

## **Consideration of Comments for the Third Draft of Standard IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)**

The Transmission Loading Relief Standard Drafting Team thanks all commenters who submitted comments on the third draft of standard IRO-006-5 and IRO-006-EAST-1 (Project 2006-08). The standards were posted for a 30-day public comment period from July 13, 2009 through August 13, 2009. Stakeholders were asked to provide feedback on the draft standards and associated implementation plan through a special electronic comment form. There were 15 sets of comments, including comments from more than 70 different people from over 50 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

<http://www.nerc.com/filez/standards/Reliability-Coordination-Transmission-Loading-Relief.html>

In general, the majority of comments received were supportive of the changes proposed by the drafting team.

Based on stakeholder comments, the SDT made the following changes:

The SDT combined Requirements R4 and R5, and established the time for the Reliability Coordinator to take action as 15 minutes.

The SDT clarified in IRO-006-5, Requirement R1 that an entity must comply with a request to curtail an Interchange Transaction "unless it provides *to the requestor* a reliability reason that it cannot comply with the request."

The drafting team has deleted Appendix A of IRO-006-EAST-1 and instead incorporated the table from the Appendix into Requirement R2. The system conditions were relabeled as examples, a footnote was added to explain the role of the table, and a sentence was added that states "TLR levels are neither required nor expected to be issued in numerical order of level."

The SDT clarified that a Reliability Coordinator's experience may be used to determine if requested TLR actions are appropriate, and made this clear by replacing "analysis" with "assessment" in IRO-006-EAST-1 Requirement R4.

Additionally, the SDT reviewed the use of the verb "direct" in the previous version of the standard. Following discussion regarding the steps of TLR and what is expected to happen in each of those steps, it was determined that the RC is not issuing directives when implementing TLR. The issuance of TLR and the associated instructions to take action are made unilaterally by the Reliability Coordinator(s). Balancing Authorities are expected to review the requests for action and verify that they can be implemented reliably. To the extent they cannot be implemented reliably, Balancing Authorities are expected to work with their Reliability Coordinator in determining the best course of action. For Interchange Transactions, this Balancing Authority discretion is discussed in INT-005-3 R1.1 and INT-006-3 R1.1. For NITS, Native Load, and Market Flow, it is addressed implicitly in IRO-005-3 R6 and TOP-002-2a R4. Accordingly, rather than use the verb "direct," the team has modified the standard to use the verb "instruct."

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, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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

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**Consideration of Comments on Project 2006-08 Transmission Loading Relief**

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

		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region		Segment Selection									
1.	Ralph Rufrano	New York Power Authority		NPCC	5										
2.	Alan Adamson	New York State Reliability Council		NPCC	10										
3.	Gregory Campoli	New York Independent System Operator		NPCC	2										
4.	Peter Yost	Consolidated Edison Co. of New York, Inc.		NPCC	3										
5.	Kurtis Chong	Independent Electricity System Operator		NPCC	2										
6.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC	1										
7.	Manuel Couto	National Grid		NPCC	1										
8.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC	1										
9.	Brian D. Evans-Mongeon	Utility Services		NPCC	8										
10.	Mike Garton	Dominion Resources Services, Inc.		NPCC	5										
11.	Brian L. Gooder	Ontario Power Generation Incorporated		NPCC	5										
12.	Kathleen Goodman	ISO - New England		NPCC	2										
13.	David Kiguel	Hydro One Networks Inc.		NPCC	1										

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	Commenter	Organization	Industry Segment																	
			1	2	3	4	5	6	7	8	9	10								
14. Michael R. Lombardi	Northeast Utilities	NPCC	1																	
15. Randy MacDonald	New Brunswick System Operator	NPCC	2																	
16. Greg Mason	Dynegy Generation	NPCC	5																	
17. Bruce Metruck	New York Power Authority	NPCC	6																	
18. Chris Orzel	FPL Energy/NextEra Energy	NPCC	5																	
19. Robert Pellegrini	The United Illuminating Company	NPCC	1																	
20. Michael Schiavone	National Grid	NPCC	1																	
21. Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																	
22. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
2.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X											
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Chuck Westbrook	Tx Pre-Schedule & Real Time	WECC	1																
3.	Group	Carol Gerou	MRO NERC Standards Review Subcommittee																	X
<b>Additional Member Additional Organization Region Segment Selection</b>																				
1.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																
2.	Neal Balu	Wisconsin Public Service	MRO	3, 4, 5, 6																
3.	Terry Bilke	Midwest ISO	MRO	2																
4.	Ken Goldsmith	Alliant Energy	MRO	4																
5.	Jim Haigh	WAPA	MRO	1, 6																
6.	Terry Harbour	MidAmerican Energy Company	MRO	3, 5, 6, 1																
7.	Joe Knight	Great River Energy	MRO	1, 3, 5, 6																
8.	Alice Murdock	Xcel Energy	MRO	1, 3, 5, 6																
9.	Scott Nickels	Rochester Public Utilities	MRO	4																
10.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																
11.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6																
4.	Group	Jason L. Marshall	Midwest ISO Standards Collaborators		X															

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	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
<b>Additional Member Additional Organization Region Segment Selection</b>												
1.	Jim Cyrulewski	JDRJC Associates	RFC	8								
2.	Jianmei Chai	Consumers Energy	RFC	3, 4, 5								
5.	Group	Sam Ciccone	FirstEnergy		X		X	X	X	X		
<b>Additional Member Additional Organization Region Segment Selection</b>												
1.	Dave Folk	FirstEnergy	RFC									
2.	Doug Hohlbaugh	FirstEnergy	RFC									
6.	Group	Jim Case	SERC OC Standards Review Group		X		X					
<b>Additional Member Additional Organization Region Segment Selection</b>												
1.	Gary Hutson	SMEPA	SERC	1, 3, 5								
2.	Steve Fritz	ACES Power Marketing	SERC	6								
3.	Gerry Beckerle	Ameren	SERC	1, 3								
4.	Eugene Warnecke	Ameren	SERC	1, 3								
5.	Joel Wise	TVA	SERC	1, 3, 5, 9								
6.	Chad Randall	E. ON US	SERC	1, 3, 5								
7.	Brad Young	E. ON US	SERC	1, 3, 5								
8.	Fred Krebs	Calpine	SERC	5								
9.	Hugh Francis	Southern	SERC	1, 3, 5								
10.	Alan Jones	Alcoa	SERC	1, 5								
11.	Timmy LeJeune	Louisiana. Generating	SERC	1, 3, 5								
12.	Don Reichenbach	Duke	SERC	1, 3, 5								
13.	Greg Stone	Duke	SERC	1, 3, 5								
14.	Jason Marshall	MISO	SERC	2								
15.	Randy Wilkerson	Progress Energy	SERC	1, 3, 5								
16.	Ray Phillips	AMEA	SERC	3, 4								
17.	Narinder Saini	Entergy	SERC	1, 3								
18.	Robert Thomasson	BREC	SERC	1, 3, 5, 9								

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		Commenter	Organization	Industry Segment															
				1	2	3	4	5	6	7	8	9	10						
19.	Barbara Doland	SERC	SERC	10															
20.	Wes Davis	SERC	SERC	10															
21.	John Troha	SERC	SERC	10															
7.	Individual	Sandra Shaffer	PacifiCorp		X		X		X	X									
8.	Individual	Hugh Francis	Southern Company		X		X		X										
9.	Individual	Kasia Mihalchuk	Manitoba Hydro		X		X		X	X									
10.	Individual	Roger Champagne	Hydro-Québec TransEnergie (HQT)		X														
11.	Individual	James H. Sorrels, Jr.	American Electric Power		X		X		X	X									
12.	Individual	Bill Harm	PJM			X													
13.	Individual	Dan Rochester	Independent Electricity System Operator			X													
14.	Individual	Greg Rowland	Duke Energy		X		X		X	X									
15.	Individual	Pat Harrington	BC Hydro				X												

1. The drafting team has modified the purpose of IRO-006-5 to read:

*To ensure coordinated action between Interconnections when implementing Interconnection-wide transmission loading relief procedures to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the bulk electric system.*

Do you agree with this modified purpose?

**Summary Consideration:** The majority of commenters were satisfied with the purpose.

Some entities had concern with the use of the phrase “Interconnection-wide.” The purpose is using the phrase “Interconnection-wide” to address the scope of the congestion management effort. While the SDT recognizes that there may be impacts in other Interconnections, we believe those impacts are related to the transmission loading relief procedure only by virtue of Interchange; moving generation in one interconnection will not aid a transmission loading in another unless it impacts Interchange between the interconnections. Accordingly, the SDT believes this purpose correctly discusses the coordination needed between interconnections when one interconnection implements an interconnection-wide procedure and that procedure curtails schedules that cross the interconnection boundary.

Organization	Yes or No	Question 1 Comment
Manitoba Hydro	No	For the most part agree but believe statement on interconnection wide is misleading. Suggest striking inter-connection wide from the purpose.
<p><b>Response:</b> The purpose is using the phrase “Interconnection-wide” to address the scope of the congestion management effort. While the SDT recognizes that there may be impacts in other Interconnections, we believe those impacts are related to the transmission loading relief procedure only by virtue of Interchange; moving generation in one interconnection will not aid a transmission loading in another unless it impacts Interchange between the interconnections. Accordingly, the SDT believes this purpose correctly discusses the coordination needed between interconnections when one interconnection implements an interconnection-wide procedure and that procedure curtails schedules that cross the interconnection boundary.</p>		
MRO NERC Standards Review Subcommittee	No	MRO NSRS largely agrees with the modified purpose statement but believes one additional modification is required. Interconnection-wide contradicts that coordination is needed among Interconnections. We suggest striking Interconnection-wide from the purpose. The purpose should then read: "To ensure coordinated action between Interconnections when implementing transmission loading relief procedures to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the Bulk Electric System."
<p><b>Response:</b> The purpose is using the phrase “Interconnection-wide” to address the scope of the congestion management effort. While the SDT</p>		

**Consideration of Comments on Project 2006-08 Transmission Loading Relief**

Organization	Yes or No	Question 1 Comment
		<p>recognizes that there may be impacts in other Interconnections, we believe those impacts are related to the transmission loading relief procedure only by virtue of Interchange; moving generation in one interconnection will not aid a transmission loading in another unless it impacts Interchange between the interconnections. Accordingly, the SDT believes this purpose correctly discusses the coordination needed between interconnections when one interconnection implements an interconnection-wide procedure and that procedure curtails schedules that cross the interconnection boundary.</p>
Midwest ISO Standards Collaborators	No	<p>We largely agree with modified purpose statement but believe one additional modification is required. Interconnection-wide contradicts that coordination is needed among Interconnections. We suggest striking Interconnection-wide from the purpose. The purpose should then read:"To ensure coordinated action between Interconnections when implementing transmission loading relief procedures to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the bulk electric system."</p>
<p><b>Response:</b> The purpose is using the phrase "Interconnection-wide" to address the scope of the congestion management effort. While the SDT recognizes that there may be impacts in other Interconnections, we believe those impacts are related to the transmission loading relief procedure only by virtue of Interchange; moving generation in one interconnection will not aid a transmission loading in another unless it impacts Interchange between the interconnections. Accordingly, the SDT believes this purpose correctly discusses the coordination needed between interconnections when one interconnection implements an interconnection-wide procedure and that procedure curtails schedules that cross the interconnection boundary.</p>		
SERC OC Standards Review Group	No	<p>We suggest removing the words, "Interconnection-wide" and suggest alternative wording to enhance clarity: To ensure coordinated action when implementing transmission loading relief procedures between and among Interconnections to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the bulk electric system.</p>
<p><b>Response:</b> The purpose is using the phrase "Interconnection-wide" to address the scope of the congestion management effort. While the SDT recognizes that there may be impacts in other Interconnections, we believe those impacts are related to the transmission loading relief procedure only by virtue of Interchange; moving generation in one interconnection will not aid a transmission loading in another unless it impacts Interchange between the interconnections. Accordingly, the SDT believes this purpose correctly discusses the coordination needed between interconnections when one interconnection implements an interconnection-wide procedure and that procedure curtails schedules that cross the interconnection boundary.</p>		
American Electric Power	Yes	
BC Hydro	Yes	

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Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
PJM	Yes	
Southern Company	Yes	

2. The drafting team modified Requirement R1 of IRO-006-5 such that it no longer applies to the Transmission Operator. While requests may still be issued by Reliability Coordinators (as is done in the Eastern Interconnection) or Transmission Operators (as the SDT believes is currently done in the West) or Balancing Authorities (which may be done at some point in the future), the SDT believes that the appropriate entities to respond to those requests are either Balancing Authorities or Reliability Coordinators. Additionally, the SDT has removed ambiguous language from the requirement. Do you agree with these modifications?

**Summary Consideration:** The majority of commenters agreed with the modifications.

Some commenters expressed a concern that it was not clear who was communicating to whom when giving a reliability reason for not complying with a request. The SDT clarified this language in the standard.

One commenter felt that there needed to be an obligation to act within a certain time frame imposed by the standard. The SDT combined R4 and R5 to provide this obligation, and established the time for the RC to take action as 15 minutes.

Organization	Yes or No	Question 2 Comment
American Electric Power	No	AEP believes that there should be a corresponding relationship between the level of the TLR and the VSL, as the TLR level will provide the severity of action or non-action required.
<p><b>Response:</b> The SDT disagrees that the TLR Level will have an impact on the Violation Severity Level. The VSL measures the extent to which an entity failed to meet the requirement.</p>		
Southern Company	No	<p>It is our opinion that the Standard Drafting Team (SDT) has not fully developed Requirement R1 in that there is no explicit time period specified within IRO-006-5 for meeting this requirement. Because a thirty minute time period for compliance is prevalent in several approved standards (cited below), we feel Tv or a maximum limit of thirty minutes is appropriate for this standard. The modified language is included below.</p> <p>R1. Each Reliability Coordinator and Balancing Authority that receives a request pursuant to an Interconnection-wide transmission loading relief procedure (such as Eastern Interconnection TLR, WECC Unscheduled Flow Mitigation, or congestion management procedures from the ERCOT Protocols) from any Reliability Coordinator, Balancing Authority, or Transmission Operator in another Interconnection to curtail an Interchange Transaction that crosses an Interconnection boundary shall comply with the request within Tv but no longer than 30 minutes, unless it provides a reliability reason that it cannot comply with the request. [Violation Risk Factor: High] [Time Horizon: Real-time</p>

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Organization	Yes or No	Question 2 Comment
		<p>Operations]</p> <p>The following standards included some mention of a 30 minute limit or Tv limit. IRO-001-1.1 (R3), IRO-009-1 (R4 &amp; R5), TOP-004-2 (R4), TOP-007-0 (R2).</p>
<p><b>Response:</b> The SDT has combined R4 and R5 and incorporated a 15-minute deadline for the RC to take action into R4 to address this issue. The 15 minute duration was chosen based on current practice, which allows for sufficient time to make adjustments to any Interchange Schedules being curtailed.</p>		
MRO NERC Standards Review Subcommittee	No	<p>MRO NSRS agrees with the changes but notes an additional clarification is needed. R1 requires the RC and BA to comply with a curtailment request "unless it provides a reliability reason that it cannot comply with the request." The reader could infer that this reason must be provided to the issuing RC but the requirement does not explicitly state this. Further, the BA may provide the reason to its RC (assume this RC did not issue TLR) and rely on that RC to communicate it to the issuing RC.</p>
<p><b>Response:</b> The SDT agrees and has modified the standard to state that an entity must comply "unless it provides to the requestor a reliability reason that it cannot comply with the request."</p>		
Duke Energy	No	<p>The Standards Drafting Team needs to confirm that TOPs in the West may issue requests for loading relief before including the TOP in Requirement R1.</p>
<p><b>Response:</b> The SDT has spoken with representatives from the West, and believes this is the manner in which WECC procedures are currently handled.</p>		
Midwest ISO Standards Collaborators	Yes	<p>We agree with the changes but note an additional clarification is needed. R1 requires the RC and BA to comply with a curtailment request "unless it provides a reliability reason that it cannot comply with the request." The reader could infer that this reason must be provided to the issuing RC but the requirement does not explicitly state this. Further, the BA may provide the reason to its RC (assume this RC did not issue TLR) and rely on that RC to communicate it to the issuing RC.</p>
<p><b>Response:</b> The SDT agrees and has modified the standard to state that an entity must comply "unless it provides to the requestor a reliability reason that it cannot comply with the request."</p>		
Manitoba Hydro	Yes	<p>Agree with the changes but note an additional clarification is needed. R1 requires the RC and BA to comply with a curtailment request "unless it provides a reliability reason that it cannot comply with the request." It is still not clear who should be communicating. The reader could infer that this reason must be provided to the issuing RC but the requirement does not explicitly state this. Further, the</p>

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Organization	Yes or No	Question 2 Comment
		BA may provide the reason to its RC (assume this RC did not issue TLR) and rely on that RC to communicate it to the issuing RC.
<p><b>Response:</b> The SDT agrees and has modified the standard to state that an entity must comply “unless it provides to the requestor a reliability reason that it cannot comply with the request.”</p>		
BC Hydro	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
PJM	Yes	
SERC OC Standards Review Group	Yes	

3. The drafting team has updated the definition of “Market Flow” to read:

*Market Flow: the total amount of energy flowing across a specified facility or set of facilities due to a market dispatch of internal generation to serve internal load.*

Do you agree with this definition?

**Summary Consideration:** The majority of commenters agreed with the definition. Minor changes were made as suggested by two of the commenters. The definition was changed as follows:

Market Flow: the total amount of power flowing across a specified Facility or set of Facilities due to a market dispatch of internal generation to serve internal load.

Organization	Yes or No	Question 3 Comment
American Electric Power	No	FERC has been very clear regarding the need for DR to be considered as a resource. This definition is narrow and does not include the range of resources that are also subject to dispatch.
<b>Response:</b> The SDT believes that while Demand Response can provide congestion relief, it is not appropriate to be incorporated in this definition. Market Flow includes both supply and demand, and therefore already includes the impact of all DR programs within the calculation of market flow.		
SERC OC Standards Review Group	No	The definition reproduced here is not the same as the definition in the redline version (the redline version has “facility” and “facilities” capitalized). The word “energy” should be replaced with the word “power” because energy denotes power flowing over a specified time.
<b>Response:</b> The SDT has adopted the proposed change.		
Duke Energy	No	The definition would be more clear if the word “energy” was changed to “power” since requests for relief are megawatts and not megawatt-hours.
<b>Response:</b> The SDT has adopted the proposed change.		
BC Hydro	No	The term “Market Flow” seems inappropriate. “Market Flow” suggests inter-area flow from one

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Organization	Yes or No	Question 3 Comment
		market, through one or more control areas to another market, but the definition seems to suggest the flow is within a control area to end-use customers in that control area. I suggest that you consider changing the term to "Intra-Market Flow".
<p><b>Response:</b> The term "market flow" is already in use within three RTOs (PJM, MISO and SPP), and the SDT believes that attempting to modify it now could introduce unnecessary confusion.</p>		
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Midwest ISO Standards Collaborators	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
PJM	Yes	
Southern Company	Yes	

4. The drafting team has updated Requirement R1 of IRO-006-EAST-1 to clarify if TLR is used in response to an actual IROL exceedance, it must be used “prior to or concurrently with” one or more of five other specific listed mitigation actions. Do you agree with this change?

**Summary Consideration:** The majority of commenters agreed with the change. Some entities suggested there may be other options besides those listed, and proposed that the language be less limiting, so as to allow other methods of congestion management to be considered. The SDT believes that the five actions listed are generic actions that can be implemented in multiple ways. As such, it does not believe the list is limiting.

Organization	Yes or No	Question 4 Comment
SERC OC Standards Review Group	No	Confining the available mitigation actions to the set listed in this requirement may damage reliability by preventing creative responses to system challenges.
<b>Response:</b> The SDT believes that the five actions listed are generic actions that can be implemented in multiple ways. As such, it does not believe the list is limiting.		
Duke Energy	No	We disagree with limiting actions to the five bulleted actions. Need to leave other options open.
<b>Response:</b> The SDT believes that the five actions listed are generic actions that can be implemented in multiple ways. As such, it does not believe the list is limiting.		
American Electric Power	Yes	
BC Hydro	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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<b>Organization</b>	<b>Yes or No</b>	<b>Question 4 Comment</b>
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Midwest ISO Standards Collaborators	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
PJM	Yes	
Southern Company	Yes	

5. The drafting team has modified R2 and Appendix A of IRO-006-EAST-1 to make it clear that the criteria specified for TLR levels are guidelines only, not requirements. Do you believe these modifications make it clear that an RC should not be found in violation of R2 if they invoke TLR at a level different than that which the guidelines might recommend?

**Summary Consideration:** The majority of commenters agreed with the modifications, but several suggested that the Appendix be removed. The SDT has removed the Appendix and incorporated the critical elements into the standard.

Some commenters suggested that it should be made clear that TLR Levels are not required to be called in a specific order. The SDT added the following language to a footnote for the TLR Level descriptions: "TLR levels are neither required nor expected to be issued in numerical order of level."

Organization	Yes or No	Question 5 Comment
American Electric Power	No	After the modifications, the remaining reporting obligations should be moved from Medium to Low VSL. Additionally, identifying the means of communications will be important to compliance.
<p><b>Response:</b> The SDT believes that the VSLs are appropriate. If the commenter is instead referring to VRF, the SDT believes that using the TLR level communicates information to other entities regarding the severity of congestion, and therefore is appropriate to be in the "Medium" VRF category.</p>		
Southern Company	No	Complying with one Reliability Standard should not allow someone to violate another Reliability Standard. IRO-001 states that "Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state."Regardless of the wording or intent, guidelines associated with standards become de facto standards during an audit event. Appendix A should be deleted from the standard and made a separate guideline document.
<p><b>Response:</b> The SDT is unclear of the conflict with IRO-001 as implied by the commenter. The SDT has removed the Appendix and incorporated the critical elements into the standard.</p>		
MRO NERC Standards Review Subcommittee	No	MRO NSRS believes a statement should be added that reads. "TLR levels are neither required nor expected to be issued in numerical order of level. For example, a TLR Level 3a could be issued

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Organization	Yes or No	Question 5 Comment
		without issuing any prior TLR Level 1 or 2.”
<b>Response:</b> The SDT has added “TLR levels are neither required nor expected to be issued in numerical order of level.”		
Midwest ISO Standards Collaborators	No	We believe a statement should be added that reads. “TLR levels are neither required nor expected to be issued in numerical order of level. For example, a TLR Level 3a could be issued without issuing any prior TLR Level 1 or 2.”
<b>Response:</b> The SDT has added “TLR levels are neither required nor expected to be issued in numerical order of level.”		
SERC OC Standards Review Group	No	We think clarity would be served by adding the underlined phrase in Appendix A: However, the Reliability Coordinator has the discretion to choose any of these levels in any order desired regardless of the guidelines listed below. Also, it is troubling to note that this set of guidelines is included as an appendix to a regulatory requirement when other situations similar to this (see PER Standards) are reproduced in a standalone document.
<b>Response:</b> The SDT has added “TLR levels are neither required nor expected to be issued in numerical order of level.” The SDT has removed the Appendix and incorporated the critical elements into the standard.		
FirstEnergy	Yes	We feel that this begs the question should guidelines even be a part of a standard. It sounds like the drafting team believes there is a strong possibility that an auditor might view these guidelines as requirements. If that is the case, there should be no room for error. These guidelines should be in a stand alone document referenced by the standard so that it is clear they are not requirements.
<b>Response:</b> The SDT has removed the Appendix and incorporated the critical elements into the standard.		
BC Hydro	Yes	
Bonneville Power Administration	Yes	
Duke Energy	Yes	

**Consideration of Comments on Project 2006-08 Transmission Loading Relief**

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Organization	Yes or No	Question 5 Comment
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power Coordinating Council	Yes	
PJM	Yes	

6. The drafting team has eliminated the IRO-006-EAST-1 requirement originally included in R3 to notify the Eastern Interconnection DC Tie Operator of curtailment requests, as the team believes it is no longer needed and is already implicitly addressed in BAL-001. Do you agree this requirement is no longer needed?

**Summary Consideration:** The majority of commenters agreed the requirement is no longer needed.

Organization	Yes or No	Question 6 Comment
FirstEnergy	No	Although we agree with the removal of the requirement, we have issues with a reliability requirement that is deemed "implicit" as stated in the question. Requirements, if needed for reliability, must always be explicit.
<p><b>Response:</b> The comment incorrectly referenced BAL-001. It should have instead referenced BAL-006-1, Requirement R4, which states "Adjacent Balancing Authority Areas shall operate to a common Net Interchange Schedule and Actual Net Interchange value and shall record these hourly quantities, with like values but opposite sign." The SDT believes this includes BA's separated by DC Ties, as well as any other adjacent BA.</p>		
Southern Company	No	We feel that communication with the DC Tie Operator is already covered within the standards. We again note the absence of a time requirement for some aspects of TLR within Requirement 3. Our response to Question #2 is repeated below as it regards IRO-006-EAST-1 (R3): It is our opinion that the Standard Drafting Team (SDT) has not fully developed Requirement R3 in that there is no explicit time period specified within IRO-006-EAST-1 for meeting this requirement. While the SDT may be relying on other standards; such as IRO-001-1.1 (R3), IRO-009-1 (R4 & R5), TOP-004-2 (R4), TOP-007-0 (R2) or TOP-008-1 (R1) [Note that IRO-006-EAST-1 is not applicable to Transmission Operators in the case of the last three references], language should be included to mandate a compliance period. The language should be framed to be effective in the absence of a prevailing or superior standard so as not to create a "double jeopardy" non-compliance situation. Since the thirty minute time period for compliance is prevalent in the above references we feel 15 or a maximum limit of thirty minutes is appropriate for this standard.
<p><b>Response:</b> The SDT has combined R4 and R5 and incorporated a 15-minute deadline into R4 to address this issue. The 15 minute duration was chosen based on current practice, which allows for sufficient time to make adjustments to any Interchange Schedules being curtailed.</p>		
MRO NERC Standards Review Subcommittee	Yes	MRO NSRS agrees the requirement was never needed. RC and BA sources and sinks have always been required to be notified. The sink BA is required to notify all on the transmission path including DC tie operators. However, we don't believe BAL-001 implies that this is addressed.

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Organization	Yes or No	Question 6 Comment
<p><b>Response:</b> The comment incorrectly referenced BAL-001. It should have instead referenced BAL-006-1, Requirement R4, which states “Adjacent Balancing Authority Areas shall operate to a common Net Interchange Schedule and Actual Net Interchange value and shall record these hourly quantities, with like values but opposite sign.” The SDT believes this includes BA’s separated by DC Ties, as well as any other adjacent BA.</p>		
Midwest ISO Standards Collaborators	Yes	We agree the requirement was never needed. RC and BA sources and sinks have always been required to be notified. The sink BA is required to notify all on the transmission path including DC tie operators. However, we don’t believe anything in BAL-001 implies that this is addressed.
<p><b>Response:</b> The comment incorrectly referenced BAL-001. It should have instead referenced BAL-006-1, Requirement R4, which states “Adjacent Balancing Authority Areas shall operate to a common Net Interchange Schedule and Actual Net Interchange value and shall record these hourly quantities, with like values but opposite sign.” The SDT believes this includes BA’s separated by DC Ties, as well as any other adjacent BA.</p>		
American Electric Power	Yes	
BC Hydro	Yes	
Bonneville Power Administration	Yes	
Duke Energy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power	Yes	

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Organization	Yes or No	Question 6 Comment
Coordinating Council		
PJM	Yes	
SERC OC Standards Review Group	Yes	

7. The drafting team has eliminated the IRO-006-EAST-1 requirement originally included in R4 that allowed for the use of procedures “pre-approved by the ERO...in lieu of implementing some or all of the requested flow reduction actions.” The drafting team believes that the process for Variances has replaced the pre-approval of the ERO, and no special process currently exists for acquiring pre-approval save the Variance process. Do you agree that this allowance is no longer needed?

**Summary Consideration:** The majority of commenters agreed the allowance is no longer needed. Some entities expressed concern with the use of the word “analysis.” The SDT agreed with those concerns and has replaced “analysis” with the word “assessment” in order to allow other sources, such as experience, to be considered in the bulleted list of actions in Requirement R4. For comparison, here are definitions of analysis and assessment:  
 Analysis - the examination of something in detail in order to understand it better or draw conclusions from it  
 Assessment - a judgment about something based on an understanding of the situation

Organization	Yes or No	Question 7 Comment
SERC OC Standards Review Group	No	Requirement 4 has several fundamental issues as it is currently worded:  No. 1 This change to the requirement seems to allow “on the fly substitution” for interconnection wide congestion management procedure proscriptions during an actual event. This change would damage coordination because other parties in the congestion management event would not necessarily know or understand what the changes were and why they were substituted for the officially recommended actions. This also would tend to dilute and diminish the ability of an adjacent Reliability Coordinator to maintain their wide-area situational awareness.  No. 2 The variance process is essentially a regional variance process, while it is possible and likely that a substitute congestion management procedure may cross regional boundaries.  No. 3 Approval by the ERO is an artifact (the ERO was called NERC in the previous versions of this standard and the actual approval was by the NERC OC) from the days of voluntary standards. Assuming that the variance process can’t be used, what would constitute approval by the ERO in the context of mandatory standards approved by FERC?  No. 4 The use of the word “analysis” in the bullets under R4 seems to indicate a formalized process with a study document which we do not believe would be possible in real time.
<p><b>Response:</b>                      1.) The current IRO-006-4 Attachment 1 sections 1.5 and 1.6 allow for deviations from the directed actions in certain cases. The SDT believes</p>		

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Organization	Yes or No	Question 7 Comment
<p>the new R4 is consistent with that which is currently allowed under the existing standards.</p> <p>2.) The SDT disagrees that the variance process is a “regional” process. NERC’s rules of procedure allow for both regional variances and entity variances, and entity variances may apply to more than just a single entity. In this case, the SDT would expect that the RC and the associated entities performing the substitute action would jointly seek an entity variance to allow the alternate procedure to be used in lieu of TLR response actions.</p> <p>3.) The SDT agrees that “approval by the ERO” is ambiguous. Accordingly, we have proposed to remove the language and instead use the Variance process, which will ensure that the alternate process receives appropriate attention prior to its being allowed as a substitute.</p> <p>4.) The SDT agrees with your concerns regarding the use of the word “analysis,” and has replaced it with the word “assessment” in order to allow other sources, such as experience, to be considered.</p>		
Duke Energy	No	We believe that alternate congestion management actions should be pre-approved by the ERO, as provided in Requirement R3 of IRO-006-4.1
<p><b>Response:</b> The SDT believes that “approval by the ERO” is ambiguous. Accordingly, we have proposed to remove the language and instead use the Variance process, which will ensure that the alternate process receives appropriate attention prior to its being allowed as a substitute.</p>		
Midwest ISO Standards Collaborators	Yes	<p>We agree with the removal. However, we do not believe a variance is necessary in all cases. Fortunately, the drafting team has left R4 flexible enough that the RC can take other action. However, we believe additional modification is necessary to improve this flexibility and reduce compliance burden. We believe that bullets under the implementing an alternate reliability action need to be modified. Analysis is one way to demonstrate that the congestion management actions will be ineffective or result in a reliability concern or adversely affect reliability. However, it is not the only way and this could imply that the RC now has to have a documented study defending their actions. The RCs operational experience and judgment is likely enough reason to take an alternate action. We suggest that the drafting modify these bullets to make clear that the bottom line is the result needs to be equally effective and as long as actual results demonstrate this, no analysis is necessary.</p>
<p><b>Response:</b> The SDT agrees with your concerns regarding the use of the word “analysis,” and has replaced it with the word “assessment” in order to allow other sources, such as experience, to be considered.</p>		
MRO NERC Standards Review Subcommittee	Yes	<p>MRO NSRS agrees with the removal. However, we do not believe a variance is necessary in all cases. Fortunately, the drafting team has left R4 flexible enough that the RC can take other action. However, we believe additional modification is necessary to improve this flexibility and reduce the compliance burden. We believe that bullets under the implementing an alternate reliability action</p>

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Organization	Yes or No	Question 7 Comment
		<p>need to be modified. Analysis is one way to demonstrate that the congestion management actions will be ineffective or result in a reliability concern or adversely affect reliability. However, it is not the only way and this could imply that the RC now has to have a documented study defending their actions. The RCs operational experience and judgment is likely enough reason to take an alternate action. We suggest that these bullets be modified to make clear that the bottom line is the result needs to be equally effective and as long as actual results demonstrate this, no analysis is necessary.</p>
<p><b>Response:</b> The SDT agrees with your concerns regarding the use of the word “analysis,” and has replaced it with the word “assessment” in order to allow other sources, such as experience, to be considered.</p>		
American Electric Power	Yes	
BC Hydro	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power Coordinating Council	Yes	
PJM	Yes	

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Organization	Yes or No	Question 7 Comment
Southern Company	Yes	



8. The drafting team has eliminated the concept of “reloading” from IRO-006-EAST-1. Reliability Coordinators do not direct reloads; they allow them to occur if the operating conditions permit and transmission customers so desire. Accordingly, the team does not believe any requirement to issue reloads is needed. Do you agree that requiring reloads is not needed in the Reliability Standard?

**Summary Consideration:** The majority of commenters agreed requiring reloads is not needed in the Reliability Standards.

Organization	Yes or No	Question 8 Comment
American Electric Power	No	Reloads need to be evaluated before resuming energy flow to avoid compromising the reliability of the BES.
<b>Response:</b> The SDT agrees that reloads should be evaluated before resuming energy flow. However, the SDT believes this is addressed already in INT-006-2 R1.		
MRO NERC Standards Review Subcommittee	Yes	MRO NSRS agrees that Reloads are not a reliability issue and therefore do not belong in the reliability standards.
<b>Response:</b> The SDT thanks you for your supportive comment.		
Midwest ISO Standards Collaborators	Yes	We agree that Reloads are not a reliability issue and therefore do not belong in the reliability standards.
<b>Response:</b> The SDT thanks you for your supportive comment.		
BC Hydro	Yes	
Bonneville Power Administration	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	

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Organization	Yes or No	Question 8 Comment
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power Coordinating Council	Yes	
PJM	Yes	
SERC OC Standards Review Group	Yes	
Southern Company	Yes	

**9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standards.**

**Summary Consideration:**

The majority of comments were not significant. Some resulted in minor language changes for clarity or consistency.

One commenter expressed concerns regarding business practices. The SDT referred that entity to the NAESB and FERC forums.

Some entities expressed concern with not having enough time allowed in IRO-006-EAST-1 R5. The SDT combined R4 and R5 and gave entities 15 minutes, rather than 10, to comply.

Organization	Question 9 Comment
FirstEnergy	1. In IRO-006-EAST-1, we do not understand the reason why the Applicability section must state the "Initiating" RC and "Responding" RC. The Requirements are already explicit enough and the applicability should simply state "Reliability Coordinator". 2. In IRO-006-5, we do not understand why the VRF was increased from "Medium" to "High". We believe it should remain "Medium".
<p><b>Response:</b></p> <p>1. The SDT believes it is important to make it clear that only Eastern Interconnection RCs are subject to the requirements that apply to initiating RCs, but all RCs (including those in other Interconnections) are subject to the requirements for responding RCs.</p> <p>2. The VRF was raised to be consistent with previous FERC actions and directives related to this standard.</p>	
Duke Energy	1. IRO-006-EAST-1 Requirement R2.2 is unclear regarding what constitutes the "list of congestion management actions". Suggest the following alternate wording: A list of congestion management actions to be implemented, which are calculated by the TLR procedure based upon the TLR level chosen. 2. The Standards Drafting Team needs to make sure that all these revisions are coordinated with the NAESB procedures. 3. The red-lined version of IRO-006-EAST-1 is hard to read because Requirements R3 and R4 formatting is mangled.
<p><b>Response:</b></p> <p>1. The SDT had attempted to draft this standard in a more generic fashion such that if the TLR process changes over time, it is less likely that the standard will need to be modified to accommodate the changes.</p>	

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Organization	Question 9 Comment
	<p>2. NERC and NAESB are currently coordinating closely on the TLR standards, and meeting as a joint standards drafting team on a regular basis.</p> <p>3. The SDT will work with NERC staff to review the redline.</p>
BC Hydro	<p>Additional Comments:</p> <ol style="list-style-type: none"> <li>1. In R4, the term “Network Integrated Transmission Service” should be changed to “Network Integration Transmission Service” (see Appendix B of FERC Order 890 B (2008-Jun-23 version of the FERC pro-forma Open-Access Transmission Tariff, OATT): <a href="http://www.ferc.gov/whats-new/comm-meet/2008/061908/E-1.pdf">http://www.ferc.gov/whats-new/comm-meet/2008/061908/E-1.pdf</a></li> <li>2. In R1, the term “Tv” should be defined in the standard because it does not appear in the NERC Glossary (<a href="http://www.nerc.com/files/Glossary_12Feb08.pdf">http://www.nerc.com/files/Glossary_12Feb08.pdf</a>; or <a href="http://www.nerc.com/files/Glossary_2009April20.pdf">http://www.nerc.com/files/Glossary_2009April20.pdf</a>).</li> <li>3. Appendix A should make the priority order for curtailments clearer and make reference to Section 13.6 of the FERC OATT, particularly the following excerpt, However, the Transmission Provider reserves the right to Curtail, in whole or in part, any Firm Transmission Service provided under the Tariff when, in the Transmission Provider’s sole discretion, an emergency or other unforeseen condition impairs or degrades the reliability of its Transmission System. This would help to avoid costly and time-consuming legal proceedings like the one involving FERC and Northern States Power that resulted in the 1999 Mar 14 ruling by the US Court of Appeal (see: <a href="http://caselaw.lp.findlaw.com/data2/circs/8th/983000p.pdf">http://caselaw.lp.findlaw.com/data2/circs/8th/983000p.pdf</a>).</li> <li>4. Appendix A should clearly state that curtailment of Firm Network Load and Firm Native Load (these terms should be defined by pointing to FERCs OATT) should only take place after all relevant Non Firm and Firm inter-market transfers have been curtailed. The following excerpt from the ruling referenced above provides the rationale: Thus, NSP argues, when there exists a power constraint, by providing curtailment to its native/retail consumers on a pro rata basis with wholesale users, NSP will be forced to provide interruptible service to its native/retail consumers. When such power outages occur, a pro rata curtailment will detrimentally affect native/retail consumers who have no other alternatives available to obtain electrical service. NSP urges that when wholesale (point-to-point) customers are curtailed in electrical transmission, the wholesale customer has alternative sources from which to obtain continuous electrical supply, through either the purchase of electricity from another provider, or via their own power generation facilities.</li> <li>5. Appendix A: Consider having three columns, (1) “Level”, (2) “Guidelines for System Conditions” and (3) “Additional Actions to be Initiated”. As it is now the definition of the TLR level and the actions to take at that level are in the same column. The last column, by including only the actions additional to what would be taken at the “earlier” TLR levels, would highlight the priority order of the actions. The additional actions to be taken at TLR level 6 should be “curtailment of Network Load and Native Load on a pro-rata basis” to make the link to FERC OATT Section 13.6.</li> <li>6. General: All NERC and NAESB standards relating to Transmission Loading Relief should make reference to the FERC OATT (particularly Section 13.6, “Curtailment of Firm Transmission Service”). The priority order for curtailments should be clearly articulated using the same language used in the FERC OATT (eg, Non-Firm Point-to-Point, Network Integration Transmission Service, NITS, Network Load, Native Load, etc). Since NERC is acting as the FERC ERO, there needs to be</li> </ol>

Organization	Question 9 Comment
	<p>clearer links between the OATT and the NERC and NAESB standards.</p> <p>7. General: A link to the relevant NAESB web page should be provided in the footnotes that all read, "Reallocation is a term defined within the NAESB TLR standards" I find the NAESB website (<a href="http://www.naesb.org/default.htm">http://www.naesb.org/default.htm</a>) difficult to navigate and couldn't find a glossary, but only many documents related to meeting agendas of the Glossary committee. The NAESB TLR Group page (<a href="http://www.naesb.org/weq/weq_tlr.asp">http://www.naesb.org/weq/weq_tlr.asp</a>) doesn't appear to have any documents newer than 2005 Jun 28.</p>
<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. The SDT has modified the language as suggested.</li> <li>2. The term is defined in the glossary under "IROL T<sub>v</sub>"</li> <li>3. The SDT believes these business rules are currently addressed in NAESB standards and FERC Orders, and suggests that the commenter work through those organizations to effect changes if such changes are desired.</li> <li>4. The SDT believes these business rules are currently addressed in NAESB standards and FERC Orders, and suggests that the commenter work through those organizations to effect changes if such changes are desired.</li> <li>5. The attachment is not specifying the actions to take, but rather serves as a guideline to determine the appropriate level of TLR. In this particular case, the guidance is based on what actions could be expected to mitigate the scenario.</li> <li>6. The reliability standard does not make reference to curtailment priority. Curtailment priorities are stipulated in NAESB's business practices and FERC Orders.</li> <li>7. To access specific NAESB standards, please contact NAESB (<a href="http://www.naesb.org">www.naesb.org</a>) for details.</li> </ol>	
<p>MRO NERC Standards Review Subcommittee</p>	<p>MRO NSRS is concerned that reliability reason is the only reason allowed for not complying with R1 in IRO-006-5. Unfortunately, the IDC allows an RC to issue a TLR that requires curtailments in the past and MISO has actually received requests for curtailments with effective times that are in the past. R1 could be modified to allow other reasons for not complying with the request such as this or another requirement could be written that requires a reasonable lead time on issuing TLRs and expected time of implementation of cuts.</p> <p><b>Response: The NERC IDCWG has been investigating this issue and has made some changes to the IDC that may help address this problem.</b></p> <p>Since this standard is for the Eastern Interconnection only, MRO NSRS asks the SDT to write the Measurements to consider presentation of IDC logs and screens as satisfactory evidence. Specifically, we ask the drafting team to modify M2 and M3 IRO-006-EAST-1 to clarify that providing the TLR history from the IDC will satisfy the evidence requirements. Since no RC ever issues a TLR without the IDC, MRO NSRS asks the SDT to write the requirements with consideration of</p>

Organization	Question 9 Comment
	<p>the use of the IDC. For example, R3 should be clarified that the IDC can be relied upon to communicate the notifications. The RC should not be required to demonstrate that the notifications went out as appropriate or essentially that the IDC worked as design.</p> <p><b>Response: In previous postings, commenters have agreed that the standard should not reference any specific tool. The IDC is the name of the NERC tool that is currently used to manage the TLR process and is a way, but not necessarily the only way, to show compliance.</b></p> <p>MRO NSRS suggests the wording for the third sub-bullet under the first bullet of IRO-006-EAST-1 R4 be changed from: "provide the Market Flow schedule changes" to: "achieve the Market Flow relief obligations". The term "provide" could be misinterpreted.</p> <p><b>Response: The SDT has replaced the word "provide" with "implement" to address your concerns.</b></p> <p>In IRO-006-EAST-1 R5, the words "as soon as possible but not more than" are problematic from a compliance perspective. How do you prove you did it as soon as possible? If you could have done it 5 seconds sooner, this could be construed as a violation unnecessarily. The MRO NSRS suggests changing this phrase to "within".</p> <p><b>Response: The "as soon as possible" language is intended to communicate a sense of urgency, which is appropriate. The language is not included in the measures and is not included in the VSLs.</b></p> <p>With regard to IRO-006-EAST-1 R5, there needs to be a documented exemption for tool performance issues. Often there is a 3 minute latency for receiving TLR curtailments from the time they are issued. This leaves only 7 minutes for the RC to review, determine impacts, communicate internally and with the initiating RC, if necessary, to make alternate arrangements, and acknowledge the curtailments.</p> <p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p> <p>Similarly, it should be stated that initiating discussions with the initiating RC regarding the curtailments counts as acknowledgement.</p> <p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p> <p>R5 needs to be further modified to allow 15 minutes rather than 10 for acknowledgement.</p>

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Organization	Question 9 Comment
	<p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p>
<p><b>Response: Please see in-line responses.</b></p>	
<p>Northeast Power Coordinating Council</p>	<p>NPCC appreciates the work of the Drafting Team, and has no additional comments.</p>
<p><b>Response: The SDT thanks you for your supportive comment.</b></p>	
<p>Independent Electricity System Operator</p>	<p>The drafting team has adequately addressed our comments on the previous draft. Thank you.</p>
<p><b>Response: The SDT thanks you for your supportive comment.</b></p>	
<p>SERC OC Standards Review Group</p>	<p>The language in IRO-006-East-1 is too detailed in the “how to” for managing SOL and IROL events. This level of detail is more properly contained in a procedural document. Mandatory enforceable standards should describe “what” is required and at a higher level than described in this current document.</p> <p><b>Response: The SDT does not believe that this standard describes the “how” for managing SOL and IROL events; there are other standards that address managing SOL and IROL events. TLR is only one of the measures that can be used to manage congestion. The SDT generally agrees that standards should stipulate the “what,” but there are certain procedures which, if they must be performed in a specific fashion to ensure reliability, should be stipulated as reliability standards.</b></p> <p>We suggest that the second bullet of R4 in IRO-006-1 should be rewritten to begin as follows: “With the agreement of the initiating Reliability Coordinator, implement alternate congestion management actions to those communicated in Requirement R3, provided that:” If the drafting team agrees with this change the second sub-bullet of the second bullet may be deleted as it may now be redundant.</p> <p><b>Response: The SDT agrees that this change could be made, but does not feel that it adds any significant benefit or clarity.</b></p> <p>The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.</p>

Organization	Question 9 Comment
<p><b>Response: Please see in-line responses.</b></p>	
<p>Midwest ISO Standards Collaborators</p>	<p>We are concerned that reliability reason is the only reason allowed for not complying with R1 in IRO-006-5. Unfortunately, the IDC allows an RC to issue a TLR that requires curtailments in the past and we have actually received requests for curtailments with effective times that are in the past. R1 could be modified to allow other reasons for not complying with the request such as this or another requirement could be written that requires a reasonable lead time on issuing TLRs and expected time of implementation of cuts.</p> <p><b>Response: The NERC IDCWG has been investigating this issue and has made some changes to the IDC that may help address this problem.</b></p> <p>Since this standard is for the Eastern Interconnection only, we ask the SDT to write the Measurements to consider presentation of IDC logs and screens as satisfactory evidence. Specifically, we ask the drafting team to modify M2 and M3 IRO-006-EAST-1 to clarify that providing the TLR history from the IDC will satisfy the evidence requirements. Since no RC ever issues a TLR without the IDC, we ask the SDT to write the requirements with consideration of the use of the IDC. For example, R3 should be clarified that the IDC can be relied upon to communicate the notifications. The RC should not be required to demonstrate that the notifications went out as appropriate or essentially that the IDC worked as design.</p> <p><b>Response: In previous postings, commenters have agreed that the standard should not reference any specific tool. The IDC is the name of the NERC tool that is currently used to manage the TLR process and is a way, but not necessarily the only way, to show compliance.</b></p> <p>We suggest the wording for the third sub-bullet under the first bullet of IRO-006-EAST-1 R4 be changed from:”provide the Market Flow schedule changes”to:”achieve the Market Flow relief obligations”. Provide could be misinterpreted.</p> <p><b>Response: The SDT has replaced the word “provide” with “implement” to address your concerns.</b></p> <p>In IRO-006-EAST-1 R5, the words “as soon as possible but not more than” are problematic from a compliance perspective. How do you prove you did it as soon as possible? If you could have done it 5 seconds sooner, this could be construed as a violation unnecessarily. We suggest changing this phrase to “within”.</p> <p><b>Response: The “as soon as possible” language is intended to communicate a sense of urgency, which is appropriate. The language is not included in the measures or the VSLs.</b></p>

Organization	Question 9 Comment
	<p>With regard to IRO-006-EAST-1 R5, there needs to be a documented exemption for tool performance issues. Often there is a 3 minute latency for receiving TLR curtailments from the time they are issued. This leaves only 7 minutes for the RC to review, determine impacts, communicate internally and with the initiating RC, if necessary, to make alternate arrangements, and acknowledge the curtailments.</p> <p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p> <p>Similarly, it should be stated that initiating discussions with the initiating RC regarding the curtailments counts as acknowledgement.</p> <p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p> <p>R5 needs to be further modified to allow 15 minutes rather than 10 for acknowledgement.</p> <p><b>Response: The SDT has eliminated R5 and incorporated a 15-minute deadline into R4 to address this issue.</b></p>
<p><b>Response: Please see in-line responses.</b></p>	