

## **Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08**

The Transmission Loading Relief Standard Drafting Team thanks all commenters who submitted comments on the 1<sup>st</sup> draft of standards IRO-006-5 — Reliability Coordination — Transmission Loading Relief and IRO-006-EI-1 — TLR Procedure for the Eastern Interconnection. These standards were posted for a 30-day public comment period from October 30, 2008 through December 1, 2008. Stakeholders were asked to provide feedback on the standards through a special electronic comment form. There were 12 sets of comments, including comments from more than 40 different people from approximately 30 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team has prepared a second draft of the standards. Comments that resulted in modifications to the standards are as follows:

- Commenters suggested that “reallocation” be footnoted to reference NAESB’s business practices.
- Commenters proposed the definition of “Market Flow” be modified to replace the phrase “Market Flow Calculation Methodology” with more explicit language.
- Commenters expressed concerns with how the concepts of “interconnection wide” and/or “regional” standards were being addressed. In response, the SDT modified the approach to the standards and eliminated IRO-006-5 R1. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all Reliability Coordinators within the Eastern Interconnection. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01.
- Commenters pointed out that TLR-0 was undefined. The level was added to the appendix.

On January 22, 2008, NERC staff met with FERC staff briefly to answer questions regarding the use of the Interchange Distribution Calculator and the TLR process. During these discussions, FERC staff suggested that as written, NERC standards related to TLR did not make clear that when experiencing an actual Interconnection Reliability Operating Limit (IROL) violation, the first responsibility of a Reliability Coordinator is to mitigate the IROL violation, then address the equity provisions of TLR. In other words, FERC staff opined that saying that a Reliability Coordinator was not to use TLR as the “sole remedy” to mitigate an IROL violation did not support the recommendation in the Blackout Report. FERC staff suggested that in order to support the recommendation in the Blackout Report, the standards should be clear that a Reliability Coordinator must initiate actions that can mitigate the IROL violation first, and then may follow with initiation or continuing management of the TLR process as appropriate. NERC staff brought the details of this conversation back to the TLR Drafting Team. The TLR Drafting Team discussed these comments, and made changes to IRO-006-EAST-1 R1 in response.

In this “Consideration of Comments” document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received can be viewed in their original format at:

<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](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

---

<sup>1</sup> 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 proposed to remove the NERC definition of Reallocation from the Glossary, as it is already defined in NAESB Business Practices. Do you believe this removal to be appropriate?..... 8

2. The drafting team has proposed a new definition for inclusion in the NERC glossary. Do you agree with the proposed definitions in the standard? .....11

3. The drafting team has moved or eliminated three of the requirements originally in IRO-006-4. Do you believe these modifications are appropriate? .....13

4. The SDT has proposed removing the Regional Differences for MISO, PJM, and SPP, as the language within IRO-006-EI-1 incorporates the concept of Market Flow. Do you agree that these Regional Differences can be removed? ..... 15

5. The drafting team has converted Attachment 1 to a separate standard that is posted with this comment form (IRO-006-EI-1). Do you believe this is appropriate? .....16

6. The drafting team has proposed that Attachment 1 be treated as a standard for the Eastern Interconnection (IRO-006-EI-1). Alternatively, the standard may be treated as a continent-wide standard (IRO-017) that is applicable only to entities in the Eastern Interconnection. Do you prefer one approach over the other? ..... 18

7. The drafting team has identified a concern related to compliance with IRO-006-EI-1 and the availability of the IDC or similar technology. To address this, the SDT is considering adding language to IRO-006-5. Do you believe this or similar language is appropriate and necessary? .....20

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? .....23

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. ....24

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.	Guy Zito	NPCC													✓
Additional Member		Additional Organization		Region		Segment		Selection							
1.	Ralph Rufrano	New York Power Authority		NPCC		5									
2.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC		2									
3.	Rick White	Northeast Utilities		NPCC		1									
4.	Greg Campoli	New York Independent System Operator		NPCC		2									
5.	Mike Garton	Dominion Resources Services, Inc.		NPCC		5									
6.	Chris De Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC		1									
7.	Don Nelson	Massachusetts Dept. of Public Utilities		NPCC		9									
8.	Kurtis Chong	Independent Electricity System Operator		NPCC		2									
9.	Brian Gooder	Ontario Power Generation Incorporated		NPCC		5									
10.	David Kiguel	Hydro One Networks Inc.		NPCC		1									
11.	Kathleen Goodman	ISO - New England		NPCC		2									
12.	Brian Evans-Mongeon	Utility Services, LLC		NPCC		6									
13.	Mike Gildea	Constellation Energy		NPCC		6									
14.	Lee Pedowicz	NPCC		NPCC		10									

	Commenter	Organization	Industry Segment																														
			1	2	3	4	5	6	7	8	9	10																					
2.	Jason Marshall	Midwest ISO Standards Stakeholders Collaborators		✓																													
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Jim Cyrulewski</td> <td>JDRJC Associates</td> <td>RFC</td> <td>8</td> </tr> <tr> <td>2. Kirit Shah</td> <td>Ameren</td> <td>SERC</td> <td>1</td> </tr> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection	1. Jim Cyrulewski	JDRJC Associates	RFC	8	2. Kirit Shah	Ameren	SERC	1								
Additional Member	Additional Organization	Region	Segment Selection																														
1. Jim Cyrulewski	JDRJC Associates	RFC	8																														
2. Kirit Shah	Ameren	SERC	1																														
3.	Denise Koehn	Bonneville Power Administration	✓		✓		✓	✓																									
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Thomas Westbrook</td> <td>Transmission Operational Analysis &amp; Support</td> <td>WECC</td> <td>1</td> </tr> <tr> <td>2. Wesley Hutchison</td> <td>Transmission Pre-Schedule &amp; Real Time</td> <td>WECC</td> <td>1</td> </tr> <tr> <td>3. Timothy Loepker</td> <td>Transmission Dispatch</td> <td>WECC</td> <td>1</td> </tr> <tr> <td>4. Joel Jenck</td> <td>Power - Scheduling Coordination</td> <td>WECC</td> <td>5</td> </tr> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection	1. Thomas Westbrook	Transmission Operational Analysis & Support	WECC	1	2. Wesley Hutchison	Transmission Pre-Schedule & Real Time	WECC	1	3. Timothy Loepker	Transmission Dispatch	WECC	1	4. Joel Jenck	Power - Scheduling Coordination	WECC	5
Additional Member	Additional Organization	Region	Segment Selection																														
1. Thomas Westbrook	Transmission Operational Analysis & Support	WECC	1																														
2. Wesley Hutchison	Transmission Pre-Schedule & Real Time	WECC	1																														
3. Timothy Loepker	Transmission Dispatch	WECC	1																														
4. Joel Jenck	Power - Scheduling Coordination	WECC	5																														
4.	Roman Carter	Southern Company Transmission	✓																														
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Jim Busbin</td> <td>Southern Transmission</td> <td>SERC</td> <td>1</td> </tr> <tr> <td>2. Raymond Vice</td> <td>Southern Transmission</td> <td>SERC</td> <td>1</td> </tr> <tr> <td>3. JT Wood</td> <td>Southern Transmission</td> <td>SERC</td> <td>1</td> </tr> <tr> <td>4. Marc Butts</td> <td>Southern Transmission</td> <td>SERC</td> <td>1</td> </tr> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection	1. Jim Busbin	Southern Transmission	SERC	1	2. Raymond Vice	Southern Transmission	SERC	1	3. JT Wood	Southern Transmission	SERC	1	4. Marc Butts	Southern Transmission	SERC	1
Additional Member	Additional Organization	Region	Segment Selection																														
1. Jim Busbin	Southern Transmission	SERC	1																														
2. Raymond Vice	Southern Transmission	SERC	1																														
3. JT Wood	Southern Transmission	SERC	1																														
4. Marc Butts	Southern Transmission	SERC	1																														
5.	Sam Ciccone	FirstEnergy	✓		✓	✓	✓	✓																									
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1. Dave Folk</td> <td>FE</td> <td>RFC</td> <td></td> </tr> <tr> <td>2. Doug Hohlbaugh</td> <td>FE</td> <td>RFC</td> <td></td> </tr> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection	1. Dave Folk	FE	RFC		2. Doug Hohlbaugh	FE	RFC									
Additional Member	Additional Organization	Region	Segment Selection																														
1. Dave Folk	FE	RFC																															
2. Doug Hohlbaugh	FE	RFC																															
6.	Charles Yeung	IRC Standards Review Committee		✓																													
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> </tbody> </table>														Additional Member	Additional Organization	Region	Segment Selection																
Additional Member	Additional Organization	Region	Segment Selection																														

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Commenter		Organization		Industry Segment																																																													
				1	2	3	4	5	6	7	8	9	10																																																				
1.	Patrick Brown	PJM	RFC	2																																																													
2.	Jim Castle	New York ISO	NPCC	2																																																													
3.	Matt Goldberg	ISONE	NPCC	2																																																													
4.	Lourdes Estrada-Saliner	CAISO	WECC	2																																																													
5.	Anita Lee	AESO	WECC	2																																																													
6.	Steve Myers	ERCOT	ERCOT	2																																																													
7.	Bill Phillips	Midwest ISO	RFC	2																																																													
8.	Dan Rochester	IESO	NPCC	2																																																													
7.	Dan Rochester	IESO				✓																																																											
8.	Thad Ness	American Electric Power (AEP)			✓		✓		✓	✓																																																							
9.	Kathleen Goodman	ISO New England Inc				✓																																																											
10.	Patrick Brown	PJM Interconnection																																																															
11.	Paul Humberson, David Lemmons, Steve Rueckert, Donald Pape	WACM, Excel, WECC			✓															✓																																													
12.	Jason Shaver	American Transmission Company			✓																																																												
13.	Michael Brytowski	MRO																		✓																																													
<table border="1"> <thead> <tr> <th colspan="2">Additional Member</th> <th colspan="2">Additional Organization</th> <th colspan="1">Segment Selection</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Neal Balu</td> <td>WPS</td> <td></td> <td>3,4,5,6</td> </tr> <tr> <td>2.</td> <td>Terry Bilke</td> <td>MISO</td> <td></td> <td>2</td> </tr> <tr> <td>3.</td> <td>Carol Gerou</td> <td>MP</td> <td></td> <td>1,3,5,6</td> </tr> <tr> <td>4.</td> <td>Jim Haigh</td> <td>WAPA</td> <td></td> <td>1,6</td> </tr> <tr> <td>5.</td> <td>Charles Lawrence</td> <td>ATC</td> <td></td> <td>1</td> </tr> <tr> <td>6.</td> <td>Ken Goldsmith</td> <td>ALTW</td> <td></td> <td>4</td> </tr> <tr> <td>7.</td> <td>Pam Sordet</td> <td>XEL</td> <td></td> <td>1,3,5,6</td> </tr> <tr> <td>8.</td> <td>Dave Rudolph</td> <td>BEPC</td> <td></td> <td>1,3,5,6</td> </tr> </tbody> </table>																					Additional Member		Additional Organization		Segment Selection	1.	Neal Balu	WPS		3,4,5,6	2.	Terry Bilke	MISO		2	3.	Carol Gerou	MP		1,3,5,6	4.	Jim Haigh	WAPA		1,6	5.	Charles Lawrence	ATC		1	6.	Ken Goldsmith	ALTW		4	7.	Pam Sordet	XEL		1,3,5,6	8.	Dave Rudolph	BEPC		1,3,5,6
Additional Member		Additional Organization		Segment Selection																																																													
1.	Neal Balu	WPS		3,4,5,6																																																													
2.	Terry Bilke	MISO		2																																																													
3.	Carol Gerou	MP		1,3,5,6																																																													
4.	Jim Haigh	WAPA		1,6																																																													
5.	Charles Lawrence	ATC		1																																																													
6.	Ken Goldsmith	ALTW		4																																																													
7.	Pam Sordet	XEL		1,3,5,6																																																													
8.	Dave Rudolph	BEPC		1,3,5,6																																																													

Commenter			Organization			Industry Segment														
						1	2	3	4	5	6	7	8	9	10					
9.	Eric Ruskamp	LES			1,3,5,6															
10.	Joseph Knight	GRE			1,3,5,6															
11.	Joe DePoorte	MGE			3,4,5,6															
12.	Larry Brusseau	MRO			10															

1. The drafting team has proposed to remove the NERC definition of Reallocation from the Glossary, as it is already defined in NAESB Business Practices. Do you believe this removal to be appropriate?

**Summary Consideration:** The majority of commenters support the elimination of this definition. This term is no longer used in any requirement. It is only used in Appendix A, which is intended to provide the Reliability Coordinator (RC) with a summary of system conditions, not require any specific action. In Appendix A, it is not capitalized to identify “reallocation” as a defined term. However, it has been footnoted to indicate that more information can be found within NAESB’s business practices.

Organization	Question #1 Yes or No	Question #1 Comment
NPCC	No	NPCC participating members are not in agreement. A term used in a NERC standard should not be defined in a NAESB document. A joint NERC/NAESB glossary should be developed defining all terms in all standards. Until such time, the term must remain in the NERC glossary.
<p><b>Response:</b> The majority of commenters support the elimination of this definition. This term is no longer used in any requirement. It is only used in Appendix A, which is intended to provide the RC with a summary of system conditions, not require any specific action. In Appendix A, it is not identified as a defined term. However, it has been footnoted to indicate that more information can be found within NAESB’s business practices.</p> <p>NERC and NAESB have discussed the possibility of creating a single joint glossary, but at this time, various logistical and regulatory constraints would make such a proposition difficult.</p>		
ISO New England Inc	No	A term used in a NERC standard should not be defined in a NAESB document. A joint NERC/NAESB glossary should be developed defining all terms in all standards.
<p><b>Response:</b> The majority of commenters support the elimination of this definition. This term is no longer used in any requirement. It is only used in Appendix A, which is intended to provide the RC with a summary of system conditions, not require any specific action. In Appendix A, it is not identified as a defined term. However, it has been footnoted to indicate that more information can be found within NAESB’s business practices.</p> <p>NERC and NAESB have discussed the possibility of creating a single joint glossary, but at this time, various logistical and regulatory constraints would make such a proposition difficult.</p>		
American Transmission Company	No	ATC Operations prefers to see all definitions in one location, rather than searching multiple documents.
<p><b>Response:</b> NERC and NAESB have discussed the possibility of creating a single joint glossary, but at this time, various logistical and</p>		

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	Question #1 Yes or No	Question #1 Comment
regulatory constraints would make such a proposition difficult.		
Midwest ISO Standards Stakeholders Collaborators	Yes	It is not clear how definitions in NAESB Business Practice apply to NERC standards. Do they apply because they are approved by FERC? To the extent this definition applies, we agree with it.
<b>Response:</b> NAESB definitions do not apply to NERC standards, and vice versa. The drafting team is proposing to eliminate the definition because the term is no longer used in any requirement. It is only used in Appendix A, which is intended to provide the RC with a summary of system conditions, not require any specific action. In Appendix A, it is not identified as a defined term. However, it has been footnoted to indicate that more information can be found within NAESB's business practices.		
IRC Standards Review Committee	Yes	It is not clear how definitions in NAESB Business Practice apply to NERC standards. Do they apply because they are approved by FERC? To the extent this definition applies, we agree with it.
<b>Response:</b> NAESB definitions do not apply to NERC standards, and vice versa. The drafting team is proposing to eliminate the definition because the term is no longer used in any requirement. It is only used in Appendix A, which is intended to provide the RC with a summary of system conditions, not require any specific action. In Appendix A, it is not identified as a defined term. However, it has been footnoted to indicate that more information can be found within NAESB's business practices.		
IESO	Yes	We agree that reallocation is a business practice and hence its definition is better placed in the NAESB Business Practices. Furthermore, to avoid inconsistencies terms should only be defined in one document. However, we recommend that a footnote is added in the NERC standards to refer to the appropriate NAESB documents for the definition of reallocation. In terms of the impact that such a change could eventually have on reliability, we recommend that NERC and NAESB develop the necessary controls such that, whenever implemented, reallocation provides the appropriate amount of transmission loading relief.
<b>Response:</b> The use of the term has been footnoted. NERC and NAESB will continue to coordinate their actions to ensure the missions of both organizations continue to be met.		
Bonneville Power Administration	Yes	
Southern Company Transmission	Yes	

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

---

Organization	Question #1 Yes or No	Question #1 Comment
FirstEnergy	Yes	
PJM Interconnection	Yes	
MRO NERS Standards Review Subcommittee	Yes	

2. The drafting team has proposed a new definition for inclusion in the NERC glossary:

**Market Flow:** *the amount of energy flowing across a specified facility or set of facilities due to the operation of a market that has implemented a "Market Flow Calculation" methodology.*

Do you agree with the proposed definitions in the standard?

**Summary Consideration:** While most commenters supported the definition, some requested more detail. The SDT has revised the definition to replace the phrase "Market Flow Calculation Methodology" with more explicit language as shown below: .

**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.*

Organization	Yes or No	Question #2 Comment
FirstEnergy	Yes	While we agree the definition is needed, it relies on the term "Market Flow Calculation" which is not a NERC Glossary Term and should also be defined in this standard.
<b>Response:</b> The SDT has revised the definition to replace the phrase "Market Flow Calculation Methodology" with more explicit language.		
IESO	Yes	While we agree that a market flow definition should be listed in the NERC glossary, we are concerned about the clarity of this definition. We think that the SDT should provide a market flow definition that is unequivocal and that does not allow entities to reclassify the components that constitute a market flow in manner that diminishes their obligation to provide transmission loading relief.
<b>Response:</b> The obligation for those markets that calculate Market Flow to provide Transmission Loading Relief is covered by requirements within the standard, and does not need to be restated in this definition.		
MRO NERS Standards Review Subcommittee	Yes	** what is 'Market Flow Methodology'?
<b>Response:</b> The SDT has revised the definition to replace the phrase "Market Flow Calculation Methodology" with more explicit language.		
NPCC	Yes	

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	Yes or No	Question #2 Comment
Midwest ISO Standards Stakeholders Collaborators	Yes	
Bonneville Power Administration	Yes	
Southern Company Transmission	Yes	
IRC Standards Review Committee	Yes	
AEP	Yes	
ISO New England Inc	Yes	
PJM Interconnection	Yes	
American Transmission Company	Yes	

3. The drafting team has moved or eliminated three of the requirements originally in IRO-006-4:
- The drafting team eliminated IRO-006-4 R2, which stated “The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party.”
  - The drafting team moved IRO-006-4 R3, which stated “Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO.” These concepts were incorporated into the new IRO-006-EI-1.
  - The drafting team eliminated IRO-006-4 R5, which stated “During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards.” This language was redundant with the INT standards themselves.

Do you believe these modifications are appropriate?

**Summary Consideration:** Most commenters believe the changes to be appropriate. One entity expressed concern about how the concept of regional standards was being addressed. In response, the SDT modified the approach to the standards and eliminated IRO-006-5 R1. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all Reliability Coordinators within the Eastern Interconnection. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01.

Organization	Question #3 Yes or No	Question #3 Comment
ISO New England Inc	No	Although the ability for NERC to develop interconnection-wide standards is clearly adopted in the Rules of Procedure and Standards Development Procedure, we believe that NERC/ERO Standards should be either continent-wide or regional. Developing interconnection-wide standards adds complexity to the stakeholders and the compliance programs, and will result in a greater number of standards. In addition, the proposed numbering for IRO-006-EI-1 is an inconsistent standard numbering convention, and will create difficulties with compliance based software applications. Also, With the deletion of R3 and the wording of the new IRO-006-5 R1, it is unclear how/if all entities within an Interconnection are required to respond to a request for relief under an Interconnection Wide procedure. The confusion arises from the fact that R1 states the 'RC that USES an Interconnection-wide congestion management procedure shall use the procedure for its Interconnection'. If, for example, an RC in the Eastern Interconnect does not USE an Interconnection Wide congestion management process, that RC would not be required to follow the request for curtailment under the Interconnection Wide procedure.

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	Question #3 Yes or No	Question #3 Comment
<p><b>Response:</b> The SDT has modified the approach to the standards and eliminated IRO-006-5 R1. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all RCs within the Eastern Interconnection. In order to comply with NERC's published numbering convention, the standard will be renamed as IRO-006-EAST-01.</p>		
NPCC	Yes	
Midwest ISO Standards Stakeholders Collaborators	Yes	
Bonneville Power Administration	Yes	
Southern Company Transmission	Yes	
FirstEnergy	Yes	
IRC Standards Review Committee	Yes	
IESO	Yes	
AEP	Yes	
PJM Interconnection	Yes	
WACM, Excel, WECC	Yes	
American Transmission Company	Yes	
MRO NERS Standards Review Subcommittee	Yes	

**Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08**

---

4. The SDT has proposed removing the Regional Differences for MISO, PJM, and SPP, as the language within IRO-006-EI-1 incorporates the concept of Market Flow. Do you agree that these Regional Differences can be removed?

**Summary Consideration:** None of the respondents disagreed with the removal of these Regional Differences.

Organization	Question #4 Yes or No	Question #4 Comment
Midwest ISO Standards Stakeholders Collaborators	Yes	
Southern Company Transmission	Yes	
FirstEnergy	Yes	
IRC Standards Review Committee	Yes	
IESO	Yes	
AEP	Yes	
PJM Interconnection	Yes	
MRO NERS Standards Review Subcommittee	Yes	

**Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08**

5. The drafting team has converted Attachment 1 to a separate standard that is posted with this comment form (IRO-006-EI-1). Do you believe this is appropriate?

**Summary Consideration:** Two entities opposed the creation of an Interconnection Wide standard, although both agreed that NERC’s Rules of Procedures allow for such standards to be developed. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all RCs within the Eastern Interconnection. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST -01.

Organization	Question #5 Yes or No	Question #5 Comment
NPCC	No	See response to question 6.
<b>Response:</b> Please see our response in Question 6.		
ISO New England Inc	No	Although the ability for NERC to develop interconnection-wide standards is clearly adopted in the Rules of Procedure and Standards Development Procedure, we believe that NERC/ERO Standards should be either continent-wide or regional. Developing interconnection-wide standards adds complexity to the stakeholders and the compliance programs, and will result in a greater number of standards. In addition, the proposed numbering for IRO-006-EI-1 is an inconsistent standard numbering convention, and will create difficulties with compliance based software applications.
<b>Response:</b> The SDT does not agree that standards should only be regional or continent-wide, and as indicated by the commenter, NERC’s Rules of Procedure allow the development of such standards. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all RCs within the Eastern interconnection. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01.		
Midwest ISO Standards Stakeholders Collaborators	Yes	In general, we do not support standards that are in essence procedures. However, we do believe the drafting team has pared down the true reliability requirements out of attachment one. Given this paring down of attachment one and the importance of the TLR procedure, we can support this standard.
<b>Response:</b> Thank you for your supportive comment.		
IRC Standards Review Committee	Yes	In general, the IRC SRC does not support standards that are in essence procedures. However, we do believe the drafting team has pared down the true reliability requirements out of attachment one. Given this paring down of attachment one and the importance of the TLR procedure, the IRC SRC can support this standard.

Organization	Question #5 Yes or No	Question #5 Comment
<b>Response:</b> Thank you for your supportive comment.		
Southern Company Transmission	Yes	
FirstEnergy	Yes	
IESO	Yes	
AEP	Yes	
PJM Interconnection	Yes	
WACM, Excel, WECC	Yes	
MRO NERS Standards Review Subcommittee	Yes	

**Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08**

6. The drafting team has proposed that Attachment 1 be treated as a standard for the Eastern Interconnection (IRO-006-EI-1). Alternatively, the standard may be treated as a continent-wide standard (IRO-017) that is applicable only to entities in the Eastern Interconnection. Do you prefer one approach over the other?

**Summary Consideration:** Seven of the thirteen respondents supported the EI naming convention, while four of the thirteen preferred the alternate approach. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01. 13 responses.

Organization	IRO-006-EI-1	IRO-017-1	Question #6 Comment
WACM, Excel, WECC			No preference as to IRO-006-EI-1 or IRO-017, but agree treatment identifying it is the Eastern Interconnection process and not a continent-wide process is correct.
<b>Response:</b> Thank you for your supportive comment.			
NPCC		X	Although the ability for NERC to develop interconnection-wide standards is clearly adopted in the Rules of Procedure and Standards Development Procedure, NPCC participating members believe that NERC/ERO Standards should be either continent-wide or regional. Developing interconnection-wide standards adds complexity and potential confusion to the stakeholders and the compliance programs, and will result in a greater number of standards. In addition, the proposed numbering for IRO-006-EI-1 is an inconsistent standard numbering convention, and will create difficulties with compliance based software applications.
<b>Response:</b> The SDT does not agree that standards should only be regional or continent-wide, and as indicated by the commenter, NERC’s rules of procedure allow the development of such standards. IRO-006-EI-1 will continue to be treated as an Eastern Interconnection standard, and therefore apply to all RCs within the Eastern interconnection. In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01.			
ISO New England Inc		X	Although the ability for NERC to develop interconnection-wide standards is clearly adopted in the Rules of Procedure and Standards Development Procedure, we believe that NERC/ERO Standards should be either continent-wide or regional. Developing interconnection-wide standards adds complexity to the stakeholders and the compliance programs, and will result in a greater number of standards. In addition, the proposed numbering for IRO-006-EI-1 is an inconsistent standard numbering convention, and will create difficulties with compliance based software applications.
<b>Response:</b> In order to comply with NERC’s published numbering convention, the standard will be renamed as IRO-006-EAST-01.			

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	IRO-006-EI-1	IRO-017-1	Question #6 Comment
MRO NERS Standards Review Subcommittee		X	The MRO believes that naming the standard IRO-017-1 stays consistent with the NERC standard naming convention and does not add another element to the standards naming.
<b>Response:</b> In order to comply with NERC's published numbering convention, the standard will be renamed as IRO-006-EAST-01.			
American Transmission Company		X	
FirstEnergy	X		It may be better to easily identify the Eastern Interconnection requirements with the "EI" designation since WECC made their numbering system unique (WECC-IRO-STD-006-0).
<b>Response:</b> In order to comply with NERC's published numbering convention, the standard will be renamed as IRO-006-EAST-01.			
AEP	X		AEP supports the use of IRO-006-EI-1, but is not strongly opposed to the use of IRO-017-1.
<b>Response:</b> Thank you for your supportive comment.			
Midwest ISO Standards Stakeholders Collaborators	X		
Southern Company Transmission	X		
IRC Standards Review Committee	X		
IESO	X		
PJM Interconnection	X		

7. The drafting team has identified a concern related to compliance with IRO-006-EI-1 and the availability of the IDC or similar technology. To address this, the SDT is considering adding the following language to the IRO-006-5:

*R1. A Reliability Coordinator desiring to utilize an Interconnection-wide congestion management procedure shall utilize the appropriate procedure below based on the region in which they oversee reliability, provided the necessary tools to support the procedure are available and in working order:*

Do you believe this or similar language is appropriate and necessary?

**Summary Consideration:** Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met.

Organization	Question #7 Yes or No	Question #7 Comment
Midwest ISO Standards Stakeholders Collaborators	No	This language is not appropriate. Because an RC can't rely on the use of TLR to mitigate an IROL, the RC must always have alternative methods to available to mitigate IROLs. Thus, the availability of the IDC is not truly relevant to reliability.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
FirstEnergy	No	If the "necessary tools to support the procedure are" not in service or available, then the procedure and/or standard should be retired at the same time that the tools are no longer available. Therefore this requirement is unnecessary and inappropriate for a reliability standard.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
IRC Standards Review Committee	No	All NERC standards implicitly require that the hardware and software associated with effecting a response to the respective requirement's is operational. There is no need to even include the provision about the availability of the support tools.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that		

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	Question #7 Yes or No	Question #7 Comment
Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
IESO	No	We disagree with the wording and suggest the latter part of the sentence be deleted (i.e. ", provided the necessary tools to support the procedure are available and in working order"). We believe that a Reliability Coordinator that chooses to utilize an Interconnection-wide congestion management procedure should make sure that it has the necessary tools to support the procedure and they are available and in working order. Furthermore, tools unavailability should not preclude the implementation of an interconnection-wide congestion management procedure. Besides TLR, system operators can access other mechanisms to mitigate IROL violations, such as reconfiguration, redispatch, load shedding etc.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
ISO New England Inc	No	The last sentence "provided the necessary tools to support the procedure are available and in working order" is not needed.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
PJM Interconnection	No	The availability of a software tool should not dictate whether or not the RC takes action to alleviate a reliability issue. If the IDC tools are not available, or not properly functioning in real-time, the RC should not be absolved from the responsibility to initiate a good faith effort to comply with the spirit of the TLR procedures. The RC should not be considered non-compliant if the software is not functioning and, despite a good faith effort, the RC could not achieve full compliance.
<b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.		
American Transmission Company	No	
NPCC	Yes	Remove the wording "provided the necessary tools to support the procedure are available and in

Consideration of Comments on 1<sup>st</sup> Draft of IRO-006-5 and IRO-006-EI-1 — Project 2006-08

Organization	Question #7 Yes or No	Question #7 Comment
		working order:" The RC must have the tools to support the procedure.
<p><b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.</p>		
AEP	Yes	- Our "yes" depends upon what this statement means... We answer "yes" - if you mean that the RC cannot provide an Interconnection-wide congestion management procedure without the using the IDC or similar technology. We answer "no" - if you mean you don't
<p><b>Response:</b> Following further discussion, the SDT believes that the current draft standard as written allows for sufficient flexibility to ensure that Internet outages, software problems, or hardware failures will not result in situations in which the NERC requirements cannot be met. The proposed language has not been added.</p>		
MRO NERS Standards Review Subcommittee	Yes	
Southern Company Transmission	Yes	

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement?

**Summary Consideration:** No entities commented that they were aware of any conflicts.

Organization	Question #8 Yes or No	Question #8 Comment
NPCC	No	
Midwest ISO Standards Stakeholders Collaborators	No	
Bonneville Power Administration	No	
Southern Company Transmission	No	
FirstEnergy	No	
IRC Standards Review Committee	No	
IESO	No	
AEP		
ISO New England Inc	No	
PJM Interconnection	No	
WACM, Excel, WECC		
American Transmission Company	No	
MRO NERS Standards Review Subcommittee	No	

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:** Some entities expressed concern with the phrasing of IRO-006-EI (EAST) R1. The SDT has chosen not to modify IRO-006-EI R1, as it is consistent with language currently within IRO-006-4.

One entity suggested that IRO-006-EI (EAST) R1 might be redundant with IRO-005 R17. The SDT explained that IRO-005 R17 applies to all actions, and leaves it up to the RC to determine if the actions being taken are sufficient or not. IRO-006-EI (EAST) R1 specifically applies to TLR, and prohibits the use of TLR as the sole tool to mitigate an IROL violation.

One entity expressed confusion regarding the difference between IRO-006-EI (EAST) R4.2 and R4.3. The SDT explained that R4.2 is intended to address situations where an entity wishes to use an alternate procedure on an ongoing basis, NOT one that is necessarily occurring in real-time. The standard communicates this through the use of the phrase “pre-approved.” If a real-time alternative was developed, it would fall as described under R4.3.

One entity expressed concern that IRO-006-EI (EAST) R4 might create a situation where an RC was forced to violate a standard. The SDT explained that R4.3.2 implies that the initiating RC will respond to alternate actions proposed by the responding RC. Absent a response or a concurrence, the responding RC has met its obligation, even if it does not implement any of the actions in R4.

One entity pointed out that TLR-0 was undefined. The level was added to the appendix.

Some entities expressed general concerns with the relevance of the standards to WECC, and a specific concern with a reference in IRO-006-5 R1. The SDT has elected to modify the standard to eliminate IRO-006-5 R1, which we believe will address the commenters’ concerns. IRO-006-5 R2 has been modified to include Transmission Operators and Balancing Authorities, which the SDT believes will further support the WECC practices. The SDT also pointed out that IRO-006-EI (EAST) is intended to apply only to the Eastern Interconnection.

Organization	Question #9 Comment
Bonneville Power Administration	These revisions are quite specific to the methods and procedures of the Eastern Interconnection. Things are done a little differently in the West, therefore choosing not to comment on those specific questions.
<b>Response:</b> The SDT agrees. IRO-006-EI (EAST) is intended only to apply within the Eastern Interconnection. IRO-006-5 has been modified to address differences in implementation between the various Interconnections.	
FirstEnergy	IRO-006-EI-1 R1 should be revised to state, "When responding to an IROL violation, each Reliability Coordinator shall implement other actions, including reconfiguration, redispatch, use of demand-side

Organization	Question #9 Comment
	<p>management, or load shedding in conjunction with the initiation of the Eastern Interconnection TLR procedure." In the standards the assumption should be that the operator is responding to actual situations unless stated otherwise. The reliability standards represent the minimum requirements therefore the term "but not limited to" is redundant and unnecessary.</p> <p><b>Response:</b> The SDT has chosen not to modify IRO-006-EI R1, as it is consistent with language currently within IRO-006-4.</p> <p>IRO-006-EI-1 R2.2 should be revised to state, "A plan of action, based on the TLR level chosen." If the RC is in a TLR, they should be leading the activities and not merely proposing actions.</p> <p><b>Response:</b> The SDT believes that language as written is appropriate.</p> <p>In IRO-006-EI-1 R3 the phrase "a proposal for actions to take" should be replaced with the phrase "a plan of action." In IRO-006-EI-1 R3 the phrase "proposed actions to take" should be replaced with the phrase "action plan."</p> <p><b>Response:</b> The SDT believes that language as written is appropriate.</p> <p>In IRO-006-EI-1 R3.2 and R3.3 the phrase "proposed actions" should be replaced with the phrase "action plan."</p> <p><b>Response:</b> The SDT believes that language as written is appropriate.</p> <p>In IRO-006-EI-1 R3.2, R3.3, R3.3.1, R3.3.2, R3.3.3, and R3.3.4 the term "proposed" should be replaced with the phrase "planned."</p> <p><b>Response:</b> The SDT believes that language as written is appropriate.</p> <p>IRO-006-EI-1 R4.2 - We suggest removing R4.2. We do not agree that the ERO should have a role in a reliability standard requirement. This requirement should be removed because it does not place responsibilities (and for that matter cannot since they are not a user, operator or owner of the BES) on the ERO to act in sufficient time to approve an alternate mitigation procedure. Any delay on the part of the ERO could adversely impact the reliability of the BES. Also, even if the ERO was appropriate in the standard, R4.2 is not necessary since R4.3 already covers alternate actions that can be taken in lieu of R4.1.</p>

Organization	Question #9 Comment
	<p><b>Response:</b> R4.2 is intended to address situations where an entity wishes to use an alternate procedure on an ongoing basis, NOT one that is necessarily occurring in real-time. The standard communicates this through the use of the phrase "pre-approved." If a real-time alternative was developed, it would fall as described under R4.3.</p>
<p><b>Response:</b> Please see in-line responses.</p>	
PJM Interconnection	<p>R1. The first sentence should be reworded to say what actions should be taken instead of what should not be done. Current wording; R1. The Reliability Coordinator shall not use the Eastern Interconnection TLR procedure alone to mitigate an actual IROL violation. Recommended word change to make it a proactive requirement; R1. When responding to an actual IROL violation, each Reliability Coordinator shall implement supplementary mitigation actions prior to or in conjunction with the initiation of this TLR procedure. Such actions include, but are not limited to, the following: reconfiguration, redispatch, use of demand-side management, load shedding.</p> <p><b>Response:</b> The SDT has chosen not to modify IRO-006-EI R1, as it is consistent with language currently within IRO-006-4.</p> <p>Two additional comments regarding R1: This requirement is similar to the Requirement R17 in IRO-005. The SDT should consider revising R1 of this standard or R17 of IRO-005 to address the need in one standard instead of splitting it into two separate requirements.</p> <p><b>Response:</b> IRO-005 R17 applies to all actions, and leaves it up to the RC to determine if the actions being taken are sufficient or not. IRO-006-EI (EAST) R1 specifically applies to TLR, and prohibits the use of TLR as the sole tool to mitigate an IROL violation.</p> <p>Also the SDT needs to develop language that requires the mitigation actions external to the TLR procedures be bonafide mitigation attempts.</p> <p><b>Response:</b> The SDT is uncertain what is being requested.</p> <p>R 4.3.2. The SDT should discuss the appropriateness of the "and" conditions throughout R 4.3. R 4.3.2 should be strengthened to accommodate alternatives to the TLR procedure. For example, if an action contained in the TLR procedure would have an adverse consequence on the network but, for whatever reason, concurrence from the RC calling the TLR isn't obtained, the only options available to the RC requesting an alternative are 1) to be non-compliant or 2) implement a change that has a negative impact on system reliability.</p>

Organization	Question #9 Comment
	<p><b>Response:</b> R4.3.2 implies that the initiating RC will respond to alternate actions proposed by the responding RC. Absent a response or a concurrence, the responding RC has met its obligation, even if it does not implement any of the actions in R4.</p> <p>Appendix A- The standard references TLR level 0, which is not included in the appendix.</p> <p><b>Response:</b> The SDT has modified the appendix to address this issue.</p>
<p><b>Response:</b> Please see in-line responses.</p>	
<p>WACM, Excel, WECC</p>	<p>WECC believes that bullet 2 of R1 should reference the WECC Qualified Path Unscheduled Flow Relief Plan and not the WECC interim Tier 1 regional reliability standard. RCs in the West do not receive requests for curtailment. The WECC Qualified Path Unscheduled Flow Relief Procedures identifies entities receiving the schedule as the entity that must implement curtailments. We question whether RCs can actually curtail or reload transactions (normally a TOP function in the west). WECC RCs do not do this. We believe that RC's in the East are typically BA operators also. WECC's are not. We believe that the language in the current standard reflects an Eastern Interconnection bias towards transmission loading relief and would need to be modified to recognize the different process in the West before it could become a continent-wide standard.</p>
<p><b>Response:</b> The SDT has elected to modify the standard to eliminate IRO-006-5 R1, which we believe will address the commenters' concerns. IRO-006-5 R2 has been modified to include Transmission operators and Balancing Authorities, which the SDT believes will further support the WECC practices. Note that IRO-006-EI (EAST) is intended to apply only to the Eastern Interconnection.</p>	