

SRSG Operating Procedure No. 10

Resolution of RSS Data and Operating Procedure Disagreements

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1. Purpose

The purpose of this Operating Procedure No. 10 is to establish the methodology for handling resolution of disagreements between a Party and the SRSG or between two or more Parties. These disagreements are either over actual reserve data and/or system disturbance event data as described in Operating Procedure No. 2 or interpretation of other Operating Procedures.

2. Forecast Data Error

Changes to forecast data after the fact retroactively change each Party's quota possibly resulting in deficiencies, and are not allowed. Parties are always required to carry no less than their Contingency Reserve and Spinning Reserve allocations.

3. Disagreements between SRSG and a Party

3.1 A Party shall be responsible for submitting a disagreement in writing to the Administrator, which will then be forwarded to the OC. Party shall submit such disagreements within 10 working days of the following:

- Originally submitted RSS data
- Notification by the SRSG Administrator of Disturbance Control Standard (DCS) non-compliance

3.2 At the OC meeting immediately following the submitted disagreement, the Administrator shall present all relevant RSS data, and the Party shall present such data that supports the Party's written disagreement.

3.3 The OC will determine resolution of the disagreement based on the impact severity to the group.

3.4 In the case of a deficiency where reserves were actually carried but inaccurate data was submitted to the RSS, a Party shall provide

EMS data or other proof that reserves were actually carried. Inaccurate data could be the result of, but not limited to:

- Communication problems
- Party's incorrectly submitted RSS Data
- Failure of a Party's Energy Management System.
- Incorrect telemetry

3.5 In the event the SRSG Administrator Site System assesses an inaccurate monetary penalty/reward to a Party, that Party has a right to be compensated by the SRSG or Parties who benefited or were affected by the assessment. The SRSG Administrator will inform the Operating Committee of said problems and obtain their approval for the proposed solution. Contingency Reserve adjustments will be allocated per Operating Procedure No. 4. SRSG Parties will be held harmless for any additional penalties or costs in excess of the original penalty/reward amounts.

4. Disagreements between SRSG Parties

- 4.1 The SRSG Operating Committee will serve as a clearinghouse to resolve disputes between SRSG Parties concerning SRSG Operating Procedure interpretation and shall not supercede section 15 of the SRSG Participation Agreement.
- 4.2 The SRSG Operating Committee will not resolve disputes between SRSG Parties over contractual interpretations other than the SRSG Participation Agreement (per Section 15) and its associated Operating Procedures.