Consideration of Comments

Project 2015-06 Interconnection Reliability Operations and Coordination IRO-006-East and IRO-009

The Project 2015-06 Drafting Team thanks all commenters who submitted comments on the standards. The standards were posted for a formal 45-day public comment period from May 21, 2015 through July 08, 2015[1]. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form.

All comments submitted may be reviewed in their original format on the project page.

There were 29 sets of responses, including comments from approximately 89 different people from approximately 64 different companies representing 9 of the 10 Industry Segments as shown in the report.

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 Director of Standards, Howard Gugel (via email) or at (404) 446-9693.

This document contains the Project 2015-06 Interconnection Reliability Operations (IRO) standard drafting team's (SDT) response to all industry comments received during this comment period. The IRO SDT encourages commenters to review its responses to ensure all concerns have been addressed. The IRO SDT notes that while commenters agree with the IRO SDT's recommendations on the standards, specific concerns were expressed. Some comments supporting the IRO SDT's recommendations are discussed below but in most cases are not specifically addressed in this response. Also, several comments in response to specific questions are duplicated in other questions, and several commenters raise substantively the same concerns as others. Therefore, the IRO SDT's consideration of all comments is addressed in this section in summary form, with duplicate comments treated as a single issue.

[1] The public comment period for IRO-006-EAST-2 closed on July 8, 2015 as scheduled; however, the public comment period for IRO-009-2 was extended to close on July 9, 2015 in an effort to reach quorum.

1. Summary Consideration

Based on the results from the comment and ballot period, it appears that industry generally agrees with the Project 2015-06 IRO SDT recommendations on revisions to IRO-006-EAST-1 and IRO-009-1. However, there are some disagreements among stakeholders and suggestions for language revisions contained in industry comments. To the extent that there are comments beyond the scope of the IRO SDT, those comments will be communicated to the appropriate drafting team or other appropriate group for consideration.

Additionally, the IRO SDT considered recommendations provided by the Industry Expert Review Panel as follows:

IRO-006-EAST-1:
Industry Expert Review Panel questioned if it would be possible to combine in continent wide standard.

It is the position of the IRO SDT that IRO-006-EAST should remain as a separate standard for the Eastern Interconnection, due to the variety of congestion management techniques in each of the different interconnections, and in particular the unique nature of Transmission Loading Relief (TLR) in the Eastern Interconnection.
IRO-009-1, Requirements R1-R5:

Industry Expert Review Panel recommended incorporating "grid impactful SOLs" into methodology, noting that these are SOLs that can become IROLs. Also suggested adding a definition to the Glossary. Grid impactful SOLs are defined in footnote 31 of paragraph 27 in order 748.. . . NERC does not offer a definition of the term “grid impactive SOL,” but we understand it to mean an SOL that the reliability coordinator monitor so that it does not develop into an IROL).

The issue of “grid-impactive SOL” has been addressed by NERC in its TOP/IRO Petition in response to two directives from FERC Order No. 748. These directives were addressed in the TOP/IRO Petition as follows:

> In addition to the directives addressed by the standards drafting team . . . NERC also notes that it resolved two directives from Order No. 748 that relate to the issues addressed by the proposed Reliability Standards. First, the Commission directed the NERC Reliability Coordinator Working Group to consider whether the need exists to refine the delineation of responsibilities between the Reliability Coordinator and Transmission Operator for analyzing certain “grid-impactive” SOLs that are of interest to the Reliability Coordinator. Second, the Commission directed the NERC Reliability Coordinator Working Group to consider

whether there is a need for reliability coordinators to have action plans developed and implemented with respect to certain "grid-impactive" SOLs that are of interest to the Reliability Coordinator.

The working group, which included participation from the NERC Operating Committee and stakeholders, concluded that there was no need to create another category between IROL and SOL called "grid-impactive" SOLs. The working group determined that such a category could not be clearly defined and consequently did not support changes to the currently effective IRO standards. In addition to the working group action, the directives are addressed by proposed IRO-008-2 Requirements R1 and R2, which require the Reliability Coordinator to (1) analyze both SOLs and IROLs, as discussed above, and (2) must have a coordinated operating plan to address potential SOL and IROL exceedances which considers the operating plans provided by the Transmission Operators.

The TOP/IRO Notice of Proposed Rulemaking (NOPR), issued on June 18, 2015 proposes to approve the TOP and IRO standards and discusses issues raised in the "remand NOPR" that NERC addressed as well as listed new issues. None of the new issues listed in the current NOPR mention grid-impactive SOLs.

The IRO SDT has carefully reviewed and considered the Five-Year Review Team (FYRT) recommendations, as well as each stakeholder comment, and has revised the standards where suggested changes improve clarity and are consistent with IRO SDT intent and apparent industry consensus. The IRO SDT has carefully considered standard language as well as explanatory language and has implemented revisions to further clarify the language based on comments received. The IRO SDT is not changing the intent of the standard modification.

The IRO SDT's consideration of all comments follows.

2. IRO-006-EAST

Several commenters suggested retaining Requirement R1 since it was developed to address a directive.

FERC Order 693, paragraph 964 states:

964. Accordingly, in addition to approving the Reliability Standard, the Commission directs the ERO to develop a modification to IRO-006-3 through the Reliability Standards development process that (1) includes a clear warning that the TLR procedure is an inappropriate and ineffective tool to mitigate actual IROL violations and (2) identifies in a Requirement the available alternatives to

mitigate an IROL violation other than use of the TLR procedure. In developing the required modification, the ERO should consider the suggestions of MidAmerican and Xcel.

The IRO SDT agrees with the FYRT's acknowledgment that Requirement R1 addresses the directive. The FYRT notes that IRO-008-1 and IRO-009-1 were developed after Order 693 was issued and the particular directive was addressed. The IRO SDT agrees with the FYRT's assertion that IRO-008-1, Requirement R3 and IRO-009-1, Requirement R4 are redundant with Requirement R1 and that the requirements in IRO-008-1 and IRO-009-1 are results based and specify a reliability objective to be achieved. The IRO SDT further agrees with the FYRT's conclusion that Requirement R1 in IRO-006-EAST-1 simply provides a list of actions to be taken without any parameters for their use. The requirements of IRO-008-1 and IRO-009-1 point to IROL exceedances and mitigating the magnitude and duration within the IROL's T_v.

IRO-008-1, R3: When a Reliability Coordinator determines that the results of an Operational Planning Analysis or Real-time Assessment indicates the need for specific operational actions to prevent or mitigate an instance of exceeding an IROL, the Reliability Coordinator shall share its results with those entities that are expected to take those actions.

IRO-009-1, R4: When actual system conditions show that there is an instance of exceeding an IROL in its Reliability Coordinator Area, the Reliability Coordinator shall, without delay, act or direct others to act to mitigate the magnitude and duration of the instance of exceeding that IROL within the IROL's T_v.

It should be noted that there is potential overlap between these two requirements in the instance where there is an IROL exceedance but they are not duplicative. IRO-008-1 addresses actions to prevent or mitigate an IROL exceedance while IRO-009-1 addresses an actual exceedance and acting to mitigate the magnitude and duration of the exceedance within T_v.

One commenter suggested that the IRO SDT remove the reference to IRO-008-1 and its Requirement R3 redundancy issues from the IRO SDT's rationale for recommendation to retire Requirement R1 and requested the drafting team to provide information on the status of the IRO-008-1.

Rather than remove the information, the IRO SDT elects to provide information regarding the potential disposition of the substance of IRO-008-1 Requirement R3 that may result from Project 2014-03 recommendations as well as the status of Project 2014-03 recommendations.

Project 2014-03 Revisions to TOP and IRO Standards recommended replacing IRO-008-1 R3 with proposed IRO-008-2, Requirements R3 and R5. IRO-008-1 is currently subject to enforcement. IRO-008-2 is currently filed and subject to regulatory approval.

Proposed IRO-008-2, Requirements R3 and R5:

R3. Each Reliability Coordinator shall notify impacted entities identified in its Operating Plan(s) cited in Requirement R2 as to their role in such plan(s).

R5. Each Reliability Coordinator shall notify impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, when the results of a Real- time Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Wide Area.

A commenter requested that the IRO SDT vet the retirement of Requirement R1 with appropriate ERO and FERC liaisons to ensure that its removal would not result in reissuance of a similar directive.

The IRO SDT has worked closely with appropriate ERO and FERC liaisons, and, to the extent possible, the IRO SDT has ensured that there are no known issues with appropriate ERO and FERC liaisons associated with the retirement of IRO-006-EAST Requirement R1.

At least one commenter noted that the update of “at least every clock hour” is the minimum, and that implementation information should be updated as system conditions change.

The IRO SDT agrees that system conditions may arise that prompt the Reliability Coordinator (RC) to update the TLR. The IRO SDT anticipates that the RC will update the TLR in the Interchange Distribution Calculator (IDC) tool as needed, which will in turn broadcast the updated TLR. The requirement does not prohibit the RC from updating the TLR more often than the clock hour, rather the requirement establishes the minimum hourly update schedule.

A commenter suggested that the SDT coordinate efforts with the FAC Review Team/SDT along with the Alignment of Terms (Project 2015-04) SDT to ensure that the term ‘System Operating Limit-SOL’ is correctly defined and aligned with all relevant documentation such as: the Functional Model, Glossary of Terms and the Rules of Procedure (RoP).

The IRO SDT has taken into consideration the current proposed draft of the term System Operating Limit (SOL) and the potential state of particular Reliability Standards. The IRO SDT will ensure the Project 2015-06 background documents and rationale are provided to the project teams mentioned in the comment, as the work of the IRO SDT will likely conclude prior to the completion of the project teams indicated above.

At least one commenter requested the IRO SDT clarify where the TLR levels and congestion management actions should be updated.

The IRO SDT anticipates that the RC will update such information using the appropriate technology, such as updating the TLR level in the IDC tool.

Several commenters either expressed concern, or requested clarification regarding the IRO SDT's position that, in the event of an IDC failure, TLR action will be very limited or unavailable, requiring manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, and some commenters provided associated suggested language revisions to the requirements of the standard.

It is the position of the IRO SDT that, if the currently applicable technology, such as IDC, became unavailable, the actions taken would be other than the TLR actions prescribed by the standard, are addressed in other standards, and are beyond the scope of IRO-006-EAST.

One commenter also suggested adding language to Requirement R1 that refers to the Interchange Distribution Calculator (IDC).

The IRO SDT considered adding the language as proposed by the commenter; however, the IRO SDT ultimately determined not to specify the particular technology that would be used to facilitate the TLR so that future standard revisions would not be necessary in the event of technology changes.

At least one commenter raised the issue of who would be held responsible for communicating the actions required by the standard, and noted that it is not appropriate for the vendor of IDC to assume this responsibility and ensure the correctness of the communicated actions.

IRO-006-EAST is applicable to Reliability Coordinators. If the IDC tool is not operational, then the RC would be expected to take alternative actions; however, other entities, such as the vendor of the IDC, are not addressed through the requirements of IRO-006-EAST.

One commenter suggested revising the purpose statement of IRO-006-EAST to remove the term "ensure."

The IRO SDT agrees with the suggested language and has revised the purpose statement as such.

Several commenters provided various suggested revisions of the 15 minute language in proposed IRO-006-EAST-2 Requirement R2, suggesting that the current language, as written, would benefit from additional clarification of whether the 15 minute timeframe applies to the Sink Balancing Authority or Reliability Coordinator.

IRO-006-EAST is only applicable to Reliability Coordinators; therefore, only Reliability Coordinators must comply with the requirements therein. The IRO SDT; however, agrees that the language of the requirement would benefit from further clarification, and has revised the language as such to further clarify the requirement.

More than one commenter opined that the 15 minute time requirement for the RC to instruct the Sink BA, should be complemented by a corresponding time requirement for the BA to implement actions, and that the corresponding time requirement should also apply to the GOP.

IRO-006-EAST is applicable to Reliability Coordinators only. Responsibility to implement the directives as well as any associated timeliness is therefore appropriately addressed through other Reliability Standard requirements.

A commenter raised the issue that there are times when an immediate change in ACE from a large TLR impact could cause a reliability issue for the Balancing Authority that is more severe than the issue which caused the TLR to be initiated, and stated that the standard needs to be clear on how those conflicting reliability issues should be dealt with, noting that in many cases other alternatives are available which do not cause a reliability issue for any entities.

The IRO SDT expects the Reliability Coordinator to coordinate the appropriate actions, and has provided an exception to Requirement R2 that:

"Should an assessment determine that one or more of the congestion management actions communicated will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions with the issuing Reliability Coordinator."

One commenter suggested that the drafting team provide examples to help give more clarity on what type of assessment(s) they are referring to in the bullet in Requirement R2, noting that providing proof of an assessment may be challenging depending on the issue.

Proposed IRO-006-EAST-2 does not specify the nature of the assessment. The initiator for alternate actions is "will result in a reliability concern or will be ineffective," not the assessment that determined such. The term assessment is not a defined term, and is broad enough to allow an entity the latitude to exercise judgement during varying circumstances through a variety of different means. The IRO SDT expects that the reasons for taking the alternate action will be the substance of the assessment by which "one or more of the congestion management actions communicated will result in a reliability concern or will be ineffective" is determined.

One commenter suggested that there should be revision of proposed IRO-006-EAST-2 Requirement R2 to include some alternative language to ensure that the Sink Balancing Authority being referenced in this requirement is applicable to the Reliability Coordinator's area, and provided suggested language.

The SDT carefully considered the suggested language revision and determined that the language as written in the requirement adequately conveys, through the phrase "with a" that the Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure is the Sink Balancing Authority within the applicable Reliability Coordinator's area. Further, it is the IRO SDT's understanding that in order for a Sink Balancing Authority to receive congestion management actions pursuant to the Eastern Interconnection TLR procedure, the RC that has the Sink Balancing Authority within its area must acknowledge the TLR if it has been issued by another RC.

One commenter noted that that the language for TLR-6 in the supplemental material could be redundant with TLR-3a, TLR-3b, TLR-5a, and TLR-5b, and that TLR-6 indicates there is a Transmission Facility is currently exceeding or is expect to exceed its SOL or IROL. The commenter also stated that the same conditions apply to TLR-3a, TLR-3b, TLR-5a, and TLR-5b with the exception that those levels describe whether non-firm and firm curtailments are sufficient to mitigate the exceedance, asserting that TLR-6 should only be issued when complete curtailment of firm and non-firm interchange transactions are insufficient to mitigate and SOL or IROL exceedance and additional emergency actions may be warranted for complete mitigation. The commenter recommended updating the description to reflect this statement.

The Standard Attachment, Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels was provided as a reference. The IRO SDT has determined that the reference is more appropriately referenced only in the Associated Documents section of the standard, since the document is maintained outside of the standards development process, and revisions subsequent to Project 2015-06 may make the descriptions of the TLR levels out-of-date. The recommendations above will be communicated to the appropriate group for consideration.

3. IRO-009

Several commenters provided various suggested revisions to the language of Requirement R1.

The IRO SDT has carefully considered this proposed language changes and determined that the language of the standard as currently proposed addresses the appropriate identification of IROLs prior to the current day. The IRO SDT maintains that Operational Planning Analysis assesses expected system conditions next-day to determine if there are any anticipated IROL exceedances. Operational Planning Analyses do not in and of themselves determine an IROL.

More than one commenter suggested adding the term ”exceedance” following the second instance of IROL in Part 1.2 to clarify that which is to be relieved in Part 1.2.

The IRO SDT agrees that adding the term as suggested improves the clarity of the requirement and has implemented the change in the proposed standard.

One commenter recommended requiring elimination of the IROL exceedance within T_v, rather than mitigation, noting that an IROL exceedance can lead to widespread outages.

The IRO SDT recognizes that an IROL exceedance can lead to widespread outages. The IRO SDT carefully considered the suggested revisions; however, the IRO SDT has determined that the term “mitigate” should be retained to maintain consistency with the earlier version of IRO-009, as well as with other Reliability Standards.

More than one commenter identified that there is an additional instance of the term “that” in Measure M1, and recommended revision to remove the additional term.

The SDT agrees and has implemented the editorial change as proposed.

At least one commenter recommended revising Requirement R1 as follows:

R1. Each Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it the Reliability Coordinator shall take, or actions it shall direct others to take for each IROL that the Reliability Coordinator identifies one or more days prior to the current day.

The IRO SDT carefully considered the suggested revision, and agrees that the structure suggested is generally preferred; however, the IRO SDT has determined that language as currently written is preferred to maintain the integrity of clarity of the relationship between Requirement R1 and Parts 1.1 and 1.2. Parts 1.1 and 1.2 describe attributes of the final clause of Requirement R1, "that identify actions the Reliability Coordinator shall take or actions the Reliability Coordinator shall direct others to take (up to and including load shedding)," and it is preferable that the Parts which refer to this clause remain proximate to it.

One commenter suggested adding the term "beyond" to the phrase "prior to the current day," such that the phrase would be revised to "beyond prior to the current day," reasoning that the term yesterday is one day prior to the current day and; therefore, the day before yesterday is more than one day prior to today.

The IRO SDT considered the suggested revision; however, the IRO SDT has determined that language as currently written adequately reflects the intent of the IRO SDT that IRO-009-2 Requirement R1 applies to each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day.

One commenter stated that, during the last comment period, the comment was provided that proposed IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired, and that the SDT responded IRO-009-2 should not should not contain a reference to a retired document. That commenter noted that the term "IROL Violation Report" is referenced in proposed IRO-009-2.

The IRO SDT agrees, and has modified the standard to address this issue.

One commenter noted that the "v" in Tv was not consistently subscripted throughout the document.

The IRO SDT agrees that the term "T_v" should be consistently rendered throughout the document, and has implemented the appropriate revisions.

At least one commenter recommended revisions to the VSL for R3, stating the revision was needed for consistency with the language of Requirement R3, while noting that there is language included in the requirement that is not included in the associated VSL.

The IRO SDT has carefully considered the suggested revision and has determined that the VSL should remain as written, because the singular condition of whether or not the IROL exceedance was mitigated within the IROL's T_v identifies the severity level of this requirement.

One commenter recommended that the phrase "(up to and including load shedding)" be revised to "(up to and including load shedding for IROL exceedances)," indicating that the current phrase may imply that load shedding is a mandatory action to prevent an IROL exceedance. Load shedding should be an option at the system operator's disposal, but it should not be required.

Proposed IRO-009-2 Requirement R1 is drafted with the understanding that load shedding is an action that the Reliability Coordinator must consider in the development of its Operating Processes, Procedures, or Plans to prevent an IROL exceedance.

One commenter indicated that the implementation plans for both standards include a reference that the prior implementation plan is incorporated by reference and a link is provided. Unless the standards are still in implementation, these references are not necessary and may confuse some entities implementing the standard. We encourage the SDT to remove the language unless it is needed for implementation.

The incorporation by reference language has been removed from the Implementation plan as suggested.

At least one commenter raised the issue that, as IRO-009-1: R1 refers to 'Operating Processes, Procedures, or Plans that identify actions….'…R2 refers to ' ….one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1)……why wouldn't every potential process, procedure or plan available as an option in R2 also be included in R1?....in other words if its available for R2 should it not also be an 'action' available for R1?

The IRO SDT has revised IRO-009-1 R1 and R2 to be combined into proposed IRO-009-2 R1 with two subparts. The IRO SDT agrees that the Operating Processes, Procedures or Plans developed to prevent IROL exceedances may be the same as those for mitigating and alleviating an IROL exceedance, however, the IRO SDT has provided latitude for an entity to have different Operating Processes, Procedures or Plans as necessary since system conditions can vary requiring alternate Operating Processes, Procedures or Plans to be utilized.

At least one commenter stated that, since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

The IRO SDT agrees that the reference to Requirement R1 is not needed in Measure M3, and has removed this reference. The IRO SDT has determined that the reference to Requirement R1 is prudent in Measure M2, however, because of the parenthetical statement in Requirement R2 that refers to Requirement R1: "(not limited to the Operating Processes, Procedures, or Plans developed for Requirement R1)."

More than one commenter stated that, as R2 calls for the RC to initiate one or more Operating Processes, Procedures and Plans…, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance, and that presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

The IRO SDT agrees that the VSL for Requirement R2 considers only whether or not the RC initiated an Operating Process, Procedure, or Plan. The issue of the failure of the RC to mitigate the IROL within the IROL's T_v is addressed by Requirement R3.

Questions

1. **The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R1. Do you agree with the retirement of IRO-006-EAST-1 Requirement R1? If not, please explain specifically what aspects of the retirement you disagree with.**

2. **The IRO SDT recommends revising IRO-006-EAST-1 Requirement R2. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R2? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

3. **The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R3. Do you agree with the retirement of IRO-006-EAST-1 Requirement R3? If not, please explain specifically what aspects of the retirement you disagree with.**

4. **The IRO SDT recommends revising IRO-006-EAST-1 Requirement R4. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

5. **The IRO SDT recommends revising IRO-009-1 Requirement R1 to include elements of IRO-009-1 Requirement R2. Do you agree with the proposed revisions to IRO-009-1 Requirement R1? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

6. **The IRO SDT recommends revising IRO-009-1 Requirement R3. Do you agree with the proposed revisions to IRO-009-1 Requirement R3? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

7. **The IRO SDT recommends revising IRO-009-1 Requirement R4. Do you agree with the proposed revisions to IRO-009-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

8. **The IRO SDT recommends revising IRO-009-1 Requirement R5. Do you agree with the proposed revisions to IRO-009-1 Requirement R5? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.**

9. **If you have any other comments that you have not already mentioned above, please provide them here:**

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

Group Information

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
Colby Bellville	Duke Energy	1,3,5,6	FRCC,SERC,RFC	Duke Energy	Doug Hils	Duke Energy	RFC	1
					Lee Schuster	Duke Energy	FRCC	3
					Dale Goodwine	Duke Energy	SERC	5
					Greg Cecil	Duke Energy	RFC	6
Chris Scanlon	Exelon	1		Exelon Utilities	Chris Scanlon	BGE, ComEd, PECO TO's	RFC	1
					John Bee	BGE, ComEd, PECO LSE's	RFC	3

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
R. Scott Moore	Southern Company - Alabama Power Company	3		Manage Group	John Ciza	Southern Company Generation and Energy Marketing	SERC	6
					Bob Schaffeld	Southern Company Services, Inc.	SERC	1
					Bill Shultz	Southern Company Generation	SERC	5
					Scott Moore	Alabama Power Company	SERC	3
					Rob Watson	Choctaw Generation Limited Partnership, LLLP	SERC	5
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
					Amy Casucelli	Xcel Energy	MRO	1,3,5,6
					Chuck Lawrence	American Transmission Company	MRO	1

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
					Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
					Jodi Jenson	Western Area Power Administration	MRO	1,6
					Larry Heckert	Alliant Energy	MRO	4
					Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
					Marie Knox	Midwest ISO Inc.	MRO	2
					Mike Brytowski	Great River Energy	MRO	1,3,5,6
					Randi Nyholm	Minnesota Power	MRO	1,5

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Scott Nickels	Rochester Public Utilities	MRO	4
					Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
					Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Lee Pedowicz	Northeast Power Coordinating Council	10	NPCC	NPCC--Project 2015-06	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland Utilities Inc.	NPCC	3
					Greg Campoli	New York Independent System Operator	NPCC	2
					Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
					Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
					Mark Kenny	Northeast Utilities	NPCC	1
					Helen Lainis	Independent Electricity System Operator	NPCC	2
					Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
					Paul Malozewski	Hydro One Networks Inc.	NPCC	1
					Bruce Metruck	New York Power Authority	NPCC	6
					Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Robert Pellegrini	The United Illuminating Company	NPCC	1
					Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
					David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
					Brian Robinson	Utility Services	NPCC	8
					Wayne Sipperly	New York Power Authority	NPCC	5
					Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
					Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
					Michael Jones	National Grid	NPCC	1
					Brian Shanahan	National Grid	NPCC	1
					Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
					Glen Smith	Entergy Services, Inc.	NPCC	5

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
					RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
					Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
					Kathleen Goodman	ISO - New England	NPCC	2
					Guy Zito	Northeast Power Coordinating Council	NPCC	10
Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP	2
					James Nail	City of Independence, Missouri	SPP	3,5
					Jason Smith	Southwest Power Pool Inc.	SPP	2

Full Name	Entity Name	Segment	Region	Group Name	Group Member Name	Group Member Organization	Region	Group Member Segment(s)
					Mahmood Safi	Omah Public Power District	MRO	1,3,5
Kathleen Goodman	ISO New England, Inc.	2	NPCC	Standards Review Committee (SRC)	Charles Yeung	SPP	SPP	2
					Ben Li	IESO	NPCC	2
					Greg Campoli	NYISO	NPCC	2
					Matthew Goldberg	ISO-NE	NPCC	2
					Christina Bigelow	ERCOT	TRE	2
					Terry Bilke	MISO	MRO	2
					Al Dicaprio	PJM	RFC	2

1. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R1. Do you agree with the retirement of IRO-006-EAST-1 Requirement R1? If not, please explain specifically what aspects of the retirement you disagree with.

Robert Hirchak - Cleco Corporation - 6 -

Selected Yes

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes: 0

Terry BIlke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Anthony Jablonski - ReliabilityFirst - 10 -

Selected Answer: Yes

Answer Comment: ReliabilityFirst agrees that the recommended changes in the IRO-006-East draft standard are consistent with the five year review team recommendations and the overall quality of the language in the standard is improved.

Response:

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -

Selected Answer: Yes

R. Scott Moore - Southern Company - Alabama Power Company - 3 -

Selected Answer: Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment: N/A for Texas RE

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: No

Answer Comment: The SDT should reconsider retiring R1 because the requirement was added to the standard and worded in such a way to address a FERC directive in Order 693 which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation.

Response:

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

Answer Comment:

We reiterate the following comments which we submitted in 2013 when the 5-Year Review Team's recommendations were posted for comment, and in April 2015 when the revised recommendations were posted for comment:

We urge the SDT to reconsider retiring R1 since this requirement was added to the standard and worded that way to address a FERC directive in Order 693 which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation.

Part excerpt from the Order, Para. 964:

[Accordingly, in addition to approving the Reliability Standard, the Commission directs the ERO to develop a modification to IRO-006-3 through the Reliability Standards development process that (1) includes a clear warning that the TLR procedure is an inappropriate and ineffective tool to mitigate actual IROL violations and (2) identifies in a Requirement the available alternatives to mitigate an IROL violation other than use of the TLR procedure.]

The language "…prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances,

	but can be used together with but not prior to other (presumably more effective) means. The other means listed in R1 are to provide the list of measures that should be applied before or in conjunction with TRL. Alternatively, they can be referenced by quoting the other standards which contain these measures.
Response:	

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: No

Answer Comment: TVA basis for selecting "No' is provided in response to question 9.

Response:

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment: N/A

Response:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: No

Answer Comment: We agree with the SDT that if Requirement R1 of IRO-006-East-1 presents a redundancy issue (Paragraph 81) in reference to IRO-008-1 Requirement R3, and IRO-009-1 Requirement R4 and it should be retired. However, in your background information of the comment form (second paragraph last sentence), you mentioned that project 2014-03 (Revisions to TOP and IRO Standards) retired the IRO-008-1 standard. We would suggest to the IRO-SDT the removal of this phrase (IRO-008-1 and its Requirement R3 redundancy issues) from your **Rationale for recommendation to retire Requirement R1**. As we reviewed the NERC site it shows that this standard is ***subject to enforcement***, we have a concern that this information presents an inaccuracy and would ask the drafting team to provide some clarity on the status of the IRO-008-1.

Response:

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

2. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R2. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R2? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer
Comment:

Response:

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes:	0
Terry Bilke - Midcontinent ISO, Inc. - 2 -	
Selected Answer:	Yes

Anthony Jablonski - ReliabilityFirst - 10 -

Selected Answer: No

Answer Comment: ReliabilityFirst does offer a consideration regarding IRO-006-EAST-2 R2 to clearly identify which entity the 15 minutes apply to. As written, it can be left to interpretation whether the 15 minute timeframe applies to the Sink Balancing Authority or Reliability Coordinator. ReliabilityFirst offers the following modified language for consideration:

"Each Reliability Coordinator shall instruct the Sink Balancing Authority (for Sink Balancing Authorities that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure) to implement the congestion management actions within 15 minutes of receiving the request from the issuing Reliability Coordinator…"

Response:

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: N/A

Response:

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 -	
Selected Answer:	Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2	
Selected Answer:	No
Answer Comment:	The SRC is concerned with the retirement of Requirement R1, as it pertains to a directive in Order 693: "(1) includes a clear warning that a TLR procedure is an inappropriate and ineffective tool to mitigate IROL violations; (2) identifies in a Requirement the available alternatives to use of the TLR procedure to mitigate an IROL violation and;….."

	The SRC respectfully suggests that SDT vet the retirement of Requirement R1 with appropriate ERO and FERC liaisons to ensure that its removal would not result in reissuance of a similar directive. An alternative approach would be to revise Requirement R2 to provide: Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance shall: (1) prior to or concurrent with such initiation, evaluate and initiate alternatives to address such exceedance, (2) identify the TLR level and the congestion management actions to be implemented, and (3) update this information at least every clock hour (except TLR-1) after initiation up to and including the hour when the TLR level has been identified as TLR Level 0
Response:	

Jared Shakespeare - Peak Reliability - 1 -	
Selected Answer:	No
Answer Comment:	"(up to and including load shedding)" should be "(up to and including load shedding for IROL exceedances)". Current wording could suggest that load shedding is a mandatory action to prevent an IROL exceedance. Load shedding should be an option at the system operator's disposal to prevent load shedding, but it should not be required.

Response:
Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 - **Selected Answer:** Yes

R. Scott Moore - Southern Company - Alabama Power Company - 3 -

Selected Answer: Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment: N/A for Texas RE

Response:

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: No

Answer Comment: Where is the RC to update the TLR implementation information? The update of "at least every clock hour" is the minimum. The implementation information should be updated as system conditions change. Suggest changing the wording to:

"…and shall update this information as changes in system warrant deliberate changes to the in force implemented TLR procedure, and at least hourly…"

Response:
Leonard Kula - Independent Electricity System Operator - 2 - **Selected Answer:** Yes

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: No

Answer Comment: TVA basis for selecting "No' is provided in response to question 9.

Response:

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment: N/A

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Answer Comment: We would suggest to the SDT to coordinate efforts with the FAC Review Team/SDT along with the Alignment of Terms (Project 2015-04) SDT to ensure that the term 'System Operating Limit-SOL' is correctly defined and aligned with all relevant documentation such as: the Functional Model, Glossary of Terms and the Rules of Procedure (RoP). Additionally, we would ask the drafting team to provide clarity on where should the TLR levels and congestion management actions will need to be updated.

Response:

Scott McGough - Georgia System Operations Corporation - 3 - **Selected Answer:** Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

3. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R3. Do you agree with the retirement of IRO-006-EAST-1 Requirement R3? If not, please explain specifically what aspects of the retirement you disagree with.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terry BIlke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 -	
Selected Answer:	Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2	
Selected Answer:	Yes
Answer Comment:	The SRC agrees with the retirement, but requests clarification that it is the SDT's position that, in the event of an IDC failure, TLR action will be very limited or unavailable, requiring manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System. If this is the SDT's intent, the SRC suggests the SDT add a condition in R1 (previously R2), to read as follows (addition in square brackets):

	R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify…… This addition will address ambiguity regarding whether TLRs must be implemented when the IDC is unavailable
Response:	

Jared Shakespeare - Peak Reliability - 1 -	
Selected Answer:	Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 - **Selected Answer:** Yes
R. Scott Moore - Southern Company - Alabama Power Company - 3 - **Selected Answer:** Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment: N/A for Texas RE

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: No

Answer Comment:

If the acronym IDC is to stay with the standard, it should be spelled out at its initial usage, with the acronym being used subsequently.

Suggest not using the word “ensure” in the Purpose. Consider revising the wording of the Purpose to:

To coordinate action between Reliability Coordinators within the Eastern Interconnection when implementing transmission loading relief procedures (TLR) for the Eastern Interconnection to prevent or manage potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES).

The SDT should consider the following:

a. The need for this requirement was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the

vendor of IDC to assume this responsibility and ensure the correctness of the communicated actions.

b. If the SDT's position is that in the event of an IDC failure, TLR action will be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, then we suggest the SDT to add a condition in R1 (previously R2), to read as follows (addition in square brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify……

This will effectively remove the need to implement TLRs when the IDC is unavailable.

Add the above wording to R2 to address the situation when IDC is not available.

Response:

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

We are indifferent to the proposal, but suggest that the SDT carefully consider the following:

a. The need for this requirement was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions.

b. If the SDT's position is that in the event of an IDC failure, TLR action will be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, then we suggest the SDT to add a condition in R1 (previously R2), to read as follows (addition in square brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify……

This will effectively remove the need to implement TLRs when the IDC is unavailable.

	We therefore suggest the SDT to either keep the requirement R3 as is, or add the above wording to R2 to address the situation when IDC is not available.
Response:	

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC	
Selected Answer:	Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC	
Selected Answer:	No
Answer Comment:	TVA basis for selecting "No' is provided in response to question 9.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Selected Answer:	
Answer Comment:	N/A

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP **Selected Answer:** Yes
Scott McGough - Georgia System Operations Corporation - 3 - **Selected Answer:** Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:	Yes
Answer Comment:	ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.
Response:	

4. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R4. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 - **Selected Answer:** Yes
Terry Bilke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO	
Selected Answer:	Yes
RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC	
Selected Answer:	No
Answer Comment:	To provide clarity around the 15 minute time frame suggest rewording the requirement as below: "Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions."

Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?

If the 15 minutes is the time requirement for the RC to instruct the Sink BA, then a time frame also should be identified for when the BA has to implement actions. This time requirement should also apply to the GOP.

We request the SDT consider adding time requirements to specify when the Sink BA and associated GOPs should have curtailment actions completed.

We understand this would require adding BA, TOP, and GOP to be applicable to the standard.

To provide clarity around the 15 minute time frame suggest rewording the exception as below:

Should an assessment determines shows that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions**, within 15 minutes of receiving the request,** with the issuing Reliability Coordinator.

This also further agrees with the associated VSL

Response:

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: N/A

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2 **Selected Answer:** Yes

Jared Shakespeare - Peak Reliability - 1 - **Selected Answer:** Yes
R. Scott Moore - Southern Company - Alabama Power Company - 3 - **Selected Answer:** Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 - **Selected Answer:** Yes
Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 - **Selected Answer:** Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: No

Answer Comment:

Duke Energy requests clarification from the SDT regarding the wording in the proposed R4. As currently written, it is not entirely clear as to what/who is attributable to the given 15 minute timeframe. Is the 15 minute timeframe attributable to the RC, and requires the RC to instruct the Sink BA to implement congestion management actions within 15 minutes of receiving the request from an issuing RC? Or, is the 15 minute timeframe attributable to the Sink BA, requiring the Sink BA to implement the congestion management actions within 15 minutes of receiving instruction from its RC?

Alternative language that could help to add clarity to the requirement is dependent upon the answer to our question above.

Response:

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment: N/A for Texas RE

Response:

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: No

Answer Comment:

To provide clarity around the 15 minute time frame suggest rewording the requirement as below:

"

Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions."

Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?

If the 15 minutes is the time requirement for the RC to instruct the Sink BA, then a time frame also should be identified for when the BA has to implement actions.

We request the SDT consider adding time requirements to specify when the Sink BA should have curtailment actions completed.

We understand this would require adding BA to be applicable to the standard.

	To provide clarity around the 15 minute time frame suggest rewording the exception as below: Should an assessment determine that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions**, within 15 minutes of receiving the request,** with the issuing Reliability Coordinator. This also further agrees with the associated VSL.
Response:	

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Selected Answer:	
Answer Comment:	N/A

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Answer Comment: The review group agrees that there should be some form of revision in reference to Requirement R4. We would suggest to the SDT to include some alternative language to ensure that the Sink Balancing Authority being referenced in this requirement is applicable to the Reliability Coordinator's area. We would suggest the alternative language as followed: 'Each Reliability Coordinator with a Sink Balancing Authority (with in the Reliability Coordinator's area) that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority (with in the Reliability Coordinator's area) to implement the congestion management actions within 15 minutes of receiving the request from the issuing'. The suggested alternative term 'area' was taken from page 6 of Requirement R2 ***Registered Entity Response*** section of the RSAW if you review the first sentence in reference to ***Question***. Additionally, we would suggest to the drafting team to provide some form of examples to help give more clarity on what type of assessment(s) they are referring to in the bullet. Providing proof of an assessment can be challenging depending on the issue. The use of the term 'assessment' may need to be reviewed.

Response:

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: No

Answer Comment:

To provide clarity around the 15 minute time frame suggest rewording the requirement as below:
"Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall instruct the Sink Balancing Authority, within 15 minutes of receiving the request from the issuing Reliability Coordinator, to implement the congestion management actions."
Request the requirement be reworded to more clearly identify if the 15 minutes is the required time for the RC to instruct the Sink BA or is the BA expected to implement actions within 15 minutes?
If the 15 minutes is the time requirement for the RC to instruct the Sink

BA, then a time frame also should be identified for when the BA has to implement actions. This time requirement should also apply to the GOP.
We request the SDT consider adding time requirements to specify when the Sink BA and associated GOPs should have curtailment actions completed.
We understand this would require adding BA, TOP, and GOP to be applicable to the standard.
To provide clarity around the 15 minute time frame suggest rewording the exception as below:
Should an assessment determines shows that one or more of the congestion management actions communicated in Requirement R3, Part 3.3 will result in a reliability concern or will be ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions, within 15 minutes of receiving the request, with the issuing Reliability Coordinator.

This also further agrees with the associated VSL

Response:

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

5. The IRO SDT recommends revising IRO-009-1 Requirement R1 to include elements of IRO-009-1 Requirement R2. Do you agree with the proposed revisions to IRO-009-1 Requirement R1? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terry BIlke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

Response:

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2

Selected Answer: No

Answer Comment:

a) The SRC (note, ERCOT does not support this comment) has concerns with the clarity of the existing wording in Requirement R1. Specifically, it suggests that the following phrase be revised for clarity:

from

“For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day…”

to

“For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies through its Operational Planning Analysis…”

b) The SRC agrees with the proposed changes, but suggests to revise Part 1.2 as follows to improve clarity (added word in square bracket):

"1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL’s Tv."

	The added word is needed since an IROL is a limit, whose relief is not required; but its exceedance needs to be relieved. c) There are two “that’s” in Measure M1. The measure should be revised to remove the additional “that.”
Response:	

Jared Shakespeare - Peak Reliability - 1 -	
Selected Answer:	Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 - **Selected Answer:** Yes
R. Scott Moore - Southern Company - Alabama Power Company - 3 - **Selected Answer:** Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC **Selected Answer:** Yes
Rachel Coyne - Texas Reliability Entity, Inc. - 10 - **Selected Answer:** Yes

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: No

Answer Comment:

To be consistent with in place standard formatting, Requirement R1 should be revised to read:

R1. Each Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it the Reliability Coordinator shall take, or actions it shall direct others to take for each IROL that the Reliability Coordinator identifies one or more days prior to the current day.

We agree with the proposed changes, but suggest rewording Part 1.2 as follows to improve clarity (added word in square bracket):

1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL's Tv.

The added word is needed since IROL is a limit, whose relief is not required; but its exceedance needs to be relieved.

Response:
Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC **Selected Answer:** Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:	Yes
Answer Comment:	ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.
Response:	

6. The IRO SDT recommends revising IRO-009-1 Requirement R3. Do you agree with the proposed revisions to IRO-009-1 Requirement R3? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer
Comment:

Response:

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes:	0
Terry BIlke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes	

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO **Selected Answer:** Yes
RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC **Selected Answer:** Yes

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2 **Selected Answer:** Yes

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -

Selected Answer: Yes

R. Scott Moore - Southern Company - Alabama Power Company - 3 -

Selected Answer: Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 - **Selected Answer:** Yes
Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC **Selected Answer:** Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP **Selected Answer:** Yes
Scott McGough - Georgia System Operations Corporation - 3 - **Selected Answer:** Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

7. The IRO SDT recommends revising IRO-009-1 Requirement R4. Do you agree with the proposed revisions to IRO-009-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer
Comment:

Response:

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes:	0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2 **Selected Answer:** Yes

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -

Selected Answer: Yes

R. Scott Moore - Southern Company - Alabama Power Company - 3 -

Selected Answer: Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

8. The IRO SDT recommends revising IRO-009-1 Requirement R5. Do you agree with the proposed revisions to IRO-009-1 Requirement R5? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer
Comment:

Response:

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes:	0
Terry Bilke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes	

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer: Yes

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer: Yes

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment: Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1N/A

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Terry BIlke - Midcontinent ISO, Inc. - 2 - **Selected Answer:** Yes
Kathleen Goodman - ISO New England, Inc. On Behalf of: Michael Puscas, ISO New England, Inc., 2 **Selected Answer:** Yes

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Robert A. Schaffeld - Southern Company - Southern Company Services, Inc. - 1 -

Selected Answer: Yes

R. Scott Moore - Southern Company - Alabama Power Company - 3 -

Selected Answer: Yes

John J. Ciza - Southern Company - Southern Company Generation and Energy Marketing - 6 -

Selected Answer: Yes

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5 -

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer: Yes

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

9. If you have any other comments that you have not already mentioned above, please provide them here:

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer
Comment:

Response: Comments regarding Standard IRO-009.docx

Likes: 1 Hydro-Qu?bec TransEnergie, 1, Boisvert Martin

Dislikes: 0

Anthony Jablonski - ReliabilityFirst - 10 -

Selected Answer:

Answer Comment: ReliabilityFirst agrees that the recommended changes in the IRO-009 draft standard are consistent with the five year review team recommendations and the overall quality of the language in the standard is improved.

Response:

Chris Scanlon - Exelon - 1 -

Selected Answer:

Answer Comment: The implementation plans for both standards include a reference that the prior implementation plan is incorporated by reference and a link is provided. Unless the standards are still in implementation, these references are not necessary and may confuse some entities

	implementing the standard. We encourage the SDT to remove the language unless it is needed for implementation.
Response:	

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO	
Selected Answer:	
Answer Comment:	The drafting team did a good job of removing redundancies and adding clarity. There is an apparent bug in the existing wording of IRO-009 that the team might consider changing. The current wording is: "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day…"

	Yesterday is one day prior to the current day. The day before yesterday is more than one day prior to today. Seems like better wording would be: "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies beyond prior to the current day…"
Response:	

Martin Boisvert - Hydro-Qu?bec TransEnergie - 1 -

Selected Answer:

Answer Comment:	Please see the comments submitted by Si Truc Phan, **On Behalf of:** Hydro-Quebec TransEnergie, NPCC, Segments 1
Response:	

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

During the last comment period, Texas RE pointed out that IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired. The SDT responded IRO-009-2 should not should not contain a reference to a retired document. It still appears that there is a reference to the Violation Report in section 1.1 Evidence Retention and Section 1.3 Additional Compliance Information.

Additionally, Texas RE noticed that the "v" in Tv was not consistently subscripted throughout the document.

Texas RE recommends changing the VSL for R3 so that it is consistent with the R3 language. For example, the standard language indicates that the Reliability Coordinator *shall act or direct others to act* to mitigate the IROL within its Tv, which the proposed VSL does not explicitly reflect. Therefore, Texas RE recommends the following revisions to the VSL for R3:

Severe – Actual system conditions showed that there was an IROL exceedance in its Reliability Coordinator Area, the Reliability Coordinator did not act, or direct others to act and the IROL exceedance was not mitigated within the IROL's Tv.

Response:

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

Answer Comment:

Regarding IRO-009-1: R1 refers to 'Operating Processes, Procedures, or Plans that identify actions….'…R2 refers to ' ….one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1)……why wouldn't every potential process, procedure or plan available as an option in R2 also be included in R1?....in other words if its available for R2 should it not also be an 'action' available for R1?

Remove the second “that” from Measure M1 to have it read”… along with one or more dated Operating Processes, Procedures, or Plans that will be used.”

Since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

R2 calls for RC to initiate one or more Operating Processes, Procedures and Plans… Therefore, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance. Presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

Add the following text either to Severe VSL or High VSL: The RC did not initiate all Operating Processes, Procedures and Plans that could have prevented an IROL exceedance.

Response:

Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC

Selected Answer:

Answer Comment:

Overall, we agree with the proposed changes as simple refinements of the standards that do not change the basic reliability requirements. However, we do note that the language for TLR-6 in the supplemental material could be redundant with TLR-3a, TLR-3b, TLR-5a, and TLR-5b. TLR-6 indicates there is a Transmission Facility is currently exceeding or is expect to exceed its SOL or IROL. These same conditions apply to TLR-3a, TLR-3b, TLR-5a, and TLR-5b with the exception that those levels describe whether non-firm and firm curtailments are sufficient to mitigate the exceedance. TLR-6 should only be issued when complete curtailment of firm and non-firm interchange transactions are insufficient to mitigate and SOL or IROL exceedance and additional emergency actions may be warranted for complete mitigation. The description should be updated to reflect this statement.

Response:

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

IRO-006-EAST is the Transmission Loading Relief Procedure for the Eastern Interconnection. Currently the procedure is only applicable to the Reliability Coordinator. For TLR process to work in a reliable, predicable and consistent manner, the standard also needs to be applicable to the Balancing Authority. Without the cooperation of the BA the relief that is needed to keep the transmission system reliable isn't guaranteed to arrive as the requesting RCs are expecting. As the make-up of the Eastern Interconnection has changed over the years, the timing for relief provided seems to have diverged. The timing of relief provided by tags differs to the timing of relief provided by firm and non-firm market flows differs from the timing of relief provided by generation redispatch to meet NNL curtailment obligations. This lack of consistency and predictability has led to issues when using the TLR process. For example, TVA has experienced times where entities provide the required relief for the current hour well after TVA has had to reissue the TLR for next hour. Reliability Coordinators can't expect to mitigate transmission system exceedences in a timely manner if the TLR process does not provide relief in a timely manner. The standard currently set the expectation that the RC notify the BA of their relief obligation in 15 minutes but is silent on how long the BA has to start meeting their relief obligation and when it is expected to be finished. Some BA have specific rules as to when they will input their relief obligations in their generation redispatch significantly delaying when the RC can expect requested relief. TVA urges the Standard Drafting Team to consider extending the

	applicability of this TLR standard to the BA and define consistent timing requirements that all entities have to follow in order to increase the reliability, predictability and usefulness of the TLR process. Another consideration is that there are times when an immediate change in ACE from a large TLR impact could cause a reliability issue for the BA that is more severe than the issue which caused the TLR to be initiated. The standard needs to be clear on how those conflicting reliability issues should be dealt with. In many cases other alternatives are available which do not cause a reliability issue for any entities.
Response:	

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:	N/A
Response:	

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Response:

Comments regarding Standard IRO-009-2
(Submitted by Si Truc Phan)

Comment 1: Replace terms such as « mitigate » and « relieve » with « eliminate ».
Considering that an IROL exceedance can lead to widespread outages, it should be required that the IROL exceedance be eliminated within Tv . However when one looks at the vocabulary used in the standard it is much less forceful. The requirements call for reducing or alleviating the IROL exceedance rather than removing it.
The following definitions come from the Merriam-Webster:
Mitigate: *(transitive verb)*

1 **:** to cause to become less harsh or hostile **:** mollify

2 *a* **:** to make less severe or painful **:** alleviate

b **:** extenuate

Synonyms: allay, alleviate, assuage, ease, help, mollify, palliate, relieve, soothe
Relieve: (*transitive verb)*

1 a : to free from a burden : give aid or help to

b : to set free from an obligation, condition, or restriction

c : to ease of a burden, wrong, or oppression by judicial or legislative interposition

2 a : to bring about the removal or alleviation of : mitigate <helps relieve stress>

b : rob, deprive <relieved us of our belongings>

(…)

Synonyms: allay, alleviate, assuage, ease, mitigate, mollify, palliate, help, soothe

Comment 2: Typographical error in Measure M1
M2. (…) along with one or more dated Operating Processes, Procedures, or Plans that ~~that~~ will be used.
Comment 3: Measures M2 and M3
Since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference whatsoever to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

M2. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it initiated one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1) in accordance with Requirement R2. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans ~~from Requirement R1~~, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

M3. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it acted or directed others to act in accordance with Requirement R3. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans ~~from Requirement R1~~, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

Comment 4: VSL for R2

R2 calls for RC to initiate one or more Operating Processes, Procedures and Plans… Therefore, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance. Presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

Add the following text either to Severe VSL or High VSL: The RC did not initiate all Operating Processes, Procedures and Plans that could have prevented an IROL exceedance.

Prepared by: Jeannette Gauthier, Compliance Engineer
Hydro-Québec TransÉnergie
June 5th 2015

End of Report