**Unofficial Comment Form**Regional Reliability Standard – Retirement

IRO-006-TRE-1

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the proposed retirement of the Regional Reliability Standard **IRO-006-TRE-1 IROL and SOL Mitigation in the ERCOT Region**. The electronic form must be submitted by **8 p.m. Eastern, Monday, August 6, 2018.**

Documents and information about this project are available on the [Texas RE Standards](https://www.texasre.org/Pages/standards.aspx)page. If you have questions, contact Reliability Standards Analyst, Nasheema Santos (via email) or at (404) 446-2564.

**Background Information**

The Texas RE drafting team recommends the retirement of Regional Reliability Standard IRO-006-TRE-1 due to the following:

* The reliability-related substance is addressed in other continent-wide NERC Standards (IRO-002-5, IRO-008-2, TOP-001-3, TOP-001-4 and TOP-002-4); and
* Other issues cited in the technical justification document.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Regional Reliability Standards shall be: (1) more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) necessitated by a physical difference in the bulk power system. Regional Reliability Standards shall provide for as much uniformity as possible with Reliability Standards across the interconnected bulk power system of the North American continent. Regional Reliability Standards, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC Reliability Standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a Regional Reliability Standard, or the retirement of an existing standard, requires NERC to publicly notice and request comment on the proposed standard or proposed standard retirement. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process, if adversely affected.

**Balanced** — Regional reliability standards shall have a balance of interests and shall not be dominated by any two-interest categories and no single-interest category shall be able to defeat a matter.

**Due Process** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

Review the justification documents for retiring the Regional Reliability Standard and answer the following questions.

1. Do you agree the process for retiring the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the process for retiring the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the process for retiring the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the process for retiring the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the process for retiring the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments: