

## **Consideration of Comments on Regional Reliability Standards IRO-006-TRE-1**

Texas Reliability Entity and NERC thank all commenters who submitted comments on the Regional Reliability Standard IRO-006-TRE-1, IROL and SOL Mitigation in the ERCOT Region. These standards were posted for a 45-day public comment period from July 7, 2011 through August 22, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 4 sets of comments, including comments from approximately 7 different people from 5 companies representing 5 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/regional\\_standards/regional\\_reliability\\_standards\\_under\\_development.html](http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

---

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

**Index to Questions, Comments, and Responses**

1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure? ..... 4

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection? ..... 5

3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security? ..... 6

4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability? ..... 7

5. Does the proposed regional reliability standard meet at least one of the following criteria?..... 8

6. If you have any other comments that you have not already provided in the response to the prior questions, please provide them here. .... 9

**Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1**

The Industry Segments are:

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				
		<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>		<b>Segment Selection</b>							
1.	Rebecca Berdahl	Long Term Sales and Purchases	WECC	5									
2.	Ted Snodgrass	Munro Dispatch	WECC										
3.	Robin Chung	Pre-Schedule & Real Time	WECC										
2.	Group	Howard Gugel	NERC Staff Technical Review										
No additional members listed.													
3.	Individual	Thad Ness	American Electric Power	X		X		X	X				
4.	Individual	H. Steven Myers	ERCOT		X								

Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1

**1. Was the proposed standard developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?**

**Summary Consideration:** No negative comments were received. One comment was received from an entity in the ERCOT Region confirming that appropriate procedures were followed. Note that ERCOT, as RC, is the only entity that has responsibilities under this Regional Standard.

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review	Yes	
American Electric Power	Yes	
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.
<p><b>Response:</b> Thank you for providing your observation that Texas RE followed all steps required in our Regional Reliability Standard Development Process.</p>		

Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1

**2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?**

**Summary Consideration:** No adverse impacts to reliability or commerce were identified.

Organization	Yes or No	Question 2 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review	No	
American Electric Power	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.
<b>Response:</b> Thank you for your comment.		
ERCOT	No	The standard establishes requirements designed to improve reliability and coordinates with processes required by other NERC reliability standards which require transmission loading management.
<b>Response:</b> Thank you for your comment.		

Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1

**3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?**

**Summary Consideration:** No threats were identified.

Organization	Yes or No	Question 3 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review	No	
American Electric Power	No	
ERCOT	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.
<p><b>Response:</b> Thank you for your comment.</p>		

**4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?**

**Summary Consideration:** No burdens on competitive markets were identified.

Organization	Yes or No	Question 4 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review	No	
American Electric Power	No	
ERCOT	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.
<p><b>Response:</b> Thank you for your comment.</p>		

5. Does the proposed regional reliability standard meet at least one of the following criteria?

- The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard
- The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

**Summary Consideration:** This proposed Regional Reliability Standard is intended to complement a continent-wide standard, in order to provide enforceable requirements associated with existing ERCOT transmission load relief (congestion management) procedures. The comments confirm that the proposed regional standard contains more specific criteria than the continent-wide standards.

Organization	Yes or No	Question 5 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review	Yes	
American Electric Power		
ERCOT	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.
<p><b>Response:</b> Thank you for your comment.</p>		

Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1

6. If you have any other comments that you have not already provided in the response to the prior questions, please provide them here.

**Summary Consideration:** The Standard Drafting Team views Requirements R1 and R2 to be two independent tasks intended to require different, yet interrelated, activities by the RC. Developing and maintaining a procedure is a separate task, involving different personnel at a different time, than acting to implement the procedure. Significantly, each Requirement has a different VRF and time horizon. The phrase “shall act to identify and mitigate” is intended to be non-prescriptive, so that the RC has the flexibility to define appropriate specific actions in the procedure required by R1.

Organization	Yes or No	Question 7 Comment
Bonneville Power Administration		BPA has no concerns or comments.
NERC Staff Technical Review		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.
<p><b>Response:</b> Thank you for your comments. The Standard Drafting Team views Requirements R1 and R2 to be two independent tasks intended to require different, yet interrelated, activities by the RC. Developing and maintaining a procedure is a separate task, involving different personnel at a different time, than acting to implement the procedure in real-time. Significantly, each Requirement has a different VRF and time horizon. The phrase “shall act to identify and mitigate” in R2 is intended to be non-prescriptive, so that the RC has the flexibility to define specific actions in the procedure required by R1.</p>		
American Electric Power		
ERCOT		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.

Consideration of Comments on Regional Reliability Standard IRO-006-TRE-1

Organization	Yes or No	Question 7 Comment
<p><b>Response:</b> Thank you for your comment. The NERC Transmission Loading Relief drafting team requested ERCOT to address the FERC directive (Paragraph 964 of Order 693) regarding the ERCOT Interconnection-wide congestion management process. This proposed Regional Standard is responsive to that request.</p>		

**END OF REPORT**