Unofficial Comment Form

Project 2015-06 Interconnection Reliability Operations and Coordination

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/Ballot/BallotResults) to submit comments on IRO-006-EAST and IRO-009 and associated documents. The electronic comment form must be completed by **8:00 p.m. Eastern July 08, 2015.**

If you have questions, contact Katherine Street (via email) or by telephone at 404.446.9702.

[Project 2015-06 Interconnection Reliability Operations and Coordination](http://www.nerc.com/pa/Stand/Pages/Project_2015-06_Interconnection_Reliability_Operations_Coordination_IRO-006-East_and_IRO-009.aspx)

## Background Information

This project involves the following two IRO standards:

* IRO-006-EAST-2 – Transmission Loading Relief Procedure for the Eastern Interconnection
* IRO-009-2 – Reliability Coordinator Actions to Operate Within IROLs

Project 2015-06 was initiated in response to work done by the Project 2012-09 Interconnected Reliability Operations Five-Year Review Team (FYRT). As the five-year review has resulted in a recommendation to revise IRO-006-EAST-1 and IRO-009-1, a separate drafting team has been tasked with Project 2015-06, which is implementing the Project 2012-09 IRO FYRT’s recommendations on IRO-006-East-1 and IRO-009-1.

The FYRT reviewed IRO-003-2, IRO-004-2, IRO-005-4, IRO-006-5, IRO-006-East-1, IRO-008-1, IRO-009-1 and IRO-010-1a and posted eight draft recommendations for industry comment. All standards were recommended for revision except for IRO-006-5, which was presented to the NERC Board of Trustees (Board) for reaffirmation. A final set of recommendations and a Standard Authorization Request (SAR) were submitted to the Standards Committee (SC) in October 2013. However, Project 2014-03, Revisions to TOP and IRO Standards, retired IRO-003-2, IRO-004-2, IRO-005-4, IRO-008-1, and IRO-010-1a, leaving only IRO-006-East-1 and IRO-009-1 recommended for revision.

The IRO Standard Drafting Team (IRO SDT) has implemented the FYRT recommendations. Since Project 2012-09 was scoped, a number of initiatives have been implemented to improve the overall quality of the NERC standards, including retirement of unnecessary or redundant requirements under Paragraph 81 of the Federal Energy Regulatory Commission's March 15, 2012 order[[1]](#footnote-1), consideration of Independent Expert Review Panel recommendations, and implementation of results-based concepts in the standards.

The IRO SDT considered elements of the five-year review and industry comments, including those that resulted from the SAR 30-day informal comment period for Project 2015-06, as it implemented the FYRT’s recommendations.

**Questions**

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

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

Comments:

1. 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

Comments:

1. 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

Comments:

1. 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

Comments:

1. 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

Comments:

1. 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

Comments:

1. 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

Comments:

1. 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

Comments:

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

Comments:

1. *Order Accepting with Conditions the Electric Reliability Organization’s Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing*, 138 FERC ¶61,193 (2012). [↑](#footnote-ref-1)