

Background:

The TLR – General Update SAR drafting team thanks all commenters who submitted comments on the first draft of the SAR and associated proposed revisions to IRO-006. The SAR was posted from August 4 through September 2, 2005. The drafting team asked stakeholders to provide feedback on the SAR and standard through a special SAR Comment Form. There were 12 sets of comments, including comments representing the views of 65 different people from 36 different entities in seven of the eight NERC Regions.

When the first SAR was posted for comment, the requestor had envisioned publishing a NERC standard and an associated NAESB business practice. Many stakeholders indicated that this would be very challenging for use in real-time operations. In response to stakeholder concerns, NAESB and NERC developed and approved the NERC-NAESB Procedure for Joint Development and Coordination. This procedure guides joint development of standards and business practices when the reliability and business practice components are intricately entwined within a proposed standard. This procedure was approved for implementation by the Standards Committee, NERC Board of Trustees and the NAESB Board and is being used to make modifications to IRO-006.

Based on stakeholder comments and changes that have taken place in the industry since the initial posting of the SAR, the drafting team made the following significant changes to the SAR:

- Modified the desired product so that instead of publishing the NERC Reliability Standard as a separate product, will produce a single document with NAESB that includes both the NERC reliability requirements and the NAESB business practices relative to the TLR Procedure. This should satisfy commenters who indicated that having two different documents would be a detriment to reliability. (As envisioned, the NERC/NAESB split would be balloted as soon as possible.)
- Expanded the scope of the SAR to include consideration of **all** the modifications to the standard proposed by FERC and stakeholders as identified on the ‘Standard Review Form’ attached to the revised SAR. This expansion in scope should satisfy the need to improve the overall quality of this standard. The existing standard includes some material that is more appropriate in a technical reference, and some parts of the standard don’t meet the quality criteria established for ERO standards. The expansion in scope brings this SAR into conformance with the *Reliability Standards Development Plan: 2007–2009*.
- Expanded the scope of the SAR to include consideration of modifications previously addressed in the SAR to Modify IRO-006 for Market Information. This should satisfy stakeholders who suggested that having multiple SARs for the same project is not desirable.

With the above conforming changes, the drafting team is recommending that the SAR move forward to standard drafting.

In this ‘Consideration of Comments’ document, stakeholder comments have been organized so that it is easier to see the summary of changes in response to each question posed by the requestor. All comments received on the can be viewed in their original format at:

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

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you

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can contact the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

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

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Commenter	Organization	Industry Segment								
		1	2	3	4	5	6	7	8	9
Dan Boezio (G1)	AEP	x								
Raj Rana	AEP	x		x		x				
Ken Goldsmith (G5)	ALT									
Serhly Kotsan (G1)	Boston Pacific									
Bonita Smulski (G6)	BPA	x								
Salah Kitali (G6)	BPA	x								
Taryn McPherson (G6)	BPA	x								
Troy Simpson (G6)	BPA	x								
Vinod Kotecha (G3)	ConEd	x								
Bill Aycock (G7)	Entergy	x								
Ed Davis (G7)	Entergy	x								
George Bartlett (G7)	Entergy	x								
James Case (G7)	Entergy	x								
Jay Zimmerman (G7)	Entergy	x								
Maurice Casadaban (G7)	Entergy	x								
Melinda Montgomery (G7)	Entergy	x								
Narinder Saini (G7)	Entergy	x								
Rick Riley (G7)	Entergy	x								
Joel Mickey (G6)	ERCOT		x							
Bert Gumm (G6)	Idaho Power	x								
Dan Rochester	IESO		x							
Khaqan Khan (G3)	IESO		x							
Cheryl Mendrala	ISO New England		x							
Kathleen Goodman (G3)	ISO New England		x							
Mike Gammon (G1)	KCP&L	x								
Todd Fridley (G1)	KCP&L	x								
Dennis Florom (G5)	LES	x								

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Tom Mielnik (G5)	MEC												
Robert Coish (G5)	MHEB	x		x	x	x							
Terry Bilke (G5)	MISO		x										
Joe Knight (G5)	MRO		x										
Guy Zito (G3)	NPCC		x										
Alan Boesch (G5)	NPPD												
Paul Sorenson (G6)	OATI												
Scott Cunningham	Ohio Valley Electric Corp		x	x	x	x	x	x	x	x			
Todd Gosnell (G5)	OPPD												
Andrew Burke (G6)	PacifiCorp	x											
Kathee Downing (G6)	PacifiCorp	x											
Jim Eckelcamp (G6)	Progress Energy						x						
C. Robert Moseley (G4)	PSC of South Carolina												x
David Wright (G4)	PSC of South Carolina												x
Elizabeth Fleming (G4)	PSC of South Carolina												x
G. O'Neal Hamilton (G4)	PSC of South Carolina												x
John Howard (G4)	PSC of South Carolina												x
Mignon Clyburn (G4)	PSC of South Carolina												x
Phil Riley (G4)	PSC of South Carolina												x
Randy Mitchell (G4)	PSC of South Carolina												x
Bob Harshbarger (G6)	Puget Sound Energy	x											
Jim Hansen (G6)	Seattle City Light	x											
Marilyn Franz (G6)	Sierra Pacific Power Co	x											
Bob Schwermann (G6)	SMUD	x											
Clifford Shephard (G2)	Southern Company Generation							x					
Joel Dison (G2)	Southern Company Generation							x					
Lucius Burris (G2)	Southern Company Generation							x					
Roman Carter (G2)	Southern Company Generation							x					
Steve Lowe (G2)	Southern Company Generation							x					

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Jim Busbin (G8)	Southern Company Services	x												
Jim Viikinsalo (G8)	Southern Company Services	x												
Marc Butts (G8)	Southern Company Services	x												
Wayne Guttormson (G5)	SPC													
Robert Rhodes (G1)	SPP		x											
Bob Cochran (G1)	SPS	x												
Darrick Moe (G5)	WAPA													
Mike Crouch (G1)	WFEC	x												
Jim Maenner (G5)	WPS													

- G1 – SPP Operating Reliability Working Group
- G2 – Southern Company Generation
- G3 – NPCC CP9 Reliability Standards Working Group
- G4 – Public Service Commission of South Carolina
- G5 – Midwest Reliability Organization
- G6 – Joint Interchange Scheduling Working Group NERC/NAESB
- G7 – Entergy
- G8 – Southern Company Services

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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.

Summary Consideration: While there was no overwhelming consensus on this issue, most commenters indicated there is a reliability-related need for the proposed standard change. Of the commenters who disagreed with the change, some felt that the change was not 'initiated' due to a reliability need and some felt that splitting the standard between NERC and NAESB would lead to confusion.

The original intent of the SAR was to publish both a NERC version of the standard and a NAESB version of the associated business practice. The SAR was revised to indicate that there will be one document published jointly by NERC and NAESB. This should satisfy commenters who indicated that having two documents would be confusing and a detriment to reliability.

Commenter	Yes	No	Comment
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	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.
Response: The proposed change was initiated to clearly distinguish reliability-related requirements from business practice requirements.			
The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practice requirements and the reliability requirements without need for separate documents.			
ISO NE Cheryl Mendrala		X	This proposed standard change was not initiated due to reliability needs
Response: The proposed change was initiated to clearly distinguish reliability-related requirements from business practice requirements.			
The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practice requirements and the reliability requirements without need for separate documents.			
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban		X	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.
Response: Agreed. Since the first draft of this SAR was posted, the NERC NAESB Template Procedure for Joint Standards Development and Coordination was developed to ensure proper coordination for standards where there is no easy separation of business and reliability.			
The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practice requirements and the reliability requirements without need for separate documents.			
AEP Raj Rana		X	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 by 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

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			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.
<p>Response: The proposed change was initially initiated to clearly distinguish reliability-related requirements from business practice requirements. Since then, other stakeholders and FERC have identified the need for several additional changes to the standard beyond the NERC/NAESB coordinated split of the requirements. The revised SAR has an expanded scope to address all of these proposed changes. Please see the revised SAR.</p>			
Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight		X	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.
<p>Response: The proposed change was initiated to clearly distinguish reliability-related requirements from business practice requirements. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.</p>			
IESO, Ontario Dan Rochester		X	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.
<p>Response: The proposed change was initiated to clearly distinguish reliability-related requirements from business practice requirements. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.</p>			
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley	X		
Ohio Valley Electric Corp. Scott R. Cunningham	X		
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp	X		

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Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke			
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		N/A
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe	X		

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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.

Summary Consideration: The comments do indicate some support, but not a clear consensus in support of the proposed division of TLR business practices versus TLR reliability requirements. In reviewing the comments, the drafting team notes that several of the comments imply that certain steps in Attachment 1 were proposed to be assigned as business practices, but those steps were not proposed as business practices in the first draft of the SAR.

The modifications made to the SAR should improve this consensus as many of the negative comments indicated that subdividing the requirements into two separate documents would be confusing and under the revised SAR NERC and NAESB will jointly publish a document that includes both the Business Practice requirements and the reliability requirements in a single document.

Commenter	Yes	No	Comment
IESO, Ontario Dan Rochester		X	<p>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.</p> <p>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.</p>
<p>Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice. In support of this approach, the drafting team believes that the following steps in the TLR Procedure should be assigned to a NAESB Business practice: 1.5.1, 2.2.2, 2.4.2, and 2.5.2. Note that the other steps in the process that you've identified, 1.4.1, 1.4.1.1, 1.5, 1.6, 1.7, 2.1.2, 3.2.1.2, 3.3.1.2, and 7.1 are retained as reliability-steps in the revised SAR. There were no changes to 1.6.6 as part of the approval of IRO-006-02.</p>			
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	<p>- 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.</p> <p>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.</p> <p>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.</p> <p>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,</p>

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			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.
<p>/Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice. In support of this approach, the drafting team believes that the following steps in the TLR Procedure should be assigned to a NAESB Business practice: 1.5.1, 2.2.2, 2.4.2, and 2.5.2.</p> <p>The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.</p>			
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes		X	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.
<p>Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice.</p> <p>The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.</p>			
ISO NE Cheryl Mendrala		X	<p>- 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.</p> <p>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.</p> <p>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.</p>
Response:			

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The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.

Note that in the revised SAR, all of the 'step-by-step' actions identified for TLR Levels 5a and 5b appear in the combined document.

In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice.

Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban		X	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.
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Response:
 In the future, the drafting team will make sure all documents needed for review are posted. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.

AEP Raj Rana		X	The two documents are overlapping. Same statements in both documents.
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Response: Agreed – this duplication will be eliminated as indicated in the revised SAR. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.

Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members		X	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.
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Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice. In support of this approach, the drafting team believes that the following steps in the TLR Procedure should be assigned to a NAESB Business practice: 1.5.1, 2.2.2, 2.4.2, and 2.5.2.
 Note that the other steps in the process that you've identified, 1.4.1, 1.4.1.1, 1.5, 1.6, 1.7, 2.1.2, 3.2.1.2, 3.3.1.2, and

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7.1 are retained as reliability-steps in the revised SAR.

There were no changes to 1.6.6 as part of the approval of IRO-006-02.

Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		N/A
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke	X		
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley	X		
Ohio Valley Electric Corp. Scott R. Cunningham	X		
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe	X		

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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.

Summary Consideration: Most commenters indicated that the TLR business practices have been removed from the TLR reliability requirements. Some commenters were not able to locate the NAESB Business Practice and could not easily answer this question. In the future, the drafting team will ensure that all documents needed to answer the questions on the comment forms are posted with the comment form.

Commenter	Yes	No	Comment
Ohio Valley Electric Corp. Scott R. Cunningham	X		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.
Response: This is a change that could be addressed with the technical revisions to improve the standard in phase 2 of the proposed revisions.			
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		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.
Response: The drafting team agrees that many parts of Attachment 1 should be placed into either the Business Practices document or in a Technical Reference. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents. Appendix A may be a reference document for both the reliability standard and the business practice – Appendix B is expected to be included in the NAESB business practices.			
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban	X		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.
Response: Agreed. The revised SAR indicates that most of the content in the IDC Reference Document (Appendix E) should be translated into a reference document.			
AEP Raj Rana	X		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.
Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those			

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<p>results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice. The Attachment 1 steps of the procedure have been identified by the TLR Taskforce as having both Reliability and business practices within them. As the resulting standard will be published jointly all items are expected to be retained and the distinction of the items as reliability or as business practices will be identified.</p>			
ISO NE Cheryl Mendrala		X	See response to question 2.
<p>Response: See response to comments on question 2.</p>			
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	See response to question 2.
<p>Response: See response to comments on question 2.</p>			
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo		X	N/A
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke		X	
Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florum Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members		X	
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton		X	

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Mignon L. Clyburn C. Robert Moseley			
IESO, Ontario Dan Rochester		X	
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe		X	

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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.

Summary Consideration: Most commenters indicated that there aren't TLR reliability requirements in the proposed TLR business practices. Some commenters were not able to locate the NAESB Business Practice and could not easily answer this question. In the future, the drafting team will ensure that all documents needed to answer the questions on the comment forms are posted with the comment form.

Commenter	Yes	No	Comment
AEP Raj Rana			No comments. The TLR business practices document is not available.
Response: In the future, the drafting team will make sure all relevant documents are posted.			
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		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.
Response: In determining how to subdivide the requirements, this is the approach taken by the TLR Task Force: A procedure includes steps that are performed to achieve expected results. It is only one method to achieve those results. If a Reliability Coordinator has options to address congestion and those options are prioritized in order of economic preference then the RC is making choices that would be appropriate under a business practice.			
Note that in the revised SAR, 3.2.1.2 is included in the reliability related steps of the procedure.			
ISO NE Cheryl Mendrala	X		See response to question 2.
Response: See response to comments on question 2.			
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha	X		See response to question 2.
Response: See response to comments on question 2.			
Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members	X		See comments in question 2.
Response: See response to comments on question 2			
IESO, Ontario		X	See comments in question 2.

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Dan Rochester			
Response: See response to comments on question 2.			
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban		X	We can not answer this question since we do not have the NAESB proposal TLR business practices in this package.
Response: In the future, the drafting team will make sure all relevant documents are posted.			
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo		X	N/A
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke		X	
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley		X	
Ohio Valley Electric Corp. Scott R. Cunningham		X	
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe		X	

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

Summary Consideration:

The NERC-NAESB Procedure for Joint Development and Coordination was established after the first posting of this SAR, to guide joint development of standards and business practices when the reliability and business practice components are intricately entwined within a proposed standard. This procedure has been approved for implementation by the Standards Committee, NERC Board of Trustees and the NAESB Board and is applicable to the revisions of IRO-006. The revisions made to IRO-006 will be jointly published by NERC and NAESB in a single document, thus eliminating the need for a real-time system operator to have two documents that must be merged together to provide the needed information.

Several commenters suggested modifications to some of the requirement in the standard and/or to some of the steps in the TLR process. The drafting team modified its SAR to clearly indicate that the revisions to IRO-006 will be addressed in phases – with assigning the steps in Attachment 1 of IRO-006 between NERC/NAESB as the first phase – and addressing technical revisions that require field testing, changes to the IDC, and other modifications already identified as needed to improve the overall quality of the standard being addressed following the NERC/NAESB split. Stakeholder suggestions for technical modifications that were made in response to this question have been added to the laundry list of items under the IRO-006 'To Do List'.

Commenter	Yes	No	Comment
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		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?
<p>Response: Note that following the first posting of this SAR, NERC and NAESB jointly developed and adopted a procedure to ensure that when a reliability standard and business practice are 'entwined', the development (and revision) would be coordinated between the two organizations. The revised SAR indicates that there will be joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard will include the business practices and the reliability standards without need for separate documents.</p>			
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		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.
<p>Response: This is in Sections 1.1, 1.2, 1.2.11 of NAESB Transmission Loading Relief Business Practice and is shown in the proposed revisions to Attachment 1.</p>			

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<p>ISO NE Cheryl Mendrala</p>	<p>X</p>	<p>Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.</p> <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>
<p>As noted in the revised SAR, the standard will be revised in phases – the first phase will be limited to the 'NERC/NAESB/ split' – but following that split, the standard drafting team will be focusing on the laundry list of technical improvements to the standard that have already been identified in the SAR – and will add your list to those that will be considered.</p> <p>The reference was moved to NAESB BP 1.4 and changed to refer to generic tool instead of RCIS specifically. This approach limits the number of changes that need to be made to standards when the tool or committee name changes.</p>		

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<p>Section 3.1 does appear in the revised proposed changes to Attachment 1.</p> <p>Going forward the changes will be managed from the joint standards development process and there is no anticipated change in the funding or contract agreements to modify the software.</p> <p>The standard drafting team will determine the best way to format and number the steps in the procedure jointly.</p>		
<p>Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban</p>	<p>X</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>Please provide a redline version showing the draft changes to IRO-006-1. This redline would make review and comment much easier for commenters. 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.</p>
<p>Response: The standard drafting team will make its revisions to the latest approved version of the standard – which is now IRO-006-03. Headers, footers, etc will be corrected when the draft standard is posted for review and comment. The SAR was revised to identify the scope of changes that will be made, without trying to make all those changes since that is really the work of the standard drafting team – there is no red line to the standard as the proposed changes to the standard will be refined by the standard drafting team. The matrix was confusing and will not be carried forward.</p>		
<p>Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke</p>	<p>X</p>	<p>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 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.</p>
<p>Response: As noted in the revised SAR, the standard will be revised in phases – the first phase will be limited to the 'NERC/NAESB/ split' – but following that split, the standard drafting team will be focusing on the laundry list of</p>		

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<p>technical improvements to the standard that have already been identified in the SAR – and will add your list to those that will be considered.</p>		
<p>AEP Raj Rana</p>	<p>X</p>	<p>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.</p>
<p>Response: As noted in the revised SAR, the standard will be revised in phases – the first phase will be limited to the 'NERC/NAESB/ split' – but following that split, the standard drafting team will be focusing on the laundry list of technical improvements to the standard that have already been identified in the SAR – and will add your list to those that will be considered.</p>		
<p>Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members</p>	<p>X</p>	<p>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.</p>
<p>Response: The NERC NAESB Template Procedure for Joint Standards Development and Coordination was developed to ensure proper coordination for standards where there is no easy separation of business and reliability. The approach includes joint collaboration and joint publication of the resulting standard. There will be one jointly published document which covers both the business practice steps and the reliability steps of the Attachment in IRO-006.</p>		
<p>Ohio Valley Electric Corp. Scott R. Cunningham</p>	<p>X</p>	<p>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.</p>
<p>Response: As noted in the revised SAR, the standard will be revised in phases – the first phase will be limited to the 'NERC/NAESB/ split' – but following that split, the standard drafting team will be focusing on the laundry list of technical improvements to the standard that have already been identified in the SAR – and will add your list to those that will be considered.</p>		
<p>IESO, Ontario Dan Rochester</p>	<p>X</p>	<p>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,</p>

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		<p>consideration should be given as to how this split will be maintained, if going forward, before it is adopted by the industry.</p> <p>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.</p>
<p>Response: The NERC NAESB Template Procedure for Joint Standards Development and Coordination was developed to ensure proper coordination for standards where there is no easy separation of business practices and reliability requirements. The approach includes joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard includes the business practices and the reliability standards without need for separate documents.</p> <p>The IDC is the tool that specifies how the Business Practice and the Reliability adjustments are made. The RC specifies how much relief is required and the tool combines the logic based on business practice rules to identify how much relief in each transaction should be distributed. NERC will work jointly to provide training when needed by using the committees and then by providing the necessary materials so the industry can train their staff on</p>		
<p>Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe</p>	X	<p>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.</p>
<p>Response: The NERC NAESB Template Procedure for Joint Standards Development and Coordination was developed to ensure proper coordination for standards where there is no easy separation of business practices and reliability requirements. The approach includes joint collaboration and joint publication of the resulting standard. The joint collaboration ensures during development issues can be addressed jointly so that the resulting business practice and reliability standards work together. Using this process the result is that the jointly published standard includes the business practices and the reliability standards without need for separate documents.</p>		
<p>CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha</p>	X	<p>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.</p> <p>Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.</p> <p>- 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.</p>

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		<p>- Section 1.5.3 the numbering on this section is very confusing. Suggest the following:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>- Title of Section 2 should be changed to be only "Transmission Loading Relief (TLR) Levels."</p> <p>- Section 3 is missing section 3.1.</p> <p>- Suggest that Section 3.2 include a reference to the fact that transactions submitted after the XX:25 deadline will put on HOLD.</p> <p>- 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.</p> <p>- 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".</p> <p>- 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".</p> <p>- 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.</p> <p>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. 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.</p> <p>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.</p>
<p>Response: As noted in the revised SAR, the standard will be revised in phases – the first phase will be limited to the 'NERC/NAESB/ split' – but following that split, the standard drafting team will be focusing on the laundry list of technical improvements to the standard that have already been identified in the SAR – and will add your list to those that will be considered.</p> <p>The reference was moved to NAESB BP 1.4 and changed to refer to generic tool instead of RCIS specifically. This approach limits the number of changes that need to be made to standards when the tool or committee name changes.</p> <p>Section 3.1 does appear in the revised proposed changes to Attachment 1.</p> <p>Going forward the changes will be managed from the joint standards development process and there is no anticipated change in the funding or contract agreements to modify the software. The standard drafting team will determine the best way to format and number the steps in the procedure jointly.</p>		

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Coordination — Transmission Loading Relief**

Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley		X	
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