

Consideration of Comments on Initial Ballot of IRO-006-4 — Reliability Coordination – Transmission Loading Relief

Summary Consideration:

The drafting team did not make any changes to the standard based on the comments submitted by balloters.

Segment	Organization	Comment
1	Duke Energy	<p>Duke Energy greatly appreciates the work behind the drafting of this Standard, however most of the concerns which we have noted in the past have not been addressed:</p> <ol style="list-style-type: none"> 1. There is ambiguity between requirements R1, R1.1 and R3 which could cause the RC or BA to hesitate to act during an emergency in real time. We are concerned that there is a lack of clarity between R1, R1.1 and R3 regarding the use of local procedures in response to a SOL or IROL violation. R1 states that the RC can select a local procedure at its discretion, and R1.1 recognizes that an Interconnection-wide TLR procedure used alone is an inappropriate and ineffective tool. However R3 states that the RC must have prior approval from the ERO to use a local procedure as a substitute for curtailments directed by the Interconnection-wide procedure. However it is unclear how prior approval can be obtained since the local procedure will be case-specific to the problem that initiates the Interconnection-wide procedure. Further, depending upon the resolution of this issue, M3 will need to be restated. 2. The SDT added Transmission Operator back to the Applicability section of this standard. We disagree with this because there are no requirements in the standard which apply to the Transmission Operator. 3. The SDT has not accurately captured the reliability requirements of the former TLR procedure following the NERC/NAESB split. <ul style="list-style-type: none"> ▪ The portions of the Regional Differences (Section E) that describe how the impact of market flows on facilities are calculated should not be moved to NAESB. The amount of flow presented to the IDC for curtailment on a constrained facility (Flowgate) clearly has Reliability aspects. Also, while it is clear what the intent is, the objective has not been accomplished because there are some instances where information may need to be in both documents. ▪ Attachment 1 - Section 2 Transmission Loading Relief (TLR) Levels should have a statement for each level that indicates whether or not transactions will be impacted. (Example – for TLR Level 1 – No transactions will be impacted; Level 2 - Prevents all transactions less than priority 7 with TDF > 5% from starting or increasing; etc.) A good guide for this can be found on the NERC site under IDC training – IDC TLR Matrix.

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		<ul style="list-style-type: none"> ▪ Attachment 1 - Section 3.1 (Interchange Transaction Curtailment Order for use in TLR Procedures / Priority of Interchange Transactions) should not be moved to NAESB. Without this, there will be no reference to the curtailment order in the procedure. ▪ Additional comments on the split: Section 1.5.1 should not move to NAESB ▪ Section 2.2.2 “However, the RC...on the Constrained Facility” should stay in IRO-004. ▪ Section 2.2.3 “If the time in TLR Level 2...TLR Log” should stay in IRO-004. ▪ Section 2.5.3 First sentence should move to NAESB. ▪ Section 2.5.3 Reference to Section 4 in last sentence needs to be reviewed since Section 4 moves to NAESB. ▪ Section 3.2 – 3.2.1.1 Stay in the IRO. ▪ Section 4.1.4 Stay in the IRO. ▪ Section 6 – 6.1 Need wording like section 7 – 7.1 ▪ Section 6.2 -6.2.6 Should move to NAESB ▪ Section 7.4.1 – 7.4.3 Move to NAESB ▪ Section 7.7 – 7.9, Appendix E and F should move to NAESB. ▪ Attachment 1 - Section 1.7 Redispatch options should not be moved Attachment 1 - Section 2. - Introduction – The last two sentences are “on path/off path discussion”. Similar discussion was moved. ▪ Attachment 1 - Section 2.5.3 – the first sentence should be moved <p>4. We do not agree with the measures proposed in the standard.</p> <ul style="list-style-type: none"> ▪ M5 seems to be measuring compliance to other Standards. INT-001 and INT-003 have applicability for the BA and not the RC. And INT-004 has applicability for both the RC and BA. INT-004 has no measure or compliance for the RC. There should not be a requirement (R5) or measure (M5) that requires compliance to another standard. ▪ R3 needs to be split into two requirements, one that focuses on implementing a local procedure simultaneously with the Interconnection-wide procedure and another that states specifically, “Each Reliability Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure.” This requirement should have a Medium Violation Risk factor and a real time operations time horizon. This would

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		<p>be similar to R4, but for curtailing transactions that are within an Interconnection.</p> <ul style="list-style-type: none"> ▪ M3 – Need to have clarity on just what is considered a procedure in this case. <p>5. We do not agree with the compliance elements proposed in the standard.</p> <ul style="list-style-type: none"> ▪ Violation Severity Levels 2.4.2 and 2.4.3 should be moved from Severe to High because these violations may not adversely affect the effectiveness of TLR in mitigating the congestion on the constrained facility. ▪ Section 2.1.2 – the RC has no compliance obligation
<p>Response: The Drafting Team has responded to your comments in detail below.</p> <p>1.) The Drafting Team does not agree the requirements are ambiguous.</p> <p>R1 indicates that an RC can select a local procedure, an Interconnection-wide procedure, or some combination of the two to mitigate a transmission constraint. In R1.1, if an Interconnection-wide procedure is used (with or without any other local procedures), the TLR procedure stipulated in Attachment 1 must be followed. It is also pointed out in R1.1 that an Interconnection-wide procedure alone is inappropriate and ineffective tool to manage IROLS. There is no conflict between R1 and R1.1.</p> <p>R3 requires that an RC having a relief obligation from an Interconnection-wide procedure shall follow that procedure and meet any relief obligation in the manner directed by the procedure. However, if an RC wishes to use a local procedure <u>in lieu</u> of the requested curtailment, the use of that local procedure needs to have prior approval from the ERO. There is no conflict with R1 and R1.1 (in which the local procedure is used either alone or in conjunction with other procedures, but not as a substitute for a requested curtailment using the Interconnection-wide procedure). Obtaining prior approval from the ERO for use of a local procedure as a substitute for TLR curtailments is the current practice and a requirement stipulated in the pre-converted Operating Policy 9. The need for obtaining the ERO approval has been a practice for years. Before formation and certification of the ERO, the NERC OC has served the approval role. The Drafting Team has not changed the requirement, except to replace “NERC OC” with “the ERO” to reflect today’s standard approval authority.</p> <p>With regard to the concerns expressed related to “prior approval,” the intent is that prior to any local procedure being used in lieu of the curtailments directed by an RC, it must be peer-reviewed for effectiveness by the industry at large. This does not require all local procedures to be pre-approved by the ERO; only those that will be used in place of RC-requested curtailments. It is expected that such procedures will not be developed “on the fly,” but be developed and reviewed for effectiveness prior to implementation.</p> <p>We will attempt to provide more clarity in the planned Phase 3 revisions.</p> <p>2.) Some previous commenters pointed out that Requirement 1.8.1 and 2.9.2 place requirements for the Transmission Operators to comply with the RC’s requests. The Drafting Team has therefore returned the TOp to the Applicability Section.</p> <p>3.) Regional Differences (Section E) - Calculation of market flows is part of the “how” the TLR is implemented and hence, should be in the NAESB Business Practice. However, the calculation of market flows will continue to be in the NERC Standard until such time as the</p>		

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		ongoing Market Flow pilot has been completed and changes to the market flow calculation (if any) are determined and implemented.
		Attachment 1 - Section 2 Transmission Loading Relief (TLR) Levels - The IDC TLR matrix is an excellent reference document for an overview of the TLR levels, but this information does not belong in this standard because it is supporting information for the NAESB Business Practice. A more appropriate place for this information is in the NAESB Business Practice or the forthcoming Operator’s Guide.
		Attachment 1 - Section 3 - The curtailment order is a NAESB Business Practice issue and is addressed in NAESB documents.
		Section 1.5 - The Drafting Team agrees that Section 1.5.1 should be included in the NERC Standard and it will be reviewed as part of the planned Phase 3 revisions.
		Section 2.2.2 - The Drafting Team agrees with the comment and it will be reviewed as part of the planned Phase 3 revisions.
		Section 2.2.3 - The Drafting Team agrees with the comment and it will be reviewed as part of the planned Phase 3 revisions.
		Section 2.5.3 - Curtailments of non-firm are addressed in the NAESB Business Practice.
		Section 2.5.3 - Section 4 is addressed in the NAESB Business Practice.
		Section 3.2 – 3.2.1.1 - The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Section 4.1.4 - The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Section 6 – 6.1 - The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Section 6.2 -6.2.6 - The Drafting Team agrees. The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Section 7.4.1 – 7.4.3 - The Drafting Team agrees. The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Section 7.7 – 7.9, Appendix E and F - The Drafting Team agrees. The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.
		Attachment 1 - Section 1.7 - The Drafting Team does not understand the comment.
		Introduction to Section 2 – This topic is a NAESB Business Practice issue and should have been removed. This will be addressed in

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		<p>the planned Phase 3 revisions.</p> <p>Attachment 1 - Section 2.5.3 - The Drafting Team agrees. The details of how curtailments are implemented are a NAESB Business Practice issue and are addressed in NAESB documents.</p> <p>4.) R5 in this standard is worded such that the applicable requirements in the Interchange Standards shall be followed. The need for R5 is under review and will be either removed or strengthened in the planned Phase 3 revisions.</p> <p>The Drafting Team agrees that R3 can be split into 2 requirements. However, given the scope of this Phase 1 task (to split the existing standard into the NERC Reliability and NAESB Business Practice components), the Drafting Team has attempted to minimize changes to existing requirements and put all improvement changes into the planned Phase 3 revisions.</p> <p>M3 references R3, which indicates that the procedure is a local procedure that is used as a substitute for curtailment as directed by an Interconnection-wide procedure.</p> <p>5.) Violation Severity Levels 2.4.2 and 2.4.3 - The Drafting Team believes the "Severe" level is appropriate. Please note that the Violation Severity Level is not a measure of how much impact a violation of the requirement will have on the system (which is described by the Violation Risk Factor); it is a measure of the magnitude of a violation, or "how far" the entity has deviated from the standard.</p> <p>In the case of 2.4.2 which references R3, compliance is a simple "Yes" or "No". If the TOp experiencing the congestion uses a local procedure to which it is not a party, then R3 is obviously violated. There is no "partial compliance" or way to determine degree of violation in this case beyond "Yes" or "No." Hence a Severe level is assigned.</p> <p>The same reasoning applies for 2.4.2, in which case prior approval has either been obtained or not.</p> <p>Section 2.1.2 - The Reliability Coordinator has compliance obligations in INT-004 and INT-010.</p>
1	ITC Transmission	This Standard is not ready for ballot; the Drafting Team did not complete its job. There are too many instances where the SDT pushed resolution of comments and concerns off to "Phase III." The Drafting Team even acknowledged, "The Drafting Team was not able to resolve all issues." Resolve the issues, then post it for ballot.
<p>Response: Phase 1 of the Drafting Team's work aims only at splitting the existing standard to meet FERC's requirement. It was made clear to the industry, both at the start of this project and in the first posting of this standard, that changes to improve the quality of this standard would be addressed in a planned "Phase 3," an approach with which the majority of the industry agreed.</p>		
1	Nebraska Public Power District	<p>I believe the Violation Risk Factor of R3 should be Medium due to the potential SOL/IROL impact of not complying with curtailments as directed by the interconnect-wide procedure.</p> <p>Also, the Time Horizon of R3 should be Real-Time Operations as curtailments are implemented real-time. I do not</p>

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		believe these comments warrant a negative vote however they should be considered at the next opportunity.
<p>Response: The key requirement in R3 is to obtain prior approval from the ERO to use a local procedure as a substitute for curtailments directed by the Interconnection-wide procedure. If the local procedure is invoked, it is likely that relief will be provided; the main violation is that the procedure has not received prior approval. Hence, the Drafting Team assesses the risk of this requirement based on the impact of not receiving prior approval, and find that risk to be Low. Risk of this requirement is not based on the impact of not following the Interconnection-wide procedure, which is addressed in R1.1.</p> <p>Similarly, mitigation of the violation (in this case, obtaining approval from the ERO), is not a real-time or short term task. Hence, the Drafting Team assigns the time horizon "Operations Planning" to be an acceptable duration in which to have the violation corrected.</p> <p>Thank you for supporting this standard despite your concerns.</p>		
1	SaskPower	<p>SaskPower is generally supportive of the standard, but does not support the language in R3 requiring a RC to obtain prior approval of a local procedure from the ERO. We can see the need for documentation as to why a local procedure is being used and its effectiveness for compliance purposes, but not approval from the ERO.</p> <p>Also we do not see the need for the industry at large to verify that a local procedure will achieve the stated goals of providing relief. That is the function of the RC, or why have them.</p> <p>R3 also does not seem to follow the intent of the following SAR mandates in that it introduces a role for the ERO in the requirement: Do not include any 'fill-in-the-blank' requirements. These are requirements that assign one entity responsibility for developing some performance measures without requiring that the performance measures be included in the body of a standard – then require another entity to comply with those requirements. Do not write any requirements for the Regional Reliability Organization. Any requirements currently assigned to the RRO should be re-assigned to the applicable functional entity. In the Saskatchewan context, the Eastern Interconnection procedure based on using the IDC does not work due to the nature of either the interface (phase-shifting transformer) or its transfer limitation (voltage). Perhaps the Eastern Interconnection procedure needs to be reviewed to see if it can truly function on an Interconnection wide basis.</p>
<p>Response: The need for obtaining the ERO approval has been a practice for years. Before formation and certification of the ERO, the NERC OC has served as the approval authority. The Drafting Team has not changed the requirement, except to replace "NERC OC" with "the ERO" to reflect today's standard approval authority.</p> <p>Nonetheless, as part of our work on the planned Phase 3 revisions, the Drafting Team will take your comment to the NERC Standards Committee (and the OC as appropriate) to review the need for having prior NERC approval for using a local procedure as a substitute for curtailments directed by an Interconnection-wide procedure. This may be discussed as part of a broader issue regarding the need for NERC to approve regional reliability plans and Reliability Coordinator plans.</p>		
1	Tri-State G &	Standard does not fully address the regional differences and could allow the Reliability Coordinator to implement a

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	T Association Inc.	procedure not applicable to its region, i.e. a WECC - Coordinator could implement the Eastern TLR at their discretion.
<p>Response: The regional differences are provided in R1.1 to R1.3, where it is described that each procedure is for use in a specific Interconnection. While your described scenario could technically occur based on the language used in the standard, the Drafting Team does not believe an RC in one Interconnection would attempt to implement an Interconnection-wide procedure from another Interconnection, because 1.) any such attempt would require tools not available to that RC, and 2.) if those tools were available to that RC, they would not be configured such that they were capable of analyzing the different Interconnection without significant re-work and modeling effort.</p>		
2	Midwest ISO, Inc.	<p>While we are supportive of this standard, we have underlying concerns about how similar things will be handled in the future. The Drafting Teams had to create an “operator manual” to provide a single picture of how the process works. After parsing part of this standard out, the industry has spent a very very significant amount of time and effort tinkering with the two pieces. After all this effort, it appears from the operator manual that nothing really has changed. Just because a reliability standard has business implications, does not make it a business practice. We hope careful thought is given before going down a similar path with other reliability standards.</p>
<p>Response: The Drafting Team appreciates your concerns. The Drafting Team is assigned such a task (to split the standard) and has provided the draft Operator Manual in response to industry comments. The Drafting Team will bring your comments to the Standards Committee’s attention, so they may consider them in future work efforts.</p>		
3	Duke Energy	<p>1. There is ambiguity between requirements R1, R1.1 and R3 which could cause the RC or BA to hesitate to act during an emergency in real time. We are concerned that there is a lack of clarity between R1, R1.1 and R3 regarding the use of local procedures in response to a SOL or IROL violation. R1 states that the RC can select a local procedure at its discretion, and R1.1 recognizes that an Interconnection-wide TLR procedure used alone is an inappropriate and ineffective tool. However R3 states that the RC must have prior approval from the ERO to use a local procedure as a substitute for curtailments directed by the Interconnection-wide procedure. However it is unclear how prior approval can be obtained since the local procedure will be case-specific to the problem that initiates the Interconnection-wide procedure. Further, depending upon the resolution of this issue, M3 will need to be restated.</p> <p>2. The SDT added Transmission Operator back to the Applicability section of this standard. We disagree with this because there are no requirements in the standard which apply to the Transmission Operator.</p> <p>3. The SDT has not accurately captured the reliability requirements of the former TLR procedure following the NERC/NAESB split.</p> <ul style="list-style-type: none"> ▪ The portions of the Regional Differences (Section E) that describe how the impact of market flows on facilities are calculated should not be moved to NAESB. The amount of flow presented to the IDC for curtailment on a constrained facility (Flowgate) clearly has Reliability aspects. Also, while it is clear what the intent is, the objective has not been accomplished because there are some instances where information may need to be in both documents. ▪ Attachment 1 - Section 2 Transmission Loading Relief (TLR) Levels should have a statement for each level that indicates whether or not transactions will be impacted. (Example – for TLR Level 1 – No transactions will be impacted; Level 2 - Prevents all transactions less than priority 7 with TDF > 5% from starting or

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		<p>increasing; etc.) A good guide for this can be found on the NERC site under IDC training – IDC TLR Matrix.</p> <ul style="list-style-type: none"> ▪ Attachment 1 - Section 3.1 (Interchange Transaction Curtailment Order for use in TLR Procedures / Priority of Interchange Transactions) should not be moved to NAESB. Without this, there will be no reference to the curtailment order in the procedure. ▪ Additional comments on the split: Section 1.5.1 should not move to NAESB ▪ Section 2.2.2 “However, the RC...on the Constrained Facility” should stay in IRO-004. ▪ Section 2.2.3 “If the time in TLR Level 2...TLR Log” should stay in IRO-004. ▪ Section 2.5.3 First sentence should move to NAESB. ▪ Section 2.5.3 Reference to Section 4 in last sentence needs to be reviewed since Section 4 moves to NAESB. ▪ Section 3.2 – 3.2.1.1 Stay in the IRO. ▪ Section 4.1.4 Stay in the IRO. ▪ Section 6 – 6.1 Need wording like section 7 – 7.1 ▪ Section 6.2 -6.2.6 Should move to NAESB ▪ Section 7.4.1 – 7.4.3 Move to NAESB ▪ Section 7.7 – 7.9, Appendix E and F should move to NAESB. ▪ Attachment 1 - Section 1.7 Redispatch options should not be moved ▪ Attachment 1 - Section 2. - Introduction – The last two sentences are “on path/off path discussion”. Similar discussion was moved. Attachment 1 - Section 2.5.3 – the first sentence should be moved <p>4. We do not agree with the measures proposed in the standard.</p> <ul style="list-style-type: none"> ▪ M5 seems to be measuring compliance to other Standards. INT-001 and INT-003 have applicability for the BA and not the RC. And INT-004 has applicability for both the RC and BA. INT-004 has no measure or compliance for the RC. There should not be a requirement (R5) or measure (M5) that requires compliance to another standard. ▪ R3 needs to be split into two requirements, one that focuses on implementing a local procedure simultaneously with the Interconnection-wide procedure and another that states specifically, “Each Reliability

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		<p>Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure.” This requirement should have a Medium Violation Risk factor and a real time operations time horizon. This would be similar to R4, but for curtailing transactions that are within an Interconnection.</p> <ul style="list-style-type: none"> ▪ M3 – Need to have clarity on just what is considered a procedure in this case. <p>5. We do not agree with the compliance elements proposed in the standard.</p> <ul style="list-style-type: none"> ▪ Violation Severity Levels 2.4.2 and 2.4.3 should be moved from Severe to High because these violations may not adversely affect the effectiveness of TLR in mitigating the congestion on the constrained facility. ▪ Section 2.1.2 – the RC has no compliance obligation.
<p>Response: See previous response to Duke Energy’s comments.</p>		
9	North Carolina Utilities Commission	<p>Comments of the North Carolina Utilities Commission regarding NERC’s Transmission Loading Relief Standard IRO-006 Please refer to the referenced lines in the draft “Joint NERC/NAESB System Operator’s Transmission Loading Relief (TLR) Reference Manual.” (These comments apply to parallel portions of the draft standard document as well.)</p> <ol style="list-style-type: none"> 1. Line 403 allows a Reliability Coordinator (RC) to implement a local transmission loading relief or congestion management procedure “simultaneously” with the interconnection-wide TLR procedure. At 407 the RC is to “revert back” to the Interconnection-wide TLR procedure in the event the local procedures are not effective. It is not clear how much authority a “local” Reliability Coordinator has and what kinds of coordination are expected with the Reliability Coordinator who is driving the interconnection-wide TLR effort. While the standard seems to acknowledge that a local solution might be the most effective and while the standard appears to give a local Reliability Coordinator flexibility to use a local approach, the standard also requires compliance with mandates from the RC in charge of the interconnection-wide TLR, as well as communication. Given the need to take prompt action in real time, the standard and operating manual need to be clearer regarding whether the “local” RC can act unilaterally. If the standard is ambiguous, the “local” RC could lose precious time discerning their options. Finally, M3 in the Standards document indicates a local procedure must be pre-approved by the ERO. If this is the case, the system operator’s reference manual should reiterate the requirement for pre-approval at 1.5.1.2. 2. Line 423 – The manual asks the RC to use “best efforts” to curtail transactions in order to relieve overloads of transmission elements that are not modeled in the Interchange Distribution Calculator. The “lessons learned” effort after the TLR should include consideration regarding whether those specific overloading transmission facilities should be added to the model. 3. In several places (lines 470 and 1117 for example) the manual seems to indicate that TLR is appropriate for an existing Interconnection Reliability Operating Limit (IROL) violation. While the standard attempts to be very clear that this is not the case, all of the documents need to be tightly edited to remove/address any ambiguity. 4. Line 1217 – “The Reliability Coordinator shall notify all affected parties when the Reliability Coordinator has returned the system to a reliable state.” It does not appear “reliable state” has a definition. Section 200 of the

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		<p>“Rules of Procedure of the Electric Reliability Organization” states: “Reliable operation means operating the elements of the bulk power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements.” Is this intended to be the controlling definition of “reliable state”?</p> <p>5. The draft removes some of the material regarding regional differences, thus allowing RTOs to apply a different curtailment threshold to transactions in and out of the RTO than they do to transactions within the RTO. Page 83 of the draft manual references four planned flowgate studies per the MISO/PJM white paper “Managing Congestion to Address Seams.” The material on regional differences should not be removed from the standard until the studies are conducted and stakeholders discuss the findings.</p>
<p>Response: Thank you for commenting on the Joint Operator Manual. The manual is not posted for balloting. After the Standard is approved by the NERC Board of Trustees, the manual will be posted again for public comments. These comments will be considered when the Standards Committee reviews, revises, and approves the final version of the Joint Operator Manual.</p> <p>Specific to your comments, our responses are:</p> <ol style="list-style-type: none"> 1. We will review the referenced sections in the manual to provide better clarity as needed. In general, Reliability Coordinators would follow the relief requests. However, provision has always been made that an RC may deviate from the request, for whatever reasons, for so long as the measure taken to substitute for the requested curtailment provides the equivalent amount of relief on the constrained transmission facility. While time may be of essence, TLR is not being relied upon as the primary tool to correct SOL or IROL violations. Other measures, as described in the TOP and IRO standards, are more effective means to provide the relief. 2. Best effort is the appropriate approach before the newly identified facility is added to the model. The Drafting Team will include adding the facility to the model as a priority in the upcoming revisions to the manual. 3. We will review, and revise as necessary, any language in the manual that is not clear regarding the use of TLR to mitigate transmission congestion – whether caused by SOL or IROL. 4. This is the intent. The Drafting Team will look at the definition provided in the Rules of Procedure and/or NERC standards to make references where appropriate. 5. The Midwest ISO/PJM Regional Difference that appears on pages 81 through 85 of the Joint Operator Manual contains the Regional Difference that was approved by the NERC OC on March 25, 2004. There has been no change to the Regional Difference based on its inclusion in the Joint Operator Manual. <p>Footnote 3 that appears on page 84 references the four studies that are performed by Midwest ISO and PJM to determine whether a flowgate is significantly impacted by market flows and should have its market flows reported to the IDC. These studies have not changed since the original approved Regional Difference and are not related to the market flow threshold pilot study that is underway.</p> <p>As previously stated in response to Duke Energy’s third comment, the calculation of market flows will continue to be in the NERC Standard until such time as the ongoing market flow pilot has been completed and changes, if any, are made to the market flow threshold.</p>		
10	SERC	The statement that the TLR procedure is an inappropriate and ineffective tool to mitigate IROL violations is not

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	Reliability Corporation	stated as a performance requirement. The statement also does not distinguish between use of TLR to prevent reaching an IROL, which is appropriate and effective, and use of TLR to cure an IROL violation that has already occurred.
<p>Response: The use of TLR to mitigate an SOL/IROL violation is not effective, as evidenced in previous events and as indicated by FERC. This statement is made in the requirements. The Drafting Team has not included a statement that the use of TLR to prevent reaching an IROL is inappropriate, but notes that other measures could be more appropriate and effective. The Drafting Team will address this concern in more detail in the planned Phase 3 revisions.</p>		