

Individual or group. (4 Responses)
Name (2 Responses)
Organization (2 Responses)
Group Name (2 Responses)
Lead Contact (2 Responses)
Question 1 (3 Responses)
Question 1 Comments (4 Responses)
Question 2 (3 Responses)
Question 2 Comments (4 Responses)
Question 3 (3 Responses)
Question 3 Comments (4 Responses)
Question 4 (3 Responses)
Question 4 Comments (4 Responses)
Question 5 (2 Responses)
Question 5 Comments (4 Responses)
Question 6 (0 Responses)
Question 6 Comments (4 Responses)

Group
Bonneville Power Administration
Chris Higgins
BPA has no concerns or comments.
BPA has no concerns or comments.
BPA has no concerns or comments.
BPA has no concerns or comments.
BPA has no concerns or comments.
BPA has no concerns or comments.
Group
NERC
Howard Gugel
Yes
No
No
No
Yes
A few observations: The phrase "shall act to identify and mitigate" is somewhat ambiguous. It appears that the intent of Requirement R2 is to implement R1. It appears that R1 and R2 could be combined to say that the RC shall "document and implement procedures." R2 restricts the action of the RC to only the procedures identified in R1. There may be times that the RC's actions are not specified in the procedures in R1, but may be the right thing to do for reliability. Those exceptions could be noted and provided in a feedback loop to R1 to modify the procedures for the next occurrence.
Individual
Thad Ness
American Electric Power
Yes

No
AEP is not aware of any potential adverse impact to reliability or commerce in a neighboring region or interconnection that would be caused by the proposed standard.
No
No
Individual
H. Steven Myers
ERCOT
Yes
The Texas RE regional standards development procedure was followed. A SAR was received and processed. The Texas RE Reliability Standards Committee reviewed the process and approved the project to proceed. A standard drafting team was assigned in accordance with the procedure, and the drafting team met numerous times, iterated through several drafts, and posted the draft for comments. The drafting responded to the minimal comments received and requested approval to proceed to ballot. The Texas RE Reliability Standards Committee approved for the ballot to proceed and the proposed standard was approved by ballot. The Texas RE then submitted the standard to the Texas RE Board of Directors and it was approved there. The Texas RE then submitted the standard to NERC for NERC's process.
No
The standard establishes requirements designed to improve reliability and coordinates with processes required by other NERC reliability standards which require transmission loading management.
No
The standard requires action which will improve congestion management in rare instances when ERCOT nodal market-based congestion management actions do not resolve congestion. The effect of this is to relieve potential threat to the public health, safety, welfare, or national security which may accompany congestion management which could occur if limit exceedances were allowed to persist to violation.
No
The standard contains requirements that are used when the ERCOT nodal market-based actions do not resolve congestion completely, thus the actions are outside and in addition to the competitive market actions.
Yes
The standard gives more specific criteria for congestion management when additional actions are needed following ERCOT nodal market-based congestion management activities. Although the requirement to resolve congestion is redundant with actions required by reliability standard IRO-009, the specific criteria strengthens required actions within the ERCOT Interconnection.
ERCOT believes that the requirements in the regional standard IRO-006-1-TRE exceed the FERC directive in Paragraph 964 of FERC Order 693. The nature of congestion management procedures within the ERCOT Interconnection and the absence of a transmission service market make these requirements redundant to IRO-009. However, since these requirements are designed to be used when other congestion management processes implemented with nodal market-based products do not mitigate the congestion, ERCOT supports this standard.