

# Survey Report

## Survey Details

**Name** 2015-06 IRO | IRO-006-East & IRO-009

**Description**

**Start Date** 5/21/2015

**End Date** 7/9/2015

**Associated Ballots**

Project 2015-06 Interconnection Reliability Operations and Coordination IRO-006-East IN 1 ST

Project 2015-06 Interconnection Reliability Operations and Coordination IRO-009 IN 1 ST

## Survey Questions

**1. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R1. Do you agree with the retirement of IRO-006-EAST-1 Requirement R1? If not, please explain specifically what aspects of the retirement you disagree with.**

Yes

No

**2. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R2. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R2? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

**3. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R3. Do you agree with the retirement of IRO-006-EAST-1 Requirement R3? If not, please explain specifically what aspects of the retirement you disagree with.**

Yes

No

**4. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R4. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

**5. The IRO SDT recommends revising IRO-009-1 Requirement R1 to include elements of IRO-009-1 Requirement R2. Do you agree with the proposed revisions to IRO-009-1 Requirement R1? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

**6. The IRO SDT recommends revising IRO-009-1 Requirement R3. Do you agree with the proposed revisions to IRO-009-1 Requirement R3? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

**7. The IRO SDT recommends revising IRO-009-1 Requirement R4. Do you agree with the proposed revisions to IRO-009-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

**8. The IRO SDT recommends revising IRO-009-1 Requirement R5. Do you agree with the proposed revisions to IRO-009-1 Requirement R5? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

Yes

No

9. *If you have any other comments that you have not already mentioned above, please provide them here:*

---

## Responses By Question

1. *The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R1. Do you agree with the retirement of IRO-006-EAST-1 Requirement R1? If not, please explain specifically what aspects of the retirement you disagree with.*

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer: Yes

**Answer Comment:**

ReliabilityFirst agrees that the recommended changes in the IRO-006-East draft standard are consistent with the five year review team recommendations and the overall quality of the language in the standard is improved.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

[Group Information](#)

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Voter** **Segment**

Chris Scanlon 1

**Entity** **Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6

Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Emily Rousseau	1,2,3,4,5,6
<b>Entity</b>	<b>Region(s)</b>
MRO	MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**  
N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2

Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

### Voter Information

**Voter** **Segment**

Kathleen Goodman 2

**Entity** **Region(s)**

ISO New England, Inc. NPCC

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name:        Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
R. Scott Moore	3

<b>Entity</b>	<b>Region(s)</b>
Southern Company - Alabama Power Company	

Selected Answer:        Yes

**Answer Comment:**



**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

Voter	Segment
Colby Bellville	1,3,5,6

  

Entity	Region(s)
Duke Energy	FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**  
N/A for Texas RE

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

## Group Information

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5

Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

### Voter Information

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

Selected Answer: No

**Answer Comment:**

The SDT should reconsider retiring R1 because the requirement was added to the standard and worded in such a way to address a FERC directive in Order 693 which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation.

**Document Name:**

Likes: 0

Dislikes: 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: No

**Answer Comment:**

**We reiterate the following comments which we submitted in 2013 when the 5-Year Review Team's recommendations were posted for comment, and in April 2015 when the revised recommendations were posted for comment:**

**We urge the SDT to reconsider retiring R1 since this requirement was added to the standard and worded that way to address a FERC directive in Order 693 which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation.**

**Part excerpt from the Order, Para. 964:**

**[Accordingly, in addition to approving the Reliability Standard, the Commission directs the ERO to develop a modification to IRO-006-3 through the Reliability Standards development process that (1) includes a clear warning that the TLR procedure is an inappropriate and ineffective tool to mitigate actual IROL violations and (2) identifies in a Requirement the available alternatives to mitigate an IROL violation other than use of the TLR procedure.]**

**The language “...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)” is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other (presumably more effective) means. The other means listed in R1 are to provide the list of measures that should be applied before or in conjunction with TRL. Alternatively, they can be referenced by quoting the other standards which contain these measures.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:** TVA basis for selecting "No" is provided in response to question 9.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**



Likes: 0

Dislikes: 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

Voter	Segment
-------	---------

Shannon Mickens	2
-----------------	---

Entity	Region(s)
--------	-----------

Southwest Power Pool, Inc. (RTO)	SPP
----------------------------------	-----

Selected Answer: No

**Answer Comment:**

We agree with the SDT that if Requirement R1 of IRO-006-East-1 presents a redundancy issue (Paragraph 81) in reference to IRO-008-1 Requirement R3, and IRO-009-1 Requirement R4 and it should be retired. However, in your background information of the comment form (second paragraph last sentence), you mentioned that project 2014-03 (Revisions to TOP and IRO Standards) retired the IRO-008-1 standard. We would suggest to the IRO-SDT the removal of this phrase (IRO-008-1 and its Requirement R3 redundancy issues) from your **Rationale for recommendation to retire Requirement R1**. As we reviewed the NERC site it shows that this standard is **subject to enforcement**, we have a concern that this information presents an inaccuracy and would ask the drafting team to provide some clarity on the status of the IRO-008-1.

**Document Name:**

Likes: 0

Dislikes: 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**2. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R2. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R2? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

**Selected Answer:** No

**Answer Comment:**

ReliabilityFirst does offer a consideration regarding IRO-006-EAST-2 R2 to clearly identify which entity the 15 minutes apply to. As written, it can be left to interpretation whether the 15 minute timeframe applies to the Sink Balancing Authority or Reliability Coordinator. ReliabilityFirst offers the following

modified language for consideration:

“Each Reliability Coordinator shall instruct the Sink Balancing Authority (for Sink Balancing Authorities that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure) to implement the congestion management actions within 15 minutes of receiving the request from the issuing Reliability Coordinator...”

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Voter** **Segment**

Chris Scanlon

1

**Entity**

**Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0



Dislikes: 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6

Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
---------------	--------------------------------	-----	-------

**Voter Information**

**Voter** **Segment**

Emily Rousseau 1,2,3,4,5,6

**Entity** **Region(s)**

MRO MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

**Voter Information**

**Voter** **Segment**

Kathleen Goodman

2

**Entity**

**Region(s)**

ISO New England, Inc.

NPCC

Selected Answer: No

**Answer Comment:**

The SRC is concerned with the retirement of Requirement R1, as it pertains to a directive in Order 693:

"(1) includes a clear warning that a TLR procedure is an inappropriate and ineffective tool to mitigate IROL violations; (2) identifies in a Requirement the available alternatives to use of the TLR procedure to mitigate an IROL violation and;....."

The SRC respectfully suggests that SDT vet the retirement of Requirement R1 with appropriate ERO and FERC liaisons to ensure that its removal would not result in reissuance of a similar directive. An alternative approach would be to revise Requirement R2 to provide:

Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance shall: (1) prior to or concurrent with such initiation, evaluate and initiate alternatives to address such exceedance, (2) identify the TLR level and the congestion management actions to be implemented, and (3) update this information at least every clock hour (except TLR-1) after initiation up to and including the hour when the TLR level has been identified as TLR Level 0

**Document Name:**

Likes: 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: No

**Answer Comment:**

“(up to and including load shedding)” should be “(up to and including load shedding for IROL exceedances)”. Current wording could suggest that load shedding is a mandatory action to prevent an IROL exceedance. Load shedding should be an option at the system operator's disposal to prevent load shedding, but it should not be required.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name: Manage Group

Group Member Name	Entity	Region	Segments
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

**Voter Information**

Voter	Segment
R. Scott Moore	3



**Entity**

**Region(s)**

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

**Voter**

**Segment**

Colby Bellville

1,3,5,6

**Entity**

**Region(s)**

Duke Energy

FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

N/A for Texas RE

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6

Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

### Voter Information

### Segment

**Voter**

Lee Pedowicz

10

**Entity**

**Region(s)**

Northeast Power Coordinating Council

NPCC

Selected Answer: No

**Answer Comment:**

Where is the RC to update the TLR implementation information? The update of "at least every clock hour" is the minimum. The implementation information should be updated as system conditions change. Suggest changing the wording to:

"...and shall update this information as changes in system warrant deliberate changes to the in force implemented TLR procedure, and at least hourly..."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

TVA basis for selecting "No" is provided in response to question 9.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**  
N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
-------------------	--------	--------	----------



Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Shannon Mickens	2

<b>Entity</b>	<b>Region(s)</b>
Southwest Power Pool, Inc. (RTO)	SPP

Selected Answer: Yes

**Answer Comment:**

We would suggest to the SDT to coordinate efforts with the FAC Review Team/SDT along with the Alignment of Terms (Project 2015-04) SDT to ensure that the term 'System Operating Limit-SOL' is correctly defined and aligned with all relevant documentation such as: the Functional Model, Glossary of Terms and the Rules of Procedure (RoP). Additionally, we would ask the drafting team to provide clarity on where should the TLR levels and congestion management actions will need to be updated.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

Likes: 0

Dislikes: 0

**3. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R3. Do you agree with the retirement of IRO-006-EAST-1 Requirement R3? If not, please explain specifically what aspects of the retirement you disagree with.**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Voter**

**Segment**

Chris Scanlon

1

**Entity**

**Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6



Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Emily Rousseau	1,2,3,4,5,6

<b>Entity</b>	<b>Region(s)</b>
MRO	MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Quebec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

**Voter Information**

**Voter** **Segment**

Kathleen Goodman 2

**Entity** **Region(s)**

ISO New England, Inc. NPCC

Selected Answer: Yes

**Answer Comment:**

The SRC agrees with the retirement, but requests clarification that it is the SDT's position that, in the event of an IDC failure, TLR action will be very limited or unavailable, requiring manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System. If this is the SDT's intent, the SRC suggests the SDT add a condition in R1 (previously R2), to read as follows (addition in square brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify.....

This addition will address ambiguity regarding whether TLRs must be implemented when the IDC is unavailable

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name:        Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
R. Scott Moore	3

<b>Entity</b>	<b>Region(s)</b>
Southern Company - Alabama Power Company	

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6

**Entity****Region(s)**

Duke Energy

FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:****Document Name:**

Likes: 0

Dislikes: 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

N/A for Texas RE

**Document Name:**

Likes: 0

Dislikes: 0

## Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

### Group Information

Group Name: NPCC--Project 2015-06

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5

Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

### Voter Information

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

Selected Answer: No

**Answer Comment:**

If the acronym IDC is to stay with the standard, it should be spelled out at its initial usage, with the acronym being used subsequently.

Suggest not using the word “ensure” in the Purpose. Consider revising the wording of the Purpose to:

To coordinate action between Reliability Coordinators within the Eastern Interconnection when implementing transmission loading relief procedures (TLR) for the Eastern Interconnection to prevent or manage potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES).

The SDT should consider the following:

**a.** The need for this requirement was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to assume this responsibility and ensure the correctness of the communicated actions.

**b.** If the SDT’s position is that in the event of an IDC failure, TLR action will be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, then we suggest the SDT to add a condition in R1 (previously R2), to read as follows (addition in square brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify.....

This will effectively remove the need to implement TLRs when the IDC is unavailable.

Add the above wording to R2 to address the situation when IDC is not available.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

#### **Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

We are indifferent to the proposal, but suggest that the SDT carefully consider the following:

a. The need for this requirement was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions.

b. If the SDT's position is that in the event of an IDC failure, TLR action will be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, then we suggest the SDT to add a condition in R1 (previously R2), to read as follows (addition in square

brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify.....

This will effectively remove the need to implement TLRs when the IDC is unavailable.

We therefore suggest the SDT to either keep the requirement R3 as is, or add the above wording to R2 to address the situation when IDC is not available.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

TVA basis for selecting "No" is provided in response to question 9.

**Document Name:**

Likes: 0

Dislikes: 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

N/A

**Document Name:**

Likes: 0

Dislikes: 0



**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

**Voter** **Segment**

Shannon Mickens 2

**Entity** **Region(s)**

Southwest Power Pool, Inc. (RTO) SPP

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**4. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R4. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1

John Bee	BGE, ComEd, PECO LSE's	RFC	3
----------	------------------------	-----	---

**Voter Information**

**Voter** **Segment**

Chris Scanlon 1

**Entity** **Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4



Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Emily Rousseau	1,2,3,4,5,6
<b>Entity</b>	<b>Region(s)</b>
MRO	MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

**Selected Answer:** No

**Answer Comment:**

To provide clarity around the 15 minute time frame suggest rewording the requirement as below:

"Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions."

Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?

If the 15 minutes is the time requirement for the RC to instruct the Sink BA, then a time frame also should be identified for when the BA has to implement actions. This time requirement should also apply to the GOP.

We request the SDT consider adding time requirements to specify when the Sink BA and associated GOPs should have curtailment actions completed.

We understand this would require adding BA, TOP, and GOP to be applicable to the standard.

To provide clarity around the 15 minute time frame suggest rewording the exception as below:

Should an assessment determines shows that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions, **within 15 minutes of receiving the request**, with the issuing Reliability Coordinator.

This also further agrees with the associated VSL

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

### Group Information

Group Name: Standards Review Committee (SRC)

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

### Voter Information

**Voter**

**Segment**

Kathleen Goodman

2

**Entity**

**Region(s)**

ISO New England, Inc.

NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name: Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6

Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

**Voter Information**

**Voter** **Segment**

R. Scott Moore 3

**Entity** **Region(s)**

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

### Group Information

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

### Voter Information

Voter	Segment
Colby Bellville	1,3,5,6
Entity	Region(s)
Duke Energy	FRCC,SERC,RFC

Selected Answer: No

#### Answer Comment:

Duke Energy requests clarification from the SDT regarding the wording in the proposed R4. As currently written, it is not entirely clear as to what/who is attributable to the given 15 minute timeframe. Is the 15

**minute timeframe attributable to the RC, and requires the RC to instruct the Sink BA to implement congestion management actions within 15 minutes of receiving the request from an issuing RC? Or, is the 15 minute timeframe attributable to the Sink BA, requiring the Sink BA to implement the congestion management actions within 15 minutes of receiving instruction from its RC?**

**Alternative language that could help to add clarity to the requirement is dependent upon the answer to our question above.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

N/A for Texas RE

**Document Name:**

**Likes:** 0

**Dislikes:** 0

## Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

### Group Information

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8

Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

### Voter Information

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

To provide clarity around the 15 minute time frame suggest rewording the requirement as below:

"

Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions."

Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?

If the 15 minutes is the time requirement for the RC to instruct the Sink BA, then a time frame also should be identified for when the BA has to implement actions.

We request the SDT consider adding time requirements to specify when the

Sink BA should have curtailment actions completed.

We understand this would require adding BA to be applicable to the standard.

To provide clarity around the 15 minute time frame suggest rewording the exception as below:

Should an assessment determine that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions, **within 15 minutes of receiving the request**, with the issuing Reliability Coordinator.

This also further agrees with the associated VSL.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**



Likes: 0

Dislikes: 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

Voter	Segment
Shannon Mickens	2

  

Entity	Region(s)
Southwest Power Pool, Inc. (RTO)	SPP

Selected Answer: Yes

**Answer Comment:**

The review group agrees that there should be some form of revision in reference to Requirement R4. We would suggest to the SDT to include some alternative language to ensure that the Sink Balancing Authority being referenced in this requirement is applicable to the Reliability Coordinator's area. We would suggest the alternative language as followed: 'Each Reliability Coordinator with a Sink Balancing Authority (with in the Reliability Coordinator's area) that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority (with in the Reliability Coordinator's area) to implement the congestion management actions within 15 minutes of receiving the request from the issuing'. The suggested alternative term 'area' was taken from page 6 of Requirement R2 **Registered Entity Response** section of the RSAW if you review the first sentence in reference to **Question**. Additionally, we would suggest to the drafting team to provide some form of examples to help give more clarity on what type of assessment(s) they are referring to in the bullet. Providing proof of an assessment can be challenging depending on the issue. The use of the term 'assessment' may need to be reviewed.

**Document Name:**

Likes: 0

Dislikes: 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: No

**Answer Comment:**

To provide clarity around the 15 minute time frame suggest rewording the requirement as below:

“Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions.”

Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?

If the 15 minutes is the time requirement for the RC to instruct the Sink BA, then a time frame also should be identified for when the BA has to implement actions. This time requirement should also apply to the GOP.

We request the SDT consider adding time requirements to specify when the Sink BA and associated GOPs should have curtailment actions completed. We understand this would require adding BA, TOP, and GOP to be applicable to the standard.

To provide clarity around the 15 minute time frame suggest rewording the exception as below:

Should an assessment determines shows that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions, within 15 minutes of receiving the request, with the issuing Reliability Coordinator.

This also further agrees with the associated VSL

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**5. *The IRO SDT recommends revising IRO-009-1 Requirement R1 to include elements of IRO-009-1 Requirement R2. Do you agree with the proposed revisions to IRO-009-1 Requirement R1? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.***

**Robert Hirchak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Voter** **Segment**

Chris Scanlon 1

**Entity** **Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**



**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1

Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Emily Rousseau	1,2,3,4,5,6
<b>Entity</b>	<b>Region(s)</b>
MRO	MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**

Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**[Group Information](#)**

Group Name: Standards Review Committee (SRC)

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

### Voter Information

Voter	Segment
-------	---------

Kathleen Goodman	2
------------------	---

Entity	Region(s)
--------	-----------

ISO New England, Inc.	NPCC
-----------------------	------

Selected Answer: No

### Answer Comment:

a) The SRC (note, ERCOT does not support this comment) has concerns with the clarity of the existing wording in Requirement R1. Specifically, it suggests that the following phrase be revised for clarity:

from

“For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day...”

to

“For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies through its Operational Planning Analysis...”

b) The SRC agrees with the proposed changes, but suggests to revise Part 1.2 as follows to improve clarity (added word in square bracket):

"1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL's Tv."

The added word is needed since an IROL is a limit, whose relief is not required; but its exceedance needs to be relieved.

c) There are two “that’s” in Measure M1. The measure should be revised to remove the additional “that.”

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name: Manage Group

Group Member Name	Entity	Region	Segments
-------------------	--------	--------	----------



John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

### Voter Information

**Voter** **Segment**

R. Scott Moore 3

**Entity** **Region(s)**

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6
<b>Entity</b>	<b>Region(s)</b>
Duke Energy	FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

**Group Name:** NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
--------------------------	---------------	---------------	-----------------

Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1

Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

### Voter Information

Voter	Segment
Lee Pedowicz	10

Entity	Region(s)
Northeast Power Coordinating Council	NPCC

Selected Answer: No

#### Answer Comment:

To be consistent with in place standard formatting, Requirement R1 should be revised to read:

R1. Each Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it the Reliability Coordinator shall take, or actions it shall direct others to take for each IROL

that the Reliability Coordinator identifies one or more days prior to the current day.

We agree with the proposed changes, but suggest rewording Part 1.2 as follows to improve clarity (added word in square bracket):

1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL's Tv.

The added word is needed since IROL is a limit, whose relief is not required; but its exceedance needs to be relieved.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

a. We agree with the proposed changes, but suggest to reword Part 1.2 as follows to improve clarity (added word in square bracket):

1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL's Tv.

The added word is needed since IROL is a limit, whose relief is not required; but its exceedance needs to be relieved.

b. There are two "that's" in Measure M1. Please remove one of them.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

**Voter** **Segment**

Shannon Mickens 2

**Entity** **Region(s)**

Southwest Power Pool, Inc. (RTO) SPP

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**6. The IRO SDT recommends revising IRO-009-1 Requirement R3. Do you agree with the proposed revisions to IRO-009-1 Requirement R3? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Segment**

**Voter**

Chris Scanlon

1

**Entity**

**Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

**Voter** **Segment**

Emily Rousseau 1,2,3,4,5,6

**Entity** **Region(s)**

MRO MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Quebec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**

Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

**Voter Information**

**Voter** **Segment**

Kathleen Goodman

2

**Entity**

**Region(s)**

ISO New England, Inc.

NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name: Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3

Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5
------------	--	------	---

**Voter Information**

**Voter** **Segment**

R. Scott Moore 3

**Entity** **Region(s)**

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

[Group Information](#)

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

### Voter Information

Voter	Segment
Colby Bellville	1,3,5,6

  

Entity	Region(s)
Duke Energy	FRCC,SERC,RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1

Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5

Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

**Voter Information**

**Voter** **Segment**

Lee Pedowicz 10

**Entity** **Region(s)**

Northeast Power Coordinating Council NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

**Voter** **Segment**

Shannon Mickens 2

**Entity** **Region(s)**

Southwest Power Pool, Inc. (RTO) SPP

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**7. The IRO SDT recommends revising IRO-009-1 Requirement R4. Do you agree with the proposed revisions to IRO-009-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Quebec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Voter** **Segment**

Chris Scanlon

1

**Entity**

**Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

Dislikes: 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6

Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

**Voter** **Segment**

Emily Rousseau 1,2,3,4,5,6

**Entity** **Region(s)**

MRO MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**



Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Quebec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**

Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

**Voter Information**

**Voter**

**Segment**

Kathleen Goodman

2

**Entity**

**Region(s)**

ISO New England, Inc.

NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

**Group Information**

Group Name: Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3

Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5
------------	--	------	---

**Voter Information**

**Voter** **Segment**

R. Scott Moore 3

**Entity** **Region(s)**

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
-------------------	--------	--------	----------

Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

**Segment**

**Voter**

Colby Bellville

1,3,5,6

**Entity**

**Region(s)**

Duke Energy

FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2

Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8

RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

**Segment**

**Voter**

Shannon Mickens

2

**Entity**

**Region(s)**

Southwest Power Pool, Inc. (RTO)

SPP

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**8. *The IRO SDT recommends revising IRO-009-1 Requirement R5. Do you agree with the proposed revisions to IRO-009-1 Requirement R5? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.***

**Robert Hirschak - Cleco Corporation - 6 -**

**Selected Answer:**

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

Dislikes: 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
John Bee	BGE, ComEd, PECO LSE's	RFC	3

**Voter Information**

**Segment**

**Voter**

Chris Scanlon

1

**Entity**

**Region(s)**

Exelon

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6

Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

[Voter Information](#)

**Segment**

**Voter**

Emily Rousseau

1,2,3,4,5,6

**Entity**

**Region(s)**

MRO

MRO

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**

Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0



**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2

Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

**Voter Information**

**Voter** **Segment**

Kathleen Goodman 2

**Entity** **Region(s)**

ISO New England, Inc. NPCC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

[Group Information](#)

Group Name:        Manage Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
R. Scott Moore	3

  

<b>Entity</b>	<b>Region(s)</b>
---------------	------------------

Southern Company - Alabama Power Company

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6

**Entity**

**Region(s)**

Duke Energy

FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3

Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1

Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

**Voter Information**

**Segment**

**Voter**

Lee Pedowicz

10

**Entity**

**Region(s)**

Northeast Power Coordinating Council

NPCC

Selected Answer:        Yes

**Answer Comment:**

**Document Name:**

**Likes:**                    0

**Dislikes:**                0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2

Mahmood Safi	Omaha Public Power District	MRO	1,3,5
--------------	-----------------------------	-----	-------

**Voter Information**

**Voter** **Segment**

Shannon Mickens 2

**Entity** **Region(s)**

Southwest Power Pool, Inc. (RTO) SPP

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

Likes: 0

Dislikes: 0

**9. If you have any other comments that you have not already mentioned above, please provide them here:**

**Robert Hirschak - Cleco Corporation - 6 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:** Comments regarding Standard IRO-009.docx

**Likes:** 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Anthony Jablonski - ReliabilityFirst - 10 -**

Selected Answer:



**Answer Comment:**

ReliabilityFirst agrees that the recommended changes in the IRO-009 draft standard are consistent with the five year review team recommendations and the overall quality of the language in the standard is improved.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

**Group Information**

Group Name: Exelon Utilities

Group Member Name	Entity	Region	Segments
Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1

John Bee	BGE, ComEd, PECO LSE's	RFC	3
----------	------------------------	-----	---

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Chris Scanlon	1

<b>Entity</b>	<b>Region(s)</b>
Exelon	

Selected Answer:

**Answer Comment:**

The implementation plans for both standards include a reference that the prior implementation plan is incorporated by reference and a link is provided. Unless the standards are still in implementation, these references are not necessary and may confuse some entities implementing the

standard. We encourage the SDT to remove the language unless it is needed for implementation.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Information

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6

Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

### Voter Information

	Segment
<b>Voter</b>	
Emily Rousseau	1,2,3,4,5,6
<b>Entity</b>	<b>Region(s)</b>

MRO

MRO

Selected Answer:

**Answer Comment:**

The drafting team did a good job of removing redundancies and adding clarity.

There is an apparent bug in the existing wording of IRO-009 that the team might consider changing. The current wording is: "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day..."

Yesterday is one day prior to the current day. The day before yesterday is more than one day prior to today. Seems like better wording would be: "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies beyond prior to the current day..."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -**

Selected Answer:

**Answer Comment:**

Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Mike Smith - Manitoba Hydro - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**



**Likes:** 0

**Dislikes:** 0

**Terry Bilke - Midcontinent ISO, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc.,  
2**

**Group Information**

Group Name: Standards Review Committee (SRC)

Group Member Name	Entity	Region	Segments
-------------------	--------	--------	----------

Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Greg Campoli	NYISO	NPCC	2
Matthew Goldberg	ISO-NE	NPCC	2
Christina Bigelow	ERCOT	TRE	2
Terry Bilke	MISO	MRO	2
Al Dicaprio	PJM	RFC	2

### Voter Information

<b>Voter</b>	<b>Segment</b>
Kathleen Goodman	2
<b>Entity</b>	<b>Region(s)</b>
ISO New England, Inc.	NPCC

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**R. Scott Moore - Southern Company - Alabama Power Company - 3 -**

### Group Information

Group Name: Manage Group

Group Member Name	Entity	Region	Segments
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
Bob Schaffeld	Southern Company Services, Inc.	SERC	1
Bill Shultz	Southern Company Generation	SERC	5
Scott Moore	Alabama Power Company	SERC	3
Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5

### Voter Information

**Segment**

**Voter**

R. Scott Moore

3

**Entity**

**Region(s)**

Southern Company - Alabama Power Company

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0



**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

**Segment**

**Voter**

Colby Bellville

1,3,5,6

**Entity**

**Region(s)**

Duke Energy

FRCC,SERC,RFC

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

Selected Answer:

**Answer Comment:**

During the last comment period, Texas RE pointed out that IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired. The SDT responded IRO-009-2 should not contain a reference to a retired document. It still appears that there is a reference to the Violation Report in section 1.1 Evidence Retention and Section 1.3 Additional Compliance Information.

Additionally, Texas RE noticed that the “v” in Tv was not consistently subscripted throughout the document.

Texas RE recommends changing the VSL for R3 so that it is consistent with the R3 language. For example, the standard language indicates that the Reliability Coordinator *shall act or direct others to act* to mitigate the IROL within its Tv, which the proposed VSL does not explicitly reflect. Therefore, Texas RE recommends the following revisions to the VSL for R3:

Severe – Actual system conditions showed that there was an IROL exceedance in its Reliability Coordinator Area, the Reliability Coordinator did not act, or direct others to act and the IROL exceedance was not mitigated within the IROL’s Tv.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Information**

Group Name: NPCC--Project 2015-06

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1

Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1

Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Guy Zito	Northeast Power Coordinating Council	NPCC	10

**Voter Information**

	<b>Segment</b>
<b>Voter</b>	
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>

Northeast Power Coordinating Council

NPCC

Selected Answer:

**Answer Comment:**

Regarding IRO-009-1: R1 refers to 'Operating Processes, Procedures, or Plans that identify actions....'...R2 refers to ' ....one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1).....why wouldn't every potential process, procedure or plan available as an option in R2 also be included in R1?...in other words if its available for R2 should it not also be an 'action' available for R1?

Remove the second "that" from Measure M1 to have it read"... along with one or more dated Operating Processes, Procedures, or Plans that will be used."

Since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

R2 calls for RC to initiate one or more Operating Processes, Procedures and Plans... Therefore, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance. Presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

Add the following text either to Severe VSL or High VSL: The RC did not initiate all Operating Processes, Procedures and Plans that could have

prevented an IROL exceedance.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0



**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer:

**Answer Comment:**

Overall, we agree with the proposed changes as simple refinements of the standards that do not change the basic reliability requirements. However, we do note that the language for TLR-6 in the supplemental material could be redundant with TLR-3a, TLR-3b, TLR-5a, and TLR-5b. TLR-6 indicates there is a Transmission Facility is currently exceeding or is expect to exceed its SOL or IROL. These same conditions apply to TLR-3a, TLR-3b, TLR-5a, and TLR-5b with the exception that those levels describe whether non-firm and firm curtailments are sufficient to mitigate the exceedance. TLR-6 should only be issued when complete curtailment of firm and non-firm interchange transactions are insufficient to mitigate and SOL or IROL exceedance and additional emergency actions may be warranted for complete mitigation. The description should be updated to reflect this statement.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

IRO-006-EAST is the Transmission Loading Relief Procedure for the Eastern Interconnection. Currently the procedure is only applicable to the Reliability Coordinator. For TLR process to work in a reliable, predicable and consistent manner, the standard also needs to be applicable to the Balancing Authority. Without the cooperation of the BA the relief that is needed to keep the transmission system reliable isn't guaranteed to arrive as the requesting RCs are expecting. As the make-up of the Eastern Interconnection has changed over the years, the timing for relief provided seems to have diverged. The timing of relief provided by tags differs to the timing of relief provided by firm and non-firm market flows differs from the timing of relief provided by generation redispatch to meet NNL curtailment obligations. This lack of consistency and predictability has led to issues when using the TLR process. For example, TVA has experienced times where entities provide the required relief for the current hour well after TVA has had to reissue the TLR for next hour. Reliability Coordinators can't expect to mitigate transmission system exceedences in a timely manner if the TLR process does not provide relief in a timely manner. The standard currently set the expectation that the RC notify the BA of their relief obligation in 15 minutes but is silent on how long the BA has to start meeting their relief obligation and when it is expected to be finished. Some BA have specific rules as to when they will input their relief obligations in their generation redispatch significantly delaying when the RC can expect requested relief. TVA urges the Standard Drafting Team to consider extending the applicability of this TLR standard to the BA and define

consistent timing requirements that all entities have to follow in order to increase the reliability, predictability and usefulness of the TLR process.

Another consideration is that there are times when an immediate change in ACE from a large TLR impact could cause a reliability issue for the BA that is more severe than the issue which caused the TLR to be initiated. The standard needs to be clear on how those conflicting reliability issues should be dealt with. In many cases other alternatives are available which do not cause a reliability issue for any entities.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:** N/A

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
James Nail	City of Independence, Missouri	SPP	3,5
Jason Smith	Southwest Power Pool Inc	SPP	2
Mahmood Safi	Omaha Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
--------------	----------------

Shannon Mickens	2
-----------------	---

<b>Entity</b>	<b>Region(s)</b>
---------------	------------------

Southwest Power Pool, Inc. (RTO)	SPP
----------------------------------	-----

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Scott McGough - Georgia System Operations Corporation - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

Additional comments received from Si Truc Phan – Hydro-Quebec TransEnergie

**Comments regarding Standard IRO-009-2**

**Comment 1:** Replace terms such as « mitigate » and « relieve » with « eliminate ».

Considering that an IROL exceedance can lead to widespread outages, it should be required that the IROL exceedance be eliminated within Tv .

However when one looks at the vocabulary used in the standard it is much less forceful. The requirements call for reducing or alleviating the IROL exceedance rather than removing it.

The following definitions come from the Merriam-Webster:

**Mitigate:** (*transitive verb*)

1 : to cause to become less harsh or hostile : mollify

2 a : to make less severe or painful : alleviate

b : extenuate

Synonyms: allay, alleviate, assuage, ease, help, mollify, palliate, relieve, soothe

**Relieve:** (*transitive verb*)

1 a : to free from a burden : give aid or help to

b : to set free from an obligation, condition, or restriction

c : to ease of a burden, wrong, or oppression by judicial or legislative interposition

2 a : to bring about the removal or alleviation of : mitigate <helps relieve stress>

b : rob, deprive <relieved us of our belongings>

(...)

Synonyms: allay, alleviate, assuage, ease, mitigate, mollify, palliate, help, soothe

**Comment 2:** Typographical error in Measure M1

M2. (...) along with one or more dated Operating Processes, Procedures, or Plans that ~~that~~ will be used.

**Comment 3:** Measures M2 and M3

Since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference whatsoever to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

**M2.** Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it initiated one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1) in accordance with Requirement R2. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans ~~from Requirement R1~~, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

**M3.** Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it acted or directed others to act in accordance with Requirement R3. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans ~~from Requirement R1~~, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

**Comment 4:** VSL for R2



R2 calls for RC to initiate one or more Operating Processes, Procedures and Plans... Therefore, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance. Presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

Add the following text either to Severe VSL or High VSL: The RC did not initiate all Operating Processes, Procedures and Plans that could have prevented an IROL exceedance.

Prepared by: Jeannette Gauthier, Compliance Engineer  
Hydro-Québec TransÉnergie

June 5<sup>th</sup> 2015