

Consideration of Comments on Second Draft of IRO-006-5 — Reliability Coordination — Transmission Loading Relief and IRO-006-EAST-1 — TLR Procedure for the Eastern Interconnection (Project 2006-08)

The Transmission Loading Relief Standard Drafting Team (TLR SDT) thanks all commenters who submitted comments on the second draft of IRO-006-5 — Reliability Coordination — Transmission Loading Relief and IRO-006-EAST-1 — TLR Procedure for the Eastern Interconnection. These standards were posted for a 45-day public comment period from February 19, 2009 through April 6, 2009. Stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 17 sets of comments, including comments from 60 different people from 40 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Most comments received on the standards were favorable. Some entities questioned whether NERC was allowed to create an Interconnection-wide standard; the SDT believes that NERC is able to take this approach.

The majority of respondents supported the changes to the applicability of IRO-006-5, but some entities suggested that including the Transmission Operator as a responding entity did not make sense. The SDT concurred and removed the Transmission Operator as an applicable entity. Some entities suggested that the Interchange Authority should be included; the team disagreed, believing that any role for the Interchange Authority should be addressed in the INT standards.

Several entities questioned whether reloading should be included in the standard. The team removed the concept of mandatory reloading, as this is not the way reloading works in reality.

Several entities expressed concern with the VSLs for the standards. The SDT has attempted to clarify the VSLs in the latest draft. All comments received can be reviewed at the following site:

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

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

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

Index to Questions, Comments, and Responses

- 1. The drafting team has removed the requirement from IRO-006-5 that indicated which methods were used in each of the Interconnections, instead relying on regional standards (with IRO-006-EAST-1 serving as an Interconnection-wide standard) for the three Interconnections to capture this information. Do you believe this to be appropriate? 7
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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	Jason Marshall	Midwest ISO Standards Collaborators		X									
		Additional Member	Additional Organization	Region			Segment Selection							
	1.	Jim Cyrulewski	JDRJC Associates	RFC			8							
2.	Group	Michael Brytowski	MRO NERC Standards Review Subcommittee											X
		Additional Member	Additional Organization	Region			Segment Selection							
	1.	Carol Gerou	MP	MRO			1, 3, 5, 6							
	2.	Neal Balu	WPS	MRO			3, 4, 5, 6							
	3.	Terry Bilke	MISO	MRO			2							
	4.	Joe DePoorter	MGE	MRO			3, 4, 5, 6							
	5.	Ken Goldsmith	ALTW	MRO			4							
	6.	Jim Haigh	WAPA	MRO			1, 6							
	7.	Terry Harbour	MEC	MRO			1, 3, 5, 6							

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	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
	8. Joseph Knight	GRE				MRO						1, 3, 5, 6
	9. Scott Nickels	RPU				MRO						3, 4, 5, 6
	10. Dave Rudolph	BEPC				MRO						3, 5, 6, 1
	11. Eric Ruskamp	LES				MRO						1, 3, 5, 6
	12. Pam Sordet	XCEL				MRO						1, 3, 5, 6
3.	Group	Michael Gammon	Kansas City Power & Light (KCPL)	X		X		X	X			
	Additional Member	Additional Organization	Region	Segment Selection								
	1. Jim Useldinger	Kansas City Power & Light	SPP	1, 3, 5, 6								
	2. Denney Fales	Kansas City Power & Light	SPP	1, 3, 5, 6								
	3. Tom Saitta	Kansas City Power & Light	SPP	1, 3, 5, 6								
4.	Group	Marc Butts	Southern Company Transmission	X								
	Additional Member	Additional Organization	Region	Segment Selection								
	1. Hugh Francis	Southern Company Services, Inc.	SERC	1								
	2. J. T. Wood	Southern Company Services, Inc.	SERC	1								
	3. Chris Wilson	Southern Company Services, Inc.	SERC	1								
5.	Group	Denise Koehn	Bonneville Power Administration (BPA)	X		X		X	X			
	Additional Member	Additional Organization	Region	Segment Selection								
	1. Thomas Westbrook	Tx Pre-Schedule & Real Time Scheduling	WECC	1								
	2. Angie Lumbert	Tx Operational Analysis & Support	WECC	1								
	3. Wes Hutchison	Tx Operational Analysis & Support	WECC	1								
6.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X			
	Additional Member	Additional Organization	Region	Segment Selection								
	1. Dave Folk	FE	RFC	1, 3, 4, 5, 6								
	2. Doug Hohlbaugh	FE	RFC	1, 3, 4, 5, 6								

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		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
7.	Group	Guy Zito	Northeast Power Coordinating Council (NPCC)												X
		Additional Member	Additional Organization					Region							Segment Selection
		1. Ralph Rufrano	New York Power Authority					NPCC							5
		2. Al Adamson	New York State Reliability Council					NPCC							10
		3. Greg Campoli	New York Independent System Operator					NPCC							2
		4. Roger Champagne	Hydro-Quebec TransEnergie					NPCC							2
		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. Gerry Dunbar	Northeast Power Coordinating Council					NPCC							10
		10. Brian Evans-Mongeon	Utility Services					NPCC							6
		11. Mike Garton	Dominion Resources Services, Inc.					NPCC							5
		12. Mike Gildea	Constellation Energy					NPCC							6
		13. Brian Gooder	Ontario Power Generation Incorporated					NPCC							5
		14. Kathleen Goodman	ISO - New England					NPCC							2
		15. David Kiguel	Hydro One Networks Inc.					NPCC							1
		16. Randy MacDonald	New Brunswick System Operator					NPCC							2
		17. Bruce Metruck						NPCC							6
		18. Don Nelson						NPCC							9
		19. Chris Orzel						NPCC							5
		20. Lee Pedowicz						NPCC							10
		21. Robert Pellegrini						NPCC							1
		22. Michael Schiavone						NPCC							1
		23. Rick White						NPCC							1

Consideration of Comments on Second Draft of IRO-006-5 and IRO-006-EAST-1 — Project 2006-08

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
	24. Peter Yost		NPCC							3				
8.	Individual	Jason Shaver	American Transmission Company (ATC)	X										
9.	Individual	Dan Rochester	Independent Electricity System Operator (IESO)		X									
10.	Individual	Greg Rowland	Duke Energy Corporation	X		X		X	X					
11.	Individual	Howard Rulf	We Energies			X	X	X						
12.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X					
13.	Individual	Jack Cashin/Barry Green	Electric Power Supply Association (EPSA)					X	X					
14.	Individual	Patrick Brown	PJM Interconnection		X									
15.	Individual	Jeff Hackman	Ameren	X										
16.	Individual	Edward Davis	Entergy Services, Inc.	X		X		X	X					
17.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X					
18.		Ben Li	ISO/RTO Council											

1. The drafting team has removed the requirement from IRO-006-5 that indicated which methods were used in each of the Interconnections, instead relying on regional standards (with IRO-006-EAST-1 serving as an Interconnection-wide standard) for the three Interconnections to capture this information. Do you believe this to be appropriate?

Summary Consideration: The majority of comments agreed that this was appropriate. Those who objected questioned whether NERC was allowed to create an Interconnection-wide standard. The SDT believes that NERC is able to take this approach. Regarding whether or not WECC and ERCOT were being held to the same standard as the Eastern Interconnection, the team believes this is not an area of valid concern – and if it was, due to the technical deference afforded to WECC and ERCOT, the ERO would likely not be the proper forum to address it.

Organization	Yes or No	Question 1 Comment
Midwest ISO Standards Collaborators	Yes	While we generally agree with this approach, it is actually somewhat confusing. IRO-006-EAST-1 is not a regional standard but a inter-connection wide standard and is thus posted with the IRO-006-5. This causes one to question why the other regional standards aren't posted but that is because they are truly regional standards and handled by WECC and ERCOT since their Interconnections are the same as the region. We question if an interconnection wide standard for the Eastern Interconnection is in fact supported by the NERC Rules of Procedure. Given the decoupling of the ERCOT and WECC region standards from this Interconnection wide standard effort, we fear that the Eastern Interconnection could be held to a higher standard than the WECC and ERCOT. What precautions is the drafting team taking to prevent this from happening?
<p>Response: The EAct requires that NERC give a “rebuttable presumption” of technical validity to the WECC and ERCOT approaches. Accordingly, the venue to address concerns with the WECC or ERCOT approaches is not within the Continent-wide NERC community – it is either within the WECC or ERCOT processes, or at the FERC.</p> <p>NERC’s Rules of Procedure do not prohibit the creation of Interconnection-wide standards. In previous postings, the drafting team questioned whether there was a preference for a continent-wide standard with interconnection-wide applicability or if there should be an interconnection-wide standard. Slightly more than 50% indicated they preferred the interconnection-wide standard, while approximately</p>		

Organization	Yes or No	Question 1 Comment
		<p>30% preferred the continent-wide standard with interconnection-wide applicability.</p> <p>Additionally, as both WECC and ERCOT are single RC areas, they do not necessarily need the kind of RC to RC coordination described in IRO-006-EAST. The Eastern Interconnection, with its multiple RCs, does have a need for coordination between RCs. Accordingly, the standard has requirements for RC to RC coordination that are not needed in WECC or ERCOT, which may indeed be a higher standard – but not one that would be applicable in those areas.</p>
<p>MRO NERC Standards Review Subcommittee</p>	<p>No</p>	<p>While we generally agree with this approach, it is actually somewhat confusing. IRO-006-EAST-1 is not a regional standard but a inter-connection wide standard and is thus posted with the IRO-006-5. This causes one to question why the other regional standards aren't posted but that is because they are truly regional standards and handled by WECC and ERCOT since their Interconnections are the same as the region. We question if an interconnection wide standard for the Eastern Interconnection is in fact supported by the NERC Rules of Procedure. Given the decoupling of the ERCOT and WECC region standards from this Interconnection wide standard effort, we fear that the Eastern Interconnection could be held to a higher standard than the WECC and ERCOT. What precautions is the drafting team taking to prevent this from happening?</p>
		<p>Response: The EPAct requires that NERC give a “rebuttable presumption” of technical validity to the WECC and ERCOT approaches. Accordingly, the venue to address concerns with the WECC or ERCOT approaches is not within the Continent-wide NERC community – it is either within the WECC or ERCOT processes, or at the FERC.</p> <p>NERC’s Rules of Procedure do not prohibit the creation of Interconnection-wide standards. In previous postings, the drafting team questioned whether there was a preference for a continent-wide standard with interconnection-wide applicability or if there should be an interconnection-wide standard. Slightly more than 50% indicated they preferred the interconnection-wide standard, while approximately 30% preferred the continent-wide standard with interconnection-wide applicability.</p> <p>Additionally, as both WECC and ERCOT are single RC areas, they do not necessarily need the kind of RC to RC coordination described in IRO-006-EAST. The Eastern Interconnection, with its multiple RCs, does have a need for coordination between RCs. Accordingly, the standard has requirements for RC to RC coordination that are not needed in WECC or ERCOT, which may indeed be a higher standard –</p>

Organization	Yes or No	Question 1 Comment
but not one that would be applicable in those areas.		
ISO/RTO Council	Yes and No	While we generally agree with this approach, it is actually somewhat confusing. IRO-006-EAST-1 is not a regional standard but a inter-connection wide standard and is thus posted with the IRO-006-5. This causes one to question why the other regional standards aren't posted but that is because they are truly regional standards and handled by WECC and ERCOT since their Interconnections are the same as the region. We question if an interconnection wide standard for the Eastern Interconnection is in fact supported by the NERC Rules of Procedure.
<p>Response: The EPCRA requires that NERC give a “rebuttable presumption” of technical validity to the WECC and ERCOT approaches. Accordingly, the venue to address concerns with the WECC or ERCOT approaches is not within the Continent-wide NERC community – it is either within the WECC or ERCOT processes, or at the FERC.</p> <p>NERC’s Rules of Procedure do not prohibit the creation of Interconnection-wide standards. In previous postings, the drafting team questioned whether there was a preference for a continent-wide standard with interconnection-wide applicability or if there should be an interconnection-wide standard. Slightly more than 50% indicated they preferred the interconnection-wide standard, while approximately 30% preferred the continent-wide standard with interconnection-wide applicability.</p>		
FirstEnergy	Yes	We agree. We would also suggest requirement R1 of IRO-006-5 be revised to be a "directive" rather than a "request". If an entity must comply with the request then it should come in the form of an RC directive; even if it is a directive from one RC to another RC.
<p>Response: The SDT believes this is not a true “directive” – it is simply RC to RC coordination.</p>		
KCPL	Yes	
Southern Company Transmission	Yes	N/A
BPA	Yes	

Organization	Yes or No	Question 1 Comment
NPCC	Yes	
American Transmission Company	Yes	
IESO	Yes	
Duke Energy Corporation	Yes	
We Energies	Yes	
American Electric Power	Yes	
EPSA	Yes	
PJM Interconnection	Yes	
Ameren	Yes	
PacifiCorp	Yes	

2. The drafting team has expanded the applicability of IRO-006-5 to include the Transmission Operator and the Balancing Authority. Do you believe this to be appropriate?

Summary Consideration: The majority of comments supported the addition. However, some entities suggested that including the Transmission Operator as a responding entity did not make sense. The SDT concurred and removed the Transmission Operator as an applicable entity.

Some entities suggested that the Interchange Authority should be included; the team disagreed, believing that any role for the Interchange Authority should be addressed in the INT standards.

Some entities suggested there was a potential for conflict between entities in different Interconnections. The SDT does not agree that the potential for conflict exists.

Organization	Yes or No	Question 2 Comment
Midwest ISO Standards Collaborators	No	We agree with the drafting team inclusion of the BA. It is not clear to us why the Transmission Operator is included. What role does the Transmission Operator play in curtailing an Interchange Transaction. This may be confusing the TOP with TSP or IA.
Response: The drafting team agrees, and has removed the Transmission Operator from the applicability of the standard. Note that Transmission Operators are still referenced in R1 as entities that may send requests to Reliability Coordinators and Balancing Authorities.		
MRO NERC Standards Review Subcommittee	No	We agree with the drafting team inclusion of the BA. It is not clear to us why the Transmission Operator is included. What role does the Transmission Operator play in curtailing an Interchange Transaction. This may be confusing the TOP with TSP or IA.
Response: The drafting team agrees, and has removed the Transmission Operator from the applicability of the standard. Note that Transmission Operators are still referenced in R1 as entities that may send requests to Reliability Coordinators and Balancing Authorities.		
American Transmission Company	No	We agree with the inclusion of the BA but do not agree with the inclusion of the TOP. ATC does not believe that the TOP plays a role in this standard and that maybe the team is confusing the TOP with the TSP or IA.

Organization	Yes or No	Question 2 Comment
		What responsibility does the Transmission Operator have in curtailing an Interchange Transaction?
<p>Response: The drafting team agrees, and has removed the Transmission Operator from the applicability of the standard. Note that Transmission Operators are still referenced in R1 as entities that may send requests to Reliability Coordinators and Balancing Authorities.</p>		
ISO/RTO Council	No	We agree with the drafting team inclusion of the BA. It is not clear to us why the Transmission Operator is included. What role does the Transmission Operator play in curtailing an Interchange Transaction. This may be confusing the TOP with TSP or IA.
<p>Response: The drafting team agrees, and has removed the Transmission Operator from the applicability of the standard. Note that Transmission Operators are still referenced in R1 as entities that may send requests to Reliability Coordinators and Balancing Authorities.</p>		
FirstEnergy	No	<p>We understand per the SDT response to comments ("IRO-006-5 R2 has been modified to include Transmission Operators and Balancing Authorities, which the SDT believes will further support the WECC practices") that the TOP and BA were added to the applicability to reflect WECC practices. Although we believe a continent-wide standard should capture all best practices, it should not cause issues with any other region or interconnection. In the East interconnection entities are ultimately bound by the RC directives since they have the highest level of authority. The requirement takes WECC into account but could cause compliance issues to a TOP or BA in the Eastern interconnection if it did not follow through on a request from a neighboring TOP or BA because they were already bound by a request from an RC. The phrase "as appropriate for the neighboring Interconnection" is also ambiguous and could add to conflict and varying interpretations. The wording needs clarity and we suggest that the TOP/BA applicability only be included in WECC's TLR standard IRO-006-WECC-1 if it is only appropriate in the Western Interconnection. Also, this applicability may conflict with IRO-001-1 which requires "R1. Each Regional Reliability Organization, subregion, or interregional coordinating group shall establish one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries." Therefore all segments of any interconnection have a Reliability Coordinator to coordinate emergency operations and issue directives to the BAs and TOPs.</p>
<p>Response: The ambiguous language has been removed. However, we believe there should not be any conflict, as the requirement includes a provision to not implement the request if the applicable entity "provides a reliability reason that it cannot comply with the request." This reason could include a statement that the local RC was forbidding the requested action. Note the requirement only applies to requests to curtail Interchange transactions that cross an Interconnection Boundary, and the request must be made as part of an Interconnection-wide congestion management</p>		

Organization	Yes or No	Question 2 Comment
<p>procedure. Given these limitations, we do not believe there to be a potential for conflict.</p>		
Southern Company Transmission	Yes	The Drafting Team might also consider including Interchange Authorities. Please see our comments at Question #7.
<p>Response: The drafting team believes that the Interchange Authority function provides coordination of interchange transaction changes (which may occur as a result of this standard), but it is not directly involved. To the extent requirements are needed to define tasks for the Interchange Authority related to Interchange, they will most likely be addressed in the INT standards.</p>		
KCPL	Yes	
BPA	Yes	
NPCC	Yes	
IESO	Yes	
Duke Energy Corporation	Yes	
We Energies	Yes	
American Electric Power	Yes	
EPSA	Yes	
PJM Interconnection	Yes	
Ameren	Yes	
PacifiCorp	Yes	

3. The drafting team has included measures and data retention period for IRO-006-5. Do you agree with these measures and the data retention period?

Summary Consideration: The majority of comments supported the language. Several entities questioned whether reloading should be included in the standard. The team removed the concept of mandatory reloading, as this is not the way reloading works in reality. The team also explained R1 in more detail, and removed some ambiguous language in the requirement.

Organization	Yes or No	Question 3 Comment
Southern Company Transmission	No	There is no need to require compliance with reload requests when the reloads are due to the the level of the TLR being reduced (ie. level 3 to level 1). The reload is due to the fact that the flowgate can take more flow than is currently allowed. Reloads are a commercial issue and not a reliability issue. They also conflict with current business practices such as off hour ramping for non-reliability reasons.Reloads is referenced in IRO-006-5 at:Requirement R1Measure M1VSL for R1and in IRO-006-EAST-1 at:Requirement R3.2.2Requirement R3.3.1Requirement R3.3.2Requirement R3.3.3Requirement R3.3.4Measure M3 (2)VSL for R3It is our opinion that reloading, and the references to it, should be removed from the two standards.
Response: The drafting team concurs, and has removed “reloading” from the proposed IRO-006-5 and IRO-006-EAST-1.		
FirstEnergy	No	Per our previous comments regarding the TOP/BA applicability, including them in this standard and along with measures could cause a double jeopardy violation for the same infraction.
Response: As discussed in response to the previous comment, the SDT does not believe that there is any potential for double jeopardy.		
NPCC	No	Please explain the intent of the words "as appropriate" in R1. This suggests that Balancing Authorities (BAs) and Transmission Operators (TOPs) (in addition to Reliability Coordinators) in another Interconnection, are also authorized to make requests to curtail or reload a transaction pursuant to an Interconnection-wide transmission loading relief procedure. Are they authorized "by default", or is it expected that BAs and TOPs

Organization	Yes or No	Question 3 Comment
		will receive their authorization based on an agreement between the neighboring Reliability Coordinators? In brief, what is the expected protocol for making these requests and how is it to be set up?
<p>Response: The ambiguous “as appropriate” language has been removed. However, in general, it is possible that Transmission Operators and Balancing Authorities may initiate curtailment of Interchange Transactions based on interconnection-wide congestion management activities. The intent of this requirement is to make it clear that should such requests be received in a different Interconnection than that from which the request originated, the BA or RC is required to either honor the request or explain why they cannot honor the request.</p>		
IESO	No	Please explain the intent of the words "as appropriate" in R1. This suggests that Balancing Authorities (BAs) and Transmission Operators (TOPs) (in addition to Reliability Coordinators) in another Interconnection, are also authorized to make requests to curtail or reload a transaction pursuant to an Interconnection-wide transmission loading relief procedure. Are they authorized "by default", or is it expected that BAs and TOPs will receive their authorization based on an agreement between the neighbouring Reliability Coordinators? In brief, what is the expected protocol for making these requests and how is it to be set up?
<p>Response: The ambiguous “as appropriate” language has been removed. However, in general, it is possible that Transmission Operators and Balancing Authorities may initiate curtailment of Interchange Transactions based on interconnection-wide congestion management activities. The intent of this requirement is to make it clear that should such requests be received in a different Interconnection than that from which the request originated, the BA or RC is required to either honor the request or explain why they cannot honor the request.</p>		
We Energies	No	R1 states that the requesting RC, BA, or TOP are in another interconnection. M1 needs to also state that. Also "reload" needs to be removed (see question #7).
<p>Response: The SDT has modified the standard to remove “reload,” and modified M1 to include the reference to “another interconnection” as suggested.</p>		
Midwest ISO Standards Collaborators	Yes	
MRO NERC Standards Review Subcommittee	Yes	

Organization	Yes or No	Question 3 Comment
KCPL	Yes	
BPA	Yes	
American Transmission Company	Yes	
Duke Energy Corporation	Yes	
American Electric Power	Yes	
PJM Interconnection	Yes	
Ameren	Yes	
PacifiCorp	Yes	
ISO/RTO Council	Yes	

4. The drafting team has included measures and data retention period for IRO-006-EAST-1. Do you agree with these measures and the data retention period?

Summary Consideration: The majority of comments supported the measures and data retention. The team made minor edits based on suggestions received.

Organization	Yes or No	Question 4 Comment
Duke Energy Corporation	No	<p>Measure M1 and the associated Requirement R1 and VSL all include the descriptive phrase "more effective" when describing actions other than a TLR to be taken to mitigate an IROL exceedance. This phrase introduces uncertainty and unnecessary compliance risk and should be deleted since the actions to be taken are spelled out in the Requirement (i.e. reconfiguration, redispatch, use of DSM and load shedding). Compliance should not depend upon an after-the-fact determination of how effective the actions turned out to be. Additionally, the way Requirement R1 is written, it could be interpreted to mean that all of the listed actions must be taken, as a minimum. R1 should state that actions to be taken "could include", but are not limited to reconfiguration, etc.</p>
<p>Response: The drafting team has modified the language of R1 and M1 to address your concerns.</p>		
PJM Interconnection	No	<p>The combination of requirements in this standard make sense, particularly as they pertain to IROLs and the need to plan, implement and communicate all steps needed to mitigate the IROL exceedance as quickly as possible. The issue is that the wording in requirements 1 through 4 may setup either an explicit (intended by the SDT) or implicit (not intended, but open to interpretation by auditors) logging and reporting requirement to log all actions "to be taken", i.e., the plan for each and every SOL (IROLs may make sense) as well as each and every hour until the TLR is set as a TLR 0. Non-compliance could be as benign as failing to log all of the action steps "to be taken" for a particular hour of a TLR level 1 for any SOL that has been in effect during the entire peak period. The excessive reporting/data retention requirements will not provide commensurate improvement in system reliability. R2. When initiating the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance, and at least every clock hour after initiation, up to and including the hour when the TLR level has been identified as TLR Level 0, the Reliability Coordinator shall identify: R2.1. The TLR level in accordance with the criteria in Appendix A, and R2.2. A list of actions to take, based on the</p>

Organization	Yes or No	Question 4 Comment
		TLR level chosen.PJM suggests that the wording be changed to reflect that all actions taken be logged, but remove any implicit or explicit reference to the requirement to log all actions "to be taken", i.e., the plan for each and every SOL (IROLs may make sense) as wells as each and every hour until the TLR is set as a TLR 0.
Response: The drafting team has modified the standard to use the phrase “congestion management actions to be implemented”		
Southern Company Transmission	No	Please see response to Question #3.
Response: Please see question 3 for response.		
American Transmission Company	No	Please see our comment to question 2
Response: Please see question 2 for response.		
NPCC	Yes	1. While we generally agree with the measures and data retention period, we do have a concern with the phrase "prior to or in conjunction with" in R1. We interpret the intent here to be that the Reliability Coordinator would, in response to an IROL exceedance, initiate local control procedures first, followed by the TLR procedure, or at least the two procedures would be carried out at the same time. The phrase in question leaves open the possibility that the TLR procedure may be initiated first with other control actions coming later, an ambiguity we believe should be cleared up at this stage if this is not the intent. We therefore suggest the following alternative phrasing "either prior to or simultaneously with". M1 would therefore have to be changed. 2. In M3, there is a typo in line 2. The word "for" should be removed.
Response: The drafting team has modified R1, M1, and M3 as suggested.		
IESO	Yes	1. While we generally agree with the measures and data retention period, we do have a concern with the phrase "prior to or in conjunction with" in R1. We interpret the intent here to be that the Reliability Coordinator would, in response to an IROL exceedance, initiate local control procedures first, followed by the TLR procedure, or at least the two procedures would be carried out at the same time. The phrase in question leaves open the possibility that the TLR procedure may be initiated first with other control actions coming

Organization	Yes or No	Question 4 Comment
		later, an ambiguity we believe should be cleared up at this stage if this is not the intent. We therefore suggest the following alternative phrasing "either prior to or simultaneously with". M1 would therefore have to be changed. 2. In M3, there is a typo in line 2. The word "for" should be removed.
<p>Response: The drafting team has modified R1, M1, and M3 as suggested.</p>		
Midwest ISO Standards Collaborators	Yes	
MRO NERC Standards Review Subcommittee	Yes	
KCPL	Yes	
FirstEnergy	Yes	
We Energies	Yes	
American Electric Power	Yes	
EPSA	Yes	
Ameren	Yes	
ISO/RTO Council	Yes	
PacifiCorp		None

5. The drafting team has included Violation Severity Levels for IRO-006-5. Do you agree with these Violation Severity Levels?

Summary Consideration: Slightly more than half of the comments supported the IRO-006-5 VSLs. The team removed references to reloading from the standards, as discussed previously. Some entities objected to the use of a “binary” VSL; the team explained the use of VSLs and its rationale for selecting this particular approach.

Organization	Yes or No	Question 5 Comment
Midwest ISO Standards Collaborators	No	<p>The Commission established in their June 19, 2008 order conditional approving VSLs that they prefer VSLs to have as many levels as possible defined in paragraph 27. For IRO-006-5 R1, we believe that it is possible and preferable to assign two VSLs rather than one by splitting the response to reloads from the response for curtailments. When you further consider that reloading is not a reliability issue but an equity issue (that is a market participant wants their transaction to flow for as long as possible to increase their revenue and the Transmission Provider does as likewise to avoid crediting the Transmission Reservation usage charges for the curtailments), the Lower VSL level should be used for it. Thus, we propose the following VSLs for IRO-006-5 R1: Lower: The applicable entity received a request to reload an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request. Severe: The applicable entity received a request to curtail an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request.</p>
<p>Response: The drafting team has eliminated reloading from the standard.</p>		
MRO NERC Standards Review Subcommittee	No	<p>The Commission established in their June 19, 2008 order conditional approving VSLs that they prefer VSLs to have as many levels as possible defined in paragraph 27. For IRO-006-5 R1, we believe that it is possible and preferable to assign two VSLs rather than one by splitting the response to reloads from the response for curtailments. When you further consider that reloading is not a reliability issue but an equity issue (that is a</p>

Organization	Yes or No	Question 5 Comment
		<p>market participant wants their transaction to flow for as long as possible to increase their revenue and the Transmission Provider does as likewise to avoid crediting the Transmission Reservation usage charges for the curtailments), the Lower VSL level should be used for it. Thus, we propose the following VSLs for IRO-006-5 R1:Lower: The applicable entity received a request to reload an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request.Severe: The applicable entity received a request to curtail an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request.</p>
<p>Response: The drafting team has eliminated reloading from the standard.</p>		
ISO/RTO Council	No	<p>The Commission established in their June 19, 2008 order conditional approving VSLs that they prefer VSLs to have as many levels as possible defined in paragraph 27. For IRO-006-5 R1, we believe that it is possible and preferable to assign two VSLs rather than one by splitting the response to reloads from the response for curtailments. When you further consider that reloading is not a reliability issue but an equity issue (that is a market participant wants their transaction to flow for as long as possible to increase their revenue and the Transmission Provider does as likewise to avoid crediting the Transmission Reservation usage charges for the curtailments), the Lower VSL level should be used for it. Thus, we propose the following VSLs for IRO-006-5 R1:</p> <p>Lower: The applicable entity received a request to reload an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request.</p> <p>Severe: The applicable entity received a request to curtail an Interchange Transaction crossing an Interconnection boundary pursuant to an Interconnection-wide transmission loading relief procedure from a Reliability Coordinator, Balancing Authority or Transmission Operator, but the entity neither complied with the request nor provided a reliability reason it could not comply with the request.</p>

Organization	Yes or No	Question 5 Comment
<p>Response: The drafting team has eliminated reloading from the standard.</p>		
Southern Company Transmission	No	We again take exception to reloads being included in the standard. Is there an instance/example of when a reload that was not performed caused a reliability problem on a flowgate currently under TLR?
<p>Response: The drafting team has eliminated reloading from the standard.</p>		
FirstEnergy	No	If the communication is truly a request that is not honored, then the VSL should be a lower not a severe. If it is a directive that is not followed as we have suggested in the response to question 1 then a severe is appropriate.
<p>Response: VSLs do not describe the risk of a violation, but the extent to which a violation occurred. In this case, either the request was honored (or not honored but explained), or it was not. As such, there is only 0% compliance or 100% compliance. In the case of 0% compliance, the SDT is treating this as a complete failure to meet the requirement; hence, the use of the Severe VSL.</p> <p>Note that this is not a directive - it is intended to be communication of a desired outcome, followed by either concurrence or negotiation of a compromise outcome.</p>		
American Transmission Company	No	The standard requires a response to a request, not a directive. This distinction implies that the request is less onerous than a directive and should, therefore, have a lower severity level. In addition, the reload of an Interchange Transaction is not a reliability issue but a market issue and should have a lower severity level.
<p>Response: VSLs do not describe the risk of a violation, but the extent to which a violation occurred. In this case, either the request was honored (or not honored but explained), or it was not. As such, there is only 0% compliance or 100% compliance. In the case of 0% compliance, the SDT is treating this as a complete failure to meet the requirement; hence, the use of the Severe VSL.</p> <p>Note that this is not a directive - it is intended to be communication of a desired outcome, followed by either concurrence or negotiation of a compromise outcome.</p> <p>The drafting team has eliminated reloading from the standard.</p>		
We Energies	No	Same comment as #3, remove reload. Requesting RC, BA, or TOP is in another interconnection.
<p>Response: The drafting team has eliminated reloading from the standard.</p>		

Organization	Yes or No	Question 5 Comment
The standard has been clarified to indicate that the requestor must be from another Interconnection.		
BPA	Yes	
KCPL	Yes	
NPCC	Yes	
IESO	Yes	
Duke Energy Corporation	Yes	
American Electric Power	Yes	
PJM Interconnection	Yes	
Ameren	Yes	
PacifiCorp	Yes	

6. The drafting team has included Violation Severity Levels for IRO-006-EAST-1. Do you agree with these Violation Severity Levels?

Summary Consideration: Only a small number of comments supported the VSLs for IRO-006-EAST-1. Some entities had concerns with the use of the phrase “some, but not all.” The SDT explained the use of this term. Some entities suggested the need for consistency between the requirements and the VSLs; the drafting team made changes to address this shortcoming. One entity suggested removing the concept of timeliness from R5; the team disagreed with the suggestion.

Organization	Yes or No	Question 6 Comment
Midwest ISO Standards Collaborators	No	<p>Please split the tables into rows. It is difficult to detect where the VSLs for one requirement end and another requirement begin. We believe part of the High VSL is ambiguous thus violates the Commission's guideline 2 (specifically part b) established in their June 19, 2008 order on VSLs. Specifically, how many is some? Use of the term some will result in inconsistent enforcement. Additionally, we note that it is not clear what VSL applies when all of the sub-requirements 3.1-3.3 are violated. To ensure various combinations of the violations of the sub-requirements are covered in all the VSLs and to make the VSLs consistent with the direction the VSL drafting team is applying to VSLs, we suggest the following VSLs:</p> <p>Lower: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1)</p> <p>Moderate: The initiating Reliability Coordinator did not communicate the list of actions to one or more of the required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2)</p> <p>OR</p> <p>The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p> <p>High: The initiating Reliability Coordinator violated two of the sub-requirements R3.1, R3.2, and R3.3 as</p>

Organization	Yes or No	Question 6 Comment
		<p>described in the Lower or Moderate VSLs.</p> <p>Severe: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1)</p> <p>AND</p> <p>The initiating Reliability Coordinator did not communicate the list of actions to one or more of the required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2)</p> <p>AND</p> <p>The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p>
<p>Response: The table has been modified so the row delineations will display correctly.</p> <p>The drafting team believes the VSLs are clear as written. Note that the use of the phrase “some” would be ambiguous if other options were provided and intended to imply a relative scale (e.g., few, some, many, etc...). However, the definition of “some” is generally defined as being a part of a set of unspecified size. In this case, the VSL is graded based on ALL actions being taken, SOME actions being taken, or NO actions being taken. SOME, therefore, indicates that at least one action was taken (therefore the entity has met more than 0% of their obligation), but not all actions were taken (so the entity did not meet 100% of their obligation). We believe that this use, in this context, is appropriate.</p>		
<p>MRO NERC Standards Review Subcommittee</p>	<p>No</p>	<p>Please split the tables into rows. It is difficult to detect where the VSLs for one requirement end and another requirement begin. We believe part of the High VSL is ambiguous thus violates the Commission's guideline 2 (specifically part b) established in their June 19, 2008 order on VSLs. Specifically, how many is some? Use of the term some will result in inconsistent enforcement. Additionally, we note that it is not clear what VSL applies when all of the sub-requirements 3.1-3.3 are violated. To ensure various combinations of the violations of the sub-requirements are covered in all the VSLs and to make the VSLs consistent with the direction the VSL drafting team is applying to VSLs, we suggest the following VSLs:</p> <p>Lower: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1)</p> <p>Moderate: The initiating Reliability Coordinator did not communicate the list of actions to one or more of the</p>

Organization	Yes or No	Question 6 Comment
		<p>required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2)</p> <p>OR</p> <p>The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p> <p>High: The initiating Reliability Coordinator violated two of the sub-requirements R3.1, R3.2, and R3.3 as described in the Lower or Moderate VSLs.</p> <p>Severe: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1) ANDThe initiating Reliability Coordinator did not communicate the list of actions to one or more of the required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2) AND The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p>
<p>Response: The table has been modified so the row delineations will display correctly.</p> <p>The drafting team believes the VSLs are clear as written. Note that the use of the phrase “some” would be ambiguous if other options were provided and intended to imply a relative scale (e.g., few, some, many, etc...). However, the definition of “some” is generally defined as being a part of a set of unspecified size. In this case, the VSL is graded based on ALL actions being taken, SOME actions being taken, or NO actions being taken. SOME, therefore, indicates that at least one action was taken (therefore the entity has met more than 0% of their obligation), but not all actions were taken (so the entity did not meet 100% of their obligation). We believe that this use, in this context, is appropriate.</p>		
ISO/RTO Council	No	<p>Please split the tables into rows. It is difficult to detect where the VSLs for one requirement end and another requirement begin.</p> <p>We believe part of the High VSL is ambiguous thus violates the Commission's guideline 2 (specifically part b) established in their June 19, 2008 order on VSLs. Specifically, how many is some? Use of the term some will result in inconsistent enforcement. Additionally, we note that it is not clear what VSL applies when all of the sub-</p>

Organization	Yes or No	Question 6 Comment
		<p>requirements 3.1-3.3 are violated. To ensure various combinations of the violations of the sub-requirements are covered in all the VSLs and to make the VSLs consistent with the direction the VSL drafting team is applying to VSLs, we suggest the following VSLs:</p> <p>Lower: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1)</p> <p>Moderate: The initiating Reliability Coordinator did not communicate the list of actions to one or more of the required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2)</p> <p>OR</p> <p>The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p> <p>High: The initiating Reliability Coordinator violated two of the sub-requirements R3.1, R3.2, and R3.3 as described in the Lower or Moderate VSLs.</p> <p>Severe: The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level. (R3.1)</p> <p>AND</p> <p>The initiating Reliability Coordinator did not communicate the list of actions to one or more of the required Reliability Coordinators, which are defined as all Eastern Interconnection Reliability Coordinators and any Reliability Coordinators in other Interconnections responsible for curtailing or reloading Interchange Transactions crossing Interconnection boundaries identified in the list of actions. (R3.2)</p> <p>AND</p> <p>The initiating Reliability Coordinator did not request one or more of the Reliability Coordinators identified in R3.3 to implement the identified actions.</p>
<p>Response: The drafting team believes that the language as written is appropriate.</p> <p>Note that the use of the phrase “some” would be ambiguous if other options were provided and intended to imply a relative scale (e.g., few, some,</p>		

Organization	Yes or No	Question 6 Comment
<p>many, etc...). However, the definition of “some” is generally defined as being a part of a set of unspecified size. In this case, the VSL is graded based on ALL actions being taken, SOME actions being taken, or NO actions being taken. SOME, therefore, indicates that at least one action was taken (therefore the entity is has met more than 0% of their obligation), but not all actions were taken (so the entity did not meet 100% of their obligation). We believe that this use, in this context, is appropriate.</p>		
KCPL	No	<p>The term "more effective actions" in the VSL for R1 is too subjective and not auditably supportable. Obviously, the determination of what is "more effective actions" is debatable and can be the cause of controversy in an audit. Recommend either removal or quantifying actions that could be considered "more effective" in Requirement R1, measure M1, and the VSL for R1.</p>
<p>Response: The drafting team has removed the phrase “more effective” from the requirement.</p>		
Southern Company Transmission	No	<p>Please see response to Question #5 Also, the Severe VSL Requirement R5 suggests that an RC's response time of 25 minutes plus one is just as harmful as not responding at all. Has any consideration been given to removing the time component of this VSL?</p>
<p>Response: Please see question 5 for response.</p> <p>The time component of the VSL was included to ensure relief is provided on a timely basis. If that time exceeds 25 minutes, we believe the RC may be unable to seek alternate relief suggestions in a time frame sufficient to avoid mitigate the problem effectively. Therefore, the late provision of this information has little reliability value, and does not meet the intent of the requirement.</p>		
NPCC	No	<p>See our response to Q#4 re. R1.R5 states that the RC must acknowledge to the initiating RC the actions "it will take" within ten minutes, whereas the Lower, Moderate and High VSLs refer to "its [the RC's] actions taken" and the Severe VSL refers to "its actions". These discrepancies in what is to be communicated in our view need to be addressed. We suggest modifying the VSLs by replacing the text in quotes with "the actions it will take" or "the actions it intended to take".</p>
<p>Response: Please see response to question 4.</p> <p>The language regarding “it will take” has been modified in the VSLs to be consistent with the requirement.</p>		

Organization	Yes or No	Question 6 Comment
IESO	No	See our response to Q#4 re. R1.R5 states that the RC must acknowledge to the initiating RC the actions "it will take" within ten minutes, whereas the Lower, Moderate and High VSLs refer to "its [the RC's] actions taken" and the Severe VSL refers to "its actions". These discrepancies in what is to be communicated in our view need to be addressed. We suggest modifying the VSLs by replacing the text in quotes with "the actions it will take" or "the actions it intended to take".
<p>Response: Please see response to question 4.</p> <p>The language regarding "it will take" has been modified in the VSLs to be consistent with the requirement.</p>		
Duke Energy Corporation	No	The VSL for Requirement R1 should have the phrase "more effective" deleted as pointed out in our Comment #4 above. The VSL for Requirement R3 should be revised to place R3.1, R3.2 and R3.3 all under the SEVERE VSL heading. Failure to comply with any of these sub-requirements would result in an overall failure to meet Requirement R3.
<p>Response: The drafting team has removed the phrase "more effective" from R1 and its VSLs.</p> <p>However, the drafting team disagrees with the suggestion that any failure to comply with 3.1, 3.2, or 3.3 should be seen as a severe violation. A failure to implement 3.1 results in a lack of communication, but the remaining actions are the more important actions. If 3.2 is missed, then there is a more detailed lack of communication and coordination regarding what will be happening, but it does not eliminate the action that provides the relief. However, failing 3.3 results in some or all of the requested relief not being provided; hence its High and Severe VSL.</p>		
We Energies	Yes	
American Electric Power	Yes	
FirstEnergy	Yes	
PJM Interconnection	Yes	
Ameren	Yes	

Organization	Yes or No	Question 6 Comment
PacifiCorp		None

7. 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 commenters did not have significant comments. Changes made in response were minor and did not change the intent of the standard.
 Some commenters expressed concern regarding the guidelines for establishing the appropriate TLR Level. The SDT made clarifying changes to the standard to make it clear that these are not requirements.

Organization	Question 7 Comment
Midwest ISO Standards Collaborators	IRO-001-1 R8 requires TOPs and BAs to follow RC directives. We are concerned that these standards may be creating potential for double jeopardy because IRO-001-1 R8 already obligates BAs and TOPs to issue curtailments. Does the drafting team believe that issuing a TLR and associated curtailment requirements by the RC not represent an RC directive? We believe the industry may not have a consistent opinion on this position and that some entities could be found in violation of a requirement in these standards and IRO-001-1 R8. We support the drafting team's position regarding use of the TLR in conjunction with other tools to mitigate an IROL that has been exceeded. We believe the Commission is misapplying the conclusions of the Blackout Report.
Response: By virtue of the fact that an RC or BA can respond in the negative if they have a reliability reason to do so, we believe these are not directives.	
MRO NERC Standards Review Subcommittee	We support the drafting team's position regarding use of the TLR in conjunction with other tools to mitigate an IROL that has been exceeded. We believe the Commission is misapplying the conclusions of the Blackout Report.
Response: The drafting team appreciates your supportive comments.	
KCPL	No additional comments.
Southern Company Transmission	Interchange Authorities are not included in the standard. TLR curtailments are often denied by the Interchange Authorities, sometimes in the same reliability region that the TLR has been issued, because the TLR was issued after the time limits programmed into their tagging program. In these cases the relief would not be provided and not due to the inaction of anyone

Organization	Question 7 Comment
	<p>mentioned in this standard.</p> <p>Response: Interchange Authorities do not approve or deny transaction modifications; they collect approvals from the Balancing Authorities and the Transmission Service Providers.</p> <p>Additional comments pertain to the proposed IRO-006-EAST-1 standard and the inclusion of Appendix A. It is our recommendation that Appendix A and the reference to it in Requirement R2.1 be deleted from the standard. The language of Appendix A is, in our opinion, overly prescriptive for the actions a Reliability Coordinator is to take with respect to Transmission Loading Relief. Several of the specific concerns we note as problematic in the content of Appendix A:</p> <p>1) The preamble of Appendix A states its purpose is ... intended to assist the Reliability Coordinator in determining what level of TLR to call and offers that... the Reliability Coordinator has the discretion to choose any of these levels regardless of the criteria listed below While the flavor of the preamble suggests no mandatory nature of the listed criteria, Requirement R2.1 does. Picking up from the end of Requirement R2 ... the Reliability Coordinator shall identify: [R2.1] The TLR level in accordance with the criteria in Appendix A, andIn addition to the deletion of Appendix A, we recommend changing the language of Requirement R2.1 to read: R2.1 The TLR level to be implemented, and.In the event the TLR SDT retains Appendix A –</p> <p>Response: The criteria have been specified as guidelines, as indicated in the introduction to the appendix. The goal of the appendix is to provide information and required nomenclature, but not mandatory criteria. Accordingly, the SDT does not believe that the requirement is in conflict with the preamble of the standard.</p> <p>2) To our knowledge, TLR Level 6 remains an option for utilization by Reliability Coordinators and is referenced in the NAESB WEQ-008 business practice standard. TLR Level 6 is not included in Appendix A.</p> <p>Response: The drafting team has returned TLR 6 back to the list.</p> <p>3) Under TLR Level 1, an eight hour lead time to issue a TLR Level 1 appears to be too long. Three to four hours seems more reasonable.</p> <p>Response: As stated above, these criteria are suggested guidelines. As listed in the introduction, an RC “has the discretion to choose any of these levels regardless of the guidelines listed below.”</p> <p>4) Under TLR Level 5a in the first bullet point, the language ?... when the next-hours transactions start should be changed to...</p>

Organization	Question 7 Comment
	<p>within the next hour.</p> <p>In the second bullet point the language offers an either / or prescription when TLR Level 5 (a or b) curtailments of Non-Firm and Firm transactions, market flows and>NNL (in Firm) are sequential in nature non-firm and then firm. We recommend changing the language in the second bullet point to read, Analysis shows the following sequential sets of actions can prevent exceeding the SOL or IROL: The connector or between the two sub-bullet points could then be changed to and (then).</p> <p>Response: The drafting team has modified the standard to state “within” the next hour, and replaced the “or” language with “and.”</p> <p>5) The same argument we make in (4) applies to the third bullet point in the TLR Level 5b section of the Appendix. To further illustrate our point, this bullet point offers that Analysis shows that either of the following sets of actions can prevent exceeding the SOL or IROL: with an or connector between the two sub-bullets. This suggests the Reliability Coordinator can choose the second sub-bullet while leaving the provisions of the first sub-bullet in play; i.e., choose to reconfigure the transmission system and curtail Firm while leaving Non-Firm in play.</p> <p>Response: The drafting team has modified the standard to replace the “or” language with “and.”</p> <p>6) The original intent of TLR 0 was to simply conclude a TLR event. The criteria shown for TLR 0 in Appendix A significantly adds to the purpose of TLR 0. It causes a Reliability Coordinator to remain in a TLR event until certainty of not approaching, or exceeding, a SOL or IROL eight hours into the future is determined.</p> <p>Response: As stated above, these criteria are suggested guidelines. As listed in the introduction, an RC “has the discretion to choose any of these levels regardless of the guidelines listed below.”</p> <p>In conclusion, we would like to add that we very much appreciate the work of the Transmission Loading Relief Standard Drafting Team to improve the overall quality of the IRO-006 standards and thank the members of the drafting for their commitment of time and effort in bringing Phase III of their work to fruition. Furthermore, we would like to say that we appreciate the opportunity to comment on this second draft of the proposed versions of the IRO-006 standards.</p>
	<p>Response: Please see in-line responses.</p>
BPA	BPA is in support of standard as written.

Organization	Question 7 Comment
<p>Response: The drafting team appreciates your supportive comments.</p>	
<p>FirstEnergy</p>	<p>1. In the following phrase from the Draft 2 proposed Market Flow definition: "the total amount of generation-to-load impact flowing across a specified facility or set of facilities due to a market dispatch", the term "impact" is vague and does not improve clarity over the terms "energy" or "power" from the original draft of the definition.</p> <p>Response: The definition has been clarified as shown below.</p> <p>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.</p> <p>2. Since IRO-006-5 requires compliance with interconnection-specific TLR procedures per requirement R1, it would be helpful if IRO-006-5 Sec. F. "Associated Documents" provided links to IRO-006-EAST-1, IRO-006-WECC-1, and the congestion management procedures from the ERCOT Protocols.</p> <p>Response: As these suggested documents are actual standards, there is no need to link to them. The SDT does not believe it is necessary to link to the ERCOT protocols, as they are already easily available from the ERCOT website.</p>
<p>Response: Please see in-line responses.</p>	
<p>NPCC</p>	<p>1. We have a further concern with R1 of IRO-005-EAST-1 that it may result in "premature" load shedding on occasions. For example, in situations where the only "more effective action" that can be taken is load shedding (say because other actions had been used previously to mitigate other exceedances), the RC would be obliged to shed load before being able to (again) initiate the TLR procedure. Shedding load should be a measure of last resort but yet this would have to be done before initiating the TLR procedure since this procedure cannot be used alone to mitigate the exceedance. Can such situations be accounted for</p> <p>Response: The SDT has eliminated the "more effective" language from the standard. However, note that R1 does not require an entity to shed load before or after initiating a TLR. The decision to shed load rests with the extent to which an entity can meet requirement R4 of IRO-009 to be under their IROL within their T_v</p> <p>2. The purpose statement of IRO-006-5 refers to "potential or actual SOL and IROL violations?", whereas the purpose statement of IRO-006-EAST-1 refers to "potential or actual SOL and IROL exceedances". We believe this is an inconsistency and should be</p>

Organization	Question 7 Comment
	<p>addressed by changing "violations" to "exceedances".</p> <p>Response: The SDT modified the IRO-006-5 purpose to use the word “exceedances.”</p>
<p>Response: Please see in-line responses.</p>	
<p>IESO</p>	<p>1. We have a further concern with R1 of IRO-005-EAST-1 that it may result in "premature" load shedding on occasions. For example, in situations where the only "more effective action" that can be taken is load shedding (say because other actions had been used previously to mitigate other exceedances), the RC would be obliged to shed load before being able to (again) initiate the TLR procedure. Shedding load should be a measure of last resort but yet this would have to be done before initiating the TLR procedure since this procedure cannot be used alone to mitigate the exceedance. Can such situations be catered for</p> <p>Response: The SDT has eliminated the “more effective” language from the standard. However, note that R1 does not require an entity to shed load before or after initiating a TLR. The decision to shed load rests with the extent to which an entity can meet requirement R4 of IRO-009 to be under their IROL within their T_v</p> <p>2. The purpose statement of IRO-006-5 refers to "potential or actual SOL and IROL violations", whereas the purpose statement of IRO-006-EAST-1 refers to "potential or actual SOL and IROL exceedances". We believe this is an inconsistency and should be addressed by changing "violations" to "exceedances".</p> <p>Response: The SDT modified the IRO-006-5 purpose to use the word “exceedances.”</p>
<p>Response: Please see in-line responses.</p>	
<p>Duke Energy Corporation</p>	<p>The Purpose statement of IRO-006-5 should be revised to more clearly state that the purpose of this standard is to require RC, BA, or TO action on TLRs that seek curtailment or reloading of Interchange Transactions that cross Interconnection boundaries, unless there is a reliability reason not to comply. As currently written, the Purpose statement only includes Interconnection-wide TLRs.</p>
<p>Response: This standard is intended to address only curtailments related to Interconnection-wide actions and the obligation to agree to curtailment requests unless a reliability reason prevents that agreement. The requirement that interchange transactions and their associated modification, including curtailment, must be agreed to and implemented by all balancing authorities is addressed in the INT family of standards.</p>	
<p>We Energies</p>	<p>IRO-006-5 Purpose: The Purpose may be too broad since the one requirement, R1, only applies to interchange crossing an</p>

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	<p>interconnection boundary.</p> <p>IRO-006-5 R1: As written, R1 REQUIRES a BA to reload an interchange transaction. A BA must always balance resources and demand, even during a TLR. When a TLR is issued that cuts or limits a transaction, the affected BAs still have to comply with the Balancing standards. One has to reduce generation, the other has to acquire other resources to supply its demand. Both have to control ACE. There will generally be no reliability reason requiring a transaction to be reloaded. Requiring a transaction to be reloaded may cause the ACE of one BA to go low because it does not have the generation to support it, and the other BAs ACE to go high because it is receiving MW but does not have load that requires it. Transactions should be allowed to be reloaded at the discretion of the parties involved, but should not be required to be reloaded.</p>
<p>Response: The SDT has updated the purpose statement to better reflect the goals of the standard.</p> <p>The SDT has eliminated “reloading” from the standards.</p>	
<p>American Electric Power</p>	<p>IRO-006-EAST-1: Market Flow: the total amount of generation-to-load impact of energy flowing across a specified facility or set of facilities due to a market dispatch. the operation of a market that has implemented a Market Flow Calculation methodology. We recommend using resource-to-load impact, rather than of generation-to-load impact.</p> <p>Response: The SDT believes that the use of the phrase “resource” is unnecessary in this definition. If a resource is not a generation resource, then it will not create energy to serve load. While the term “resource” may be appropriate for describing things such as reserves, the use of the term in this context is not appropriate.</p> <p>R1 mentions including, but not limited to, the following: reconfiguration, redispatch, use of demand-side management, and load shedding, yet R4 does not reference redispatch or generation, when this action, or directive, directly impacts a BAs ability to balance resources to load or demand. A TOP or RC may be giving a directive for redispatch of generation for reliability purposes, but there should also be mention of directing a BA to also implement redispatch requests, as it directly impacts balancing efforts.</p> <p>Response: The SDT believes that the last two bullets incorporate the concepts of redispatch. Note that independent of the procedure, an RC may direct redispatch as an independent action. Regardless of whether or not a redispatch directive is received by a Balancing Authority, that entity is still subject to the BAL standards and their associated measures that require balancing.</p>
<p>Response: Please see in-line responses.</p>	

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EPSA	<p>Although EPSA members have no specific suggestions for changes to the proposed standards we have two general concerns with the direction of the standard. R1 of the standard requires the use of other methodologies (such as redispatch, reconfiguration, DSM and load shedding) to eliminate exceedances prior to or in conjunction with TLRs during an IROL exceedance. While we recognize the need for such actions under these circumstances, we encourage the use of the early steps of the TLR procedures with the parallel NAESB standards for dealing with equity issues, to the maximum extent possible, to mitigate situations before the exceedances occur. In addition, we recognize the need for Reliability Coordinators to have the authority to take whatever actions are necessary when an IROL exceedance occurs.</p> <p>Response: The SDT will forward this suggestion to NAESB.</p> <p>R4(2) contemplates that under certain circumstances when a TLR has been invoked, that an RC receiving a request for action will have a pre-approved (by the ERO) alternative to implementing the actions requested. Where such a plan has been approved by the ERO as meeting the reliability obligations of that RC, there should be a stakeholder process, such as NAESB's, to deal with the equity implications of the alternative plan.</p> <p>Response: The SDT is unaware of any NAESB process for reviewing equity implication of alternative congestion management approaches. We believe this is typically addressed with the FERC through tariffs. However, the SDT has considered this item further, and believe it is more appropriate to be addressed through a variance. As such, the language is being eliminated from the standard.</p> <p>EPSA is also aware that NERC is evaluating potential changes to the IDC that will facilitate alternative approaches in the implementation of TLRs, from an equity point of view. If a determination is made to proceed with IDC changes, we encourage NAESB to initiate expeditiously a review of its TLR Business Practice Standards to insure that the IDC changes are designed to also facilitate any contemplated enhancements to NAESB's standards.</p> <p>Response: NERC fully intends to coordinate with NAESB on this issue as it develops further.</p>
<p>Response: Please see in-line responses.</p>	
Entergy Services, Inc.	<p>We have the following suggestions:</p> <ol style="list-style-type: none"> 1) IRO-006-5 has "Proposed Effective Date" and IRO-006-EAST-1 has "Effective Date". They both should be the same. 2) IRO-006-5 "Proposed Effective Date" has the requirement that "...calendar quarter following...", while IRO-006-EAST-1

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	<p>"Effective Date" has the requirement that "...calendar quarter after..." Both requirements should be "following', or "after".</p> <p>3) Remove the word "for" in the second line of IRO-006-EAST-1, M3.</p> <p>4) IRO-006-5 has "Regional Variances" while IRO-006-EAST-1 has "Regional Differences". It seems they both should be the same, either "variances" or "differences".</p> <p>5) The term "reallocation" should be footnoted in TLR-5b of Appendix A of IRO-006-EAST-1. The footnoting of that term should be the same as the footnoting in TLR-5a.</p>
<p>Response: The SDT has incorporated the suggested changes.</p>	
<p>ISO/RTO Council</p>	<p>We support the drafting team's position regarding use of the TLR in conjunction with other tools to mitigate an IROL that has been exceeded. We believe the Commission is misapplying the conclusions of the Blackout Report.</p>
<p>Response: The drafting team thanks you for your supportive comment.</p>	