

**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 resolving disagreements between a Party and the SRSG or between Parties regarding actual reserve data, disturbance data described in Operating Procedure 2, or interpretation of operating procedures.

**2. Disagreements between SRSG and a Party**

2.1 A Party shall submit a disagreement in writing to the Administrator and the Operating Committee within 10 business days of the following:

2.1.1 Date of originally submitted data in the Reserve Sharing System (RSS)

2.1.2 Notification by the SRSG Administrator of noncompliance with the Disturbance Control Standard.

2.2 The Party shall present relevant data which supports the Party's written disagreement at the Operating Committee meeting immediately following the submitted disagreement. The Administrator shall present all relevant RSS data.

2.3 The Operating Committee shall resolve the disagreement based on the severity of impact to the group.

2.4 In the case of a deficiency where reserves were actually carried but inaccurate data was submitted to the RSS, the Party shall provide data from the energy management system (EMS), the Historian system, or other proof that sufficient reserve was carried. Examples of inaccurate data may be the result of, but not limited to, the following:

2.4.1 Communication problems

2.4.2 Party incorrectly submitted RSS data

2.4.3 Failure of a Party's EMS

2.4.4 Incorrect telemetry

2.5 The following shall apply to incorrect penalty assessments:

- 2.5.1 The SRSG Administrator shall inform the Operating Committee of such inaccuracies, propose a solution, and seek their approval for the proposal.
- 2.5.2 The SRSG Administrator shall adjust contingency reserve according to Operating Procedure No. 4.
- 2.5.3 A Party has the right to be reimbursed by the SRSG or Parties who benefitted from or were affected by the assessment.
- 2.5.4 SRSG Parties will be held harmless for additional punitive awards or costs in excess of the original penalty / reward amounts.

### **3. Disagreement between Parties**

- 3.1 The Operating Committee will serve as the clearinghouse to resolve disputes between SRSG Parties concerning interpretation of SRSG Operating Procedures except where section 15 of the SRSG Participation Agreement provides other remedies.
- 3.2 The Operating Committee will not resolve disputes between SRSG Parties over contractual interpretations other than the SRSG Participation Agreement and associated Operating Procedures.