements 4.1.1 through 4.1.4. ISO-NE and NPCC have agreed that such corroborating evidence provided by ISO-NE will be by exception, *i.e.*, in the event that any Generator Owner *fails to provide* data referenced in this Requirement within 30 calendar days of an ISO-NE request for such data, ISO-NE will notify NPCC by email.

Process and Responsibilities

In accordance with ISO-NE Operating Procedure No. 16, “Transmission System Data,” it is the responsibility of the Market Participants to submit required data on the physical characteristics, ratings, and other operational data of all new, reconducted, and reconfigured New England Transmission System equipment to ISO-NE. Each year, the ISO-NE *Power System Model Management Department* initiates an NX9 certification process to verify that such data are accurate and complete. This process requires the Market Participant to certify that all transmission equipment identified in OP 16, including generator step-up transformers and auxiliary transformers, is accurately represented on the appropriate NX9 form and that the data is accurate, complete and reflects the actual physical characteristics, ratings, and operational limits of the equipment. ISO-NE initiates the NX9 certification process by sending a current copy of the Market Participant NX9 database and a *Certification of ISO New England Transmission Equipment Rating, Characteristic, and Operational Data* form to the Market Participant NX9 contact (this occurs on what is identified as the “certification initiation date”). To be in compliance with this ISO-NE request, the Market Participant must, within 30 calendar days of the certification initiation date, either:

- Self certify to ISO-NE that the NX9 data is accurate and complete and that no changes to the NX9 database are necessary; or
- Update and submit to ISO-NE the necessary changes to the NX9 data to make the data accurate and complete.

If a Market Participant fails to respond to this ISO-NE request within the timeframe described above, the ISO-NE *Power System Model Management Department* shall notify the ISO-NE *Reliability & Operations Compliance* Group within 10 working days of the deadline date by which the Market

Participant should have responded. This notification shall be sent by email to **ROC@iso-ne.com** and shall identify the Market Participant that did not provide the self-certification by the required deadline.

The ISO-NE *Reliability & Operations Compliance* Group shall notify, by email, NPCC's Manager, Compliance Audit Program of any failures to respond to requests for self-certifications within 10 working days of receiving notice of such failures from the ISO-NE *Power System Model Management Department*. Each notification shall identify the Market Participant that did not provide the self-certification by the required deadline.