NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# Consideration of Comments on Initial Draft of Joint NERC/NAESB System Operator's TLR Reference Manual (Project 2006-08)

The Transmission Loading Relief Drafting Team thanks all commenters who submitted comments on the TLR Manual. The manual was posted for a 45-day public comment period from February 8 through March 29, 2008. The standard drafting team asked stakeholders to provide feedback on the manual through a special Comment Form. There were 12 sets of comments, including comments from 49 different people from more than 27 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

The majority of the commenter's support the manual and agree that this document is effective. Some entities suggested changes to formatting or minor clarifications; the SDT accepted these suggestions. The drafting team adopted a suggestion to use "grey boxes" to identify NAESB text. Some entities suggested not including the full text of the standards; however the SDT believe the majority of commenters see value in having the full text available. Regarding the ongoing maintenance of the standards, the SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes.

Some entities expressed concerns with the standards themselves. The drafting team responded that these concerns needed to be addressed through the standards development process.

Based on the comments received, the drafting team is recommending that the Standards Committee approve this manual for posting as a reference document.

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 Manual 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 Vice President and 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 Process Manual: http://www.nerc.com/standards/newstandardsprocess.html.

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 (G5) | Alberta Electric System Operator | | x | | | | | | | | |
| 2. | Thad K. Ness | American Electric Power | x | | x | | x | x | | | | |
| 3. | Richard A. Ellison | Bonneville Power Administration | x | | x | | x | | | | | |
| 4. | Brent Kingsford (G5) | California ISO | | x | | | | | | | | |
| 5. | Mike Murray (G3) | City Power & Light (Independence, MO) | x | | x | | | | | | | |
| 6. | Edwin Thompson (G1) | ConEd Company of New York, Inc. | x | | x | | | x | | | | |
| 7. | Ronald Hart (G1) | Dominion Resources, Inc. | | | x | | | x | | | | |
| 8. | Gregory A. Rowland | Duke Energy Corporation | x | | | | | | | | | |
| 9. | H. Steven Myers (I) (G5) | Electric Reliability Council of Texas | | x | | | | | | | | |
| 10. | Brian Berkstresser (G3) | Empire District Electric | x | | x | | x | | | | | |
| 11. | Fred Meyer (G3) | Empire District Electric | x | | x | | x | | | | | |
| 12. | David L. Folk (G4) | FirstEnergy Corporation | x | | x | | x | x | | | | |
| 13. | Larry Hartley (G4) | FirstEnergy Corporation | x | | x | | x | x | | | | |
| 14. | Doug Hohlbaugh (G4) | FirstEnergy Corporation | x | | x | | x | x | | | | |
| 15. | Sam Ciccone (G4) | FirstEnergy Corporation | x | | x | | x | x | | | | |
| 16. | Tom Burgess (G4) | FirstEnergy Corporation | x | | x | | x | x | | | | |
| 17. | David Kiguel (G1) | Hydro One Networks, Inc. | x | | x | | | | | | | |
| 18. | Sylvain Clermont (G1) | Hydro One TransÉnergie | x | | x | | | | | | | |
| 19. | Roger Champagne (G1) | Hydro-Québec TransÉnergie | x | | | | | | | | | |
| 20. | Ron Falsetti (I) (G5) | Independent Electricity System Operator | | x | | | | | | | | |
| 21. | Ben Li (G1) | Independent Electricity System Operator | | x | | | | | | | | |
| 22. | Biju Gopi (G1) | Independent Electricity System Operator | | x | | | | | | | | |
| 23. | Kathleen Goodman (G1) | ISO New England, Inc. | | x | | | | | | | | |
| 24. | Matt Goldberg (G5) | ISO New England, Inc. | | x | | | | | | | | |
| 25. | Mike Gammon (G3) | Kansas City Power & Light | x | | x | | x | | | | | |
| 26. | Donald Nelson (G1) | MA Department of Public Utilities | | | | | | | | | x | |

| Commenter | | Organization | Industry Segment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| 27. | Bill Phillips (G5) | Midwest ISO, Inc. | | x | | | | | | | | |
| 28. | Michael Ranalli (G1) | National Grid | x | | x | | | | | | | |
| 29. | William DeVries (G1) | New York ISO | | x | | | | | | | | |
| 30. | Jim Castle | New York ISO | | x | | | | | | | | |
| 31. | Ralph Rufrano (G1) | New York Power Authority | x | | x | | x | | | | | |
| 32. | Guy V. Zito | Northeast Power Coordinating Council | | | | | | | | | | x |
| 33. | Lee Pedowicz (G1) | Northeast Power Coordinating Council | | | | | | | | | | x |
| 34. | Murale Gopinathan (G1) | Northeast Utilities | x | | | | | | | | | |
| 35. | Patrick Caufield | NRG Energy | | | x | x | x | x | | | | |
| 36. | Alan Adamson (G1) | NY State Reliability Council | | | | | | | | | | X |
| 37. | Patrick Brown | PJM Interconnection, L.L.C. | | x | | | | | | | | |
| 38. | Marc Butts (G2) | Southern Company Transmission | x | | | | | | | | | |
| 39. | Chris Wakefield (G2) | Southern Company Transmission | x | | | | | | | | | |
| 40. | Roman Carter (G2) | Southern Company Transmission | x | | | | | | | | | |
| 41. | J.T. Wood (G2) | Southern Company Transmission | x | | | | | | | | | |
| 42. | Doug McLaughlin (G2) | Southern Company Transmission | | | | | | | | | | |
| 43. | Robert C. Rhodes (G3) | Southwest Power Pool | | x | | | | | | | | |
| 44. | Jason Smith (G3) | Southwest Power Pool | | x | | | | | | | | |
| 45. | Charles Yeung (G5) | Southwest Power Pool | | x | | | | | | | | |
| 46. | Kyle McMenamin (G3) | Southwestern Public Service | x | | x | | x | | | | | |
| 47. | Steven Joseph | Tampa Electric Company | x | | x | | x | | | | | |
| 48. | Brian Evans-Mongeon (G1) | Utility Services, LLC | | | | | | | | x | | |
| 49. | Allen Klassen (G3) | Westar Energy | x | | x | | x | | | | | |

I – Individual
G1 – NPCC Regional Standards Group
G2 – Southern Company Transmission
G3 – SPP Operating Reliability Working Group
G4 – FirstEnergy Corporation
G5 – ISO/RTO Council Standards Review Committee (IRC SRC)

## Index to Questions, Comments, and Responses

**1.** We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

**Summary Consideration:** The majority of the commenter's support the manual and agree that this document is effective**.**

| #1 – Commenter | Yes | No | Comment |
|---|---|---|---|
| American Electric Power | x | | |
| Bonneville Power Administration | x | | This refernece manual is not as helpful as it would be if BPA was a part of the Eastern Interconnection or ERCOT. |
| **Response:** BPA may not initiate TLR, but it does have some responsibility in responding to TLR requests that affect transactions going into or coming out of WECC. | | | |
| Duke Energy Corporation | x | | |
| Electric Reliability Council of Texas | | x | The document should clarify that TLR is not used in ERCOT. |
| **Response:** ERCOT may not initiate TLR, but it does have some responsibility in responding to TLR requests that affect transactions going into or coming out of ERCOT. | | | |
| FirstEnergy Corporation | x | | FE applauds NERC and NAESB for using Attachment 1-IRO-006-1 as a starting point and putting together such a practical reference manual. We think the appendices are particularly helpful. |
| **Response:** Thank you for your supportive comment. | | | |
| Independent Electricity System Operator | x | | |
| IRC SRC | x | | In general, it meets our expectations. However, it is not necessary to repeat that entire NAESB and NERC TLR standards here. They should just be referred to. |
| **Response:** The majority of the commenter's support their inclusion and agree that this document is effective**.** | | | |
| NPCC Regional Standards Committee | x | | |
| NRG Energy | | x | NRG believes that it is difficult to separate the reliability and commerical apsects of TLRs and expected the manual to provide more extensive coverage of the commercial aspects. Specifically, the reference manual does not address the treatment of "internal schedules" (those with source/sink within same BA) and treatment of Qualified Facilities "put" power. Please see the additional comments offered below. |
| **Response:** The drafting team concurs that this is a challenging task. However, the treatment of internal schedules and QF put power are not addressed explicitly in the standards, and therefore have not been explicitly addressed in the manual. If you have suggestions regarding | | | |

| #1 – Commenter | Yes | No | Comment |
|---|---|---|---|
| how you would like these items addressed in the standards or business practices, please submit SARs or requests to NERC or NAESB as appropriate. | | | |
| Southern Company Transmission | x | | As a reference for System Operators, the document is a little difficult to read for comprehension. Also see Comment #2b for Question #5. |
| **Response:** Response: We have used "grey boxes" to better separate the NAESB numbering, which we believe will help in understanding the document. | | | |
| SPP Operating Reliability Working Group | | x | In general we were fairly comfortable with the split as it existed therefore we really didn't have any expectations regarding the recombination of the NERC and NAESB documents. |
| **Response:** The majority of the commenter's support the manual and agree that this document is effective**.** | | | |
| Tampa Electric Company | x | | |

**2.** The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

**Summary Consideration:** The drafting team adopted a suggestion to use "grey boxes" to identify NAESB text. Some entities suggested not including the full text of the standards; however the SDT believe the majority of commenters see value in having the full text available.

| #2 – Commenter | Comment |
|---|---|
| American Electric Power | No. |
| Bonneville Power Administration | None. |
| Duke Energy Corporation | No suggestions. |
| Electric Reliability Council of Texas | No comment. |
| FirstEnergy Corporation | The references to the NERC and NAESB standards are a good idea. Approriately, the purpose of this document is to describe or advance the industry's understanding of the TLR process. With this purpose in mind, the focus of the document is the TLR process not the rules that drive the process. Therefore, it is not necessary to include sections 2, 3 and 4 which, for all intents and purposes, is a copy of the NERC IRO-006 standard. This inclusion complicates the document and the standard is readily available to all via the NERC website. The use of font color to differentiate between NERC, NAESB, and transition langauge is very distracting and makes the document difficult to read. We suggest revising the document to use a consistent font color. In addition, the use of a hybrid of the NERC and NAESB requirement numbers is also distracting. The numbering sequence should be consistent throughout the document with the requirement citing information appearing as parentheticals after the appropriate verbiage. As an example, Section 5.1.1.1. should be revised to state, "5.1.1.1. Curtailment Threshold - The Curtailment Threshold for the Eastern Interconnection shall be 0.05 (5%).[See Section 3.10 of the NAESB Transmission Loading Relief Business Practice Standard — Curtailment Threshold]." The parenthetical in this example can be bolded or of a different text color for emphasis, if emphasis is desired or needed. |
| **Response:** The Drafting Team intentionally included the standards themselves so that operators would have one document in which they could find both sets of requirements. With respect to your suggestion on format and structure, we have revised the manual to utilize the "grey boxes" suggestion of IESO and NPCC for NAESB business practices. As far as the numbering, by including the NAESB numbers within the boxes, we believe the confusion you describe will be reduced or eliminated. | |
| Independent Electricity System Operator | The numbering is fine but the text for NAESB and text for NERC should be better demarcated. Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written. |
| **Response:** Thank you for your suggestion. We have adopted your suggestion to use the "grey boxes," which eliminates the need for the | |

| #2 – Commenter | Comment |
|---|---|
| italics or blue font. | |
| IRC SRC | Do not show the entire standards here. Only show their reference numbers. |
| **Response:** The majority of the commenter's support their inclusion and agree that this document is effective**.** | |
| NPCC Regional Standards Committee | The numbering is fine but the text for NAESB and text for NERc should be better demarcated. Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written.<br><br>Suggestion to add subheadings for Section 5. |
| NRG Energy | For items excluded from IRO-006-03, it would be beneficial for there to be cross referencing in IRO-006-04 to the location in the manual where these items are treated. |
| **Response:** The drafting team provided such a cross-reference with the standards themselves for reference. This document is intended not to indicate how the standards have been modified, but to show the requirements and business practices together. | |
| **Response:** Thank you for your suggestion. We have adopted your suggestion to use the "grey boxes," which eliminates the need for the italics or blue font. | |
| Southern Company Transmission | The incorporation of the NAESB TLR Business Practice Standards within the NERC TLR Reliability Standard, while maintaining both sets of index numbers, is obviously difficult. We do not know of a better way to index the Reference Manual without affecting either set of index numbers.<br><br>We recommend that the SDT expand the Manual's Table of Contents to make it easier to locate TLR levels. The addition of quick-links to TLR levels would be beneficial to a System Operator. |
| **Response:** We have adopted suggestions from IESO and NPCC regarding the identification of NAESB business practices, which we believe will improve the navigability of the document. | |
| SPP Operating Reliability Working Group | The numbering system, although a bit cumbersome, probably is needed for reference and clarification. We don't have a better alternative. |
| **Response:** We have adopted suggestions from IESO and NPCC regarding the identification of NAESB business practices, which we believe will improve the navigability of the document. | |
| Tampa Electric Company | None. |

**3.** The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

**Summary Consideration:** The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes.

| #3 – Commenter | Yes | No | Comment |
|---|---|---|---|
| American Electric Power | x | | The formal Reliability Standard Development Process could also be used to maintain this manual in the future. |
| **Response:** As this is not a reliability standard, we believe the formal RSDP is not necessary. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Bonneville Power Administration | | x | As a part of the WECC, I believe it would be better served if this material was covered in a document a little more specific to the region it pertains to. |
| **Response:** BPA may not initiate TLR, but it does have some responsibility in responding to TLR requests that affect transactions going into or coming out of WECC. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Duke Energy Corporation | x | | NERC should maintain the manual. |
| **Response:** The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Electric Reliability Council of Texas | | x | This manual has little usefulness in ERCOT. |
| **Response:** ERCOT may not initiate TLR, but it does have some responsibility in responding to TLR requests that affect transactions going into or coming out of ERCOT. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| FirstEnergy Corporation | x | | This document in its historical forms has proven to be very valuable. After the changes to the document proposed above, this document would continue that legacy. Maintenance of the document should be the responsibility of a joint NAESB/NERC Working Group, similar to the joint Operating Committee/Planning Committee Working Group that manages the definition of Adequate Level of Reliability/Reliability Concepts Document. However, we would not advocate expending a great deal of resources to keep a document up-to-date, when those resources could be used to push beyond TLR to develop a mechanism that is more sophisticated and granular in approach to enhancing reliability. Moving in that direction would certainly lessen some of the serious overhead we currently are obligated to maintain (IDC, etc.). |

| #3 – Commenter | Yes | No | Comment |
|---|---|---|---|
| **Response:** Thank you for your comments. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Independent Electricity System Operator | x | | The document does provide a one-stop shop for all system operators and should be maintained in order to keep it current. |
| **Response:** Thank you for your comments. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| IRC SRC | x | | The responsibility should be divided among NERC and NAESB. Changes to the NAESB standard that require changes to this document should be made by NAESB and changes to the NERC standard that require changes to the document should be made by NERC. |
| **Response:** Thank you for your suggestions. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| NPCC Regional Standards Committee | x | | The document does provide a one-stop shop for all system operators and should be maintained in order to keep it current.<br><br>Suggest that the NERC Manager of Business Practice Coordination be the caretaker of this document. |
| NRG Energy | x | | The responsibility should remain with both NERC and NAESB to insure that both the reliability and commercial aspects of TRLs is coordinated. |
| **Response:** Thank you for your suggestions. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| **Response:** The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Southern Company Transmission | x | | Yes, the reference manual should either be maintained by NERC or by FERC. |
| **Response:** The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. We do not believe that this is FERC's responsibility or role, and this document is not required to be filed with the FERC. | | | |
| SPP Operating Reliability Working Group | | x | Apparently, if there was sufficient stakeholder comment to warrant the recombination effort, there will more than likely be similar requests to maintain it although we do not necessarily hold that opinion. If the document is to be maintained, we concur with the maintenance process outlined on page 4 of the document. |

| #3 – Commenter | Yes | No | Comment |
|---|---|---|---|
| **Response:** Thank you for your comment. The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |
| Tampa Electric Company | x | | Joint task force. |
| **Response:** The SDT believes that updates to the manual will be handled by NERC and NAESB when making changes to the standards or business practices, with the assumption that these changes will generally require a joint team to develop those changes. | | | |

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

**Summary Consideration:** One entity expressed concerns with the standards themselves. The drafting team responded that these concerns needed to be addressed through the standards development process.

| #4 – Commenter | Yes | No | Comment |
|---|---|---|---|
| American Electric Power | | x | |
| Bonneville Power Administration | | x | |
| Duke Energy Corporation | | x | |
| Electric Reliability Council of Texas | x | | The Market Rules that compose the agreement within ERCOT preclude the use of TLR. |
| **Response:** ERCOT may not initiate TLR, but it does have some responsibility in responding to TLR requests that affect transactions going into or coming out of ERCOT. | | | |
| FirstEnergy Corporation | | x | |
| Independent Electricity System Operator | | x | |
| IRC SRC | | x | |
| NPCC Regional Standards Committee | | x | |
| NRG Energy | x | | IRO-006-03 section 2.6.2 Step 2, on Reallocation procedures states,"the RC shall calculate the percentage of the overload on the constrained facility caused by both firm point to point transmission service and the transmission provider's network integration transmission service and native load." In IRO-006-04, this section appears assigned to the manual under section 5.1.6.6. Within this section, the inclusion of services evaluated defaults to NAESB 3.11 which reads, "the RC intitiating a curtailment shall identify for curtailment all firm transmission services (i.e. PTP, NI and service to NL) that contribute to the flow on any constrained facility or flowgate ..." As written, NRG believes NAESB 3.11 eliminates the inclusion of non-firm service during Reallocation procedures (i.e., NN6 priority oasis or grandfathered Oasis which Transmission Owners consider as non-firm service.) |
| **Response:** The manual is intended to represent the standards and business practices as written; the drafting team is not soliciting comment on the standards or business practices themselves. However, the SDT will discuss this item with NAESB and determine how best to address your concern. | | | |
| Southern Company Transmission | | x | |

| #4 – Commenter | Yes | No | Comment |
|---|---|---|---|
| SPP Operating Reliability Working Group | | x | |
| Tampa Electric Company | | x | |

**5.** Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

**Summary Consideration:** Commenters generally had suggestions regarding formatting, rather than content. Those commenters that did have suggestions regarding comment were mostly focused on changes to the standards. The SD suggested to them that they participate in the standards development process.

| #5 – Commenter | Comment |
|---|---|
| American Electric Power | Need to define "ERO" in the manual. Also, on page 9, Measure 3, it talks about using a local procedure as a substitute for curtailment as directed by the Interconnection-wide procedure. But the local procedure has to be prior approved by the ERO. Does this mean we can not develop local procedures on the fly because it has not been approved by the ERO? |
| **Response:** We have modified the reference to explicitly state "Electric Reliability Organization."<br><br>The manual does not make changes to the standard. We suggest that you request a formal interpretation of the standard if you have questions regarding local procedures. | |
| Bonneville Power Administration | This is a large document that isn't easy to navigate. The table of contents doesn't provide much assistance. This document refers to the "WSCC Unscheduled Flow Mitigation Plan" I thought we were the WECC. |
| **Response:** We have worked to improve the navigation of the document.<br>The document referenced in the link contains the title "WSCC Unscheduled Flow Mitigation Plan;" accordingly, this is the title we used in the reference. | |
| Duke Energy Corporation | No other comments. |
| Electric Reliability Council of Texas | This document should be clearly titled as an "EASTERN INTERCONNECT" manual, not a global NERC manual. Although there are sections of this manual (particularly in section 3) which refer to WECC and ERCOT; the procedures incorporated are clearly the Eastern interconnection procedures. This manual does not have the global applicability which it seems to claim.<br><br>This is obvious when you download the manual, and find it is described in the "Purpose/Industry Need" as "a joint effort to update the Eastern Interconnection TLR procedure. " NERC knows this is an eastern interconnection only document. We need to try and avoid it being the law for the entire United States. |
| **Response:** This manual has no statutory relevance; it is purely a reference for operators. The standards themselves address the regional and jurisdictional concerns you have expressed. | |

| #5 – Commenter | Comment |
|---|---|
| FirstEnergy Corporation | FE provides the following suggestions to revise the "Manual Objectives" to state more clearly what the manual is designed to accomplish:<br><br>1. Describe the overall TLR procedure - both reliability and commercial aspects<br>2. Describe the different levels of curtailment and associated reloading of interchange transactions<br>3. Describe TLR procedure implementation process<br>4. Describe the severity of violations for non-compliance<br><br>Also:<br>FE suggests a revision to Section 1's TLR Level Process flow chart diagram. It indicates that a flowgate must go into SOL before it can become an IROL. This may not always be the case. It may be possible for facilities to become an IROL without reaching a SOL threshold. If a novice operator looks only at the flow chart, they may feel the rules obligate them to reach an SOL limit before TLR relief measures can be implemented to relieve an IROL. IROLs are made up, in many cases, of flow gates or interfaces. In these instances, an IROL limit can be reached without reaching an SOL limit on a single element and the combined SOL limits of the flowgate/interface can far exceed the IROL Limits of the flowgate/interface. The communication of the ability to go directly to IROL limit and mitigation without reaching an SOL limit is necessary and important in all aspects of this document. The flow chart should be revised to reflect this operating situation. |
| **Response:** We have modified the document to use the word "describe" as requested.<br>This diagram is part of an approved standard, and cannot be changed at this time. However, we will address this concern with the next version of the standard. | |
| Independent Electricity System Operator | i) For each TLR level identified, there should only be 2 sub-sections - CONDITION (NERC standard) and ACTION (NAESB standard) - additional sub-sections like "Holding Procedures" are not required as these lead to unnecessary confusion - an example of this is as follows: For TLR Level 2, there is no reason why 3.2.5 of the NAESB Standard is under "Holding Procedures" (5.2.2.2) whereas similar requirement for TLR Level 3A (3.3.1.2) is under "Actions" (5.2.3.2). Hence, we suggest that it would be easier to divide them as only "Conditions" as stipulated in the NERC IRO-006-4 Attachment and "Actions" as stipulated by the NAESB standards.<br>Response: The SDT has reviewed the language for consistency, and believes the structure is correct.<br><br>ii) Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written.<br>Response: We have modified the document to incorporate this suggestion. |

| #5 – Commenter | Comment |
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| | iii) The table of contents (TOC) should be expanded to one additional level at least. It becomes clearer for the reader to know that for #7 IDC Reference Document, it includes further discussions including how the IDC handles the reallocation process, timing considerations involved etc. An expanded tOC allows for a easier look-up.<br>Response: We have modified and expanded the TOC to address your concerns.<br><br>iv) The glossary of terms, be it NERC or NAESB, should always be at the beginning of the document - terms are helpful in understanding the text of the document and placing them after the text or the meat of the document does not make real sense.<br>Response: We have modified the document to move the definitions to the front.<br><br>v) Good idead to provide the TLR flowchart in the beginning of the document. There is no need for NERC Appendix A which is at the end of the current document as it is the same flowchart.<br>Response: We have included the diagram in Appendix A, as it is an appendix to the standard. The diagram at the front of the document has been included for convenience.<br><br>vi) The list of NERC and NAESB appendices should be listed in the TOC in sequence and attached to the end of the manual, instead of trying to map it in the middle of the document - a separate list of notes could be added in the document expliaining the mapping - this helps in the readability of the document, makes it a complete "reference manual" rather than only as a mapping attempt.<br>Response: The list referenced is actually a page from Attachment 1. We have included all the Appendices themselves at the end of the doument, in sections 8 (NAESB) and 9 (NERC).<br><br>Vii) In NAESB Appendix A, there seems to be a disconnect between the text and the illustration for case # 6.<br>Response: We have updated the Manual to include the correct NAESB diagram. |
| **Response:** Please see in-line responses. | |
| IRC SRC | Fig. 5 is missing. |
| **Response:** We have incorporated the correct figure. | |
| NPCC Regional Standards Committee | i) For each TLR level identified, there should only be 2 sub-sections - CONDITION (NERC standard) and ACTION (NAESB standard) - additional sub-sections like "Holding Procedures" are not required as these lead to unnecessary confusion - an example of this is as follows: For TLR Level 2, there is no reason why 3.2.5 of the NAESB Standard is under "Holding Procedures" (5.2.2.2) whereas similar requirement for TLR Level 3A (3.3.1.2) is under "Actions" (5.2.3.2). Hence, we suggest that it would be easier to |

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| | divide them as only "Conditions" as stipulated in the NERC IRO-006-4 Attachment and "Actions" as stipulated by the NAESB standards.<br><br>ii) Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written.<br><br>iii) The table of contents (TOC) should be expanded to one additional level at least. It becomes clearer for the reader to know that for #7 IDC Reference Document, it includes further discussions including how the IDC handles the reallocation process, timing considerations involved etc. An expanded TOC allows for a easier look-up.<br><br>iv) The glossary of terms, be it NERC or NAESB, should always be at the beginning of the document - terms are helpful in understanding the text of the document and placing them after the text or the meat of the document does not make real sense.<br><br>v) Good idea to provide the TLR flowchart in the beginning of the document. There is no need for NERC Appendix A which is at the end of the current document as it is the same flowchart.<br><br>vi) The list of NERC and NAESB appendices should be listed in the TOC in sequence and attached to the end of the manual, instead of trying to map it in the middle of the document - a separate list of notes could be added in the document explaining the mapping - this helps in the readability of the document, makes it a complete "reference manual" rather than only as a mapping attempt.<br><br>vii) In NAESB Appendix A, there seems to be a disconnect between the text and the illustration for case # 6. |
| **Response:** Please see IESO response. | |
| NRG Energy | As noted in the Background section of the manual, it was recognized that the TRL procedure is to be "implemented equally and without bias to all parties involved". Clarification on the application of this manual's procedures to two situations is needed: controlling for the effects of "put" power off QFs (i.e., power from QFs in excess of host load requirements which is "put" onto the transmission network), and RC's responsibilities and requirements for controlling for the impacts off internal schedules. Additionally, NRG believes that the procedures relating to NNL obligations, as written in the manual, could result in an interpretation which violates the order of priority for service curtailment.<br><br>Qualified Facilities |

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| | FERC Order No 696, finalized in May 2007, eliminated exemption of QFs from section 215 of EPAct. FERC states in the Order's introduction, "there is not a meaningful distinction between QF and non-QF generators that warrants a generic exemption of the QFs from reliability standards. FERC provided parameters for those units affected, and in its study found 745 or the 3265 QFs in the "universe of qualifying facilities" would fall under established reliability standards. What FERC did not elaborate upon, which we feel should be addressed in this document, is how "put" power should be treated within context of this reliability standard. Is "put" power exempt from the TLR process?<br><br>To the extent generators affected by Order 696 are not exempt from the TLR process, where in the standard is the unique nature of "put" power addressed? We recognize RCs can capture the effects through Local Area Processes. Once scale of required relief is elevated to SOL or IROL status, what responsibilities do RCs have to include QF generation into the solution matrix; what tools are available to measure their required relief? Although the standard generally grants RCs the ability to mitigate SOL and IROL violations and provides specific guidance regarding Interchange Transactions and NNL obligations, we contend the current procedures heavily rely upon associating power flows with an Oasis reservation. Although these procedures might allow reliability obligations to be met, we question their merits on equitably distributing the responsibility.<br><br>Since "put" power does not have an associated Oasis reservation, and relief options for inter-connection wide violations are primarily provided by IDC results, RCs face the challenge of reconciling the impacts from QF generation within the functional limits of the IDC. With the absence of Oasis reservations, the IDC cannot evaluate these flows in similar fashion to Interchange Schedules (These flows are not Interchange Schedules since they have source/sinks within the same BA.) We also question whether flows off QF "put" power can be evaluated in a BA's NNL obligations under the manual's current language. Section 3.11.2 outlines the procedure for RCs to determine NNL obligations for BAs. The procedure allows RCs to use Network Integrated Transmission Service and service to Native Load in calculations. Does "service", referenced in manual, include "put" power, or does it only refer to service for which an Oasis reservation has been granted? To the extent QF generation should be controlled for in NNL obligations, clarification on the definition of "service" is central to providing a standardized process. Otherwise, inclusion of QFs into a BA's NNL obligations is left to the individual interpretations of RCs or QF "put" power is excluded altogether despite its impact on transmission constraints.<br><br>Sufficient need exists for the manual to specifically address RC's obligations and/or limitations regarding QF "put" power under this standard. The proposed section might include attention to technical considerations created by the absence of Oasis. Since PURPA grants QFs unique rights, and potential reliability obligations generated under Order 696 are relatively new, we believe there is insufficient precedent available to RCs; especially, when faced with legal obligations that differ from non- QF |

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| | generation. Technical guidance which bounds the reliability obligations against the rights of QF "put" power provides RCs a more uniform method to comply with the standard. Excluding such detailed guidance risks an interpretation by the RC which may violate the goal of distributing reliability obligations "without bias to all parties involved."<br><br>**Response:** NERC and NAESB stakeholders are currently exploring options to address more detailed information with regard to untagged energy flows. The SDT believes that future modifications to the IDC and/or standards and business practices will address this concern. This document is intended not to indicate how the standards have been modified, but to show the requirements and business practices together. NRG is encouraged to pursue any changes they desire to the NERC or NAESB standards through their associated standards development processes.<br><br>Internal Schedules<br>For purposes of these comments, we are referring to internal schedules as E-tags that have a corresponding Oasis reservation with a source and sink contained within the same BA. It has come to our attention that BAs which contain a number of generators not owned by the hosting BA, such as IPPs, may present RCs with challenges when complying with this standard. We believe in certain regions, these internal schedules are significant enough to justify for the manual to provide specific guidance to RCs on obligations to include the flowgate impacts from these schedules, and potential technical considerations on how these impacts should be measured and controlled. To clarify the situation surrounding internal schedules, consider the following example.<br><br>A 500 mw IPP generator resides in BA "X" and sells this power on an hourly basis to load also residing in BA "X". This 500 mw facility is not considered a designated network resource and is not figured into the network customers long term resources. This internal resource has an associated E-tag and has acquired an Oasis reservation designating the source and sink. Since this E-tag has the same POD/POR it, is not considered an interchange transaction by the IDC. Are the impacts of this flow to be included within the network loads NNL obligations? If so, how is this designation to be made within the IDC calculator? Currently, the IDC refers to the Generator to Load Distribution Factors (GLDF) in determining NNL obligations. The GLDF assigns a percentage ownership to the generating resources serving the network load. This system appears to work provided the network load customer has ownership interest in the units servicing its load. However, flows off IPP units servicing network load are independently owned. Hence, network loads are liable to have their NNL obligations understated by showing zero ownership in the GLDF portion of the IDC calculation for power servicing their load off IPP units. The amount of relief required to mitigate a flowgate constraint in aggregate is not reduced, but the relief responsibilities determined for each network load customer will be biased. Hence, IPP purchases to service network load, allows for a situation where the host NNL obligations are |

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| | understated; thereby overstating the NNL obligations for neighboring network load customers. To the extent RCs are required by the standard to include impacts from internal schedules, and that inclusion requires "unbiased" distribution of those obligations as NNL relief, we contend opportunity exist which elevates the considerations placed on non-firm service to those afforded firm service priority. For internal schedules which utilize non-firm network import (NN6), we believe the manual's language does not provide guidance regarding their inclusion during NNL obligations. Since relief from NNL obligations are triggered during Level 5 TLRs, situations can occur where nonfirm network service associated with Interchange schedules will have been curtailed during Level 3 TLRs, yet non-firm network service associated with internal schedules are not controlled during Level 3 TLR.<br><br>To the extent these internal schedules flowing on non-firm network service are accounted for during NNL procedures, these flows are evaluated along with firm network schedules servicing the network load. During the Level 5 TLR stage, these non-firms Oasis are not evaluated until the same time as Interchange Schedules with firm Oasis. Is the intent of the standard to grant internal schedules on non-firm Oasis the same priority as firm service? We contend that current language in manual allows for this situation for internal schedules using non-firm network service. If there exist within the TLR process a procedure where non-firm internal schedules should be accounted,for besides within the NNL obligations of a network load customer, we believe the manual should provide specific guidance towards.<br><br>**Response:** NERC and NAESB stakeholders are currently exploring options to address more detailed information with regard to untagged energy flows. The SDT believes that future modifications to the IDC and/or standards and business practices will address some of this concern. With regard to tagged internal schedules, the IDC currently has provisions to address this in some cases; however, it generally requires modifications to the TDF matrices through the creation of additional specifically modeled points. To the extent such modifications are needed to support the tagging of specific generators to system load, RCs or BAs are expected to pursue such modifications through the IDCWG. |
| **Response:** Please see in-line responses. | |
| Southern Company Transmission | 1. Overall it appears that the drafting team did a good job in combining the content of both the standards into a single reference manual. Most of our comments/observations are related to the content of either the NERC standard or the NAESB standard and not related to the way this particular document is structured.<br><br>2. Comments related to the document itself:<br>a. The flow chart on page 5 is a little difficult to read; I would suggest removal of the curves in the outer return paths.<br>Response: This diagram is part of the standard, and cannot be changed at this time. However, it will be |

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| | udpated with the next version of the standard.<br><br>b. The document itself has a lot of sub-bullets and references to other documents making it a little difficult to use a reference manual in finding a complete answer to a question quickly. However, since two ANSI standards are involved I can't think of a better way to present the material without re-wording the original standards.<br>Response: We have used "grey boxes" to better separate the NAESB numbering, which we believe will help in understanding the document.<br><br>3. Comments related to the standards:<br>a. Section 4.1.4 page 10:<br>If or when the SCA RC declares a TLR we will need to archive the real-time contingency monitor contingencies and their designations (R, P, etc…) for 18 months. It may be well that we go ahead and set a data retention policy for this data to 18 months.<br>b. Section 5.1.2 on page 13:<br>"A Reliability Coordinator may utilize the TLR Procedure to mitigate potential or existing System Operating Limit (SOL) violations or to prevent Interconnection Reliability Operating Limit (IROL) violations on any transmission facility modeled in the IDC. However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations. Effective alternatives to the use of the TLR procedure in situations involving an existing IROL violation include: reconfiguration, re-dispatch, and load shedding outside the TLR process."<br>This falls short of saying that you must, or even should, implement local procedures prior to issuing a TLR and this is the only section of the document which specially addresses alternatives to issuing TLRs. There are however several parts of the document which address using local procedures addition to use of TLRs (section 1.2 page 15)<br>c. Section 3.3.5.2 on page 26 states that:<br>"Interchange Transactions with sub-priority S2 shall be allowed to reload to the lesser of its current hour MW level or the MW level specified in the schedule for the upcoming hour. For calculated values less than zero, zero shall be used."<br>This supports the RC's direction that reloads initiated by the IDC should be accepted even if they are off-hour reloads.<br>Response: The drafting team will consider these comments in the next update to the stadnards and business practices. |
| **Response:** Please see in-line responses. | |
| SPP Operating Reliability Working Group | Section 5.1.8 - The first parenthetical phrase should be deleted. While the NERC TLR Log is automatically opened when a TLR above a Level 2 is issued, the process does require manual |

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| | intervention by the RC to enter loading and other information. Otherwise when the Level 0 is issued the Log is closed and sent to NERC without being filled out completely.<br>Response: We have deleted the parenthetical phrase.<br><br>Section 5.1.9 - There are a couple of yellow boxes in this section asking what to do with the NERC Market Committee reference. Comments in red indicate that the references will be removed. Why weren't they?<br>**Response:** We have removed these boxes from the document. However, based on the drafting team's scope of work, the actual references to the market Committee are not to be removed form the standard until the next revision. |
| **Response:** Please see in-line responses. | |
| Tampa Electric Company | None. |