

Motion:

1. Motion that the point at which inadvertent interchange ceases to be return-in-kind and becomes a financial settlement be no more stringent than the L<sub>10</sub> allowed by NERC CPS guidelines.

Reasoning:

- This point has been determined by NERC as within reliability limits that should not compromise the integrity of the interconnection.
- Control Areas are not seen as “leaning on the interconnection” if they are within these bounds.
- Any change in the bounds should be by NERC from a reliability standpoint and not for financial reasons.
- Control Areas are required to carry reserves for reliability that are not used the majority of the time to any significant amount. I believe that return-in-kind for unintentional interconnection usage of these reserves is the compensation that they receive for bearing the responsibility of reliability support of the interconnection.