Standard Development Roadmap

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed:

1. SC authorized moving the SAR forward to standard drafting (December 5, 2006).
2. SC appointed the SDT (February 9, 2007).

Proposed Action Plan and Description of Current Draft:

This 45-day posting of IRO-006-4 and its associated implementation plan identifies the split of IRO-006 between NERC and NAESB so that the business practices are moved into a NAESB business practice and the reliability requirements are retained in the revised IRO-006.

Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post response to comments submitted on initial draft of IRO-006-4	June 21, 2007
2. Request Standards Committee to authorize proceeding to ballot.	June 22, 2007
3. Post for 30-day pre-ballot period.	June 25–July 15, 2007; reduced to 20 days if possible.
4. Conduct first ballot.	July 16–25, 2007
5. Post response to comments on first ballot	July 26, 2007
6. Conduct second ballot	Waived if possible
7. Post for 30-day period prior to board adoption.	Waived if possible
8. Board adoption date.	August 1, 2007

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

There are no new or revised definitions proposed in this standard revision.

A. Introduction

1. **Title:** **Reliability Coordination — Transmission Loading Relief (TLR)**
2. **Number:** IRO-006-4
3. **Purpose:** The purpose of this standard is to provide a method to prevent and or manage congestion on the bulk electric system.
4. **Applicability:**
   4.1. Reliability Coordinators.
   4.2. Balancing Authorities.
5. **Proposed Effective Date:** First day of first quarter after BOT adoption.

B. Requirements

R1. A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, with its authority and at its discretion, select one or more procedures to provide transmission loading relief. These procedures can be a "local" (regional, interregional, or sub-regional) transmission loading relief procedure or one of the following Interconnection-wide procedures: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

> This requirement simply states; the RC has the authority to act, the RC should know at what limits he/she needs to act, the RC has pre-identified regional, interregional and sub-regional TLR procedures.

R1.1. The Interconnection-wide Transmission Loading Relief (TLR) procedure for use in the Eastern Interconnection provided in Attachment 1-IRO-006-4. The TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispatch, or load shedding.

> Comment: see FERC Order 693 paragraph 964 regarding recommendation for using tools other than TLR to mitigate an actual IROL.

R1.2. The Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is the "WSCC Unscheduled Flow Mitigation Plan," provided at: http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf.

R1.3. The Interconnection-wide transmission loading relief procedure for use in ERCOT is provided as Section 7 of the ERCOT Protocols, posted at: http://www.ercot.com/mktrules/protocols/current.html

> Note: the URL has changed.

R2. The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]

R3. A Reliability Coordinator may implement a local transmission loading relief or congestion management procedure simultaneously with an Interconnection-wide procedure. However, each Reliability Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval by the ERO. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]

R4. When Interconnection-wide procedures are implemented to curtail Interchange Transactions that cross an Interconnection boundary, each Reliability Coordinator shall comply with the provisions of the Interconnection-wide procedure. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

R5. During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

Comment: R5 will be reviewed during Phase 3 of the TLR drafting team work. See white paper for explanation of the three phases of changes to this standard.

C. Measures

M1. Each Reliability Coordinator shall be capable of providing evidence (such as logs) that demonstrate when Eastern Interconnection, WECC, or ERCOT Interconnection-wide transmission loading relief procedures are implemented, the implementation follows the respective established procedure as specified in this standard (R1, R1.1, R1.2 and R1.3).

M2. Each Reliability Coordinator shall be capable of providing evidence (such as written documentation) that the Transmission Operator experiencing the potential or existing SOL or IROL violations is a party to the local transmission loading relief or congestion management procedures when these procedures have been implemented (R2).

M3. Each Reliability Coordinator shall be capable of providing evidence (such as NERC meeting minutes) that the local procedure has received prior approval by the ERO when such procedure is used as a substitute for curtailment as directed by the Interconnection-wide procedure (R3).

M4. Each Reliability Coordinator shall be capable of providing evidence (such as logs) that the responding Reliability Coordinator complied with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator when requested to curtail an Interchange Transaction that crosses an Interconnection boundary (R4).

M5. Each Reliability Coordinator and Balancing Authority shall be capable of providing evidence (such as Interchange Transaction Tags, operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts) that they have complied with applicable Interchange scheduling standards INT-001, INT-003, and INT-004 during the implementation of relief procedures, up to the point emergency action is necessary (R5).

D. Compliance

1. Compliance Monitoring Process

The Regional Entity shall have responsibility for compliance monitoring.

1.1. Compliance Monitoring Responsibility

Regional Entity.

1.2. Compliance Monitoring Period and Reset Time Frame

Compliance Monitoring Period: One calendar year.

Reset Period: One month without a violation.

1.3. Data Retention

The Reliability Coordinator shall maintain data for eighteen months for M1, M4, and M5.

The Reliability Coordinator shall maintain data for the duration the Transmission Operator is party to the procedure in effect plus one calendar year thereafter for M2.

The Reliability Coordinator shall maintain data for the approved duration of the procedure in effect plus one calendar year thereafter for M3.

1.4. Additional Compliance Information

Each Reliability Coordinator and Balancing Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually and reporting by exception. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.

Each Reliability Coordinator and Balancing Authority shall have the following available for its Compliance Monitor to inspect during a scheduled, on-site review or within 5 days of a request as part of an investigation upon complaint:

1.4.1 Operations logs, voice recordings or transcripts of voice recordings or other documentation providing the evidence of its compliance to all the requirements for all Interconnection-wide TLR procedures that it has implemented during the review period.

1.4.2 TLR reports.

2. Violation Severity Levels

2.1. Lower. There shall be a lower violation severity level if any of the following conditions exist:

2.1.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violates one (1) requirement of the applicable Interconnection-wide procedure (R1)

2.1.2 The Reliability Coordinators or Balancing Authorities did not comply with applicable Interchange scheduling standards during the implementation of the relief procedures, up to the point emergency action is necessary (R5).

2.2. Moderate.

2.2.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violates two (2) to three (3) requirements of the applicable Interconnection-wide procedure (R1).

2.3. High. There shall be a high violation severity level if any of the following conditions exist:

2.3.1 For each TLR in the Eastern Interconnection, the applicable Reliability Coordinator violates four (4) to five (5) requirements of the applicable Interconnection-wide procedure (R1).

2.3.2 When requested to curtail an Interchange Transaction that crosses an Interconnection boundary utilizing an Interconnection-wide procedure, the responding Reliability Coordinator did not comply with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator (R4).

2.4. Severe. There shall be a severe violation severity level if any of the following conditions exist:

2.4.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violates six (6) or more of the requirements of the applicable Interconnection-wide procedure (R1).

2.4.2 A Reliability Coordinator implemented local transmission loading relief or congestion management procedures to relieve congestion but the Transmission Operator experiencing the congestion was not a party to those procedures (R2).

2.4.3 A Reliability Coordinator implemented local transmission loading relief or congestion management procedures as a substitute for curtailment as directed by the Interconnection-wide procedure but the local procedure had not received prior approval by the ERO (R3).

2.4.4 While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation.

2.4.5 While attempting to mitigate an existing constraint in the Western Interconnection using the "WSCC Unscheduled Flow Mitigation Plan", the Reliability Coordinator did not follow the procedure correctly.

2.4.6 While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure correctly.

E. Regional Differences

This section on Regional Differences is highlighted for transfer to NAESB following completion of the MISO/PJM/SPP field test as described in the white paper.

1. PJM/MISO Enhanced Congestion Management (Curtailment/Reload/Reallocation) Waiver approved March 25, 2004. To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

2. Southwest Power Pool (SPP) Regional Difference – Enhanced Congestion Management (Curtailment/Reload/Reallocation). The SPP regional difference, which is equivalent to the PJM/MISO waiver, shall apply within the SPP region as follows:

This regional difference impacts actions on behalf of those SPP Balancing Authorities that are participating in the SPP market. This regional difference does not impact those Balancing Authorities for which SPP will continue to act as the Reliability Coordinator but that are not participating in the SPP market.

SPP shall calculate the impacts of SPP market flow on all facilities included in SPP's Coordinated Flowgate List. SPP shall conduct sensitivity studies to determine which external flowgates (outside SPP's footprint) are significantly impacted by the market flows of SPP's control zones (currently the balancing areas that exist today in the IDC). SPP shall perform studies to determine which external flowgates SPP will monitor and help control. An external flowgate selected by one of the studies will be considered a Coordinated Flowgate (CF).

In its calculation, SPP shall consider market flow impacts as the impacts of energy dispatched by the SPP market and self-dispatched energy serving load in the market footprint, but not tagged. SPP shall use a method equivalent to the PJM/MISO Market Flow Calculation methodology identified in the PJM/MISO waiver. Impacts of tagged transactions representing delivery of energy not dispatched by the SPP market and energy dispatched by the market but delivered outside the footprint will not be included in market flow.

SPP shall separate the market flow impacts for current hour and next hour into their appropriate priorities and shall provide those market flow impacts to the IDC. The market flows will be represented in the IDC and made available for curtailment under the appropriate TLR Levels. The market flow impacts will not be represented by conventional interchange transaction tags.

The SPP method will impact the following sections of the TLR Procedure:

Network and Native Load (NNL) Calculations — The SPP regional difference modifies Attachment 1-IRO-006-1 Section 5 "Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service" within the SPP region.

Section 5 of Attachment 1-IRO-006-1 requires that the "Per Generator Method without Counter Flow" methodology be utilized to calculate the portion of parallel flows on any Constrained Facility due to Network Integration (NI) transmission service and service to Native Load (NL) of each balancing authority.

SPP shall use a "Market Flow Calculation" methodology to calculate the portion of parallel flows on all facilities included in the RTO's "Coordinated Flowgate List" due to NI service or service to NL of each balancing authority.

The Market Flow Calculation differs from the Per Generator Method in the following ways:

- The contribution from all market area generators will be taken into account.
- In the Per Generator Method, only generators having a GLDF greater than 5% are included in the calculation. Additionally, generators are included only when the sum of the maximum generating capacity at a bus is greater than 20 MW. The market flow calculations will use all positively impacting flows down to 0% with no threshold. Counter flows will not be included in the market flow calculation.
- The contribution of all market area generators is based on the present output level of each individual unit.
- The contribution of the market area load is based on the present demand at each individual bus.

By expanding on the Per Generator Method, the market flow calculation evolves into a methodology very similar to the "Per Generator Method" method, while providing increased Interchange Distribution Calculator (IDC) granularity. Counter flows are also calculated and tracked in order to account for and recognize that the either the positive market flows may be reduced or counter flows may be increased to provide appropriate relief on a flowgate.

These NNL values will be provided to the IDC to be included and represented with the calculated NNL values of other Balancing Authorities for the purposes of identifying and obtaining required NNL relief across a flowgate in congestion under a TLR Level 5A/5B.

Pro Rata Curtailment of Non-Firm Market Flow Impacts — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix B "Transaction Curtailment Formula" within the SPP region.

Appendix B "Transaction Curtailment Formula" details the formula used to apply a weighted impact to each non-firm tagged Interchange Transaction (Priorities 1 thru 6) for the purposes of Curtailment by the IDC. For the purpose of Curtailment, the non-firm market flow impacts (Priorities 2 and 6) submitted to the IDC by SPP should be curtailed pro-rata as is done for Interchange Transaction using firm transmission service. This is because several of the values needed to assign a weighted impact using the process listed in Appendix B will not be available:

- Distribution Factor (no tag to calculate this value from)
- Impact on Interface value (cannot be calculated without Distribution Factor)
- Impact Weighting Factor (cannot be calculated without Distribution Factor)
- Weighted Maximum Interface Reduction (cannot be calculated without Distribution Factor)

− Interface Reduction (cannot be calculated without Distribution Factor)

− Transaction Reduction (cannot be calculated without Distribution Factor)

While the non-firm market flow impacts submitted to the IDC are to be curtailed pro rata, the impacting non-firm tagged Interchange Transactions could still use the existing processes to assign the weighted impact value.

Assignment of Sub-Priorities — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix E "How the IDC Handles Reallocation", Section E2 "Timing Requirements", within the SPP region.

Under the header "IDC Calculations and Reporting" in Section E2 of Appendix E to Attachment 1-IRO-006-1, the following requirement exists: "In a TLR Level 3a the Interchange Transactions using Non-firm Transmission Service in a given priority will be further divided into four sub-priorities, based on current schedule, current active schedule (identified by the submittal of a tag ADJUST message), next-hour schedule, and tag status. Solely for the purpose of identifying which Interchange Transactions to be loaded under a TLR 3a, various MW levels of an Interchange Transaction may be in different sub-priorities. The sub-priorities are shown in the following table:

Priority	Purpose	Explanation and Conditions
S1	To allow a flowing Interchange Transaction to maintain or reduce its current MW amount in accordance with its energy profile.	The MW amount is the lowest between currently flowing MW amount and the next-hour schedule. The currently flowing MW amount is determined by the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S2	To allow a flowing Interchange Transaction that has been curtailed or halted by TLR to reload to the lesser of its current-hour MW amount or next-hour schedule in accordance with its energy profile.	The Interchange Transaction MW amount used is determined through the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S3	To allow a flowing Transaction to increase from its current-hour schedule to its next-hour schedule in accordance with its energy profile.	The MW amounts used in this sub-priority is determined by the e-tag ENERGY PROFILE table. If the calculated amount is negative, zero is used instead.
S4	To allow a Transaction that had never started and was submitted to the Tag Authority after the TLR (level 2 or higher) has been declared	The Transaction would not be allowed to start until all other Interchange Transactions submitted prior to the TLR with the same

	to begin flowing (i.e., the Interchange Transaction never had an active MW and was submitted to the IDC after the first TLR Action of the TLR Event had been declared.)	priority have been (re)loaded. The MW amount used is the sub-priority is the next-hour schedule determined by the e-tag ENERGY PROFILE table.

SPP shall use a "Market Flow Calculation" methodology to calculate the amount of energy flowing across all facilities included in the RTO's "Coordinated Flowgate List" that is associated with the operation of the SPP market. This energy is identified as "market flow."

These market flow impacts for current hour and next hour will be separated into their appropriate priorities and provided to the IDC by SPP. The market flows will then be represented and made available for curtailment under the appropriate TLR Levels.

Even though these market flow impacts (separated into appropriate priorities) will not be represented by conventional "tags," the impacts and their desired levels will still be provided to the IDC for current hour and next hour. Therefore, for the purposes of reallocation, a sub-priority (S1 thru S4) should be assigned to these market flow impacts by the NERC IDC as follows, using comparable logic as would be used if the impacts were in fact tagged transactions.

Priority	Purpose	Explanation and Conditions
S1	To allow existing market flow to maintain or reduce its current MW amount.	The currently flowing MW amount is the amount of market flow existing after the RTO has recognized the constraint for which TLR has been called. If the calculated amount is negative, zero is used instead.
S2	To allow market flow that has been curtailed or halted by TLR to reload to its desired amount for the current-hour.	This is the difference between the current hour unconstrained market flow and the current market flow. If the current-hour unconstrained market flow is not available, the IDC will use the most recent market flow since the TLR was first issued or, if not available, the market flow at the time the TLR was fist issued.
S3	To allow a market flow to increase to its next-hour desired amount.	This is the difference between the next hour and current hour unconstrained market flow.

To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

F. Associated Documents

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	August 8, 2005	Revised Attachment 1	Revision
3	February 26, 2007	Revised Purpose and Attachment 1 related to NERC NAESB split of the TLR procedure	Revision