

Consideration of Comments on First Draft of Modifications to IRO-006 — Reliability Coordination – Transmission Loading Relief

The TLR Standard Drafting Team thanks all commenters who submitted comments on Draft 1 of the modifications to IRO-006— Reliability Coordination – Transmission Loading Relief (TLR). This standard was posted for a 45-day public comment period from May 1 through June 14, 2007. The drafting team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 11 sets of comments, including comments from 36 different people from more than 24 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team made the following minor changes to the standard, and is recommending the standard proceed to balloting:

- Clarified the purpose statement
- Returned the 'Transmission Operator' to the list of applicable functions
- Reduced the severity of non-compliance with R4 to "Lower" based on comments that indicated R4 is not clear and needs to be revised. Making the revision to R4 is outside the scope of work assigned to this phase of the project.

The drafting team was not able to resolve all issues. The following minority issues were not resolved by changes made to the standard:

- Some commenters indicated that the violation risk factors should be higher than proposed, but most commenters agreed with the proposed risk factors and these were not modified. The intent of this standard is to ensure compliance with a selected transmission relief procedure – there are other standards that require reliability coordinators to prevent or mitigate instances of exceeding IROLs.
- There were several suggestions for modifications to requirements and measures, and the drafting team did not adopt those suggestions with this phase of the project to improve IRO-006. The intent of this phase was to identify the requirements that should be in a NERC standard and separate these from the requirements that belong in a NAESB business practice. There are two other phases to this project that are aimed at making improvements to the requirements and field testing some modifications to the interchange distribution calculator that may eliminate the need for any Regional Variances. The drafting team has collected the suggestions for modification to requirements and will use those comments during the next phases of this project.
- There were several suggestions for modifications to the violation severity levels and most of these were not adopted because they would require modifications to the requirements which go beyond the scope of work assigned to this phase of the project. To ensure that the compliance monitors can interpret the requirements, the drafting is developing an audit guide that will assist in the evaluation of the application of the TLR procedure.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

<http://www.nerc.com/~filez/standards/Reliability-Coordination-Transmission-Loading-Relief.html>

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedure:
<http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments – TLR – Reliability Standard IRO-006-4

The Industry Segments are:

- 1 – Transmission Owners
- 2 – RTOs, ISOs
- 3 – Load-serving Entities
- 4 – Transmission-dependent Utilities
- 5 – Electric Generators
- 6 – Electricity Brokers, Aggregators, and Marketers
- 7 – Large Electricity End Users
- 8 – Small Electricity End Users
- 9 – Federal, State, Provincial Regulatory or other Government Entities
- 10 – Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee (G6)	AESO		✓										
2.	Thad K. Ness	American Electric Power (AEP)	✓					✓	✓					
3.	David Rudolph (G3)	Basin Electric												✓
4.	Brent Kingsford (G6)	CAISO		✓										
5.	Greg Rowland	Duke Energy	✓		✓									
6.	Ed Davis (G2)	Entergy Services Inc.	✓											
7.	Jim Caseb(G2)	Entergy Services Inc.	✓											
8.	Narinder K. Saini (G2)	Entergy Services Inc.	✓											
9.	Steve Myers (I) (G6)	ERCOT		✓										✓
10.	Joe Knight (G3)	Great River Energy												✓
11.	Ron Falsetti (I) (G6)	IESO		✓										
12.	Matt Goldberg (G6)	ISO-NE		✓										
13.	Robert Coish (G3)	Manitoba Hydro	✓		✓	✓			✓					✓
14.	Mike Brytowski (G3)	Midwest Reliability Organization												✓
15.	Carol Gerou (G3)	Minnesota Power												✓
16.	Bill Phillips (G6)	MISO		✓										
17.	Terry Bilke (G3)	MISO												✓
18.	Jim Castle (G6)	NYISO		✓										
19.	Alicia Daugherty (G6)	PJM		✓										
20.	Bill Lohrman	Prague Power, LLC									✓			
21.	C. Robert Moseley (G1)	Public Service Commission of South Carolina											✓	
22.	David Wright (G1)	Public Service Commission of South Carolina											✓	
23.	Elizabeth Fleming	Public Service Commission											✓	

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
	(G1)	of South Carolina												
24.	G. O'Neal Hamilton (G1)	Public Service Commission of South Carolina											✓	
25.	John Howard (G1)	Public Service Commission of South Carolina											✓	
26.	Mignon Clyburn (G1)	Public Service Commission of South Carolina											✓	
27.	Philip Riley (G1)	Public Service Commission of South Carolina											✓	
28.	Randy Mitchell (G1)	Public Service Commission of South Carolina											✓	
29.	J. T. Wood (G4)	Southern Company -- Transmission	✓											
30.	Marc Butts (G4)	Southern Company -- Transmission	✓		✓									
31.	Roman Carter (G4)	Southern Company -- Transmission	✓											
32.	Charles Yeung (G6)	SPP		✓										
33.	Sue Mangum-Goins (G5)	Tennessee Valley Authority	✓											
34.	Stuart Goza (G5)	TVA	✓											
35.	Jim Haigh (G3)	WAPA												✓
36.	Neal Balu (G3)	WPSR												✓
37.	Pamela Orreschrick (G3)	Xcel Energy												✓

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – Public Service Commission of South Carolina

G2 – Entergy

G3 – MRO NSRS

G4 – Southern

G5 – TVA Reliability Coordinators

G6 – ISO/RTO Council

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Consideration of Comments on 2nd Posting of Backup Facilities SAR

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

Summary Consideration: Although most commenter's agreed with the purpose as written, we are modifying it based on the comments made by Entergy, which are intended to clarify the purpose. We do not feel this is a substantial change. The new language is as follows: "To provide Interconnection-wide transmission loading relief procedures that can be used to prevent or manage potential or actual SOL and IROL violations to maintain reliability of the Bulk Electric System."

Question #1			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>IRO-005-2 deals with current day operations. IRO-005-2 R3, R16, and R17 all deal with the IROL violation issue and taking appropriate action to relieve the violation within 30 minutes.</p> <p>IRO-005-2 R3: As portions of the transmission system approach or exceed SOLs or IROLs, the Reliability Coordinator shall work with its Transmission Operators and Balancing Authorities to evaluate and assess any additional Interchange Schedules that would violate those limits. If a potential or actual IROL violation cannot be avoided through proactive intervention, the Reliability Coordinator shall initiate control actions or emergency procedures to relieve the violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall ensure all resources, including load shedding, are available to address a potential or actual IROL violation.</p> <p>IRO-005-2 R16: Each Reliability Coordinator shall confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas. The Reliability Coordinator shall discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times.</p> <p>IRO-005-2 R17: When an IROL or SOL is exceeded, the Reliability Coordinator shall evaluate the local and wide-area impacts, both real-time and post-contingency, and determine if the actions being taken are appropriate and sufficient to return the system to within IROL in thirty minutes. If the actions being taken are not appropriate or sufficient, the Reliability Coordinator shall direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system to within IROL or SOL.</p>
<p>Response: We appreciate your comments. IRO-006 is not intending to replace these other requirements or create any "double jeopardy" situations. We will be working to clarify this in the Phase III effort.</p>			
Duke Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Entergy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The purpose of this standard is to provide a method, as stated in R1, to prevent or relieve SOL or IROL violations to maintain the reliability of the bulk electric system. We

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Question #1			
Commenter	Yes	No	Comment
			suggest the purpose be revised to reflect this concept. It seems NAESB will be providing the buisness practices associate with the relief of congestion.
Response: We will change the purpose to read "To provide Interconnection-wide transmission loading relief procedures that can be used to prevent or manage potential or actual SOL and IROL violations to maintain reliability of the Bulk Electric System."			
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The original purpose contained phrasing that sounded more like requirements - terms such as "... the Reliability Coordiantor Must ..." and "... the Rliability Coordiantor needs to ..." - than a clear, concise purpose for the standard. We feel the newly stated purpose accomplishes this.
Response: We appreciate your comments.			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

Summary Consideration: To address concerns expressed by TVA and Entergy, we have added the Transmission Operator back into the standard. We have also rewritten the Attachment to address concerns about the role of the Transmission Operator in requesting TLR. We intend to re-evaluate this issue in our Phase III revisions.

Question #2			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Duke Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Entergy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	We see that Attachment 1 contains references to and places requirements on the TOP which are not applicable or already covered by other standards. This amounts to double jeopardy to the TOP. It also is inappropriate to state that the standard does not apply to the TOP (Applicability section), but then place requirements on the TOP in Attachment 1 (Section 1.2.1, 1.8.1, and 2.9.2). We agree with the removal of the TOP from the Applicability section. However, we disagree with keeping the requirements on the TOP in Attachment 1. Please remove all references to the TOP in Attachment 1.
Response: To address these concerns, as well as those of TVA, we have added the Transmission Operator back into the standard. We have also rewritten the Attachment to address concerns about the role of the Transmission Operator in requesting TLR. We will also revisit this issue in Phase III.			
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We agree.
TVA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	In R1 of the standard it states that the Reliability Coordinator shall, "with its authority and at its discretion, select" one or more procedures to provide transmission loading relief.

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Question #2			
Commenter	Yes	No	Comment
			In Sections 1.1 and 1.2.1 of Attachment 1 to IRO-006 it states that the RC shall initiate a TLR at the request of the Transmission Operator (Section 1.1 Attachment 1) or if any Transmission Operator who operates a tie facility shall be allowed to request relief from its Reliability Coordinator (Section 1.2.1). Since requirement R1.1 states that the TLR procedure for use in the Eastern Interconnection is provided in Attachment 1 then we feel the Transmission Operator requesting their RC to implement the TLR procedure should be held accountable for requesting to use the procedure and therefore it should be applicable to the TOp.
<p>Response: To address these concerns, as well as those of Entergy, we have added the Transmission Operator back into the standard. We have also rewritten the Attachment to address concerns about the role of the Transmission Operator in requesting TLR. We will also revisit this issue in Phase III.</p>			

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3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

Summary Consideration: Duke Energy identified several areas in the standard that can be improved or clarified. While we agree with many of Duke’s suggestions, the intention of this work effort is primarily to separate Reliability Standards from business practices – not change them significantly. Accordingly, the majority of the suggestions will be deferred until our Phase III re-write. The remainder will be implemented by including them in the Joint Operator manual.

Question #3			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Duke Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The portions of the Regional Differences (Section E) that describe how the impact of market flows on facilities are calculated should not be moved to NAESB. The amount of flow presented to the IDC for curtailment on a constrained facility (Flowgate) clearly has Reliability aspects.</p> <p>Also, while it is clear what the intent is, the objective has not been accomplished because there are some instances where information may need to be in both documents.</p> <p>Attachment 1 - Section 2 Transmission Loading Relief (TLR) Levels should have a statement for each level that indicates whether or not transactions will be impacted. (Example – for TLR Level 1 – No transactions will be impacted; Level 2 - Prevents all transactions less than priority 7 with TDF > 5% from starting or increasing; etc.) A good guide for this can be found on the NERC site under IDC training – IDC TLR Matrix.</p> <p>Attachment 1 - Section 3.1 (Interchange Transaction Curtailment Order for use in TLR Procedures / Priority of Interchange Transactions) should not be moved to NAESB. Without this, there will be no reference to the curtailment order in the procedure.</p> <p>Additional comments:</p> <ul style="list-style-type: none"> • Section 1.5.1 should not move to NAESB • Section 2.2.2 “However, the RC...on the Constrained Facility” should stay in IRO-004. • Section 2.2.3 “If the time in TLR Level 2...TLR Log” should stay in IRO-004. • Section 2.5.3 First sentence should move to NAESB. • Section 2.5.3 Reference to Section 4 in last sentence needs to be reviewed since

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Question #3			
Commenter	Yes	No	Comment
			<ul style="list-style-type: none"> • Section 4 moves to NAESB. • Section 3.2 – 3.2.1.1 Stay in the IRO. • Section 4.1.4 Stay in the IRO. • Section 6 – 6.1 Need wording like section 7 – 7.1 • Section 6.2 -6.2.6 Should move to NAESB • Section 7.4.1 – 7.4.3 Move to NAESB • Section 7.7 – 7.9, Appendix E and F should move to NAESB. • Attachment 1 - Section 1.7 Redispatch options should not be moved • Attachment 1 - Section 2. - Introduction – The last two sentences are “on path/off path discussion”. Similar discussion was moved. • Attachment 1 - Section 2.5.3 – the first sentence should be moved
<p>Response: This version of the standard is not affected by the description of the future changes to the Regional Differences section. At such time as the regional difference field test is completed, a more detailed analysis of the reliability components of the regional differences will be undertaken, and appropriate changes shall be made to the standard. We agree that the requirement to provide flow information to the IDC should be retained as a reliability requirement.</p> <p>We will include the information about transactions being curtailed in the Joint Operator manual.</p> <p>With regard to curtailment priority, we believe that the key element is the provision of relief, not the firmness of the transactions curtailed or re-dispatched to provide the relief. Curtailment order will be specified in NAESB business practices. The Joint Operator manual will address this as well.</p> <p>Section 1.5.1 has been incorporated into the Standard as requirement R3.</p> <p>Section 2.2.2 - We will incorporate into the Joint Operations manual.</p> <p>Section 2.2.3 – The requirement to log has been retained within section 1.7 of Attachment 1. The 30-minute guideline is business practice, and part of the NAESB standards. It will also be incorporated into the Joint Operations manual.</p> <p>Section 2.5.3 We will address the movement of this sentence in the Phase III work.</p> <p>Section 2.5.3 We agree, and have deleted the sentence referring to Section 4.</p> <p>Section 3.2 – 3.2.1.1. The process for curtailment of non-firm transactions is a NAESB business practice.</p> <p>Section 5.1.5 (NOTE: The original comment referred to a section that did not exist (4.1.4). The drafting team clarified with</p>			

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Question #3			
Commenter	Yes	No	Comment
			<p>the respondent that the correct section should be 5.1.5.). We will address this in the Phase III work.</p> <p>Section 6 – 6.1 The Section 6 summary is being retired, as it is a duplicate of work being sent to NAESB. Section 6.1 deals with reallocation, which is a business practice and part of the NAESB standards. Section 7 deals with actual curtailments, and is part of the NERC standards.</p> <p>Section 6.2 -6.2.6 As part of the Phase III work, we will re-evaluate whether this belongs in the IDC Reference Document or within the NAESB business practice standards.</p> <p>Section 7.4.1 – 7.4.3 We will address this in the Phase III work.</p> <p>Section 7.7 – 7.9 As part of the Phase III work, we will re-evaluate whether this belongs in the IDC Reference Document or within the NAESB business practice standards.</p> <p>Attachment 1 - Section 1.6.5 (this refers to an item that would have been 1.7 had it not been deleted in the redline) This is a remnant of the old NERC MRD project. NAESB will address any existing or future needs for redispatch options.</p> <p>Attachment 1 - Section 2. As part of the Phase III work, we will re-evaluate whether this reference belongs in the standard or should be removed.</p> <p>Attachment 1 - Section 2.5.3 We will address this in the Phase III work.</p>
Entergy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The draft revisions do address the NERC/NAESB split.
Response: The drafting team appreciates your confirmation.			
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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Question #3			
Commenter	Yes	No	Comment
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We agree the standard and its attachment seem to reflect all reliability components of the pre-split standard.
Response: The drafting team appreciates your confirmation.			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Agree if this is viewed against the current posted version 3 of IRO_006 but not against Version 0 of IRO-006.
Response: The intent was to view the modifications against the latest approved version of IRO-006, which is IRO-006-3.			

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4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

Summary Consideration: While most commenters agreed with the proposed violation risk factors, some commenters suggested that the VRFs should be higher than proposed because failure to relieve an SOL or IROL can have an adverse impact on reliability. The Drafting Team believes that this standard describes some of the processes through which a Reliability Coordinator may obtain congestion relief. However, these are not the only ways in which an RC may do so, and this standard is not intended to require a specific process be followed, unless the RC chooses to implement an Interconnection-wide procedure. There are other standards that apply to the RC’s ability or failure to actually obtain relief in a timely manner. As such, the Drafting Team believes the risk factors of this standard are largely procedural, and merit a lower Violation Risk Factor.

Question #4			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Duke Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Entergy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	We suggest R1 have a VRF of HIGH as improper violation of this requirement by improper use or not use of procedure to alleviate SOL or IROL violation can have severe impact on reliability.
<p>Response: The Drafting Team believes that this standard describes some of the processes through which a Reliability Coordinator may obtain congestion relief. However, these are not the only ways in which an RC may do so, and this standard is not intended to require a specific process be followed, unless the RC chooses to implement an Interconnection-wide procedure. There are other standards that apply to the RC’s ability or failure to actually obtain relief in a timely manner. As such, the Drafting Team believes the risk factors of this standard are largely procedural, and merit a lower Violation Risk Factor.</p>			
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
MRO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Violation Risk Factors are not in line with impact on reliability of the requirements. The VRFs should be higher.
<p>Response: The Drafting Team believes that this standard describes some of the processes through which a Reliability Coordinator may obtain congestion relief. However, these are not the only ways in which an RC may do so, and this standard is not intended to require a specific process be followed, unless the RC chooses to implement an Interconnection-wide procedure. There are other standards that apply to the RC’s ability or failure to actually obtain relief in a timely manner. As such, the Drafting Team believes the risk factors of this standard are largely procedural, and merit a lower Violation Risk Factor.</p>			

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Question #4			
Commenter	Yes	No	Comment
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We find the proposed violation risk factors appropriate.
Response: The drafting team appreciates your confirmation.			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines. If not, please explain your answer.

Summary Consideration: All commenters agreed with the time horizons.

Question #5			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Duke Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Entergy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We are in agreement with the proposed time horizons for this standard.
Response: The drafting team appreciates your confirmation.			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

Summary Consideration: The drafting team will address the majority of these comments in the Phase III scope of work.

Question #6			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Duke Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>M5 seems to be measuring compliance to other Standards. INT-001 and INT-003 has applicability for the BA and not the RC. And INT-004 has applicability for both the RC and BA. INT-004 has no measure or compliance for the RC. There should not be a requirement (R5) or measure (M5) that requires compliance to another standard.</p> <p>R3 needs to be split into two requirements, one that focuses on implementing a local procedure simultaneously with the Interconnection-wide procedure and another that states specifically, "Each Reliability Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure." This requirement should have a Medium Violation Risk factor and a real time operations time horizon. This would be similar to R4, but for curtailing transactions that are within an Interconnection.</p> <p>M3 – Need to have clarity on just what is considered a procedure in this case.</p>
<p>Response: Regarding R5 and M5, the Drafting Team recognizes that this Requirement can be improved. However, in this initial scope of work, we do not intend to change the requirement, as our goal is more the separation of responsibility, rather than changes to the standard. We will include this within the "Phase III" scope of work.</p> <p>Regarding R3, the Drafting Team agrees that this requirement should be restructured, and will include this within the "Phase III" scope of work.</p> <p>Regarding M3, the measure applies to any local procedure used in lieu of implementing curtailments as required by the Interconnection-wide procedure (as described in R3).</p>			
Entergy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ERCOT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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Question #6			
Commenter	Yes	No	Comment
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We agree with the proposed measures for this standard
Response: The drafting team appreciates your confirmation.			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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7. Do you agree with the compliance elements in the proposed standard? If not, please explain your answer.

Summary Consideration: We will be providing compliance auditors with guidelines to assist in the evaluation of the application of the TLR procedure. We have reduced the severity of non-compliance with R4 to "Lower." We believe the other areas commented on are appropriate as drafted. TLR Level 6 is effectively a statement of notification that the RC is initiating control actions or emergency procedures to relieve an IROL or other critical violation. TLR Level 6 does not define the procedures; it only makes reference to them. As such, being in a TLR Level 6 alone is not sufficient; taking the control actions or invoking the emergency procedures as described in other standards is required. We will evaluate TLR Level 6 during the Phase III work.

Question #7			
Commenter	Yes	No	Comment
American Electric Power	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The Violation Severity Levels do not make sense, especially those for the Eastern Interconnection. What is the rationale for the selection of 2-3 procedural violations being moderate and 4-5 being high and 6 or more being severe? For ERCOT and the Western Interconnection, not following just one procedural requirement is a severe violation. Also, for the east, is the SDT stating that all the requirements in Attachment 1 are of equal weight, hence the 2-3, and 4-5, etc. division? The SDT needs to review these one more time.</p> <p>For 2.3.2, this should be moved to the lower category and made 2.1.3 once R4 is cleaned up. The requirement it references, R4, is unclear. Each Interconnection has their own Interconnection-wide procedure. So when curtailing an Interchange Transaction that crosses an Interconnection boundary, which Interconnection-wide procedure are the initiating and responding RC to use, the one in the initiating RC's interconnection or the one in the responding RC's interconnection?</p> <p>2.4.4 should be restated as follows: While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator only applied TLR Levels 5 and lower as the sole remedy for an existing IROL violation. In the situation under 2.4.4, the appropriate action for the RC to take is to issue a TLR Level 6 - Emergency Procedures, which provides for the RC to redispatch generation, reconfigure transmission, or reduce load to mitigate the critical condition, which an IROL violation is. See 2.9 of Attachment 1 to IRO-006-4 for reference.</p>
<p>Response: We recognize the concern with the way the Violation Severity Levels are handled for the individual procedures. Until such time as the compliance elements are further clarified in Phase III, compliance auditors will be provided a set of guidelines to utilize in determining procedural violations. However, they will be given discretion in determining the actual violation severity level, based on their review of the facts relevant to the audit. A draft version of the guidelines will be</p>			

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Question #7			
Commenter	Yes	No	Comment
			<p>posted for industry review.</p> <p>2.3.2 - We will move this to the Lower category, and consider options for rewriting the requirement in Phase III. The intention of 2.3.2, and the associated R4, is to require that an RC in one interconnection, when asked to respond to a request for relief based on an Interconnection-wide procedure in another interconnection, must comply with that request in such a way that the requirements of the invoked Interconnection-wide procedure are honored. Note that INT-007 ensures that schedules are curtailed in a coordinated fashion, by requiring the Interchange Authority confirm schedules are balanced.</p> <p>TLR Level 6 is effectively a statement of notification that the RC is initiating control actions or emergency procedures to relieve an IROL or other critical violation. TLR Level 6 does not define the procedures; it only makes reference to them. As such, being in a TLR Level 6 alone is not sufficient; taking the control actions or invoking the emergency procedures as described in other standards is required. We will evaluate TLR Level 6 during the Phase III work.</p>
Duke Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Violation Severity Levels 2.4.2 and 2.4.3 should be moved from Severe to High because these violations may not adversely affect the effectiveness of TLR in mitigating the congestion on the constrained facility.</p> <p>Section 2.1.2 – the RC has no compliance obligation</p>
			<p>Response: Regarding 2.4.2 and 2.4.3, we believe that these may impact the effectiveness of TLR in mitigating congestion.</p> <p>Regarding 2.4.2: If a party attempts to utilize a procedure to which they are not a party, there is a chance that they will be unable to actually implement the procedure. For example, assume A, B, and C have a joint redispatch procedure in place. X is not party to the procedure. If X experiences an IROL, and calls upon A, B, and C to redispatch, A, B, and C may refuse because X is not party to the agreement. As such, valuable time may be lost, and the risk of the IROL elevated. As such, we believe this to be a Severe violation.</p> <p>Regarding 2.4.3: If a party attempts to utilize a local procedure in lieu of the interconnection-wide procedure without ERO approval, then the industry at large has been given no opportunity to verify that the local procedure will achieve the stated goals of providing relief. Without this review, it is possible the party implementing the local procedure can be putting the Interconnection in jeopardy. As such, we believe this to be a Severe violation.</p> <p>Regarding 2.1.2, we note that INT-004 applies to Reliability Coordinators. We will be reviewing R5 and its associated measures and compliance in Phase III.</p>
Entergy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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Question #7			
Commenter	Yes	No	Comment
ERCOT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The Violation Severity Levels seemingly could be interpreted in more than one way. This should be clarified before approval. Do the numbers apply per event or to a total by month? Also, there appears to be no differentiation between minor and major infractions.</p> <p>The severity level of high for 2.3.2 seems to be too high and it should be a moderate level violation. It seems inconsistent that within an interconnection several requirements may be violated (2.2) but in an across interconnection situation only 1 violation is required to be a high severity. The TLR will only be applicable to one Interconnection as there are no AC connections between interconnections. Therefore it should be treated the same with regard to severity as if it did not cross the boundary.</p>
<p>Response: We recognize the concern with the way the Violation Severity Levels are handled for the individual procedures. Until such time as the compliance elements are further clarified in Phase III, compliance auditors will be provided a set of guidelines to utilize in determining procedural violations. However, they will be given discretion in determining the actual violation severity level, based on their review of the facts relevant to the audit. A draft version of the guidelines will be posted for industry review.</p> <p>2.3.2 - We will move this to the Lower category, and consider options for rewriting the requirement in Phase III. The intention of 2.3.2, and the associated R4, is to require that an RC in one interconnection, when asked to respond to a request for relief based on an Interconnection-wide procedure in another interconnection, must comply with that request in such a way that the requirements of the invoked Interconnection-wide procedure are honored. Note that INT-007 ensures that schedules are curtailed in a coordinated fashion, by requiring the Interchange Authority confirm schedules are balanced.</p>			
IESO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ISO/RTO Council	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>One compliance element issue is that it is not clear how to interpret the number of interconnection wide violations by an RC for each TLR in the Eastern Interconnection (the Violation Severity Level is set by the number of violations). One way to interpret this is that for each TLR event, an RC may have multiple violations. The number of violations for that event establishes the Violation Severity Level for just that event. In this interpretation, the number of violations do not carry over from one event to another event. Another way to interpret this is the RC accumulates the number of violations for all events as it goes through the month until it reaches a total of 6 at which time it has a severe Violation Severity Level. It then resets for the same month such that future TLR violations could result in one or more violations. It is not clear which interpretation to apply. Another compliance element issue is that there is no distinction in the</p>

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Question #7			
Commenter	Yes	No	Comment
			consequences of the violations. This means a minor infraction of one requirement that has no impact on reliability will be treated on an equal basis as a major infraction of another requirement that does have an impact on reliability when determining the violation count to establish the Violation Severity Level.
<p>Response: We recognize the concern with the way the Violation Severity Levels are handled for the individual procedures. Until such time as the compliance elements are further clarified in Phase III, compliance auditors will be provided a set of guidelines to utilize in determining procedural violations. However, they will be given discretion in determining the actual violation severity level, based on their review of the facts relevant to the audit. A draft version of the guidelines will be posted for industry review.</p>			
MRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
PSC South Carolina	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Southern Transm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We agree with the proposed compliance elements reflected in this standard.
<p>Response: The drafting team appreciates your confirmation.</p>			
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Needs more clarification to understand exact parameters
<p>Response: We recognize the concern with the way the Violation Severity Levels are handled for the individual procedures. Until such time as the compliance elements are further clarified in Phase III, compliance auditors will be provided a set of guidelines to utilize in determining procedural violations. However, they will be given discretion in determining the actual violation severity level, based on their review of the facts relevant to the audit. A draft version of the guidelines will be posted for industry review.</p>			

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8. The drafting team is planning a joint NERC NAESB TLR operator’s manual for the TLR procedure. What would your organization like to see contained in a joint manual?

Summary Consideration: The drafting team thanks commenters for their suggestions. This shall serve as the sole response to all suggestions for the joint manual.

Question #8	
Commenter	Comment
American Electric Power	No comment.
Duke Energy	We would like to see at least two things: 1) All the requirements that pertain to TLRs from both the IRO standard and the NAESB business practice in one place, and a concise summary of how and when to call a TLR and how to respond to it (sort of an operator’s guide).
Entergy	We suggest the manual contain Attachment 1 with the appropriate NAESB requirements (standards) interleaved in the proper locations.
ERCOT	The Reliability Standard should flow as it currently does. The attachment (manual) should flow so that the TLR process is logical for both Business and Reliability organizations to follow. It is recommended that both NERC and NAESB versions of the standard contain the complete joint procedure. This is so that the industry always has the correct complete version. The current version of the approved Business and Reliability Standard should be referred to by the procedure. The attachment (manual) containing the TLR procedure should highlight the Reliability steps so that they are distinguishable from the Business steps.
IESO	Following the split of IRO-006, a joint NERC/NAESB TLR operator's manual is required to allow system operator to have a one-stop shop for all the requirements - reliability and business practice, needed to implement an interconnection-wide TLR procedure. The TLR operator's manual, therefore, should contain all the information in the pre-split IRO-006, and be made available to all operating entities through NERC.
ISO/RTO Council	We agree. This is in line with the correct steps to accomplish what FERC requested of NERC and NAESB. A common manual is the correct way to go on this. The split should be an administrative measure only, so that it is handled as quickly as possible. This would allow the members to quickly start the next phase, which is to do away with the Urgent Action SPP waiver and to change the threshold. The combined procedure (NERC-NAESB) should be made available to all areas through NERC. We expect that NERC and NAESB will work out a process where NAESB is OK with their standard being included in the NERC version. The joint NERC-NAESB process allows for this, so the end result needs to be a jointly published document.

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Question #8	
Commenter	Comment
	Also, the NERC-NAESB fees need to include some sort of funding for updates to the NERC IDC. A common document will facilitate coordination between functional entities using one guiding procedure."
MRO	Business practice procedures and NERC Reliability Standards.
Prague Power	A consistent flow of interwoven NERC and NAESB TLR requirements, clearly delineated (e.g. different fonts or shading) as to which organization is responsible for the development and maintenance of the respective requirements.
PSC South Carolina	N/A for Public Service Commission of South Carolina
Southern Transm.	The joint NERC NAESB TLR Operator's Manual should essentially provide the operator with the same information he/she has in the pre-split version of the standard. The drafting team should work to format the joint manual in a way that follows a logical order and is easily understandable. The manual should contain references to the latest version of the applicable NERC Standards and NAESB Business Practices. A question for the Drafting Team i- how will the joint manual be maintained and updated?
<p>Response: We believe that the joint operator manual will be maintained and updated through a coordinated process between NERC and NAESB. As such, there will be coordination to ensure changes are not made without understanding their full impact.</p>	
TVA	We would like to see one document that contains both the NERC requirements and NAESB Business Practices together. Would prefer this to be highlighted or different fonts for each so that it is easily distinguishable what sections belong to what group.

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9. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

Summary Consideration: No commenters found any conflicts.

Question #9			
Commenter	Yes	No	Comment
American Electric Power	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Duke Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Entergy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
ERCOT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
IESO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
ISO/RTO Council	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
MRO	<input type="checkbox"/>	<input type="checkbox"/>	
Prague Power	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
PSC South Carolina	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Southern Transm.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TVA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

Summary Consideration: We have addressed many of the suggestions, and will address the remainder in other documents or future versions of the standard.

Question #10			
Commenter	Yes	No	Comment
American Electric Power	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, see our comments to Q#7 and Q#11.
Response: Please see our responses in questions 7 and 11.			
Entergy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We would like the suggestions contained herein to be included in the draft standard. We may also wish to see other changes made, depending on suggestions by other commenters.
Response: Please see our responses to your comments.			
ERCOT	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Only the concerns expressed with regard to Question 7 regarding Violation Severity Levels
Response: Please see our response in question 7.			
IESO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
ISO/RTO Council	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See response to Question 7. This could possibly affect vote decisions.
Response: Please see our response in question 7.			
Prague Power	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
PSC South Carolina	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Southern Transm.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TVA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We would like to see the conflict between Requirement 1 and Sections 1.1 and 1.2.1 of Attachment 1 resolved before we could approve this draft. (see question 2)
Response: Please see our response in question 2.			

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11. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft standard.

Summary Consideration: The majority of the comments received are more appropriate to be addressed in the Phase III effort. We are correcting the numbering error, clarifying R3, and making R1.1 and Attachment 1 1.2 consistent.

Question #11	
Commenter	Comment
American Electric Power	<p>For the Standard, IRO-006-4:</p> <p>R1.1 - Delete the following: "TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispatch, or load shedding." This is an incorrect statement. The Eastern Interconnection TLR procedure includes TLR Level 6 - Emergency Procedures, which provides for the RC to redispatch generation, reconfigure transmission, or reduce load to mitigate the critical condition, which an IROL violation is. See 2.9 of Attachment 1 to IRO-006-4 for reference. TLR Level 6 is an often forgotten element of the TLR procedure, but it does exist and is perfect for the situation sited.</p> <p>For Attachment 1:</p> <p>1.2 - Delete the following: "However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations due to the time required to implement the procedure. Reconfiguration, redispatch, and load shedding are more timely and effective in mitigating existing IROL violations." This is an incorrect statement for the reason sited above in R1.1. It is interesting to note that in 1.3 of Attachment 1 acknowledges our position by stating that "Furthermore, if a Reliability Coordinator deems that a transmission loading condition could jeopardize Bulk Electric System reliability, the Reliability Coordinator shall have the authority to enter TLR Level 6 directly, and immediately direct the Balancing Authorities or Transmission Operators to take such actions as redispatching generation, or reconfiguring transmission, or reducing load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedure or other methods to return the system to a secure state." As TLR Level 6 is part of the TLR procedures, and TLR Level 6 is for directing immediate reconfiguration, redispatch, or load shedding, then the TLR procedure is an effective tool to mitigate IROL violations.</p> <p>3.0 TLR Level 0 - This is numbered incorrectly. It is part of section 2, thus should be numbered 2.10, and 3.0.1 should be numbered 2.10.1.</p>

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Question #11	
Commenter	Comment
	<p>Under the heading Requirements on pg. 7, 4.1 to 4.5 were part of former section 7, Interchange Transaction Curtailments During TLR Level 3B. If these requirements are to stay, then this heading should be used again, and they should be numbered section 3. However, we question why these remain. All but 4.5 appear to be related to the business practice side of TLR, thus they should go to NAESB.</p> <p>Appendix A - This is very out of date. NERC has not used the term OSL violation for years. This chart needs to be updated to the present terminology, using IROL and SOL, not OSL and Security Limit Violation.</p>
	<p>Response: Regarding R1.1 and Attachment 1 Section 1.2: This language was included as required by FERC Order 693, paragraph 964. TLR Level 6 is effectively a statement of notification that the RC is initiating control actions or emergency procedures to relieve an IROL or other critical violation. TLR Level 6 does not define the procedures; it only makes reference to them. As such, being in a TLR Level 6 alone is not sufficient; taking the control actions or invoking the emergency procedures as described in other standards is required. We will evaluate TLR Level 6 during the Phase III work.</p> <p>Regarding Attachment 1 Section 3.0: We agree and have corrected the numbering.</p> <p>Section 4.1 – 4.5 We will address this in the Phase III work.</p> <p>Regarding Attachment 1 Appendix A: We will update the diagram and terminology in Phase III as appropriate.</p>
Duke Energy	<p>We are concerned that there is a lack of clarity between R1, R1.1 and R3 regarding the use of local procedures in response to a SOL or IROL violation. R1 states that the RC can select a local procedure at its discretion, and R1.1 recognizes that an Interconnection-wide TLR procedure used alone is an inappropriate and ineffective tool. However R3 states that the RC must have prior approval from the ERO to use a local procedure as a substitute for curtailments directed by the Interconnection-wide procedure. However it is unclear how prior approval can be obtained since the local procedure will be case-specific to the problem that initiates the Interconnection-wide procedure. Further, depending upon the resolution of this issue, M3 will need to be restated.</p> <p>Also, in general the standard drafting team needs to carefully review cross-references to assure that the reliability and business practices split is correctly implemented.</p> <p>B. Requirements:</p> <ul style="list-style-type: none"> • R1.1. - The statement "inappropriate and ineffective tool" need to be clarified. If the reason is

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Question #11	
Commenter	Comment
	<p>that the IDC does not respond fast enough, then say so (similar to statement in Attachment 1 – 1.2.)</p> <p>Response: Regarding R1, R1.1, and R3: R1 is intended to tell the Reliability Coordinator that they may relieve congestion through the use of local procedures or Interconnection-wide procedures. R1.1 is intended to state that TLR is not robust enough to address existing IROs, and that more aggressive action should be taken by the RC through local procedures. R3 is intended to address a slightly different situation; if an Interconnection-wide procedure calls for an RC to take action, the RC must obey the request <i>unless they have been pre-authorized to take alternative actions</i>. One example might be a local procedure that rather than curtailing 20 transactions by 5MW each instead curtails a single 100MW transaction. This is acceptable as a local procedure, but if an RC wishes to do this instead of following the curtailments dictated by the Interconnection-wide procedure, they must obtain ERO approval of the substitution procedure in advance of the procedure being utilized in this fashion. We have modified the language of R3 to clarify this.</p> <p>We agree, and will do our best to ensure this is the case.</p> <p>Regarding R1.1, we have made the language consistent to explain the shortcomings of the procedure with regard to existing IROs.</p>
Entergy	<p>There is a comment added to R1.1 reflecting the FERC Order 693 paragraph 964 regarding the use of tools other than TLR to mitigate an actual IROL. That statement, being in R1.1, seems to apply only to the Eastern Interconnection. Please add that note to the other two Interconnections, or move the note so it applies to all three Interconnections.</p> <p>Please better define the "Local" Procedure. Is it developed by the TOP? Is the curtailment of transactions allowed in "Local" Procedures? Is only transmission reconfiguration allowed? Is redispatch of designated network resources allowed in a "Local" Procedure? We realize that better defining "Local Procedure" may not be related to NERC/NAESB split. However, it is important to not use any "Local Procedure" without proper description and disclosure.</p> <p>M5 identifies specific INT standards, INT-001, INT-003, and INT-004. We suggest the references to specific INT standards be deleted. Some time in the future those specific standards may be retired and this standard would then need to be revised.</p>
	<p>Response: Regarding R1.1, this is intended to apply only to TLR and the Eastern Interconnection, and the requirement so states.</p> <p>Regarding the definition of "local procedure," these procedures may be developed in many different ways (by the TOp, by the RRO, by stakeholders, etc...) and approved by many different organizations (by state regulators, by the RRO, by the ERO, by FERC, etc...). We believe the term "local procedure" applies to any procedure, regardless of source or approval body, that is not one of the three Interconnection-wide procedures described. Note that we are not requiring disclosure or description of</p>

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Commenter	Comment
	<p>local procedures, except in the case where a local procedure is desired to be used in lieu of curtailments (as described in R3), in which case it must be shared as part of the pre-authorization by the ERO.</p> <p>Regarding M5, we agree with your comments, and will improve this language with the Phase III work.</p>
ERCOT	<p>ERCOT does not use the TLR process. The Drafting Team should consider whether this standard should include a Regional Variance for a Region that does not use TLR, or for a single-Region Interconnection that does not use TLR. Or, does the Drafting Team believe that updating the wording of Requirement R1.3 would be sufficient?</p>
<p>Response: The Drafting Team believes the language in R1 and R1.3 allows ERCOT to not implement TLR.</p>	
ISO/RTO Council	<p>We find IRO-006-4 a significant improvement over IRO-006-3, however we strongly support continued improvement of this standard. The following comments are intended for Phase III of the standard development.</p> <p>IRO-006-4: The roles of the RC (as initiator or responder) are unclear and should be clarified.</p> <p>IRO-006-4, Attachment 1: Should be reviewed to determine whether there is any portion that should become part of a standard. Attachment 1 largely is procedural in nature, but part(s) of it possibly should be rewritten in the form of a standard.</p> <p>IRO-006-4, Attachment 1: Some of the assumptions made by IDC are fairly crude and can result in the inappropriate selection of interchange transactions to be curtailed.</p> <p>IRO-006-4, Attachment 1: Should either specify requirements for IDC, or require after-the-fact analysis of IDC results upon request to identify and quantify deficiencies, or both.</p>
<p>Response: The drafting team will consider these items in the Phase III scope of work.</p>	
MRO	<p>Complete and approve the Joint NERC/NASB operators manual in an expeditious manner.</p> <p>Regarding Requirement R1.1: The requirement needs to be rewritten somehow. It doesn't seem appropriate to me to list TLR as the first procedure and then go on to say it is an inappropriate procedure and list other more appropriate procedures. The drafting team should just change the list of procedures if they want to specify them and list TLR as the last procedure in the list if that is what they are saying.</p> <p>One MRO member submitted the following comment regarding violation severity levels: I question whether 2.4.2, 2.4.3 or 2.4.4 should be severe violations. How many of these actually could lead to</p>

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Question #11	
Commenter	Comment
	<p>system separation or collapse in and of themselves is not obvious to me. In addition I question the whole premise of how they are using this set of violation severity levels. They are all premised on a violation during one IROL incident. It seems to me that a violation of one step in a procedure to mitigate an IROL should not be what is considered, but a pattern of not following procedures or mitigation steps or IROL's not being mitigated in the 30 minutes allowed. Making one simple mistake in implementing a procedure in one IROL incident should not lead to sanctions.</p>
	<p>Response: Regarding the Joint Operators manual, it is our intent to post this document prior to implementation of the standard.</p> <p>Regarding R1.1, the intent is not to state that TLR is an inappropriate tool for managing congestion; rather, it is intended to say that if the system is in an insecure state, better choices exist to address the problem than TLR. There is not intended to be any ranking of the choices based on the order in which they are presented.</p> <p>Regarding 2.4.2: If a party attempts to utilize a procedure to which they are not a party, there is a chance that they will be unable to actually implement the procedure. For example, assume A, B, and C have a joint redispatch procedure in place. X is not party to the procedure. If X experiences a IROL, and calls upon A, B, and C to redispatch, A, B, and C may refuse because X is not party too the agreement. As such, valuable time may be lost, and the risk of the IROL elevated. As such, we believe this to be a Severe violation.</p> <p>Regarding 2.4.3: If a party attempts to utilize a local procedure in lieu of the Interconnection-wide procedure without ERO approval, then the industry at large has been given no opportunity to verify that the local procedure will achieve the stated goals of providing relief. Without this review, it is possible the party implementing the local procedure can be putting the interconnection in jeopardy. As such, we believe this to be a Severe violation.</p> <p>Regarding 2.4.4: FERC has directed, and the standard explicitly states, that TLR should not be used in this manner, due to the amount of time required to implement TLR. As such, using TLR as the sole remedy for an existing IROL will result in the security of the Interconnection being placed in jeopardy. As such, we believe this to be a Severe violation.</p> <p>Regarding the concern with the "one step" causing a severe violation, we recognize the concern with the way the Violation Severity Levels are handled for the individual procedures. Until such time as the compliance elements are further clarified in Phase III, compliance auditors will be provided a set of guidelines to utilize in determining procedural violations. However, they will be given discretion in determining the actual violation severity level, based on their review of the facts relevant to the audit. A draft version of the guidelines will be posted for industry review.</p>
Prague Power	n/a
Southern Transm.	We have no further comment at this time. We appreciate the work of the TLR Drafting Team and our

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Question #11	
Commenter	Comment
	opportunity to submit comments regarding the proposed standard.
Response: We appreciate your support.	