

Consideration of Comments on IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

The Transmission Loading Relief Standard Drafting Team thanks all commenters who submitted comments on the current drafts of IRO-006-5 and IRO-006-EAST-1. These standards were posted for a 30-day public comment period from October 27, 2009 through November 30, 2009. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 15 sets of comments, including comments from 70 different people from over 40 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Several minor changes were made to the standards based on suggestions received during the comment period:

- Several entities suggested that it be clear that Reliability Coordinators must initiate, not complete, the actions requested within 15 minutes. IRO-006-EAST-1 R4 was modified to make it clear that the actions must be initiated, not completed.
- Several entities expressed concern that the TLR levels listed in IRO-006-EAST-1 still seemed to imply an obligation to adhere to the criteria as provided in the examples. In response, the SDT has removed the examples into a separate reference document that will be posted with the standard.
- Several entities suggested that there was no need to explicitly identify “responding Reliability Coordinators” in the Applicability section of IRO-006-EAST-1. Upon further reflection, the SDT agreed, and modified the applicability accordingly.
- One entity expressed concern that IRO-006-5 R1 allowed entities to simply supply a reliability reason without clearly indicating that the reason must be justified. The SDT added the word “valid” to make this clear.
- One entity identified a typographical error where Measure 1 of IRO-006-5 was missing a word. The error was corrected.
- One entity suggested improvements to the definition of Market Flow to make it clear that market flow was caused by generation internal to a market serving load internal to that same market. The definition was changed.
- Several commenters objected to the requirement to update a TLR-1 on an hourly basis. However, the requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.
- Some commenters suggested that the standard, by not explicitly allowing for them, could restrict the use of proxy Flowgates. The SDT clarified that this is not the intent.
- Some commenters suggested that the standard not limit the actions that can be performed concurrently with TLR as specified in IRO-0-06-EAST R1. The SDT believes that if a new method to mitigate congestion is developed other than the five actions listed, it can be included in the standard following industry review of its effectiveness in achieving the mitigation objective.
- Some entities questioned if IDC logs were acceptable evidence to show compliance with the standard. The SDT pointed out that all four of the measures clearly indicate that Logs are an acceptable form of evidence. Additionally, the measure allows for the provision of “other information.”

All comments are shown as submitted at the following site:

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

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

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

Index to Questions, Comments, and Responses

1. The drafting team has combined IRO-006-EAST-1 R4 and R5 into a single requirement with a 15-minute target to respond to curtailment request. R5, which originally required the Responding RC to respond back to the initiating RC with a summary of actions that would be taken, was determined to be superfluous, as the first bullet would be communicated automatically through schedule changes, while the second bullet requires RC contact and approval already. If no, please explain your answer. 8
2. The drafting team has deleted Appendix A of IRO-006-EAST-1 and instead incorporated the table from the Appendix into requirement R2. The system conditions were relabeled as examples, a footnote was added to explain the role of the table, and a sentence was added that states ""TLR levels are neither required nor expected to be issued in numerical order of level." The Drafting Team's intent with this change is to make it clear that entities must use one of the 9 levels, but that it is left solely to the discretion of the RC to determine what level is needed. 13
3. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standards..... 18

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Jim Case	SERC OC Standards Review Group	X		X								
Additional Member		Additional Organization		Region		Segment Selection								
1.	J. T. Wood	Southern Company		SERC		1, 3, 5								
2.	Stephen Mizelle	Southern Company		SERC		1, 3, 5								
3.	Shaun Anders	City of Springfield, IL (CWLP)		SERC		1, 3, 5, 9								
4.	Jason Marshall	MISO		SERC		2								
5.	Tim Hattaway	PowerSouth		SERC		1, 3, 5, 9								
6.	Melinda Montgomery	Entergy		SERC		1, 3								
7.	Sam Holeman	Duke		SERC		1, 3, 5								
8.	Robert Thomasson, Jr.	Big Rivers Electric Cooperative		SERC		1, 3, 5, 9								
9.	John Neagle	Associated Electric Cooperative, Inc.		SERC		1, 3, 5								
10.	Mike Bryson	PJM		SERC		2								
11.	John Troha	SERC Reliability corporation		SERC		10								
2.	Group	Bonneville Power Administration	BPA Transmission Reliability Program	X		X		X	X					
Additional Member		Additional Organization		Region		Segment Selection								

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	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
1. Chuck Westbrook Transmission Pre-Schedule & Real Time WECC 1												
3.	Group	Guy Zito	Northeast Power Coordinating Council									X
Please complete the following information.												
Additional Member		Additional Organization		Region		Segment Selection						
1.	Ralph Rufrano	New York Power Authority		NPCC		5						
2.	Alan Adamson	New York State Reliability Council, LLC		NPCC		10						
3.	Gregory Campoli	New York Independent System Operator		NPCC		2						
4.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC		2						
5.	Kurtis Chong	Independent Electricity System Operator		NPCC		2						
6.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC		1						
7.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC		1						
8.	Brian D. Evans-Mongeon	Utility Services		NPCC		8						
9.	Mike Garton	Dominion Resources Services, Inc.		NPCC		5						
10.	Kathleen Goodman	ISO - New England		NPCC		2						
11.	David Kiguel	Hydro One Networks Inc.		NPCC		1						
12.	Michael R. Lombardi	Northeast Utilities		NPCC		1						
13.	Randy MacDonald	New Brunswick System Operator		NPCC		2						
14.	Greg Mason	Dynegy Generation		NPCC		5						
15.	Bruce Metruck	New York Power Authority		NPCC		6						
16.	Chris Orzel	FPL Energy/NextEra Energy		NPCC		5						
17.	Robert Pellegrini	The United Illuminating Company		NPCC		1						
18.	Saurabh Saksena	National Grid		NPCC		1						
19.	Michael Schiavone	National Grid		NPCC		1						
20.	Peter Yost	Consolidated Edison Co. of New York, Inc.		NPCC		3						
21.	Lee Pedowicz	Northeast Power Coordinating Council		NPCC		10						
22.	Gerry Dunbar	Northeast Power Coordinating Council		NPCC		10						
4.	Group	Carol Gerou	MRO NERC Standards Review Subcommittee									X

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
Additional Member		Additional Organization		Region				Segment Selection						
1.	Chuck Lawrence	American Transmission Company				MRO					1			
2.	Tom Webb	WPS Corporation				MRO					3, 4, 5, 6			
3.	Terry Bilke	Midwest ISO Inc.				MRO					2			
4.	Jodi Jenson	Western Area Power Administration				MRO					1, 6			
5.	Ken Goldsmith	Alliant Energy				MRO					4			
6.	Alice Murdock	Xcel Energy				MRO					1, 3, 5, 6			
7.	Dave Rudolph	Basin Electric Power Cooperative				MRO					1, 3, 5, 6			
8.	Eric Ruskamp	Lincoln Electric System				MRO					1, 3, 5, 6			
9.	Joseph Knight	Great River Energy				MRO					1, 3, 5, 6			
10.	Joe DePoorter	Madison Gas & Electric				MRO					3, 4, 5, 6			
11.	Scott Nickels	Rochester Public Utilities				MRO					4			
12.	Terry Harbour	MidAmerican Energy Company				MRO					3, 5, 6, 1			
5.	Group	Jason L. Marshall	Midwest ISO Stakeholders Standards Collaboration Group		X									
Additional Member		Additional Organization		Region				Segment Selection						
1.	Jim Cyrulewski	JDRJC Associates, LLC				RFC					8			
2.	Kirit Shah	Ameren				SERC					1			
3.	Doug Hohlbaugh	First Energy				RFC					1, 3, 4, 5, 6			
4.	Dave Folk	First Energy				RFC					1, 3, 4, 5, 6			
5.	Sam Ciccone	First Energy				RFC					1, 3, 4, 5, 6			
6.	Joe O'Brien	NIPSCO				RFC					1			
7.	Joe Knight	Great River Energy				MRO					1, 3, 5, 6			
8.	Joy Stover	Consumers Energy				RFC					3, 4, 5			
6.	Group	James T Wood	Southern Company Transmission	X		X								
Additional Member		Additional Organization		Region				Segment Selection						
1.	John Troha	SERC				SERC								

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		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
7.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X					
8.	Individual	James Starling	South Carolina Electric and Gas	X		X		X	X					
9.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X					
10.	Individual	Edward J Davis	Entergy Services	X		X		X	X					
11.	Individual	Dan Rochester	Independent Electricity System Operator		X									
12.	Individual	Martin Bauer	US Bureau of Reclamation					X						
13.	Individual	Jason Shaver	American Transmission Company	X										
14.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
15.	Individual	Joylyn Stover	Consumers Energy			X	X	X						
16.	Group	Ben Li	ISO RTO Council Standards Review Committee		X									
		Additional Member	Additional Organization	Region						Segment Selection				
		1. Charles Yeung	Southwest Power Pool	SPP						2				

1. The drafting team has combined IRO-006-EAST-1 R4 and R5 into a single requirement with a 15-minute target to respond to curtailment request. R5, which originally required the Responding RC to respond back to the initiating RC with a summary of actions that would be taken, was determined to be superfluous, as the first bullet would be communicated automatically through schedule changes, while the second bullet requires RC contact and approval already.

Do you agree with this change? If no, please explain your answer.

Summary Consideration: Several entities suggested that it be clear that Reliability Coordinators must ‘initiate’, not ‘complete’, the actions requested within 15 minutes. IRO-006-EAST-1 R4 was modified to make it clear that the actions must be initiated, not completed.

Organization	Yes or No	Question 1 Comment
American Electric Power		While this question refers to a “15-minute target,” the language of the requirement states “. . . shall within 15 minutes of receiving the request comply with the request . . .” It is important that this difference between a mandatory 15 minute requirement and a target response of 15 minutes be resolved. The standard is unclear as to whether this phrase is requiring that the RC will have initiated one of the actions within 15 minutes or if it is requiring that these actions be completed within 15 minutes. If alternative congestion management actions (such as reconfiguration or load shedding) are employed, it may not always be possible to be completed within 15 minutes. It is important to recognize in the standard that the RC can only direct or instruct that an action be taken, not perform the action. It is the BA, subject to potential penalties for non-compliance, is the entity that will take the action to relieve the congestion.
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
MRO NERC Standards Review Subcommittee	No	The MRO NSRS largely agrees with the change but some additional modification is needed. We are concerned that a compliance auditor could interpret the first bullet under R4 to require the RC not only to instruct actions to be taken within 15 minutes but also that the actions must be completed within 15 minutes. We believe the bullet should be changed to: “Communicate congestion management actions requested by the issuing Reliability Coordinator as follows”. The language in the associated measure would then require modification as well.
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
Consumers Energy	No	We agree with Midwest ISO comments: "We largely agree with the change but some additional modification is needed. We are concerned that a compliance auditor could interpret the first bullet under R4 to require the

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Organization	Yes or No	Question 1 Comment
		RC not only to instruct actions to be taken within 15 minutes but also that the actions must be completed within 15 minutes. We believe the bullet should be changed to: "Communicate congestion management actions requested by the issuing Reliability Coordinator as follows". The language in the associated measure would then require modification as well."
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
Southern Company Transmission	No	We are supporting comments submitted by SERC: While we do not disagree with the changes, there is an inadvertent change in meaning caused by this combination; therefore, the first bullet in R4 should be rephrased as follows: delete "Implement the communicated" and begin with, "Communicate congestion management actions" It is obviously impossible to complete the re-dispatch of generation within 15 minutes of notification for all curtailed schedules.
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
Midwest ISO Stakeholders Standards Collaboration Group	No	We largely agree with the change but some additional modification is needed. We are concerned that a compliance auditor could interpret the first bullet under R4 to require the RC not only to instruct actions to be taken within 15 minutes but also that the actions must be completed within 15 minutes. We believe the bullet should be changed to: "Communicate congestion management actions requested by the issuing Reliability Coordinator as follows". The language in the associated measure would then require modification as well.
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
Entergy Services	No	While we do not disagree with the changes, there is an inadvertent change in meaning caused by this combination; therefore, the first bullet in R4 should be rephrased as follows: delete "Implement the communicated" and begin with, "Communicate congestion management actions" It is obviously impossible to complete the re-dispatch of generation within 15 minutes of notification for all curtailed schedules.
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
SERC OC Standards Review Group	No	While we do not disagree with the changes, there is an inadvertent change in meaning caused by this combination; therefore, the first bullet in R4 should be rephrased as follows: delete "Implement the communicated" and begin with, "Communicate congestion management actions" It is obviously impossible to complete the re-dispatch of generation within 15 minutes of notification for all curtailed schedules.

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Organization	Yes or No	Question 1 Comment
Response: The standard has been modified to make it clear that the actions must be initiated, not completed.		
American Transmission Company	Yes	
Bonneville Power Administration	Yes	
Duke Energy	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power Coordinating Council	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	
ISO RTO Council Standards Review Committee	No	<p>A. Requiring a 15 minute acknowledgement may not be a bad thing for TLR's involving facilities with IROLs. They could be flagged in the IDC as such; drawing attention to the criticality of the TLR. TLR's only associated with SOL should be exempt from the 15 minute acknowledgement requirement.</p> <p>Response: Transmission Operators routinely request TLRs to manage SOLs, and an SOL exceedence, while not as critical as an IROL exceedence, should still be responded to in a timely manner.</p> <p>A Reliability Coordinator issuing a TLR 5 could spend 10 minutes making sure the information is right, excluding tags, excluding generation, and talking it over with the Transmission Operator before ever acknowledging another RC's TLR.</p> <p>Response: The SDT believes that this is acceptable, and does not see any conflict or problem identified in this statement.</p> <p>If the IDC is running slow, will the RC be held accountable, or will NERC (OATI), who provides the tool, be held responsible?</p>

Organization	Yes or No	Question 1 Comment
		<p>As stated in the proposed Joint NERC/NAESB System Operator’s Transmission Loading Relief (TLR) Reference Manual § 5.1.5, “The Reliability Coordinator shall simultaneously notify all parties affected by the invocation of a local congestion management procedure or the Interconnection-wide TLR procedure, using the notification method as specified by NERC (e.g. – the Reliability Coordinator Information System or successor).” The RCIS is currently a NERC Tool.</p> <p>Response: The SDT believes that as written, the standard applies regardless of whether entities are using RCIS or not. If the tool is broken, then the RC should be taking other actions to accomplish the tasks described in the standard.</p> <p>B. The Violation Severity Level (Severe VSL) for this requirement is too high. This would require the Reliability Coordinator to be more concerned about the time frame of acknowledgement to a TLR than the concern of congestion in their footprint.</p> <p>A TLR-1 should have the lowest VSL and no penalties. A TLR 3b or 5b should probably have a higher VSL than a 3a or 5a TLR. The “b” TLR addresses immediate, real-time issues, whereas the “a” TLR is associated with anticipated events next hour. Also, firm curtailments in a TLR-5 should have a higher VSL than a TLR-4, or lower. A TLR-6 should have the most severe VSL since it has been associated with emergencies in the past.</p> <p>Response: While this approach may have some merit for consideration if we redesign our compliance elements in the future, this does not align with our current definitions of “VRF” and “VSL.” VSLs only measure the level to which the requirement is violated, not the risk associated with the requirement. To the extent we wish to apply different VRFs to each TLR level, we would need to redraft the standard to have separate requirements for each TLR level.</p> <p>The RC should not be held accountable at a severe level for not acknowledging a TLR when that simple acknowledgement does not guarantee the relief will be achieved. The BA has the primary role for achieving the relief, and if they do not acknowledge the curtailment then the curtailment is denied. Therefore, even if the RC acknowledges the TLR in the 15 minute time frame the BA still could miss the curtailment and not provide the relief. The penalty does not match the real time actions and consequences.</p> <p>Response: The RC, while not actually moving the generation, nonetheless has a critical responsibility to communicate the need for the movement of generation to achieve the relief requested. If the RC does not perform this task, the relief request will definitely NOT be communicated. As such, the VRF is appropriate.</p> <p>C. In proposed IRO-006-5, the Standard is applicable to a Balancing Authority for an Interconnection-wide TLR Procedure, and the BA is held accountable for curtailments at a severe level, but this is not the case in proposed IRO-006-East-1. Why?</p> <p>Response: IRO-006-5 applies to those entities that receive a request pursuant to an interconnection-wide</p>

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Organization	Yes or No	Question 1 Comment
		<p>TLR procedure to curtail an Interchange Transaction that crosses an Interconnection boundary. As such, the BA is held accountable for curtailments at a severe VRF. In IRO-006-East-1, the BA is instructed to implement the curtailment but is not assigned a requirement to communicate and request the curtailments. The RCs that receive the requests from the initiating RCs are held responsible for such communications.</p> <p>Another example of lack of consistency can be seen in INT-005-2, which provides for a Lower VSL when a BA initiates curtailment.</p> <p>INT-005-2 R1.1. When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority. Violation Severity Levels, Lower VSL</p> <p>Response: The INT standards are currently in the process of being rewritten. As such, they are not used as a basis for writing this standard.</p>
<p>Response: Please see in-line responses.</p>		

2. The drafting team has deleted Appendix A of IRO-006-EAST-1 and instead incorporated the table from the Appendix into requirement R2. The system conditions were relabeled as examples, a footnote was added to explain the role of the table, and a sentence was added that states “TLR levels are neither required nor expected to be issued in numerical order of level.” The Drafting Team’s intent with this change is to make it clear that entities must use one of the 9 levels, but that it is left solely to the discretion of the RC to determine what level is needed.

Do you believe this has been made clear? If no, please explain your answer.

Summary Consideration: Several entities expressed concern that the TLR levels still seemed to imply an obligation to adhere to the criteria as provided in the examples. In response, the SDT has removed the examples into a separate reference document that will be posted with the standard.

Organization	Yes or No	Question 2 Comment
MRO NERC Standards Review Subcommittee	No	The MRO NSRS agrees the modifications improve the clarity but we feel additional changes need to be made. We are concerned that the footnote may prevent the use of proxy flowgates. We suggest that the footnote should strike “provided the Reliability Coordinator has reliability reasons to take such action” clause at the end of the second sentence. It is not needed and presumes the certification process does not work. By definition an RC that has been certified by NERC can and will only take action for reliability reasons.
<p>Response: The language does not prevent use of proxy flowgates. Taking action on one facility to effect change on another facility is still an action taken for reliability reasons. While the SDT agrees an RC should only be taking actions for reliability reasons, we do not believe the definition alluded to ensures such motivations. Certification only verifies that entities have the “capability” to meet specific performance – certification does not “guarantee” that entities will perform in certain ways.</p>		
Duke Energy	No	The table has been modified during the move from the Appendix into Requirement R2. The revised table descriptions of TLR levels are not as clear as they were previously. Even though they are relabeled as “examples”, we think the more descriptive language from the Appendix should be included here.
<p>Response: The information in the table has not been changed since the last posting. If this information is being compared to IRO-006-4, then the SDT removed some of that language intentionally, to make it clear the standard does not direct specific actions to be taken under specific conditions. Note that the table has now been moved into a separate reference document.</p>		
Entergy Services	No	Tragically, by incorporating the TLR Levels as a Table in R2, the error from the last posting has been compounded. A simple table that states the set of TLR Levels and the general description of those levels is all that is needed. The “Examples of Possible System Conditions” smack of procedures and are very much a

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Organization	Yes or No	Question 2 Comment
		<p>“How” as opposed to the “What” that should be the hallmark of a good reliability standard. This will lead to mandatory compliance with the “Examples”. Suggested alternative table:TLR Level Reliability Coordinator Action1 Notify Reliability Coordinators of potential System Operating Limit (SOL) or Interconnection Reliability Limit (IROL) exceedences.2 Hold Transfers at present level.3a Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service.3b Curtail Interchange Transactions using Non-firm Point-to-Point Transmission Service. 4 Reconfigure transmission system to allow Transactions using Firm Point-to-Point Transmission Service to continue.5a Reallocation of Transmission Service by curtailing Interchange Transactions using Firm Point- to-Point Transmission Service on a pro rata basis to allow additional Interchange Transactions using Firm Point-to-Point.5b Curtail Interchange Transactions using Firm Point-to-Point Transmission Service. 6 Emergency Procedures0 TLR Concluded</p> <p>Delete footnote No.1. The following statement should be added to R2 directly, “The Reliability Coordinator has the discretion to choose any of these levels.” Compliance is not measured on footnotes.</p>
<p>Response: Based on this comment and others, the SDT has removed the examples into a separate reference document that will be posted with the standard.</p>		
SERC OC Standards Review Group	No	<p>Tragically, by incorporating the TLR Levels as a Table in R2, the error from the last posting has been compounded. A simple table that states the set of TLR Levels and the general description of those levels is all that is needed. The “Examples of Possible System Conditions” smack of procedures and are very much a “How” as opposed to the “What” that should be the hallmark of a good reliability standard. This will lead to mandatory compliance with the “Examples”. Suggested alternative table:TLR Level Reliability Coordinator Action1 Notify Reliability Coordinators of potential System Operating Limit (SOL) or Interconnection Reliability Limit (IROL) exceedences.2 Hold Transfers at present level.3a Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service.3b Curtail Interchange Transactions using Non-firm Point-to-Point Transmission Service. 4 Reconfigure transmission system to allow Transactions using Firm Point-to-Point Transmission Service to continue.5a Reallocation of Transmission Service by curtailing Interchange Transactions using Firm Point-to-Point Transmission Service on a pro rata basis to allow additional Interchange Transactions using Firm Point-to-Point.5b Curtail Interchange Transactions using Firm Point-to-Point Transmission Service. 6 Emergency Procedures0 TLR Concluded</p> <p>Delete footnote No.1. The following statement should be added to R2 directly, “The Reliability Coordinator has the discretion to choose any of these levels.” Compliance is not measured on footnotes.</p>
<p>Response: Based on this comment and others, the SDT has removed the examples into a separate reference document that will be posted with the standard.</p>		

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Organization	Yes or No	Question 2 Comment
Midwest ISO Stakeholders Standards Collaboration Group	No	We agree the modifications improve the clarity but we feel additional changes need to be made. We are concerned that the footnote may prevent the use of proxy flowgates. We suggest that the footnote should strike “provided the Reliability Coordinator has reliability reasons to take such action” clause at the end of the second sentence. It is not needed and presumes the certification process does not work. By definition an RC that has been certified by NERC can and will only take action for reliability reasons.
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Consumers Energy	No	We agree with Midwest ISO's comments: "We agree the modifications improve the clarity but we feel additional changes need to be made. We are concerned that the footnote may prevent the use of proxy flowgates. We suggest that the footnote should strike “provided the Reliability Coordinator has reliability reasons to take such action” clause at the end of the second sentence. It is not needed and presumes the certification process does not work. By definition an RC that has been certified by NERC can and will only take action for reliability reasons."
<p>Response: The language does not prevent use of proxy flowgates. Taking action on one facility to effect change on another facility is still an action taken for a reliability reasons. While the SDT agrees an RC should only be taking actions for reliability reasons, we do not believe the definition alluded to ensures such motivations. Certification only verifies that entities have the “capability” to meet specific performance – certification does not “guarantee” that entities will perform in certain ways.</p>		
Southern Company Transmission	No	We are supporting comments submitted by SERC: Tragically, by incorporating the TLR Levels as a Table in R2, the error from the last posting has been compounded. A simple table that states the set of TLR Levels and the general description of those levels is all that is needed. The “Examples of Possible System Conditions” smack of procedures and are very much a “How” as opposed to the “What” that should be the hallmark of a good reliability standard. This will lead to mandatory compliance with the “Examples”. Suggested alternative table: TLR Level Reliability Coordinator Action1 Notify Reliability Coordinators of potential System Operating Limit (SOL) or Interconnection Reliability Limit (IROL) exceedences.2 Hold Transfers at present level.3a Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service.3b Curtail Interchange Transactions using Non-firm Point-to-Point Transmission Service. 4 Reconfigure transmission system to allow Transactions using Firm Point-to-Point Transmission Service to continue.5a Reallocation of Transmission Service by curtailing Interchange Transactions using Firm Point- to-Point Transmission Service on a pro rata basis to allow additional Interchange Transactions

Consideration of Comments on IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

Organization	Yes or No	Question 2 Comment
		using Firm Point-to-Point.5b Curtail Interchange Transactions using Firm Point-to-Point Transmission Service. 6 Emergency Procedures0 TLR Concluded Delete footnote No.1. The following statement should be added to R2 directly, "The Reliability Coordinator has the discretion to choose any of these levels." Compliance is not measured on footnotes.
Response: Based on this comment and others, the SDT has removed the examples into a separate reference document that will be posted with the standard.		
American Transmission Company	Yes	
Bonneville Power Administration	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
Northeast Power Coordinating Council	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	
American Electric Power	Yes	It would be clearer to use the language of the footnote in the requirement as follows: R2. When initiating the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance, and at least every clock hour after initiation up to and including the hour when the TLR level has been identified as TLR Level 0, the Reliability Coordinator shall identify: [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations] 2.1. The TLR level as listed below in Table 1. 2.1. 1. The listed system conditions shown in this table are intended to be alternatives for the Reliability Coordinator in determining what level of TLR to call. The Reliability Coordinator has the discretion to choose any of these levels regardless of the examples listed, provided the Reliability Coordinator has reliability reasons to take such action. TLR levels are neither required nor expected to be issued in numerical order of level. 2.2. A list of congestion management actions to be implemented based on the TLR level chosen. Please note that the text "conditions shown in this table" and "to be alternatives for" in 2.1.1. of this suggested requirement represent a change in the footnote

Consideration of Comments on IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

Organization	Yes or No	Question 2 Comment
		text.
<p>Response: Based on this comment and others, the SDT has removed the examples into a separate reference document that will be posted with the standard.</p>		
ISO RTO Council Standards Review Committee	No	What is the significance of the 8 hour qualifier for TLR-1 and TLR-0? Why 8 hours? Why include a time requirement?
<p>Response: Based on this comment and others, the SDT has removed the examples into a separate reference document that will be posted with the standard.</p>		

3. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standards.

Summary Consideration: Several entities suggested that there was no need to explicitly identify “responding Reliability Coordinators” in the Applicability section of IRO-006-EAST-1. Upon further reflection, the SDT agreed, and modified the applicability accordingly.

One entity expressed concern that IRO-006-5 R1 allowed entities to simply supply a reliability reason without clearly indicating that the reason must be justified. The SDT added the word “valid” to make this clear.

One entity identified a typographical error where Measure 1 of IRO-006-5 was missing a word. The error was corrected.

One entity suggested improvements to the definition of market flow to make it clear that market flow was caused by generation internal to a market serving load internal to that same market. The definition was changed.

Organization	Question 3 Comment
MRO NERC Standards Review Subcommittee	<p>A. The MRO NSRS believes that the Applicability Section for IRO-006-EAST-1 needs additional clarity. We suggest the following modification.</p> <p>4. Applicability</p> <p>4.1 Reliability Coordinator (RC)</p> <p>The purpose statement already identifies that this standard is limited to only those RC in the Eastern Interconnection so repeating that in the applicability is unnecessary.</p> <p>Response: The SDT believes it is critical that the applicability of the standard be clearly documented in the applicability section of the standard.</p> <p>In addition, 4.2 “Responding Reliability Coordinators” can also be deleted because the Applicability section in IRO-006-5 already covers their responsibility. Examples: (Statement) An RC in the Eastern Interconnection has to follow both IRO-006-5 and IRO-006-EAST-1 and all other RCs have to comply with IRO-006-5. (Example 1) If a RC in the Eastern Interconnection (EI) makes a request to an RC not in the Eastern Interconnection, that non EI RC still has to address the request based on R1 in IRO-006-5. (Example 2) If a non EI RC makes a request to a EI RC, the EI RC has to address the request based on R1 in IRO-006-5. What these examples are demonstrating is that the Applicability Section in IRO-006-EAST-1 only has to identify Reliability Coordinators because any request made to a Reliability Coordinator in a different interconnection has to be addressed because of IRO-006-5.</p> <p>Response: The SDT concurs with your suggestion, and has changed the standard accordingly.</p> <p>B. The MRO NSRS is concerned that R2 requires a TLR level 1 to be reissued every hour. Currently, it is not</p>

Organization	Question 3 Comment
	<p>industry practice to re-issue a TLR level 1 every hour because it does not impact E-Tags. Only those levels 2 and higher should require re-issuing every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>C. The MRO NSRS continues to be concerned that the measures do not reference the IDC logs in any way as sufficient basis for demonstrating compliance. In response to our last comment on this issue, the SDT responded that industry comments agreed in a previous posting that the standards should not reference any industry specific tool. First, we can find no such record posted on the NERC web site supporting such a statement. Please identify specifically which posting and where in the posting this information is contained. Secondly, assuming that the record does exist, we question what the industry thought they were agreeing to. We believe the industry probably thought they were agreeing that the requirements should not mention the IDC which we agree with. However, including lists of IDC logs in the evidence list in the measures supports clarity in compliance which is a NERC stated goal and does not contradict what industry likely thought they were agreeing to. If the SDT does not include IDC logs in the evidence lists, then please confirm our following understanding so that there is a record of what the drafting teams intentions were that will be filed with FERC. Is it the intent of the drafting team that IDC logs mentioned in the following example would demonstrate compliance with the requirements? Consider an example where the issuing RC issues a TLR 3A (R2.1), the IDC determines curtailments through its algorithm (R2.2), the IDC communicates to all RCs (R3.1, R3.2, and R3.3), receiving RCs (including the issuing RC) acknowledge the curtailments (assuming no reliability issues), whereupon the IDC communicates tag curtailments, NNL, and market flow relief to affected BAs (R4). Are the IDC and e-tagging records clearly sufficient evidence to prove compliance with the associated requirements in parentheses above? The measures currently are not clear. We are trying to avoid a situation where the RC could not rely on the IDC for evidence and would have to make and document phone calls to every RC and every impacted BA. This would be too burdensome an outcome and would distract the System Operators from their true job ensuring and maintaining reliability.</p> <p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of "other information."</p>
<p>Response: Please see in-line responses.</p>	
<p>American Transmission Company</p>	<p>ATC believes that the Applicability Section for IRO-006-EAST-1 needs additional clarity. We suggest the following modification.</p> <p>4. Applicability</p> <p>4.1 Reliability Coordinator (RC)</p>

Organization	Question 3 Comment
	<p>The purpose statement already identifies that this standard is limited to only those RC in the Eastern Interconnection so repeating that in the applicability is unnecessary.</p> <p>Response: The SDT believes it is critical that the applicability of the standard be clearly documented in the applicability section of the standard.</p> <p>In addition, 4.2 “Responding Reliability Coordinators” can also be deleted because the Applicability section in IRO-006-5 already covers their responsibility. Examples: (Statement) An RC in the Eastern Interconnection has to follow both IRO-006-5 and IRO-006-EAST-1 and all other RCs have to comply with IRO-006-5. (Example 1) If a RC in the Eastern Interconnection (EI) makes a request to an RC not in the Eastern Interconnection, that non EI RC still has to address the request based on R1 in IRO-006-5. (Example 2) If a non EI RC makes a request to a EI RC, the EI RC has to address the request based on R1 in IRO-006-5. What these examples are demonstrating is that the Applicability Section in IRO-006-EAST-1 only has to identify Reliability Coordinators because any request made to a Reliability Coordinator in a different interconnection has to be addressed because of IRO-006-5.</p> <p>Response: The SDT concurs with your suggestion, and has changed the standard accordingly.</p>
<p>Response: Please see in-line responses.</p>	
<p>Entergy Services</p>	<p>Regarding R1 of IRO-006-EAST-1: Confining the available mitigation actions to the set listed in this requirement may damage reliability by preventing creative responses to system challenges. We believe that it is not possible at this time to forecast what may be available in the near future in the way of mitigation methods or techniques. Confining Requirement R1 of IRO-006-EAST-1 to a list of five currently available techniques seems like it ensures obsolescence. A sixth bullet could be added to correct this error: “Other equally effective mitigation actions”.</p> <p>Response: The standard does not prevent any RC from implementing other actions <i>in addition to</i> the five listed here, since the requirement does not prohibit other actions. However entities wishing to use an alternative method <i>instead of</i> the five listed may not do so. The SDT believes that if a new method to mitigate congestion is developed other than these five concepts, it can be included in the standard following industry review of its effectiveness in achieving the mitigation objective</p> <p>R2, as written, requires a TLR Level 1 to be re-issued every hour; however, current industry practice is that a TLR Level 1 is not reissued every hour. Even your table appears to indicate that a TLR level 1 only has to be re-issued every 8 hours. Please modify R2 to exclude TLR Level 1 from being re-issued every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>All measures should specifically refer to the Interchange Distribution Calculator (IDC) logs and congestion management reports, along with E-tagging logs.</p>

Organization	Question 3 Comment
	<p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of “other information.”</p> <p>Entergy also would like to clarify R1 with the following changes in underline and strikeout: R1. Each Reliability Coordinator or Balancing Authority that receives a request pursuant to an Interconnection-wide transmission loading relief procedure (such as Eastern Interconnection TLR, WECC Unscheduled Flow Mitigation, or congestion management procedures from the ERCOT Protocols) from any Reliability Coordinator, Balancing Authority, or Transmission Operator in another Interconnection to curtail an Interchange Transaction that crosses an Interconnection boundary shall comply with the request, unless it provides a reliability reason to the Reliability Coordinator or Balancing Authority receiving the request and such request should not be implemented. .requestor that it cannot comply with the request.</p> <p>Response: The SDT does not believe the proposed changes achieve any better clarity.</p>
<p>Response: Please see in-line responses.</p>	
<p>SERC OC Standards Review Group</p>	<p>Regarding R1 of IRO-006-EAST-1: Confining the available mitigation actions to the set listed in this requirement may damage reliability by preventing creative responses to system challenges. We believe that it is not possible at this time to forecast what may be available in the near future in the way of mitigation methods or techniques. Confining Requirement R1 of IRO-006-EAST-1 to a list of five currently available techniques seems like it ensures obsolescence. A sixth bullet could be added to correct this error: “Other equally effective mitigation actions”.</p> <p>Response: The standard does not prevent any RC from implementing other actions <i>in addition to</i> the five listed here, since the requirement does not prohibit other actions. However entities wishing to use an alternative method <i>instead of</i> the five listed may not do so. The SDT believes that if a new method to mitigate congestion is developed other than these five concepts, it can be included in the standard following industry review of its effectiveness in achieving the mitigation objective.</p> <p>R2, as written, requires a TLR Level 1 to be re-issued every hour; however, current industry practice is that a TLR Level 1 is not reissued every hour. Even your table appears to indicate that a TLR level 1 only has to be re-issued every 8 hours. Please modify R2 to exclude TLR Level 1 from being re-issued every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>All measures should specifically refer to the Interchange Distribution Calculator (IDC) logs and congestion management reports, along with E-tagging logs.</p> <p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe</p>

Consideration of Comments on IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

Organization	Question 3 Comment
	<p>it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of “other information.”</p> <p>”The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.”</p>
<p>Response: Please see in-line responses.</p>	
<p>Independent Electricity System Operator</p>	<p>Requirement R4 requires that the RC receiving a request to implement congestion management actions shall either (a) implement them or (b) instruct implementation of alternate congestion management actions which must be agreed to by the initiating RC. Our concern is what would happen if the initiating RC does not agree? Would the RC receiving the request be expected to follow congestion management actions that in their eyes will cause a reliability concern or be ineffective, because another RC doesn’t see it, or recognize it at that point in time? If not, how could this disagreement be resolved within the 15-minute window?</p>
<p>Response: The standard does not provide a resolution process to always result in an agreed set of actions. IRO-016-1, Requirement R1 addresses the issue of resolving operating disagreements between Reliability Coordinators.</p> <p>However, this lies outside of the scope of the standard.</p>	
<p>US Bureau of Reclamation</p>	<p>The VSL for R1, the text “but the entity neither complied with the request, nor provided a reliability reason that it could not comply with the request....” can easily apply to a documentation issue rather than the more serious case when the failure to comply was not appropriate as determined by the event analysis. If failure to comply was justified, then the severity level is too high.</p>
<p>Response: The word “valid” has been added to the standard to indicate that the failure must be justified.</p>	
<p>American Electric Power</p>	<p>To the extent that the TLR process is viewed as a reliability function rather than a business process, it would be appropriate to maintain the definition of “Reallocation” in the NERC glossary. If necessary to the term’s use in this standard, the NERC definition could be up revised to read the same as the NAESB definition for “Reallocation.”</p>
<p>Response: The SDT believes that reallocation is a business function that identifies one set of transactions for curtailment and/or reloading, rather than another set of transactions. As such, this is a business selection, not a reliability requirement, and it is covered by NAESB business practices.</p>	
<p>Consumers Energy</p>	<p>We agree with Midwest ISO's comments: "We are concerned that R2 requires a TLR level 1 to be reissued every hour. Currently, it is not industry practice to re-issue a TLR level 1 every hour because it does not impact E-Tags.</p>

Organization	Question 3 Comment
	<p>Only those levels 2 and higher should require re-issuing every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>We continue to be concerned that the measures do not reference the IDC logs in any way as sufficient basis for demonstrating compliance. In response to our last comment on this issue, the SDT responded that industry comments agreed in previous posting that the standards should not reference any industry specific tool. First, we can find no such record posted on the NERC web site supporting such a statement. Please identify specifically which posting and where in the posting this information is contained. Secondly, assuming that the record does exist, we question what the industry thought they were agreeing to. We believe the industry probably thought they were agreeing that the requirements should not mention the IDC which we agree with. However, including lists of IDC logs in the evidence list in the measures supports clarity in compliance which is a NERC stated goal and does not contradict what industry likely thought they were agreeing to. If the SDT does not include IDC logs in the evidence lists, then please confirm our following understand so that there is a record of what the drafting teams intentions were that will be filed with FERC. Is it the intent of the drafting team that IDC logs mentioned in the following example would demonstrate compliance with the requirements? Consider an example where the issuing RC issues a TLR 3A (R2.1), the IDC determines curtailments through its algorithm (R2.2), the IDC communicates to all RCs (R3.1, R3.2, and R3.3), receiving RCs (including the issuing RC) acknowledge the curtailments (assuming no reliability issues), whereupon the IDC communicates tag curtailments, NNL, and market flow relief to affected BAs (R4). Are the IDC and e-tagging records clearly sufficient evidence to prove compliance with the associated requirements in parentheses above? The measures currently are not clear. We are trying to avoid a situation where the RC could not rely on the IDC for evidence and would have to make and document phone calls to every RC and every impacted BA. This would be too burdensome an outcome and would distract the system operators from their true job ensuring and maintaining reliability."</p> <p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of "other information."</p>
	<p>Response: Please see in-line responses.</p>
<p>Midwest ISO Stakeholders Standards Collaboration Group</p>	<p>We are concerned that R2 requires a TLR level 1 to be reissued every hour. Currently, it is not industry practice to re-issue a TLR level 1 every hour because it does not impact E-Tags. Only those levels 2 and higher should require re-issuing every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p>

Organization	Question 3 Comment
	<p>We continue to be concerned that the measures do not reference the IDC logs in any way as sufficient basis for demonstrating compliance. In response to our last comment on this issue, the SDT responded that industry comments agreed in a previous posting that the standards should not reference any industry specific tool. First, we can find no such record posted on the NERC web site supporting such a statement. Please identify specifically which posting and where in the posting this information is contained. Secondly, assuming that the record does exist, we question what the industry thought they were agreeing to. We believe the industry probably thought they were agreeing that the requirements should not mention the IDC which we agree with. However, including lists of IDC logs in the evidence list in the measures supports clarity in compliance which is a NERC stated goal and does not contradict what industry likely thought they were agreeing to. If the SDT does not include IDC logs in the evidence lists, then please confirm our following understanding so that there is a record of what the drafting teams intentions were that will be filed with FERC. Is it the intent of the drafting team that IDC logs mentioned in the following example would demonstrate compliance with the requirements? Consider an example where the issuing RC issues a TLR 3A (R2.1), the IDC determines curtailments through its algorithm(R2.2), the IDC communicates to all RCs (R3.1, R3.2, and R3.3), receiving RCs (including the issuing RC) acknowledge the curtailments (assuming no reliability issues), whereupon the IDC communicates tag curtailments, NNL, and market flow relief to affected BAs (R4). Are the IDC and e-tagging records clearly sufficient evidence to prove compliance with the associated requirements in parentheses above? The measures currently are not clear. We are trying to avoid a situation where the RC could not rely on the IDC for evidence and would have to make and document phone calls to every RC and every impacted BA. This would be too burdensome an outcome and would distract the system operators from their true job ensuring and maintaining reliability.</p> <p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of "other information."</p>
<p>Response: Please see in-line responses.</p>	
<p>Southern Company Transmission</p>	<p>We are supporting comments submitted by SERC: Regarding R1 of IRO-006-EAST-1: Confining the available mitigation actions to the set listed in this requirement may damage reliability by preventing creative responses to system challenges. We believe that it is not possible at this time to forecast what may be available in the near future in the way of mitigation methods or techniques. Confining Requirement R1 of IRO-006-EAST-1 to a list of five currently available techniques seems like it ensures obsolescence. A sixth bullet could be added to correct this error: "Other equally effective mitigation actions".</p> <p>Response: The standard does not prevent any RC from implementing other actions <i>in addition to</i> the five listed here, since the requirement does not prohibit other actions. However entities wishing to use an alternative method <i>instead of</i> the five listed may not do so. The SDT believes that if a new method to mitigate congestion is developed other than these five concepts, it can be included in the standard following industry review of its effectiveness in achieving</p>

Organization	Question 3 Comment
	<p>the mitigation objective.</p> <p>R2, as written, requires a TLR Level 1 to be re-issued every hour; however, current industry practice is that a TLR Level 1 is not reissued every hour. Even your table appears to indicate that a TLR level 1 only has to be re-issued every 8 hours. Please modify R2 to exclude TLR Level 1 from being re-issued every hour.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>All measures should specifically refer to the Interchange Distribution Calculator (IDC) logs and congestion management reports, along with E-tagging logs.</p> <p>Response: All four of the measures clearly indicate that Logs are an acceptable form of evidence. We do not believe it is necessary to specify the kinds of logs provided. Additionally, the measure allows for the provision of “other information.”</p>
<p>Response: Please see in-line responses.</p>	
<p>ISO RTO Council Standards Review Committee</p>	<p>(1) IRO-006-East-1 R1 is redundant to 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 Tv. IRO-006-East-1 R2 will list congestion management actions and TLR Level when the RC is initiating a TLR for SOL and IROLs. IRO-009-1 tells the RC how to act on an IROL.</p> <p>Response: IRO-009-1 R4 refers to actual IROL exceedances, while IRO-006-East-1 R1 is not intended to be the sole remedy used to respond to an actual IRO exceedance. IRO-006-East-1 R1 can also be used to relieve transmission constraints under conditions other than IROL exceedances.</p> <p>(2) In IRO-006-East-1, insert “Reliability” between “the” and “Coordinator” in the third line just after IROL’s Tv. (See M1.)</p> <p>M1. Each Reliability Coordinator shall provide evidence (such as logs, voice recordings, or other information) that when acting or instructing others to act to mitigate the magnitude and duration of the instance of exceeding an IROL within that IROL’s Tv, the Reliability Coordinator initiated one or more of the actions listed in R1 prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated) (R1).</p> <p>Response: Thank you for this suggestion. The error has been fixed.</p> <p>(3) As written, IRO-006-East-1 R2 would require the RC, upon initiation of a TLR, to re-issue the TLR each hour until it is identified as TLR Level 0. There is no need to re-issue a TLR level 1 each clock hour, as this is a notification</p>

Organization	Question 3 Comment
	<p>step and no action is required.</p> <p>A level TLR-2 and above need to be re-issued hourly to prevent or mitigate exceedances of SOLs and IROLs.</p> <p>Response: The requirement to re-issue TLR Level 1 every hour is already required in IRO-006-4, Attachment 1, section 1.4.4. This standard does not change this obligation.</p> <p>(4) Regarding IRO-006-East-1 R2.2, what is the intent behind “A list of congestion management actions?” Does the Reliability Coordinator who issues a TLR 5 need to list all generating units that are moved to provide>NNL, or market flow? Will the RC need to list generating units that are moved to provide market relief?</p> <p>The RC should only have to provide the list required in R2.2 for facilities with an IROL. Facilities with only an SOL should be exempt from this requirement. Otherwise, this effort is burdensome and distracts the RC from his other duties and responsibilities.</p> <p>Response: The intent of the requirement is that it be consistent with the items identified in Part 3.3 (in other words, Interchange transactions and then relief obligations for NITS, Native Load, and Market flow, as appropriate).</p> <p>(5) Regarding IRO-006-East-1 M2, the VSL Level should increase as the TLR level increases. A TLR-1 should have the very lowest VSL associated with it and no penalties. A “b” TLR should probably have a higher VSL than an “a” TLR. The “b” TLR addresses immediate, real-time issues, whereas the “a” TLR is associated with anticipated events next hour. Also, firm curtailments in a TLR-5 should have a higher VSL than a TLR-4 or lower. A TLR-6 should have the most severe VSL since it has been associated with emergencies in the past.</p> <p>Response: While this approach may have some merit for consideration if we redesign our compliance elements in the future, this does not align with our current definitions of “VRF” and “VSL.” VSLs only measure the level to which the requirement is violated, not the risk associated with the requirement. To the extent we wish to apply different VRFs to each TLR level, we would need to redraft the standard to have separate requirements for each TLR level.</p> <p>(6) Regarding the VSLs associated with IRO-006-East-1 R3.1, specifically, what if the initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level (3.1)?</p> <p>This is all done automatically by the IDC and RCIS. How can the RC be held responsible for the program? How would a RC know if the other RCs in the Eastern Interconnection were notified?</p> <p>Response: The IDC Tool shows acknowledgement. If the IDC tool is not used, then the RC would be expected to verbally notify the other RCs.</p> <p>In FERC Order 693, paragraph 952, the Commission addresses Reliability Coordination – Transmission Loading Relief (IRO-006-3).</p> <p>“IRO-006-3 ensures that a reliability coordinator has a coordinated method to alleviate loadings on the transmission system if it becomes congested to avoid limit violations. IRO-006-3 establishes a detailed Transmission Loading</p>

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	<p>Relief (TLR) process for use in the Eastern Interconnection to alleviate loadings on the system by curtailing or changing transactions based on their priorities and according to different levels of TLR procedures. The proposed Reliability Standard includes a regional difference for reporting market flow information to the Interchange Distribution Calculator rather than tagged transaction information for the MISO and PJM areas.” It also includes by reference the equivalent Interconnection-wide congestion management methods used in the WECC and ERCOT regions.</p> <p>Further, the proposed Joint NERC/NAESB System Operator’s Transmission Loading Relief (TLR) Reference Manual includes the following:</p> <p>5.1.4. Notification of TLR Procedure Implementation</p> <p>The Reliability Coordinator initiating the use of the TLR Procedure shall notify other Reliability Coordinators and Balancing Authorities and Transmission Operators, and must post the initiation and progress of the TLR event on the appropriate NERC web page(s).</p> <p>5.1.4.1. Notifying Other Reliability Coordinators</p> <p>The Reliability Coordinator initiating the TLR Procedure shall inform all other Reliability Coordinators via the Reliability Coordinator Information System (RCIS) that the TLR Procedure has been implemented.</p> <p>Regarding the aforementioned language from the Reference Manual, the following comment was made by MISO and MRO during the comment period for Draft 3 of TLR Standard IRO—006-5 and IRO-006-East-1:</p> <p>“Since this standard is for the Eastern Interconnection only, we ask the SDT to write the Measurements to consider presentation of IDC logs and screens as satisfactory evidence. Specifically, we ask the drafting team to modify M2 and M3 IRO-006-EAST-1 to clarify that providing the TLR history from the IDC will satisfy the evidence requirements. Since no RC ever issues a TLR without the IDC, we ask the SDT to write the requirements with consideration of the use of the IDC. For example, R3 should be clarified that the IDC can be relied upon to communicate the notifications. The RC should not be required to demonstrate that the notifications went out as appropriate or essentially that the IDC worked as designed [sic].”</p> <p>The SDT responded as follows: “In previous postings, commenter’s have agreed that the standard should not reference any specific tool. The IDC is the name of the NERC tool that is currently used to manage the TLR process and is a way, but not necessarily the only way, to show compliance.”</p> <p>The NERC tools allow the RC to choose a TLR Level and identify the TLR level. In the Eastern Interconnection, the IDC and RCIS are the current processes to effectuate the needed TLR. Language could be added that includes any successor tool(s).</p> <p>Response: The SDT does not see any new information here explaining why the tool needs to be referenced – only that the tool is used. All Measures include “other information”. Information retrieved from the IDC and RCIS can be</p>

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	<p>used as satisfactory evidence.</p> <p>(7) IRO-006-East-1 R3.2 reads as follows: Communicate the list of congestion management actions to be implemented to 1.) All Reliability Coordinators in the Eastern Interconnection, and 2.) Those Reliability Coordinators in other Interconnections responsible for curtailing Interchange Transactions crossing Interconnection boundaries identified in the list of congestion management actions. Number 2 is redundant to IRO-006-5 R1 Response: The SDT does not believe this to be redundant. Part 3.2 require that entities be sent the list. IRO-006-5 R1 requires that entities take action upon receipt of the list.</p> <p>(8) The “High VSL” for IRO-006-East-1R 3 reads, in part, as follows: “The initiating Reliability Coordinator did not communicate the list of congestion management actions to one or more of the Reliability Coordinators listed in Requirement R3, Part 3.2.” This again is too burdensome on the RCs, and at most should only be applied to facilities with identified IROLs. Response: Transmission Operators routinely request TLRs to manage SOLs, and an SOL exceedance, while not as critical as an IROL exceedance, should still be responded to in a timely manner.</p> <p>(9) Definitions of Terms Used in Standard The definition of “Market Flow” should be changed as follows: Market Flow: the total amount of power flowing across a specified Facility or set of Facilities due to a market dispatch of internal generation internal to the market to serve internal load internal to the market. Response: Thank you for your suggestion. The SDT has modified the definition per your suggestion.</p> <p>(10) Additional Compliance Information IRO-006-4.1...1.4.2 TLR Reports, This is a requirement of the IDC for the RC to fill out for TLR 2 and above. Why has this been removed for additional compliance? Will the Regional Entity not allow TLR Reports as evidence? Response: The “other information” allows the use of TLR reports. The previous Additional Compliance Information made it a requirement to fill out a TLR report. Unless this is a reliability requirement, we do not believe adding it to the compliance information will add value to the evidence that needs to be provided since this information is already covered.</p> <p>IRO-006-5 R1 the Balancing Authority is Applicability to the standard for Interconnection-wide TLR Procedure and</p>

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	<p>held accountable for curtailments at a severe level, but not in IRO-006-East, Why? But in INT-005-2 VSL level Low for the BA on curtailment?</p> <p>Response: IRO-006-5 applies to those entities that receive a request pursuant to an interconnection-wide TLR procedure to curtail an Interchange Transaction that crosses an Interconnection boundary. As such, the BA is held accountable for curtailments at a severe VRF. In IRO-006-East-1, the BA is instructed to implement the curtailment but is not assigned a requirement to communicate and request the curtailments. The RCs that receive the requests from the initiating RCs are held responsible for such communications.</p>
<p>Response: Please see in-line responses.</p>	