

Consideration of Comments on Initial Ballot of IRO-009 — Reliability Coordinator Actions to Operate Within IROLs

Summary Consideration: The drafting team corrected the typographical error in the red line version of IRO-004 – it showed “R7” instead of “R1”.
 The SDT also updated the references in the measures for IRO-005 to ensure they reference the correct requirements, using the new requirement numbers.
 The drafting team did not make any other modifications based on comments submitted with the initial ballot for this standard.

Organization:	Ameren Services Company
Member:	Kirit S. Shah
Comment:	Include Measurement for each requirement; that is, M1 for R1 and M2 for R2, etc.
Response:	The standards process requires that there be a measurement for each requirement, but does not require that there be a unique measure for each requirement. There are measures for every requirement in IRO-009. The Measures for R1 & R2 are the same; and the measures for R3 & R4 are the same. The associated requirements are specifically identified in the measures.
Organization:	Duke Energy Carolina
Member:	Douglas E. Hils
Comment:	Duke Energy appreciates the opportunity to vote and comment on this proposed Standard. IRO-009-1 Requirements R1 and R3 indicate that actions shall be implemented to prevent exceeding an IROL. This is an issue of much debate currently within the industry – whether or not IROLs may be exceeded with or without a contingency. It’s unclear whether these requirements are consistent with current industry practice. The VSL for IRO-009-1 Requirement R4 introduces a new requirement that an operator document within five minutes of exceeding an IROL that some action was taken to mitigate the magnitude and duration of the event. While we agree with R4 that the operator should act without delay to mitigate the event, we are concerned that this five minute documentation requirement could distract the operator. IRO-008-1, IRO-009-1 and IRO-010-1 all introduce new terms that are not defined in the NERC Glossary. “Operations Planning”, “Same Day Operations” and “Real-time Operations” are used to identify time horizons for requirements.

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<p>Response:</p>	<p>There has not been a single proposal that received unanimous approval from the commenters. It is clear that the Industry wants immediate action when the system is over a limit. There is recognition that in the absence of conditions related to R3 (which states that the RC that observes a pending IROL must take action) an operator must be given some finite time to assess the situation. In some cases taking no action is a proper response; in other cases any delay can be catastrophic. The standard mandates “without delay” but the severity is based on having no documented action for more than 5 minutes. Note that if an RC determines that actions already taken will resolve an IROL and no additional actions are needed, the RC can document this using any means available to it – and this would be evidence that the RC had taken action. The documentation does not need to be developed within 5 minutes – there just needs to be evidence that some action was taken within 5 minutes. This was a consensus solution.</p> <p>The definitions used in the “Time Horizons” are not in the NERC Glossary but were posted with the standard when Time Horizons were added to the standard. Here is a link to that comment form: http://www.nerc.com/docs/standards/sar/IROL_Comment_Form_02Jan07.doc</p> <p>Note that the definitions for the terms used in defining “Time Horizons” have been posted for stakeholder reference when each drafting team has added “Time Horizons” to requirements. Here are the definitions:</p> <ul style="list-style-type: none"> - Long-term Planning: a planning horizon of one year or longer. - Operations Planning: operating and resource plans from day-ahead up to and including seasonal. - Same-day Operations: routine actions required within the timeframe of a day, but not real-time. - Real-time Operations: actions required within one hour or less to preserve the reliability of the bulk electric system. - Operations Assessment: follow-up evaluations and reporting of real time operations.
<p>Organization:</p>	<p>FirstEnergy Energy Delivery, FirstEnergy Solutions</p>
<p>Member:</p>	<p>Robert Martinko, Joanne Kathleen Borrell, Kenneth Dresner, Mark S Travaglianti</p>
<p>Comment:</p>	<p>FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-009-1 and ask that the SDT consider our enclosed comments.</p> <p>Requirements R1 and R2 FirstEnergy suggests that the SDT consider the proposed edits to requirements R1 and R2 as shown below to address a potential unintended interpretation of the requirements. We believe the suggested changes remove a level of ambiguity that presently exists and helps clarify the</p>

SDT's desired outcome. In requirements R1 and R2 the text uses the phrase "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day ...". Our concern is that the wording "one or more days" is unlimited in timeframe and when performing month ahead, week ahead reviews of requested planned maintenance outages there may be potential IROL conditions identified for system configurations that in actuality never make it to the operating day, based on one or more planned outage requests being denied. Conversely, there may be instances within the day prior to the next operating day, where unexpected forced outages of bulk power facilities trigger the need for re-study. Therefore, it should be clear that the only documented Operating Processes, Procedures, or Plans that are in effect and required by the standard should reflect the most recent system information available prior to the start of the current operating day. FE assumes that there is no expectation that any and all "hypothetical" system configurations reviewed by the Reliability Coordinator would be the basis of any documented Operating Processes, Procedures, or Plans. The standard should be clear in its intent to require IROL mitigation plans be in place based on the most recent projected operating conditions for the next operating day. Therefore, we suggest the addition of the proposed sub-requirement R1.1 and that R2 be deleted and covered by our proposed sub-requirement R1.2. If adopted, some adjustments will also be needed in the text of measures and VSLs. Thank you for your consideration.

R1 For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs.

R1.1 The applicable Operating Processes, Procedures, or Plans in effect shall be revised as needed during the 24-hour period preceding the start of the current day period to reflect up to date projected system conditions.

R1.2 The applicable Operating Processes, Procedures, or Plans in effect shall mitigate the magnitude and duration of exceeding an IROL such that the IROL is relieved within the IROL's Tv.

Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General – The Violation Risk Factors should be added to the text of all of the standards.

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	<p>IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 – Several Measures reference the incorrect requirement numbers</p> <p>TOP-003 - R4 – There is no measure associated with this requirement - Measures do not include evidence of "planning" of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements</p>
Response:	<p>The SDT has been asked to draft the RSAWs for this set of standards and will include language in the RSAW for IRO-009 to address your comment.</p> <p>The VRFs are in the text of each new standard and will be added to all approved standards as part of another administrative activity.</p> <p>The 'redline' version of IRO-004 did show R7 instead of R1 for the VSL and this has been corrected. The SDT has updated the references in the measures for IRO-005 to ensure they reference the correct requirements, using the new requirement numbers.</p> <p>The scope of this standard did not include revising the compliance elements for TOP standards.</p>
Organization:	Consumers Energy
Member:	David A. Lapinski, David Frank Ronk
Comment:	IRO-009-1 discusses having plans or procedures in place when an IROL violation is forecasted before the fact. No where in the Standard does it direct the Reliability Coordinator to inform or communicate with facilities that may be part of such plans or procedures. Failure to coordinate with such facilities could easily invalidate the plans or procedures the RC is putting in place. Generation owners may schedule work or actions at a facility that would render the facility ineffectual if the RC actually implements the plan. No plan is complete without coordination.
Response:	IRO-008-1 Requirement R3 does require the Reliability Coordinator to share its analysis results with those entities that are expected to take associated actions.
Organization:	Great River Energy
Member:	Gordon Pietsch
Comment:	GRE does not agree with the removal of the references to coordinating with the TOP and BA. GRE

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	understands that under some instances the Reliability Coordinator may not have time to coordinate with the TOP and/or the BA. GRE recommends that the SDT add language that would acknowledge that this coordination must take place during the Operations Planning Time Horizon. In addition, the revised language does not make it sufficiently clear that the BA and TOP in conjunction with the Reliability Coordinator need to be involved in the development of IROL mitigation plans for their systems.
Response:	The use of the word, “coordination” is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place. The standard does not preclude the Reliability Coordinator from coordinating with other entities.
Organization:	MidAmerican Energy Co.
Member:	Thomas C. Mielnik
Comment:	Reference to coordinating with TOPs and BAs has been removed from this standard. I believe these entities should be involved in mitigation plans.
Response:	The use of the word, “coordination” is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place. The standard does not preclude the Reliability Coordinator from coordinating with other entities.
Organization:	Alliant Energy Corp. Services, Inc.
Member:	Kenneth Goldsmith
Comment:	The TOP's and BA's have the most knowledge of their system, and should not be removed from the coordination of mitigation plans.
Response:	The use of the word, “coordination” is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place. The standard does not preclude the Reliability Coordinator from coordinating with other entities.
Organization:	Midwest Reliability Organization
Member:	Larry Brusseau

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Comment:	The MRO does not agree with the removal of the references to coordinating with the TOP's and BA's. The TOP's and BA's have the most knowledge of their systems, and the MRO would think the TOP's and BA's should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's. The MRO does not agree with the removal of references directing the TOP, BA, and TSP to take actions.
Response:	The use of the word, "coordination" is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place. The standard does not preclude the Reliability Coordinator from coordinating with other entities.
Organization:	Lincoln Electric System
Member:	Bruce Merrill, Eric Ruskamp
Comment:	LES does not agree with the removal of the references to coordinating with the Transmission Operators (TOP's) and Balancing Authorities (BA's). The TOP's and BA's have the most knowledge of their systems, and LES would think the TOP's and BA's should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's. LES does not agree with the removal of references directing the TOP, BA, and Transmission Service Provider (TSP) to take actions.
Response:	The use of the word, "coordination" is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place. The standard does not preclude the Reliability Coordinator from coordinating with other entities. The Reliability Coordinator is the functional entity responsible for identifying IROLs, not the Transmission Operator or the Balancing Authority. The Balancing Authority is not required to have transmission monitoring capability. TOP-001-1 Requirement R3 requires the TOP, BA and Generator Operator to comply with the Reliability Coordinator's directives.
Organization:	City of Tallahassee
Member:	Alan Gale
Comment:	R1 and R2 contradict each other. R1 says "...to prevent exceeding those IROL's". R2 says "...to mitigate the magnitude and duration of exceeding that IROL..." So R2 says it is okay to violate R1. If that is the

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	case, R1 should not be a standard since it is not needed for the reliability of the BES.
Response:	There is no contradiction between R1 and R2. R2 recognizes that not all IROLs can be avoided.
Organization:	Entergy Services, Inc.
Member:	William Franklin
Comment:	Agree with the content changes, however the format of the Requirements deleted in other standards has resulted in a reassignment of Requirement numbering and thus created an undesirable administrative/logistical situation of entities having to revise associations with Requirement numbers to Requirement verbiage. This also applies to NERC processes as well since, for example, a reference "R2" in an RSAW or a matrix may now be skewed and really be "R1 or R3" if a Requirement was deleted or added.
Response:	This is an administrative issue, outside the drafting team's scope. The team will forward your comment to the Director of Standards for his consideration.
Organization:	Minnesota Power, Inc.
Member:	Carol Gerou
Comment:	<p>1. On page 8 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R3 & R6 while the proposed replacement requirements are IRO-009-1 R1, R2, & R3. Minnesota Power's comment to IRO-009-1 R2 is, "Any reference to coordinating with the TOP's and BA's has been removed. The TOP's and BA's have the most knowledge of their systems, and Minnesota Power believes they should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's."</p> <p>2. On page 8 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R3 & R6 while the proposed replacement requirements are IRO-009-1 R1, R2, & R3. Minnesota Power's comment to IRO-009-1 R3 is, "the SDT has removed references to directing the TOP, BA, and TSP to take actions. Minnesota Power believes this should remain."</p>
Response:	The use of the word, "coordination" is ambiguous and puts the Reliability Coordinator in a position where its authority is not clear. The Reliability Coordinator is not granted any excuse for failing to do whatever it needs to do to ensure that IROL-related action plans are in place.

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	<p>The standard does not preclude the Reliability Coordinator from coordinating with other entities. The Reliability Coordinator is the functional entity responsible for identifying IROLs, not the Transmission Operator or the Balancing Authority. The Balancing Authority is not required to have transmission monitoring capability.</p> <p>IRO-009-1 R3 and R4 require the Reliability Coordinator to act and these actions may include issuing directives to other entities. TOP-001-1 Requirement R3 requires the TOP, BA and Generator Operator to comply with the Reliability Coordinator's directives.</p>
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