

Consideration of Comments on Initial Ballot — Project 2006-08 — Reliability Coordination — Transmission Loading Relief
Date of Initial Ballot: June 23, 2010 through July 6, 2010

Summary Consideration:

Entities suggested minor clarifications, corrections, and language changes that were accepted by the SDT.

- Some entities had concerns with the potential subjectivity of the requirement in IRO-006-5 Requirement R1 for a “valid” reason. The SDT agreed with their concerns, and eliminated the word “valid.”
- Several entities objected to the need to reissue TLR-1 each hour specified in IRO-006-EAST-1 Requirement R2. Upon further review of the current standard, as well as the current implementation of the Interchange Distribution Calculator (IDC), it was determined that such updates are not required for TLR-1. The phrase “with the exception of TLR-1, where an hourly update is not required” was added to the requirement.
- Some entities expressed concern that the list of TLR levels and conditions, which was moved into a supporting document, would be more appropriately included as an attachment or a requirement. Since the information does not actually represent any specific required action, the SDT believes it is more appropriate to maintain this information in a separate document. The SDT did add a footnote to assist entities in locating the information.

If you feel that the drafting team overlooked your comments, 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, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Voter	Entity	Segment	Vote	Comment
Douglas E. Hils	Duke Energy Carolina	1	Affirmative	“For clarity, we recommend replacing the phrase “ICM procedure” with the phrase “Interconnection wide transmission loading relief procedure” in the Implementation Guideline TLR Levels Table.”
Response: Thank you. The change has been made.				

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

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Kim Warren	Independent Electricity System Operator	2	Affirmative	<p data-bbox="980 256 2003 672">IRO-006-5, Requirement R1 We don't see the need for the word "valid" introduced in this 5th draft of IRO-006-5. It begs the question "Who will judge the validity of a reliability reason advanced by the RC or BA receiving the request, and not complying with it?" We don't believe the responsible entities would be "irresponsible" by offering "invalid" reasons. They will make a judgment at the moment the request is made, based on the information they have, studies they conduct and experience of their operators. The reliability reason they give should be complete enough (within the time and information constraints) to substantiate their decision. It is also open to speculation whether an auditor would come after the fact and assess whether or not the reasons advanced for a particular event in the past were valid. The requirement is for a "reason" which should be documented and which by definition should have some solid basis. One would not expect an entity to put forward a frivolous reason. We recommend removing "valid".</p> <p data-bbox="980 721 1934 751">Response: The SDT has eliminated to the use of the word "valid" as proposed.</p> <p data-bbox="980 802 2003 927">IRO-006-EAST-1, Requirement R2, Part 2.2 We believe there should be a URL or reference to the TLR Level Reference Document indicated in Section F of the standard. We propose inserting the following text immediately before the colon: "as defined in TLR Level Reference Document found at..."</p> <p data-bbox="980 976 2003 1135">Response: Thank you. The SDT has clarified the reference in Section F, and added a footnote to Requirement R2, Part 2.2. However, we do not believe is appropriate to make direct reference to the document in R2, as this could be interpreted as incorporation of the reference into the requirement and then make the guideline mandatory and enforceable.</p> <p data-bbox="980 1185 2003 1279">IRO-006-EAST-1, Requirement R3, Part 3.3 We believe the reference should be to Requirement R2, Part 2.1 and not Part 2.2. The final line of M3 should also reflect this change.</p> <p data-bbox="980 1289 1650 1320">Response: Thank you. The correction has been made.</p> <p data-bbox="980 1370 2003 1461">IRO-006-EAST-1, Requirement R4 In R4 "communicated" is redundant and should be removed. The 4th bullet of R4 is an implied requirement to carry out an assessment and it is not clear that the RC is required to do this. For clarity we recommend making</p>

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				<p>this requirement explicit. We propose the following alternative wording: Assess the congestion management actions communicated in Requirement R3, Part 3.3 to determine which if any will result in a reliability concern or will be ineffective and replace those specific actions with alternate congestion management actions, provided that:</p> <p>Response: Regarding the elimination of the redundant word "communicated," the word has been removed.</p> <p>Regarding the implied requirement to carry out an assessment: this standard does not require the assessment, but if the RC in its normal course of duties performs such an assessment and discovers a concern, the fourth bullet makes it clear that it may use that assessment as justification for alternate actions.</p>
Response: Please see in-line responses.				
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
Response: Thank you for your affirmative response.				
Michael Gammon	Kansas City Power & Light Co.	1	Affirmative	Per IRO-EAST-1 R2, TLR 1 will have to be reissued every clock hour. Since there is no operational action required for TLR 1, this serves no reliability purpose and only provides the market with updates on the TLR 1 status. However because M2 does not distinguish whether the issuances were made for any particular TLR level, a reliability penalty can be applied for not reissuing a TLR1 for a market benefit. Although KCPL supports the changes to the IRO standards and understand benefits to the market of some of these changes, we see a disconnect from enforcing a requirement for a market benefit with a reliability sanction. In addition, transmission customers do not request hourly updates to TLR 1 status as may be the case in other regions where such information may be crucial. We believe the VSLs should be modified to reflect that only reissuance of TLR 2 and higher will be considered for compliance with IRO-EAST-1 R2.
Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Affirmative	The addition of the word "valid" in regard to reliability reasons is not necessary and highly subject to individual and conflicting interpretations. It should be deleted.

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Response: The SDT has eliminated to the use of the word "valid" as proposed.				
Jason L. Murray	Alberta Electric System Operator	2	Affirmative	The term "valid reliability reason" does not clarify the standard, unless a list of valid reasons is developed.
Response: The SDT has eliminated to the use of the word "valid" as proposed.				
Barry Green	Barry Green Consulting Inc.	6	Affirmative	The TLR process is of great concern to all Registered Entities. I, on behalf of the Electric Power Supply Association and its members am closely monitoring developments in the TLR process at FERC as well as changes to these standards, changes to the NAESB Business Practices and IDC changes being specified and implemented by the ORS and IDCWG. On-going coordination of the work in these various forums is critical. Although generally supportive of these standards, there is one question with respect to the deletion of Table 1 which provides "Examples of Possible System Conditions" previously contained in requirement R2.2 of IRO-006-EAST-1. I understand that the Table is now proposed to be included with the Implementation Guideline for RCs in the Eastern Interconnection. However, this information is to be used by RCs to identify (requirement R2.2) the appropriate TLR level and to notify (requirement R3.1) all RCs in the Eastern Interconnection of the identified level. And furthermore, this information will impact many registered entities conducting business in areas where TLRs have been called. Therefore I believe that it would be more appropriate that the Table either be part of the standard or an appendix to it. Doing so would insure that all registered entities impacted by TLRs would have ready access to this information. I recognize the need for flexibility for RCs to use discretion in selecting the appropriate TLR level based on the circumstances they are facing which may not precisely match any pre-identified criteria. However, the examples contained in the Table are still a useful reference for all, not just the RCs.
Response: The SDT does not believe that including the examples in a supporting document will preclude them from use by entities other than RCs. Not including this information in the standard or as an appendix clearly draws the line between what is required and what is not, and calling specific TLR levels based on specific conditions is not part of the requirement. The SDT will ask the SC for authorization to post the reference document with a link to the associated standard so that the information will be easy to locate.				
Jack R. Cashin	Electric Power Supply Association	5	Affirmative	The Transmission Loading Relief (TLR) process is of great concern to the Electric Power Supply Association's (EPSA) members. EPSA is closely monitoring developments in the TLR process at the Federal Energy Regulatory Commission (FERC) as well as changes to these standards, changes in the NAESB Business Practices associated with

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				TLR, and Interchange Distribution Calculator (IDC) changes being specified and implemented by the Operating Reliability Subcommittee (ORS) and IDC Working Group. Successfully changing the TLR process requires on-going coordination of the work in these various forums. Although EPSA is generally supportive of these standards, the one question that EPSA raises is with respect to the deletion of Table 1 which provides "Examples of Possible System Conditions" in requirement R2.2 of IRO-006-EAST-1. We understand that the Table is now proposed to be included with the Implementation Guideline for Reliability Coordinators (RCs) in the Eastern Interconnection. However, this information is to be used by RCs to identify (requirement R2.2) the appropriate TLR level and to notify (requirement R3.1) all RCs in the Eastern Interconnection of the identified level. Therefore we believe that it would be more appropriate that the Table either be part of the standard or an appendix to it. Doing so would also insure that other registered entities impacted by TLRs would have ready access to this information. We recognize the need for flexibility for RCs to use discretion in selecting the appropriate TLR level based on the circumstances they are facing which may not precisely match any pre-identified criteria. However, the examples contained in the Table are still a needed reference.
<p>Response: The SDT does not believe that including the examples in a supporting document will preclude them from use by entities other than RCs. Not including this information in the standard or as an appendix clearly draws the line between what is required and what is not, and calling specific TLR levels based on specific conditions is not part of the requirement. The SDT will ask the SC for authorization to post the reference document with a link to the associated standard so that the information will be easy to locate.</p>				
Chuck B Manning	Electric Reliability Council of Texas, Inc.	2	Affirmative	The word "valid" is unnecessary
<p>Response: The SDT has eliminated to the use of the word "valid" as proposed.</p>				
Terry Harbour	MidAmerican Energy Co.	1	Negative	Changes to IRO-006-East-1 now require TLR to be posted each hour. This unnecessarily increases compliance documentation without a corresponding system reliability benefit.
<p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.</p>				
Thomas C. Mielnik	MidAmerican Energy Co.	3	Negative	Changes would require TLR to be posted each hour. This unnecessarily increases documentation without a corresponding system reliability benefit.
<p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.</p>				

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David A. Lapinski	Consumers Energy	3	Negative	Consumers energy supports the comments of the Midwest ISO
Response: Please see responses to the Midwest ISO.				
James B Lewis	Consumers Energy	5	Negative	Consumers Energy supports the comments of the Midwest ISO.
Response: Please see responses to the Midwest ISO.				
Jim D. Cyrulewski	JDRJC Associates	8	Negative	For IRO-006 East Requirement R2 needs to be clarified on TLR 1 updates, R3.1 - R3.3 need to have IDC added, R4 and R3.3 seem inconsistent.
<p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase “with the exception of TLR-1, where an hourly update is not required” was added to the requirement.</p> <p>Regarding R3, Parts 3.1 through 3.3, while the IDC may be used to comply with this standard, it is not the only way that entities can comply with the standard. The SDT has intentionally drafted the standard to be implementation neutral.</p> <p>Requirement R3, Part 3.3 addresses the initiating Reliability Coordinator asking the responding Reliability Coordinator(s) to take action. R4 addresses the Responding Coordinator(s) asking their Balancing Authorities to take action (or themselves taking alternate action if conditions so require). Note that Requirement R3, Part 3.3 incorrectly referenced Requirement R2, Part 2.2 – this has been corrected to reference Requirement R2, Part 2.1.</p>				
David Frank Ronk	Consumers Energy	4	Negative	<p>I concur with the comments provided by the Midwest ISO where they said: We vote negative for the following reasons.</p> <p>1. We are concerned that unavailability or failure of the IDC could render an RC non-compliant with several requirements. Because the IDC is an efficient and effective tool for managing TLRs, RCs typically rely on the IDC to issue the “notification” (IRO-006-EAST-1 R3.1), “list of communication of actions” (IRO-006-EAST-1 R3.2) and “request for congestion management actions” (IRO-006-EAST-1 R3.3). Issuing and managing TLRs would be challenging without the IDC.</p> <p>Response: While the IDC may be used to comply with this standard, it is not the only way that entities can comply with the standard. The SDT has intentionally drafted the standard to be implementation neutral.</p> <p>2. As a result of the RCs reliance on the IDC for TLR management, we are further concerned about the retention of evidence from the IDC. IDC users can gather historical information from the IDC for any TLR that has been issued. However, it is</p>

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				<p>not clear if an RC must duplicate the information contained in the IDC within their own databases to satisfy compliance auditors. What happens if the an RC relies on the evidence retention in the IDC and the IDC experiences a database failure. Would a compliance auditor be satisfied that the information is not available? Would the RC be held accountable for not being able to present the evidence?</p> <p>Response: This is not a deficiency in the standard, but a question between the responsible entity and any other entities with which they work to perform their duties. The SDT recommends that RCs discuss this internally and with any of their related vendors or partners.</p> <p>3. We are concerned that M4 in IRO-006-EAST-1 is not completely consistent with IRO-006-EAST-1 R4. While R4 allows the receiving RC to completely substitute alternative congestion management actions, M4 appears to inadvertently require some implementation of the original congestion management actions. The problem with the the measurement is the specific language after number 2. The clause "implementing some of the communicated congestion management actions requested by the issuing Reliability Coordinator, and replacing the remainder with" is problematic because we don't believe complete substitution of the original congestion management actions meets the definition of "some". In other words, we believe that none is not included in the definition of some.</p> <p>Response: Thank you. The SDT has added "none" to the measure to address this concern.</p> <p>4. We believe that IRO-006-EAST-1 R2 will render TLR level 1 ineffective and cause RCs to stop using it. R2 incorporates explicitly the need to re-issue TLR level 1 each hour. While previous versions of the standard referenced Attachment 1 which included a guideline to re-issue TLR level 1 each hour, there was no requirement to actually re-issue TLR level 1 every hour because the attachment was not and is not a requirement.</p> <p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.</p>

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Lawrence R. Larson	Otter Tail Power Company	1	Negative	Measure 4 should allow replacing all, not only some, of the original congestion management actions within the constraints of requirement 4. The standard needs to be clearer.
Response: Thank you. The word "none" has been added to the measure to address this concern.				
Charles H Yeung	Southwest Power Pool	2	Negative	Per IRO-EAST-1 R2, TLR 1 will have to be reissued every clock hour. Since there is no operational action required for TLR 1, this serves no reliability purpose and its intent is only to provide the market with updates on the TLR 1 status. However because M2 does not distinguish whether the issuances were made for any particular TLR level, a reliability penalty can be applied for not reissuing a TLR1 for a market benefit. Although SPP supports the changes to the IRO standards and understand benefits to the market of these changes, we see a disconnect from enforcing a requirement for a market benefit through a reliability sanction. In addition, SPP's experience has been our transmission customers do not request hourly updates to TLR 1 status as may be the case in other regions where such information may be crucial. We believe the VSLs should be modified to reflect that only reissuance of TLR 2 and higher will be considered for compliance with IRO-EAST-1 R2.
Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement. The way the VSLs for R2 have been revised, it is clear that failure to provide an hourly update for TLR-1 is not a violation.				
Charles Locke	Kansas City Power & Light Co.	3	Negative	Per IRO-EAST-1 R2, TLR 1 will have to be reissued every clock hour. Since there is no operational action required for TLR 1, this serves no reliability purpose and only provides the market with updates on the TLR 1 status. However because M2 does not distinguish whether the issuances were made for any particular TLR level, a reliability penalty can be applied for not reissuing a TLR1 for a market benefit. Although KCPL supports the changes to the IRO standards and understand benefits to the market of some of these changes, we see a disconnect from enforcing a requirement for a market benefit with a reliability sanction. In addition, transmission customers do not request hourly updates to TLR 1 status as may be the case in other regions where such information may be crucial. We believe the VSLs should be modified to reflect that only reissuance of TLR 2 and higher will be considered for compliance with IRO-EAST-1 R2.
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George T. Ballew	Tennessee Valley Authority	5	Negative	Per IRO-EAST-1 R2, TLR 1 will have to be reissued every clock hour. Since there is no operational action required for TLR 1, this serves no reliability purpose and only provides the market with updates on the TLR 1 status. However because M2 does not distinguish whether the issuances were made for any particular TLR level, a reliability penalty can be applied for not reissuing a TLR1 for a market benefit. Although TVA SPP supports the changes to the IRO standards and understand benefits to the market of some of these changes, we see a disconnect from enforcing a requirement for a market benefit with a reliability sanction. In addition, SPP's experience has been our transmission customers do not request hourly updates to TLR 1 status as may be the case in other regions where such information may be crucial. We believe the VSLs should be modified to reflect that only reissuance of TLR 2 and higher will be considered for compliance with IRO-EAST-1 R2.
Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement. The way the VSLs for R2 have been revised, it is clear that failure to provide an hourly update for TLR-1 is not a violation.				
Thomas Saitta	Kansas City Power & Light Co.	6	Negative	Per IRO-EAST-1 R2, TLR 1 will have to be reissued every clock hour. Since there is no operational action required for TLR 1, this serves no reliability purpose and only provides the market with updates on the TLR 1 status. However because M2 does not distinguish whether the issuances were made for any particular TLR level, a reliability penalty can be applied for not reissuing a TLR1 for a market benefit. Although KCPL supports the changes to the IRO standards and understand benefits to the market of some of these changes, we see a disconnect from enforcing a requirement for a market benefit with a reliability sanction. In addition, transmission customers do not request hourly updates to TLR 1 status as may be the case in other regions where such information may be crucial. We believe the VSLs should be modified to reflect that only reissuance of TLR 2 and higher will be considered for compliance with IRO-EAST-1 R2.
Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement. The way the VSLs for R2 have been revised, it is clear that failure to provide an hourly update for TLR-1 is not a violation.				

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Lee Schuster	Florida Power Corporation	3	Negative	<p>Progress is voting Negative on IRO-006-EAST-1 and proposes the following changes to IRO-006-EAST-1 to clarify and improve the standard, and to possibly correct an error.</p> <p>1) In the first bullet item of R1, add the words "of generation" so the bullet reads: "Inter-area redispatch of generation." This bullet item will then be consistent with the second bullet item. Response: Thank you. The suggested change has been made.</p> <p>2) In the last bullet item of R1, the use of the word "Involuntary" is not clear. All "load reductions" by their nature are involuntary, even DSM. A better word would be "Controlled". Response: Thank you. The suggested change has been made.</p> <p>3) NERC is proposing to revise R2 so that R2.1 will be a list of congestion management actions, and R2.2 will be a list of TLR levels. However, it appears that R3.3 would now also need to be revised. Should R3.3 refer to "Part 2.1" and not "Part 2.2"? Response: Thank you. A correction has been made to address this concern.</p>
Response: Please see in-line responses.				
Wayne Lewis	Progress Energy Carolinas	5	Negative	<p>Progress is voting Negative on IRO-006-EAST-1 and proposes the following changes to IRO-006-EAST-1 to clarify and improve the standard, and to possibly correct an error.</p> <p>1) In the first bullet item of R1, add the words "of generation" so the bullet reads: "Inter-area redispatch of generation." This bullet item will then be consistent with the second bullet item. Response: Thank you. The suggested change has been made.</p> <p>2) In the last bullet item of R1, the use of the word "Involuntary" is not clear. All "load</p>

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				<p>reductions" by their nature are involuntary, even DSM. A better word would be "Controlled".</p> <p>Response: Thank you. The suggested change has been made.</p> <p>3) NERC is proposing to revise R2 so that R2.1 will be a list of congestion management actions, and R2.2 will be a list of TLR levels. However, it appears that R3.3 would now also need to be revised. Should R3.3 refer to "Part 2.1" and not "Part 2.2"?</p> <p>Response: Thank you. A correction has been made to address this concern.</p>
Response: Please see in-line responses.				
Charlie Martin	Louisville Gas and Electric Co.	5	Negative	<p>Proposed Comments on Project 2006-08 for Negative Vote Revised standard IRO-006 standard allows a responsible entity to provide "valid" reliability reasons when not complying with a TLR directive. The standard needs to identify those reasons that NERC believes are valid as well as the data required to support each reason. The standard should also identify the party responsible for determining whether the reason given for not complying with a TLR order is valid. E.ON U.S. suggests that the Regional Entity make that determination only after NERC and/or the Commission provide what each believes to be appropriate reasons to ignore a TLR order.</p>
Response: The SDT believes that, given the diversity of conditions and configurations that may be seen during real-time operations, trying to identify a list of potential reasons for not complying would be extremely challenging. Like all other elements associated with verifying that compliance with the standard occurred, reasons will be evaluated by the Compliance Enforcement Authority. Note that due to concerns expressed by other commenters, the SDT has removed the word "valid" from the requirement.				
Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	<p>Revised standard IRO-006 standard allows a responsible entity to provide "valid" reliability reasons when not complying with a TLR directive. The standard needs to identify those reasons that NERC believes are valid as well as the data required to support each reason. The standard should also identify the party responsible for determining whether the reason given for not complying with a TLR order is valid. E.ON U.S. suggests that the Regional Entity make that determination only after NERC and/or the Commission provide what each believes to be appropriate reasons to ignore a TLR order.</p>

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Daryn Barker	Louisville Gas and Electric Co.	6	Negative	<p>Revised standard IRO-006 standard allows a responsible entity to provide "valid" reliability reasons when not complying with a TLR directive. The standard needs to identify those reasons that NERC believes are valid as well as the data required to support each reason. The standard should also identify the party responsible for determining whether the reason given for not complying with a TLR order is valid. E.ON U.S. suggests that the Regional Entity make that determination only after NERC and/or the Commission provide what each believes to be appropriate reasons to ignore a TLR order.</p>
<p>Response: The SDT believes that, given the diversity of conditions and configurations that may be seen during real-time operations, trying to identify a list of potential reasons for not complying would be extremely challenging. Like all other elements associated with verifying that compliance with the standard occurred, reasons will be evaluated by the Compliance Enforcement Authority. Note that due to concerns expressed by other commenters, the SDT has removed the word "valid" from the requirement.</p>				
Marjorie S. Parsons	Tennessee Valley Authority	6	Negative	<p>The proposed requirements for TLR 1 do not provide any added benefit to reliability and create an increased burden on the real time System operators.</p>
<p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.</p>				
Martin Bauer P.E.	U.S. Bureau of Reclamation	5	Negative	<p>The Standard indicated that if a RC or BA did not comply with request from RC, BA, or TOP of another interconnection, it must provide a "valid" reason. No indication is given concerning who determines validity or how validity is determined. The draft standard was modified to change the language concerning the reason of not acting on a request from "a" reliability reason to any "a valid" reliability reason. Without the clarification, the standard would not be enforceable as it pertains to requests for curtailment that were not acted on. Furthermore, the insertion of the term "valid" implies that an RC or BA would not be acting in the true interests of BES reliability by providing "invalid" reliability reasons for not providing loading relief.</p>
<p>Response: The SDT has eliminated to the use of the word "valid" as proposed.</p>				
Jason L Marshall	Midwest ISO, Inc.	2	Negative	<p>We vote negative for the following reasons.</p> <ol style="list-style-type: none"> 1. As a result of the Reliability Coordinators' reliance on the IDC for TLR management,

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				<p>we are concerned about the retention of evidence from the IDC. IDC users can gather historical information from the IDC for any TLR that has been issued. However, it is not clear if an RC must duplicate the information contained in the IDC within their own databases to satisfy compliance auditors. What happens if an RC relies on the evidence retention in the IDC and the IDC experiences a database failure? Would a compliance auditor be satisfied that the information is not available? Would the RC be held accountable for not being able to present the evidence?</p> <p>Response: While the IDC may be used to comply with this standard, it is not the only way that entities can comply with the standard. The SDT has intentionally drafted the standard to be implementation neutral.</p> <p>2. We are concerned that M4 in IRO-006-EAST-1 is not completely consistent with IRO-006-EAST-1 R4. While R4 allows the receiving RC to completely substitute alternative congestion management actions, M4 appears to inadvertently require some implementation of the original congestion management actions. The problem with the measurement is the specific language after number 2. The clause "implementing some of the communicated congestion management actions requested by the issuing Reliability Coordinator, and replacing the remainder with" is problematic because we don't believe complete substitution of the original congestion management actions meets the definition of "some". In other words, we believe that "none" is not included in the definition of "some".</p> <p>Response: Thank you. The word "none" has been added to the measure to address this concern.</p> <p>3. We believe that IRO-006-EAST-1 R2 will render TLR level 1 ineffective and cause RCs to stop using it. R2 incorporates explicitly the need to re-issue TLR level 1 each hour. While previous versions of the standard referenced Attachment 1 which included a guideline to re-issue TLR level 1 each hour, there was no requirement to actually re-issue TLR level 1 every hour because the attachment was not and is not a requirement.</p> <p>Response: Upon further review of the current standard, as well as the current implementation of the IDC, it was determined that such updates are not required for TLR-1. The phrase "with the exception of TLR-1, where an hourly update is not required" was added to the requirement.</p>

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