

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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This form is to be used to submit comments on the proposed Draft 1 of the Proposed Reliability Coordination- Transmission Loading Relief SAR. Comments must be submitted by **September 2, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Reliability Coordination- Transmission Loading Relief SAR” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
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NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
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<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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**Background Information:**

In August 2004, NERC and NAESB agreed to immediately begin a joint effort to update the Eastern Interconnection TLR Procedure, as reflected in Attachment 1 to reliability standard IRO-006-0, to divide the reliability requirements and business practices, and to incorporate other necessary improvements to the TLR procedure. In December 2004 NERC and NAESB formed the joint TLR Subcommittee to clarify and focus Attachment 1 to NERC reliability standard IRO-006-0 on the TLR requirements that are necessary for reliability, as distinguished from those TLR requirements that are business practices.

The subject SAR is required to revise Attachment 1 (Transmission Loading Relief Procedure — Eastern Interconnection) of IRO-006-0 (Reliability Coordination — Transmission Loading Relief) in accordance with the final work products of the NERC/NAESB TLR Subcommittee. NERC representatives to the TLR Subcommittee included members of the IDC Working Group, the Distribution Factors Working Group, the Reliability Coordinator Working Group, the Operating Reliability Subcommittee, the Operating Committee, and NERC staff.

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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: We feel that the division between business practices and reliability standards may not have gone far enough. The reliability standards should focus on establishing the criteria for initiation of different TLR levels and the required timeframes for relief. Business practices should focus on how the curtailments are executed to achieve the relief levels in the timeframes required by the reliability standard.

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: Everything in the proposed Attachment 1 - IRO-006-0 from Section 3 to the end of Attachment 1, including Appendices A and B, should be removed from the reliability standard and incorporated into the TLR Business Practices document. This material gets into the internal workings of the tool itself rather than dealing with the overall guiding principle of providing, and maintaining, relief within a specific timeframe.

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: Sections 3.2.1, 3.2.1.1 and 3.2.1.2 should be moved to the reliability standard since they deal more with how and why a Level 2 TLR is initiated than with the internal workings of the IDC.

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments: Section 1.5.1 of Attachment 1 refers to treatment of Interchange Transactions not in the IDC in accordance with NAESB business practices, but we could not find any reference to this treatment in the TLR business practices.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Dan Rochester
Organization:	Independent Electricity System Operator (IESO), Ontario
Telephone:	(905) 855-6363
Email:	Dan.Rochester@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: We do not feel there is a reliability need for the proposed standard "change". We would contend that the change provides confusion to a very important reliability process. In order to understand the process the standard and the business practice are necessary.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: The reliability and business practices within the TLR process are integrated to such an extent that the details need to remain contained within a single document for clarity. Concerns regarding the ability to effectively manage the model and the process with the current proposed split need to be addressed. The ability to follow developing market issues must also be retained. Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with approval of 100% of the ballot body. It should remain as part of this standard.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: See comments in question 2.

- 5. Do you have any other comments on these proposed changes?**

Yes

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No

Comments: The IESO does not fully support the modifications proposed in this SAR. The proposed change provides confusion to a very important reliability process. Also the proposed standard references a NAESB standard which is inconsistent with the NERC Standards Process Manual which says "All mandatory requirements of a reliability standard shall be within an element of the standard. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself." There are mandatory parts of the proposed standard in the NAESB business practice that are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made. As acknowledged by the TLR Subcommittee that worked to create this proposed split, the business practices and reliability aspects of TLR are very intertwined. In effect, the information in both the proposed NERC and NAESB standard must be simultaneously available to the Operators in the Control Room, in order for them to operate the system reliably. While the effort to create this initial split in the TLR standards has been completed, consideration should be given as to how this split will be maintained, if going forward, before it is adopted by the industry. Operator training issues, as well as the ownership and funding of the IDC tool should be considered in this evaluation before such a significant step is taken on a standard that is fundamental to the reliability of the Eastern Interconnection. This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully.

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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments:

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments: As NAESB and NERC standards are approved and implemented which require close coordination between the two organizations, the need for a common "Operations Manual" may become necessary for System Operators.

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This Operations Manual should provide real time standard requirements applicable to the System Operators on NERC and NAESB standards related to their daily decision-making authority. This SAR for TLR is a potential standard that would fit the type of requirements that should be contained in the Manual.

As future changes to the requirements of standards contained in the Manual occur within either NERC or NAESB, coordination between the two organizations will be very important to ensure changes to the complementary standard within the other organization is implemented.

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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: This proposed standard change was not initiated due to reliability needs. NPCC Participating members believe that the change is in conflict to very important reliability rules. In order to understand the process the standard and the business practice are necessary.

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

- Section 2.6 and 2.7 in the original standard defined step-by-step actions the Operator is to take under TLR Levels 5a and 5b. These actions have been removed and currently reside in the proposed NAESB standard. It is not appropriate for a business practice standard to define actions to be taken by a Reliability Coordinator in real-time operations to resolve a reliability issue.

The need for a TLR is in response to a problem with reliability on the system. The Operator must be presented with all the information that is contained in both the proposed NERC and NAESB standards in order to issue that TLR. If the operator does not know what transactions are available in any given category, they do not know what TLR level is needed to resolve the situation. NPCC participating members do not agree with the assertion that the information contained in the NAESB standard does not impact reliability.

Some aspects of the original IRO-006 are 'business practices,' and that the completed effort generally meets the original intent of splitting the business practice and reliability components. However, seeing the resulting split, it is clear that these business practices have a direct impact on reliability and they should be maintained within one single standard to prevent confusion and conflicts. Also, since the fundamental practice for defining the priorities and treatment of transactions under each TLR level is consistent with the FERC pro-forma tariff, there is minimal subjectivity involved in the business practices that are included in the original NERC standard.

Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with 100% of the ballot body approval, it should remain as part of this standard.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: See response to question 2.

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: See response to question 2.

- 5. Do you have any other comments on these proposed changes?**

Yes

No

Comments:

This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully. NPCC participating Members believe the proposed change provides confusion to a very important reliability process. There are mandatory parts of the proposed standard in the NAESB business practice that are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.

Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.

- The old 1.5.1 was removed. There's a general statement added to 1.2 that says "In addition, a Reliability Coordinator may implement other NERC-approved procedures to request relief to mitigate

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any other transmission constraints as necessary to preserve the reliability of the system.” But, that phrase does not seem to capture the same intent as the previous 1.5.1 wording.

- Section 1.5.3 the numbering on this section is very confusing. Suggest the following:

1.5.3.1. Causes of questionable IDC results may include: (1) Missing Interchange transactions that are known to contribute to the Constraint, (2) Significant change in transmission system topology, or (3) TDF matrix error.

1.5.3.2 Impacts of questionable IDC results may include: (1) relief that would have no effect on, or aggravate the constraint or (2) that would initiate a constraint elsewhere.

1.5.3.3. If other Reliability Coordinators are involved in the TLR event, all impacted Reliability Coordinators shall be in agreement before any adjustments to the relief request list are made.

- Title of Section 2 should be changed to be only “Transmission Loading Relief (TLR) Levels.”

- Section 3 is missing section 3.1.

- Suggest that Section 3.2 include a reference to the fact that transactions submitted after the XX:25 deadline will put on HOLD.

- Are Section 3.3.3 and Section 3.4.3 referring back to the deadline defined in 3.2? If so, that section should be referenced.

- Text in 3.3.1.1 and 3.3.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.3.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.

- Text in 3.4.1.1 and 3.4.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.4.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.

- The section notation of Appendix B should be modified. The Section numbering shown in the index is not how the headings are titled in the Sections. Also, Section F and Section G should not be 5.1 and 5.2; they should be at the highest index level.

General Comment: There have been changes to the congestion management process over the last few years that involve the use of Market information by the IDC. Any new standards addressing the TLR process and the IDC, whether in NERC or NAESB, should consider addressing the current

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information available to the IDC and include some mention of that information in that standard development. In addition, Operator training issues, as well as the ownership and funding of the IDC tool should be considered in this evaluation before such a significant step is taken on a standard that is fundamental to the reliability of the Eastern Interconnection.

General Comment: One other practical concern that has not been addressed is the ownership, impact and funding of the IDC tool that automates the 'business practices' of implementing a TLR for the Operator. The split of the original NERC IRO-006 should not be adopted until this issue is addressed and resolved.

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Organization:	Ohio Valley Electric Corporation
Telephone:	740-289-7225
Email:	scunning@ovec.com
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<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**Background Information:**

In August 2004, NERC and NAESB agreed to immediately begin a joint effort to update the Eastern Interconnection TLR Procedure, as reflected in Attachment 1 to reliability standard IRO-006-0, to divide the reliability requirements and business practices, and to incorporate other necessary improvements to the TLR procedure. In December 2004 NERC and NAESB formed the joint TLR Subcommittee to clarify and focus Attachment 1 to NERC reliability standard IRO-006-0 on the TLR requirements that are necessary for reliability, as distinguished from those TLR requirements that are business practices.

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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

---

**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: At times, RTO ramp limitations are invoked when TLR curtailments occur. This issue is not covered in the standard, but seems to be related to a business practice, rather than a reliability issue. Perhaps the ramp limitation should be waived or adjusted if the limitation is caused by the curtailments that occur with the TLR.

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments:

**5. Do you have any other comments on these proposed changes?**

Yes

No

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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Comments: The use of proxy flowgates is not mentioned at all in the proposed standard. The use of proxy flowgates should not be allowed, except in very unusual circumstances. If use of a proxy flowgate is necessary, such use should be justified and approval from all affected parties should be obtained.

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments:

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments:

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

---

- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: The MRO does not believe there is a reliability need for the proposed standard change. We would contend that the change provides confusion to a very important reliability process. In order to understand the process the standard and the business practice are necessary.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with 100% of the ballot body approval, it should remain as part of this standard.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: See comments in question 2.

- 5. Do you have any other comments on these proposed changes?**

Yes

No

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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Comments: It was very difficult to review the changes to the standard without a redline copy. In order to perform our review we made a redline of the original standard. The MRO does not support this modification. The proposed change provides confusion to a very important reliability process. Also the proposed standard references a NAESB standard which is inconsistent with the NERC Standards Process Manual which says "All mandatory requirements of a reliability standard shall be within an element of the standard. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself." There are mandatory parts of the proposed standard in the NAESB business practice and are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Raj Rana - Coordinator	
Organization:	AEP	
Telephone:	614-716-2359	
Email:	raj_rana@AEP.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input checked="" type="checkbox"/> <b>ECAR</b>	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	
<input type="checkbox"/> <b>NA - Not Applicable</b>	<input type="checkbox"/>	



**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: We support the NERC/NAESB initiative to split the TLR document in order to extract the business practice aspects. However, there is no reliability need for this proposed standard change. The reliability need in terms of managing power flow relief in a pre-defined time period in order to maintain security of the system did not change. However, this draft does not provide reliability performance specifications, such as X MW or % of relief in Y minutes. The NERC portion of this standard should specify what is needed to maintain the system security in the interconnected environment, while the NAESB portion should specify the road map as to how to do it.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: The two documents are overlapping. Same statements in both documents.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: We believe that items like firm/non-firm transactions types, TLR levels etc. should be taken out of the reliability portion of this standard. These items should be included in the NAESB portion. The reliability portion should only address the needed relief amount on constrained facilities and the time under which the relief should be provided in order to maintain security of the interconnected network.

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: No comments. The TLR business practices document is not available.

- 5. Do you have any other comments on these proposed changes?**

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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Yes

No

Comments: Use of proxy flowgates by the reliability coordinators must be prohibited. This practice must be explicitly addressed in this standard because, the use of proxy flowgates not only will result in mis-allocation of corrective actions, but at worst could even result in actions being taken that actually increase flows on the limiting element, instead of decreasing them.

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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NERC Region	Registered Ballot Body Segment
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<input type="checkbox"/> NA - Not Applicable	

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Joint Interchange Scheduling Working Group

**Lead Contact:** Bert Gumm

**Contact Organization:** NAESB/NERC

**Contact Segment:** 1

**Contact Telephone:** 208-388-5147

**Contact Email:** rgumm@idahopower.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Troy Simpson	Bonneville Power Administration	WECC	1
Marilyn Franz	Sierra Pacific Power Company	WECC	1
Jim Hansen	Seattle City Light	WECC	1
Bert Gumm	Idaho Power Company	WECC	1
Kathee Downing	PacifiCorp	WECC	1
Jim Eckelcamp	Progress Energy	SERC	6
Bob Harshbarger	Puget Sound Energy	WECC	1
Paul Sorenson	OATI	N/A	
Bob Schwermann	Sacramento Municipal Utilities D	WECC	1
Bonita Smulski	Bonneville Power Admin	WECC	1
Taryn McPherson	Bonneville Power Admin	WECC	1
Salah Kitali	Bonneville Power Admin	WECC	1
Joel Mickey	ERCOT	ERCOT	2
Andrew Burke	PacifiCorp	WECC	1

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments:

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments: 1. We request that the scope of this SAR be expanded to include resolving the reloading of curtailed transactions above their reliability limit by an entity other than the initiating entity or above any pre-existing reliability or market profiles. 2. We also request that the scope of the SAR be expanded to include standards for when curtailments may be denied and when

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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curtailments may be issued. 1 - There have been several instances where a curtailment has been issued and then been automatically or manually reloaded above the reliability limit. The automatic reload problem created by the IDC has been resolved by CO-148, automatic reload by other back office applications has not been corrected, nor have manual adjustments. There are several options available for correcting this problem. This should be addressed by specifying requirements and performance measures in the TLR standard and may also be addressed through NAESB business practices and modifications to the e-Tag specification. Also, any pre-existing curtailment levels are lost. JISWG recommends that the entity who has issued the curtailment be the only entity able to authorize the reload. When the reload occurs the energy profile should be limited to the next lowest reliability limit or market adjustment profile. 2- Under normal circumstances, a curtailment (issued for reliability reasons) should not be denied. However, there are some limited circumstances where a curtailment should be denied. For example, if a curtailment comes in and the generator cannot meet the ramp requirements, then the curtailment could be denied and would be reissued for the next scheduling interval. This ensures that the tags reflect actual conditions. In other cases, curtailments are sometimes issued when PSE's cannot make their market level adjustments prior to cutoff. The TLR standard should address those specific reasons for denying a curtailment. Reliability is compromised when curtailments are denied for non-reliability reasons. Reliability may also be compromised when curtailments are issued for non-reliability reasons. If scope of the SAR is adjusted, JISWG volunteers to assist the drafting team with providing specific language for the TLR standard addressing these issues.

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IRO-006-1**

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In August 2004, NERC and NAESB agreed to immediately begin a joint effort to update the Eastern Interconnection TLR Procedure, as reflected in Attachment 1 to reliability standard IRO-006-0, to divide the reliability requirements and business practices, and to incorporate other necessary improvements to the TLR procedure. In December 2004 NERC and NAESB formed the joint TLR Subcommittee to clarify and focus Attachment 1 to NERC reliability standard IRO-006-0 on the TLR requirements that are necessary for reliability, as distinguished from those TLR requirements that are business practices.

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**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief  
IRO-006-1**

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- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments:

The interplay between the business practices and reliability practices associated with TLR is so intimate that the two should not be divided into two standards practices. It would be best for the industry that one TLR standard be developed by the two organizations.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

A complete response to this question is inappropriate at this time.

It appears that IRO-006 will be divided into 3 major documents: NERC TLR reliability standards, NAESB business practices, and the IDC Reference Documentation. The answer to this question will require a detailed comparison of all three documents with respect to the existing IRO-006. We do not have the NAESB document in front of us in order to make that detailed comparison. In addition, it does not appear that a detailed comparison of the three documents has been requested since the SAR request states in the last paragraph that the development effort will begin by assessing for completeness and accuracy the revised Attachment 1.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

The NERC TLR reliability standard part of this documentation appears to be all reliability related. However, the IDC Reference Document appears to have significant business practice elements contained in it.

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

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No

Comments:

We can not answer this question since we do not have the NAESB proposed TLR business practices in this package.

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments:

The SAR contains the statement that the urgent action revision to Attachment 1 addressing dynamic schedules will be incorporated into the NAESB business practices. We suggest starting with IRO-006-1, rather than with IRO-006-0.

Please delete all references to IRO-006-0 (and IRO-006-1) in headers, footers, titles, etc. This new document will result in a new version of IRO--006. This current draft is not version 0 or 1.

Please delete all references to adoption by the NERC Board of Trustees, Effective Date, and all dates because the document we are viewing has not been adopted by the BOT and does not have an Effective Date.

Please provide a redline version showing the draft changes to IRO-006-1. This redline would make review and comment much easier for commentors.

We appreciate the development of the matrix and would probably find it useful for keeping track of the disposition of each requirement in the original IRO-006. However, in its current form we do not understand which columns relate to which documents and the row designations are not clearly understood.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Cheryl Mendrala
Organization:	ISO New England
Telephone:	413 535-4184
Email:	cmendrala@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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IRO-006-1**

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IRO-006-1**

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- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: This proposed standard change was not initiated due to reliability needs.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

- Section 2.6 and 2.7 in the original standard defined step-by-step actions the Operator is to take under TLR Levels 5a and 5b. These actions have been removed and currently reside in the proposed NAESB standard. It is not appropriate for a business practice standard to define actions to be taken by a Reliability Coordinator in real-time operations to resolve a reliability issue.

The need for a TLR is in response to a problem with reliability on the system. There is no doubt that the Operator must be presented with all the information that is contained in both the proposed NERC and NAESB standards in order to issue that TLR. If the operator does not know what transactions are available in any given category, they do not know what TLR level is needed to resolve the situation. Therefore, we cannot agree with the assertion that the information contained in the NAESB standard does not impact reliability.

We agree that some aspects of the original IRO-006 are 'business practices,' and agree that the completed effort generally meets the original intent of splitting the business practice and reliability components. However, seeing the resulting split, it is clear that these business practices have a direct impact on reliability and we believe they should be maintained within one single standard to prevent confusion and conflicts. Also, since the fundamental practice for defining the priorities and treatment of transactions under each TLR level is consistent with the FERC pro-forma tariff, there is minimal subjectivity involved in the business practices that are included in the original NERC standard.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

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Comments: See response to question 2.

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: See response to question 2.

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments:

- Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.

- The old 1.5.1 was removed. There's a general statement added to 1.2 that says "In addition, a Reliability Coordinator may implement other NERC-approved procedures to request relief to mitigate any other transmission constraints as necessary to preserve the reliability of the system." But, that phrase does not seem to capture the same intent as the previous 1.5.1 wording.

- Section 1.5.3 the numbering on this section is very confusing. Suggest the following:

1.5.3.1. Causes of questionable IDC results may include: (1) Missing Interchange transactions that are known to contribute to the Constraint, (2) Significant change in transmission system topology, or (3) TDF matrix error.

1.5.3.2 Impacts of questionable IDC results may include: (1) relief that would have no effect on, or aggravate the constraint or (2) that would initiate a constraint elsewhere.

1.5.3.3. If other Reliability Coordinators are involved in the TLR event, all impacted Reliability Coordinators shall be in agreement before any adjustments to the relief request list are made.

- Title of Section 2 should be changed to be only "Transmission Loading Relief (TLR) Levels."

- Section 3 is missing section 3.1.

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- Suggest that Section 3.2 include a reference to the fact that transactions submitted after the XX:25 deadline will put on HOLD.

- Are Section 3.3.3 and Section 3.4.3 referring back to the deadline defined in 3.2? If so, that section should be referenced.

- Text in 3.3.1.1 and 3.3.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.3.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.

- Text in 3.4.1.1 and 3.4.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.4.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.

- The section notation of Appendix B should be modified. The Section numbering shown in the index is not how the headings are titled in the Sections. Also, Section F and Section G should not be 5.1 and 5.2; they should be at the highest index level.

General Comment: There have been changes to the congestion management process over the last few years that involve the use of Market information by the IDC. Any new standards addressing the TLR process and the IDC, whether in NERC or NAESB, should consider addressing the current information available to the IDC and include some mention of that information in that standard development.

General Comment: One other practical concern that has not been addressed is the ownership, impact and funding of the IDC tool that automates the ‘business practices’ of implementing a TLR for the Operator. The split of the original NERC IRO-006 should not be adopted until this issue is addressed and resolved.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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**1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: N/A

**2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: N/A

**3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: N/A

**4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: N/A

**5. Do you have any other comments on these proposed changes?**

Yes

No

Comments: My only concern with the splitting of reliability requirements and business practices is how they will be managed and/or coordinated in the future. I'm not sure what value is added to the reliability of the grid by now having our grid operators manage their respective systems with a NERC manual in one hand and a NAESB manual in the other. Right now the two documents are in synch with one another; however, as we move forward in time, what will be the process for conflict resolution between the two?

